City Council Chamber
1515 6th Street, Coachella, California
(760) 398-3502 ◆ www.coachella.org

AGENDA

OF A REGULAR MEETING
OF THE
CITY OF COACHELLA
PLANNING COMMISSION

May 06, 2026
6:00 PM

In-Person Meeting Location: City Council Chamber 1515 6th Street, Coachella, CA	**If you would like to attend the meeting via Zoom, here is the link:** https://us02web.zoom.us/j/84544257915?pwd=VTdHWitpYVdOUk1NQW8vZ1pqUm0zQT09 Or One tap mobile : +16694449171,,84544257915#,,,,*380084# Or Telephone: US: +1 669 900 6833 **Webinar ID: 845 4425 7915** **Passcode: 380084** **Spanish:** El idioma español está disponible en Zoom seleccionado la opción en la parte de abajo de la pantalla

- Public comments may be received by 12:00 P.M. **either in person, via email, telephonically, or via Zoom** with a limit of **250 words, or three minutes:**
  - **In Real Time:**

    If participating in real time via Zoom or phone, during the Public Comment Period, use the **"raise hand"** function on your computer, or when using a phone, participants can raise their hand by pressing *9 on the keypad.
  - **In Writing:**

    Written comments may be submitted to the City Council electronically via email to **cityclerk@coachella.org**. Transmittal **prior to the start** of the meeting is required. All written comments received will be forwarded to the City Council and entered into the record.

- The **live stream** of the meeting may be **viewed online** by accessing the city's website at **www.coachella.org**, and clicking on the "**Watch Council Meetings**" tab located on the home page, and then clicking on the "live" button.

CALL TO ORDER:

PLEDGE OF ALLEGIANCE:

ROLL CALL:

APPROVAL OF AGENDA:

"At this time the Commission may announce any items being pulled from the agenda or continued to another date or request the moving of an item on the agenda."

APPROVAL OF THE MINUTES:

1. Planning Commission Meeting Minutes March 18, 2026

WRITTEN COMMUNICATIONS:

PUBLIC COMMENTS (NON-AGENDA ITEMS):

"The public may address the Commission on any item of interest to the public that is not on the agenda, but is within the subject matter jurisdiction thereof. Please limit your comments to three (3) minutes."

REPORTS AND REQUESTS:

NON-HEARING ITEMS:

PUBLIC HEARING CALENDAR (QUASI-JUDICIAL):

2. A Public Hearing to Consider Resolution No. PC 2026-14 of the Planning Commission of the City of Coachella: Request for conditional approval of the Conditional Use Permit application for the construction of an 85-foot high wireless communication facility designed as a mono-palm on a 2,500 square foot leased space located at 49640 Oates Lane (APN 603-300-013). The proposed project includes a waiver request for the design and/or other requirements and restrictions set forth in Section 17.86.090 of the Coachella Municipal Code, and determining that the proposed project is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15303 – New Construction or Conversation of Small Structures and 15332, In-fill Development. Applicant: APC Towers, David Elliott, Eukon Group.

3. A Public Hearing to Consider Resolution No. PC 2026-16 of the Planning Commission of the City of Coachella: Request for Conditional Approval of Conditional Use Permit No. 401 to allow liquor sales (ABC Type 40, On-Sale Beer) within an existing 1,625 square-foot commercial suite located at 49915 Cesar Chavez Street (APN 603-281-044); and determining that the proposed project is categorically exempt from California Environmental Quality Act (CEQA) review pursuant to State CEQA Guidelines Section 15301 (Existing Facilities). Applicant: Salvador Islas

4. A Public Hearing to Consider Resolution No. PC 2026-09 of the Planning Commission of the City of Coachella: Request for Planning Commission recommendation of approval to the City Council of Change of Zone, CZ 20-01, from MH to MS and CG; and conditional approval of Tentative Parcel Map 39721; CUP 324 to allow commercial cannabis uses; CUP 325 to allow drive through restaurant; CUP 326 to allow service station and mini-mart; AR 20-04 to approve site design, architecture and signage (billboard) and DA 25-02 to approve a Development Agreement, for 43± acres of land located at the northwest corner of Airport Boulevard and SR 86 (APNs 763-330-013, 763-330-018, and 763-330-029), and recommending certification of the Coachella Airport Business Park Development Environmental Impact Report (SCH No. 2023040106), including Findings and a Statement of

Overriding Considerations, in conformance with the California Environmental Quality Act. Applicant: Empire Airport LLC.

INFORMATIONAL:

ADJOURNMENT:

Complete Agenda Packets are available for public inspection at the City Clerk's Office at 53-462 Enterprise Way, Coachella, California, and on the City's website www.coachella.org.

THIS MEETING IS ACCESSIBLE TO PERSONS WITH DISABILITIES

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AGENDA

DE UNA REUNIÓN DE LA

COMISIÓN DE PLANIFICACIÓN

PLANNING COMMISSION

6 de Mayo de 2026
6:00 PM

Lugar de la reunión en persona: Cámara del Ayuntamiento 1515 6th Street, Coachella, CA	**Si desea asistir a la reunión a través de Zoom, aquí está el enlace:** **https://us02web.zoom.us/j/84544257915?pwd=VTdHWitpYVdOUk1NQW8vZ1pqUm0zQT09** **O one tap mobile: Us: +16699006833,, 84544257915#,,,,* 380084# US** **O teléfono:** **Us: +1 669 900 6833** **ID del webinar: 845 4425 7915** **Código de acceso: 380084** **Español: El idioma español está disponible en Zoom seleccionado la opción en la parte de abajo de la pantalla**

Los comentarios públicos se pueden recibir por correo electrónico, por teléfono o por zoom con un límite de 250 palabras o tres minutos:

En vivo:
Si participa en vivo a través de zoom o teléfono, durante el período de comentarios públicos, use la función "levantar la mano" en su computadora, o cuando use un teléfono, los participantes pueden levantar la mano presionando *9 en el teclado.

Por escrito:
Los comentarios escritos pueden enviarse a la comisión electrónicamente por correo electrónico a kreif@coachella.org. Se requiere la transmisión antes del inicio de la reunión. Todos los comentarios escritos recibidos serán enviados a la comisión e ingresados en el registro.

SI LO DESEA, PUEDE DEJAR UN MENSAJE EN EL (760) 398-3102, EXTENSIÓN 122, ANTES DE LAS 4:00 P.M. DEL DÍA DE LA REUNIÓ

LLAMADO AL ORDEN:

JURAMENTO A LA BANDERA:

PASE DE LISTA:

ROTACIÓN DE PRESIDENTE Y VICEPRESIDENTE:

APROBACIÓN DE LA

AGENDA:

"En este momento, la Comisión puede anunciar cualquier punto que está siendo retirado de la agenda o continuado a otra fecha o solicitar el traslado de un punto de la agenda".

APROBACION DE LAS ACTAS:

1. Borrador de las Actas de la Comisión de Planificación - 18 de Marzo de 2026.

COMUNICACIONES ESCRITAS:

COMENTARIOS DEL PÚBLICO (PUNTOS QUE NO ESTÁN EN LA AGENDA):

"El público puede dirigirse a la Comisión sobre cualquier tema de interés para el público que no esté en la agenda, pero que esté dentro de la jurisdicción de la materia de la misma. Por favor limite sus comentarios a tres (3) minutos".

INFORMES Y SOLICITUDES:

SESIÓN DE ESTUDIO

PUNTOS QUE NO SON DE AUDIENCIA:

CALENDARIO DE AUDIENCIAS PÚBLICAS (CUASI-JUDICIAL):

2. Audiencia Pública para Considerar la Resolución Núm. PC 2026-14 de la Comisión de Planificación de la Ciudad de Coachella: Solicitud de aprobación condicional del Permiso de Uso Condicional para la construcción de una instalación de telecomunicaciones inalámbricas de 85 pies de altura, diseñada como una palmera monopolo, en un espacio arrendado de 2,500 pies cuadrados ubicado en 49640 Oates Lane (APN 603-300-013). El proyecto propuesto incluye una solicitud de exención de los requisitos de diseño y/u otros requisitos y restricciones establecidos en la Sección 17.86.090 del Código Municipal de Coachella, y la determinación de que el proyecto propuesto está exento de la Ley de Calidad Ambiental de California (CEQA), conforme a las Directrices de CEQA, Sección 15303 – Nueva Construcción o Conversión de Estructuras Pequeñas, y 15332 – Desarrollo de Relleno Urbano.
   Solicitante: APC Towers, David Elliott, Eukon Group.

3. Audiencia Pública para Considerar la Resolución Núm. PC 2026-16 de la Comisión de Planificación de la Ciudad de Coachella: Solicitud de aprobación condicional del Permiso de Uso Condicional Núm. 401 para permitir la venta de bebidas alcohólicas (ABC Tipo 40, cerveza para consumo en el lugar) dentro de una unidad comercial existente de 1,625 pies cuadrados ubicada en 49915 Cesar Chavez Street (APN 603-281-044); y la determinación de que el proyecto propuesto está categóricamente exento de la revisión bajo la Ley de Calidad Ambiental de California (CEQA), conforme a la Sección 15301 (Instalaciones Existentes) de Directrices Estatales de CEQA.

Solicitante: Salvador Islas.

4. Audiencia Pública para Considerar la Resolución Núm. PC 2026-09 de la Comisión de Planificación de la Ciudad de Coachella: Solicitud para que la Comisión de Planificación recomiende al Concejo Municipal la aprobación de un Cambio de Zonificación, CZ 20-01, de MH a MS y CG; y la aprobación condicional del Mapa Tentativo de Parcelas 39721; CUP 324 para permitir usos comerciales de cannabis; CUP 325 para permitir un restaurante con servicio para autos (drive-through); CUP 326 para permitir una estación de servicio y tienda de conveniencia; AR 20-04 para aprobar el diseño del sitio, la arquitectura y la señalización (valla publicitaria), y DA 25-02 para aprobar un Acuerdo de Desarrollo, para aproximadamente 43 acres de terreno ubicados en la esquina noroeste de Airport Boulevard y la SR 86 (APNs 763-330-013, 763-330-018 y 763-330-029), así como recomendar la certificación del Informe de Impacto Ambiental del Desarrollo del Parque Empresarial del Aeropuerto de Coachella (SCH Núm. 2023040106), incluyendo determinaciones y una Declaración de Consideraciones Predominantes, en conformidad con la Ley de Calidad Ambiental de California.
   Solicitante: Empire Airport LLC.

INFORMATIVO:

SE SUSPENDE LA SESIÓN:

Los paquetes completos de la agenda están disponibles para inspección pública en el Departamento de Servicios de Desarrollo en 53-990 Enterprise Way, Coachella, California, y en el sitio web de la ciudad www.coachella.org.

ESTA REUNIÓN ES ACCESIBLE PARA PERSONAS CON DISCAPACIDAD

City Council Cha
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MINUTES

OF A REGULAR MEETING
OF THE
CITY OF COACHELLA
PLANNING COMMISSION

March 18, 2026
6:00 PM

CALL TO ORDER: 6:00 P.M.

PLEDGE OF ALLEGIANCE:
Commissioner Torres.

ROLL CALL:
Commissioners Present:
X Chairperson Murillo
X Vice Chairperson Fonseca
X Commissioner Lara
X Commissioner Ordorica
X Commissioner Torres

Staff Present:
*Kendra Reif, Community Development Director.
*Lizzandro Diaz, Building Official
*Anahi Fernandez, Management Analyst
*Jason Stevens, Information Technology Manager.

APPROVAL OF AGENDA:

"At this time the Commission may announce any items being pulled from the agenda or continued to another date or request the moving of an item on the agenda."

MOTION MOVED BY COMMISSIONER TORRES SECONDED BY COMMISSIONER ORDORICA TO APPROVE THE MINUTES.

Approved by the following roll call vote:
AYES: Commissioner Torres, Commissioner Ordorica, Commissioner Lara, Vice Chairperson Fonseca, Chairperson Murillo.
NOES: None
ABSTAIN: None
ABSENT: None.

APPROVAL OF THE MINUTES:

1. Planning Commission Meeting Minutes March 4, 2026.

MOTION MOVED BY COMMISSIONER TORRES SECONDED BY COMMISSIONER LARA. TO APPROVE THE MINUTES VICE CHAIR FONSECA CALLED ATTENTION TO A DISCRIPTENCY IN THE DATE WITHIN THE MINUTES WHICH REFLECTED MARCH 18 2026 ON THE CITY WEBSITE AGENDA, UPON REVIEW, THE CORRECT MEETING DATE OF THE MINUTES WAS CONFIRMED TO BE MARCH 4 2026. THE MOTION TO APPROVE THE MINUTES AS CORRECTED WAS PUT TO A VOTE AND DULY CARRIED.

Approved by the following roll call vote:
AYES: Commissioner Torres, Commissioner Ordorica, Commissioner Lara, Vice Chairperson Fonseca, Chairperson Murillo.
NOES: None
ABSTAIN: None
ABSENT: None.

WRITTEN COMMUNICATIONS:

PUBLIC COMMENTS (NON-AGENDA ITEMS):

"The public may address the Commission on any item of interest to the public that is not on the agenda, but is within the subject matter jurisdiction thereof. Please limit your comments to three (3) minutes."

Public Comments Opened at 6:05 PM by Chair Murillo.

Public Comments Closed at 6:05 PM by Chair Murillo.

REPORTS AND REQUESTS:

NON-HEARING ITEMS:

2. Nomination for the positions of Planning Commission Chairperson and Planning Commission Vice Chairperson.

IT WAS MOVED BY COMMISSIONER TORRES AND SECOND BY COMMISSIONER ORDORICA TO SELECT COMMISSIONER LARA AS PLANNING COMMISSION CHAIRPERSON.

Approved by the following roll call vote:
AYES: Commissioner Lara, Commissioner Ordorica, Commissioner Torres, Chairperson Murillo.
NOES: Vice Chairperson Fonseca.
ABSTAIN: None
ABSENT: None.

IT WAS MOVED BY COMMISSIONER LARA AND SECOND BY COMMISSION TORRES TO SELECT COMMISSIONER TORRES AS PLANNING COMMISSION VICE CHAIRPERSON.

Approved by the following roll call vote:
AYES: Commissioner Lara, Commissioner Ordorica, Commissioner Torres, Vice
NOES: Chairperson Fonseca, Chairperson Murillo.
ABSTAIN: None
ABSENT: None.

3. Annual Progress Report (APR) for Housing and General Plan Implementation Update.

Anahi Fernandez, Management Analyst, gave a brief presentation for the item. A copy of the presentation is on file with the Planning Division.

PUBLIC HEARING CALENDAR (QUASI-JUDICIAL):

INFORMATIONAL:

* Our former City Manager, Bill Patterson, officially retired effective yesterday. We now have an Interim City Manager, Mr. Gabriel Gonzalez. The city has actively begun the process of recruiting a permanent City Manager. In the meantime, Mr. Gonzalez will serve in this role until a permanent replacement is selected.

* The city is hosting the Mariachi Festival this weekend, information will be provided upon request.

ADJOURNMENT: 6:28 P.M.

RESPECTFULLY SUBMITTED BY,

KENDRA REIF

PLANNING COMMISSION SECRETARY

Complete Agenda Packets are available for public inspection in the Development Services Department at 53-990 Enterprise Way, Coachella, California, and on the City's website www.coachella.org.

STAFF REPORT
5/6/2026

TO: Planning Commission Chair and Commissioners

FROM: Anahi Fernandez, Management Analyst

SUBJECT: Resolution No. PC2026-14: Request for conditional approval of the Conditional Use Permit application for the construction of an 85-foot high wireless communication facility designed as a mono-palm on a 2,500 square foot leased space located at 49640 Oates Lane (APN 603-300-013). The proposed project includes a waiver request for the design and/or other requirements and restrictions set forth in Section 17.86.090 of the Coachella Municipal Code, and determining that the proposed project is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15303 – New Construction or Conversation of Small Structures and 15332, In-fill Development. Applicant: APC Towers, David Elliott, Eukon Group.

STAFF RECOMMENDATION:

Staff recommends that the Planning Commission approve Resolution No. PC2026-14 approving Conditional Use Permit (CUP) No. 399, a request for the construction of an 85-foot mono-palm wireless communication facility pursuant to height waiver request, and determining that the project is compliant with Section 15303 and 15332 of the California Environmental Quality Act (CEQA) guidelines.

EXECUTIVE SUMMARY:

The applicant, APC Towers, is requesting the approval of Conditional Use Permit No. 399 for the installation, operation, and maintenance of a wireless communications facility located at 49640 Oates Lane (APN 603-300-013). The proposed facility will consist of an 85-foot high Mono-Palm (monopole designed to look like a palm tree) on a 2,500 square foot (SF) leased space within an existing truck storage yard. Figure 1 shows the proposed location.



The project requires the approval of Conditional Use Permit No. 399, pursuant to Sections 17.86 and 17.74 of the Coachella Municipal Code. In addition, the applicant is requesting a waiver for

the proposed height of the mono-palm. Pursuant to Coachella Municipal Code 17.86.070 (G), Stand-alone wireless facilities may not exceed fifty-five (55) feet in height unless a waiver request is granted by the Planning Commission. The applicant conducted a colocation analysis, and no existing wireless towers or structures can accommodate the equipment at the required height, configuration, or location. The applicant finds the height waiver request essential to maintain reliable wireless coverage in the area. The applicant further claims adherence to the City of Coachella's current regulations has the effect of prohibiting wireless service, and thus, a waiver is appropriate.

DISCUSSION/ANALYSIS:

The project site is located north of the Avenue 50 and Oats Lane/Peter Rabbit Lane intersection. The proposed project site has an existing truck storage yard that was previously approved under Architectural Review No. 16-04 in 2016 and includes a security trailer and site improvements for the parcel including an 8-foot high slump-stone wall, two gated entries, sidewalk, truck parking stalls and perimeter landscaping. If approved, Condition of Approval No. 38 of Resolution No. 2026-14 will require the applicant and/or property owner to address any existing code violations on the property and either remove or legalize all unpermitted structures and complete any required improvements.

The project site is bounded by an existing automotive repair services use to the north, an existing storage yard to the south, vacant land to the east, and an existing RV storage use to the west. Table 1 provide the existing conditions, including General Plan and Zoning designations for the site and its surroundings.

Table 1
General Plan, Zoning, and Surrounding Existing Uses

	General Plan	Zoning	Surrounding Existing Uses
Site:	Industrial District	Manufacturing Service (M-S)	Storage Yard
North:	Industrial District	Manufacturing Service (M-S)	Automotive Repair Services
South:	Industrial District	Manufacturing Service (M-S)	Storage Yard
East:	Suburban Neighborhood	Suburban Neighborhood (S-N)	Vacant
West:	Industrial District	Manufacturing Service (M-S)	RV Storage

CONSISTENCY WITH GENERAL PLAN

The Project site is located in an Industrial District, and further located in Subarea 8 as designated in the General Plan.

The Industrial District is envisioned to be made up of larger lots and buildings that support concentrations of business activity, with supporting retail and office uses. Projects are to be served by major City streets, and provide internal roadways that provide for internal circulation. Buildings are to be one- and two-story structures, with simple, attractive facades that face the street. Building

materials should consist of masonry or concrete, and larger buildings should include multiple simple masses. Industrial Districts are intended to be separate from the City's neighborhoods and districts. Subarea 8 is envisioned as a transforming area that will create employment opportunities with a variety of industrial and office uses that take advantage of SR 86 and railroad proximity.

The Project conforms with the vision and policies established for the Industrial District and Subarea 8. It will provide essential utility infrastructure that supports existing and future industrial and commercial uses within the Subarea. The facility will improve wireless coverage and service reliability in an area designated for industrial development and infrastructure expansion. The project provides necessary infrastructure that supports industrial operations and economic activity.

General Plan Consistency:

The project site is within the Industrial District land use designation, which accommodates light, heavy, and general industrial uses. The proposed project will improve communication infrastructure. The project is consistent with the Goals and Objectives identified in the General Plan Infrastructure and Public Services Element, particularly Goal No. 6, which promotes easy access to quality internet services, modern telecommunication services, and reliable energy throughout the City.

CONSISTENCY WITH ZONING

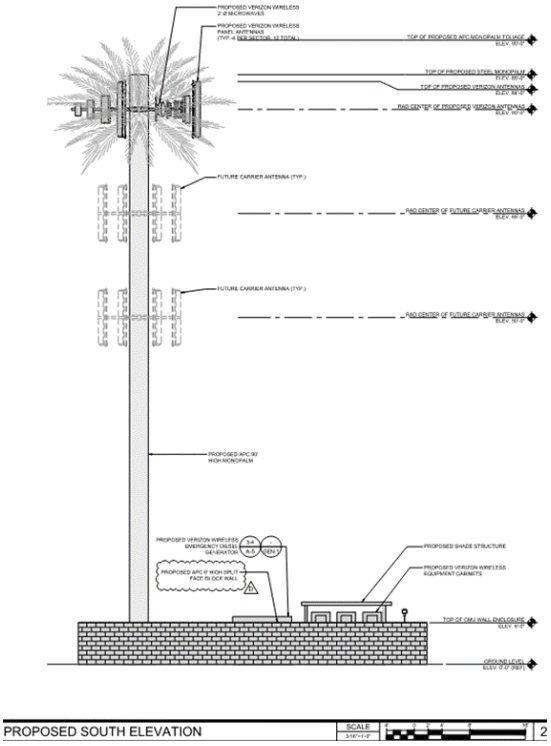
The proposed project site for CUP 399 has a zoning designation of M-S (Manufacturing Service).

Wireless communication facilities are permitted pursuant to approval of a Conditional Use Permit application in the M-S zone. Municipal Code Section 17.86.010 outlines the requirements for placement, design, and screening criteria to regulate wireless communication facilities to protect the public health, safety, general welfare, and quality of life in the City. Additionally, pursuant to Section 17.86.090 of the Municipal Code upon approval of a waiver request the proposed 85-foot height would be allowed, pursuant to the Planning Commission granting the waiver request. With the imposition of the recommended conditions of approval, the proposed project is generally consistent with the intent and purpose of the "Manufacturing Service" (M-S) zone as articulated in Section 17.30 of the C.M.C.

SITE UTILIZATION

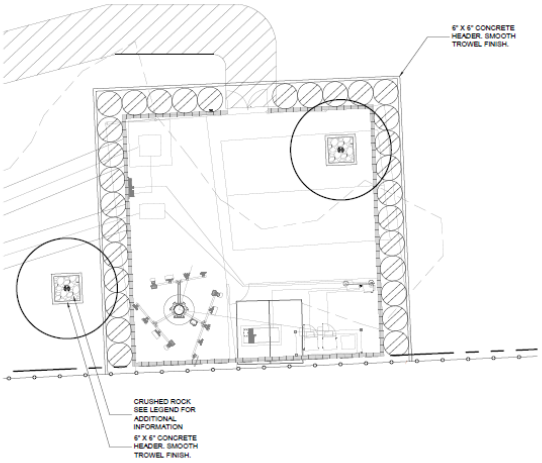
The proposed wireless communication facility will be located within a 2,500 square foot leased area of the existing truck storage yard. The site is more than 150 feet from the nearest residential uses to the east. The equipment shelter includes the construction of a 6-foot high split-face block wall around all four sides of the equipment cabinets. The southern elevations in Figure 2 below show the site design, height, and antenna placement.

Figure 2: South Elevation



Landscape will be planted to meet current City landscape requirements as shown on Figure 3 below. The design includes two date palm trees adjacent to the wireless tower, shrubs planted along the perimeter of the block wall, and crushed rock used as ground cover. The applicant is also required to prepare and submit a detailed landscaping plan for review and approval prior to the issuance of building permits. Figure 3 below is the submitted landscape plan for the project. The landscape plan has also been included in Attachment 1, Exhibit B.

Figure 3: Landscape Plan



PLANT LEGEND

SYM	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	REMARKS	WATER USE
						REGION 6
	TREES					
	PHOENIX DACTYLIFERA	DATE PALM	25' B.T.H.	2	BROWN TRUNK HEIGHT	MOD
	SHRUBS/GROUNDCOVERS					
	LEUCOPHYLLUM LANGMANIAE 'LYNN'S LEGACY'	CANYON RAIN SAGE	5 GAL.	30	5'-0" O.C.	LOW
	CRUSHED ROCK	PEWTER GREY	1"-3" DIA.	50 S.F.	MIN. 3" LAYER	

PLANTING NOTE

1. CRUSHED ROCK SHALL BE PLACED AS SHOWN PER THE PLAN.
2. ALL PLANTING AREAS TO RECEIVE LOW VOLUME HIGH EFFICIENCY SPRAY HEADS, BUBBLERS, OR DRIP EMITTERS AND SHALL FOLLOW CITY AND LOCAL AGENCY GUIDELINES. CALCULATIONS FOR WATER EFFICIENCY SHALL BE INCORPORATED INTO CONSTRUCTION DOCUMENT PHASE.

PROPOSED FINDINGS FOR CUP NO. 399:

1. **The proposed use will not be in conflict with, but will be in harmony with and in accordance with the objectives of the General Plan in that the project is generally consistent with the goals, policies and implementing actions of the Coachella General Plan.**

   The proposed project increases existing communication infrastructure to expand service to wireless customers in the vicinity. This project is consistent with the Goals and Objectives identified in the General Plan Infrastructure and Public Services Element, because Goal No. 6 promotes easy access to quality internet services, modern telecommunication services, and reliable energy throughout the City.

2. **The proposed use will be located, designed, constructed, operated, and maintained so as to be compatible with the existing or intended character of the general vicinity and shall not change the essential character of the same area.**

   The Mono-Palm design provides a stealthing solution that integrates the facility into its surrounding environment. Additionally, the proposed project is in conformance with the City of Coachella Zoning Ordinance as specified in Section 17.86 of the Zoning Code.

3. **Consideration is to be given to harmony in scale, bulk, coverage and density, to the availability of public facilities and utilities, to harmful effect, if any, upon desirable neighborhood character, to the generation of traffic and the capacity of surrounding streets, and to any other relevant impact of the development.**

No new construction or modification to the already existing infrastructure and no additional points of access to the private property. Access to the wireless communication facility will be minimal as it is an un-manned facility. Additionally, the proposed project is required to comply with the standard conditions of approval applicable to this Conditional Use Permit request.

4. **Where the proposed use may be potentially hazardous or disturbing to existing or reasonably expected neighboring uses, it must be justified by the common public interest as a benefit to the community as a whole.**

   The proposed wireless communication facility provides an essential public utility function by improving wireless network coverage, capacity, and reliability for residents, businesses, and emergency response services in the surrounding area. The facility is located within an existing industrial storage yard and is designed as a stealth monopalm structure to reduce visual impacts and maintain compatibility with surrounding industrial and utility-related uses. In addition, the project's Radio Frequency Emissions Compliance Report demonstrates that the facility will operate in compliance with applicable Federal Communication Commission (FCC) radiofrequency exposure standards, ensuring protection of public health and safety. Any potential impacts associated with the project are outweighed by the substantial public benefit of expanded and improved telecommunications service.

5. **The proposed use will include vehicular approaches to the property designed for reasonable minimal interference with traffic on surrounding public streets or roads.**

   The proposed use will include only limited vehicular access associated with maintenance and servicing of the wireless facility. The project does not include permanent staffing or customer visits. Vehicular access will utilize existing driveway improvements serving the approved truck storage yard, and no new access points to public streets are proposed. The project will operate in a manner consistent with existing industrial site access patterns and the intent of the Manufacturing Service (M-S) zone.

PROPOSED FINDINGS FOR WAIVER REQUEST:

1. Pursuant to Coachella Municipal Code Section 17.86.090, the Applicant submitted a height waiver request. The applicant submitted its request via a letter dated October 8, 2025. The applicant has the burden of demonstrating that a waiver is necessary pursuant to section 17.86.090. The applicant claims the proposed 85-foot wireless communication facility is necessary to ensure adequate wireless coverage and capacity within the service area. The applicant submitted a radio frequency propagation map demonstrating that the height of 85 feet significantly provides wider coverage and reliability compared to a facility limited to 55 feet (Attachment 4). Verizon's engineering analysis confirms that a 55-foot cell tower would result in significant signal loss, coverage degradation, and potential service interruptions. The applicant claims adherence to the City of Coachella's current regulations has the effect of prohibiting wireless service, and thus, a waiver is appropriate.

ENVIRONMENTAL REVIEW:

The City of Coachella has determined that the proposed project is exempt from environmental review under Section 15303 and 15332 of the California Environmental Quality Act (CEQA) Guidelines. This exemption applies to projects characterized as in-fill development meeting the following conditions; (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations(b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; (c) The project site has no value as habitat for endangered, rare or threatened species; (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; (e) The site can be adequately served by all required utilities and public services. The project satisfies the above criteria and as such, no environmental review is required.

PUBLIC HEARING NOTICE:

A public hearing notice for the Project was published in the Desert Sun, the newspaper of record, on April 26, 2026, and a public hearing notice was mailed to property owners within a radius of 300 feet of the subject property on April 22, 2026, pursuant to Section 17.70.050(F) of the Coachella Municipal Code. At the time of issuance of this staff report, staff had not received public comments on this application.

ALTERNATIVES:

1) Approve Resolution No. PC 2026-14 Conditional Use Permit No. 399 with the findings and conditions as recommended by Staff.

2) Approve Resolution No. PC 2026-14 Conditional Use Permit No. 399 with modification to the proposed findings and conditions as recommended by Staff.

3) Deny Resolution No. PC 2026-14.

4) Continue these items and provide staff and the applicant with direction.

RECOMMENDED ALTERNATIVE(S):

Staff recommends Alternative #1.

Attachments:

1. Resolution No. PC 2026-14 for CUP No. 399
   Exhibit A: Conditions of Approval for CUP No. 399
   Exhibit B: Architectural Exhibits
2. Project Narrative and Waiver Request
3. Photo Simulations
4. Propagation Map

RESOLUTION NO. PC2026-14

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF COACHELLA, CALIFORNIA, APPROVING CONDITIONAL USE PERMIT NO. 399 FOR THE CONSTRUCTION OF AN 85-FOOT HIGH WIRELESS COMMUNICATIONS "MONO-PALM" FACILITY ON A 2,500 SQUARE-FOOT LEASED AREA LOCATED AT 49640 OATES LANE (APN 603-300-013), AND DETERMINING THAT THE PROPOSED PROJECT IS CATEGORICALLY EXEMPT FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) PURSUANT TO CEQA GUIDELINES SECTIONS 15303 AND 15332 .

WHEREAS, APC Towers has filed an application for Conditional Use Permit No. 399 to construct an 85-foot high wireless communications facility proposed on 2,500 square feet of leased space within a truck storage yard located at 49640 Oates Lane (APN 603-300-013); and

WHEREAS, the Project is permitted pursuant to Chapter 17.74 of the Coachella Municipal Code, and the attendant applications for Conditional Use Permit No. 399 to allow the Project; and

WHEREAS, the proposed use is necessary or desirable for the development of the community, is consistent with the objectives of the City's General Plan, and is not detrimental to the existing uses or the uses specifically permitted in the zone in which the proposed use is to be located; and

WHEREAS, the proposed site is adequate in size and shape to accommodate the proposed development; and

WHEREAS, the site for the proposed conditional use relates properly to streets which are designed to carry the type and quantity of traffic to be generated by the proposed use; and

WHEREAS, the project was reviewed for compliance with the California Environmental Quality Act ("CEQA") and staff determined that the project is exempt from further environmental review under CEQA Section 15303, New Construction of Small Structures and Section 15332, Infill Development Project; an

WHEREAS, the conditions as stipulated by the City are necessary to protect the public health, safety and welfare of the community; and

WHEREAS, on May 6, 2026, the Planning Commission of the City of Coachella held a duly noticed and published Public Hearing wherein the public was offered an opportunity to testify regarding the project and the Commission considered the Conditional Use Permit as presented by the applicant, adopting the finding, conditions, and staff recommendations; and

NOW, THEREFORE, BE IT RESOLVED, that the Planning Commission of the City of Coachella, California, does hereby approve Conditional Use Permit No. 399 with the findings

listed below and subject to the Conditions of Approval for the APC Towers project contained in "Exhibit A" and made a part herein.

Section 1. Incorporation of Recitals. The Planning Commission hereby finds that all of the facts in the Recitals are true and correct and are incorporated and adopted as findings of the Planning Commission as fully set forth in this resolution.

Section 2. CEQA Findings. The Planning Commission finds the Project categorically exempt from the provisions of the California Environmental Quality Act under Sections 15303 and 15332 of the State CEQA Guidelines.

The Project is exempt under Section 15303 because it consists of the construction and operation of a small new utility structure, specifically an 85-foot wireless communications facility (mono-palm) and associated ground equipment within a 2,500-square-foot leased area of an industrial site. Accordingly, the Project falls within the Class 3 exemption.

The Project is exempt under Section 15332 because it consists of in-fill development within city limits on a project site of less than five acres that is substantially surrounded by urban uses. The Project site is located within an existing industrial property in the Manufacturing Service (M-S) zone and is consistent with the applicable General Plan designation and zoning regulations. The site has no value as habitat for endangered, rare, or threatened species, and the Project would not result in significant impacts related to traffic, noise, air quality, or water quality. The site is adequately served by all required utilities and public services. Accordingly, the Project falls within the Class 32 exemption.

Furthermore, none of the exceptions to the use of categorical exemptions set forth in State CEQA Guidelines Section 15300.2 apply. The Project will not result in a cumulatively considerable environmental impact, as it involves a single telecommunications facility and does not contribute to significant impacts related to traffic, noise, air quality, or public services. The Project site is developed and does not contain environmentally sensitive resources. The Project would not impact scenic resources within a state-designated scenic highway, is not located on a hazardous waste site pursuant to Government Code Section 65962.5, and would not cause a substantial adverse change in the significance of a historical resource, as no such resources are present on or near the site.

Staff is hereby authorized and directed to prepare, execute, and file a Notice of Exemption with the County Clerk and the State Clearinghouse within five working days of approval of the Project.

Section 3. Conditional Use Permit Findings:

1. The proposed use will not be in conflict with, but will be in harmony with and in accordance with the objectives of the General Plan in that the project is generally consistent with the goals, policies and implementing actions of the Coachella General Plan. The proposed project increases existing communication infrastructure to expand service to wireless customers in the vicinity. This project is consistent with the Goals and Objectives identified in the General Plan

Infrastructure and Public Services Element because Goal No. 6 promotes easy access to quality internet services, modern telecommunication services, and reliable energy throughout the City.

2. The proposed use will be located, designed, constructed, operated, and maintained so as to be compatible with the existing or intended character of the general vicinity and shall not change the essential character of the same area. The Mono-Palm design provides a stealthing solution that integrates the facility into its surrounding environment. Additionally, the proposed project is in conformance with the City of Coachella Zoning Ordinance as specified in Section 17.86 of the Zoning Code.

3. Consideration is to be given to harmony in scale, bulk, coverage and density, to the availability of public facilities and utilities, to harmful effect, if any, upon desirable neighborhood character, to the generation of traffic and the capacity of surrounding streets, and to any other relevant impact of the development because there is no new construction or modification to the already existing infrastructure and no additional points of access to the private property. Access to the telecommunication facility will be minimal as it is an un-manned facility. Additionally, the proposed project is required to comply with the standard conditions of approval applicable to this Conditional Use Permit request.

4. Staff has determined that the proposed projects qualify for CEQA exemptions under Section 15303 – New Construction or Conversion of Small Structures and 15332, In-fill Development, of the California Environmental Quality Act which states the following: the proposed project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations. The project site is within the city limits and is surrounded by urban uses. The project site does not have any value as habitat for endangered, rare or threatened species because the site is fully developed as a public commercial center. Migratory birds and burrowing owls do not nest near due to full development of the commercial center and recreational activities at the commercial center. Approval of the project will not result in any significant effects relating to traffic, noise, air quality, or water quality. The project site is adequately served by all required utilities and public services. The Planning Commission is required to acknowledge the CEQA exemption.

Section 4: Waiver Request Findings:

1. Pursuant to Coachella Municipal Code Section 17.86.090, the Applicant submitted a height waiver request. The applicant submitted its request via a letter dated October 8, 2025. The applicant has the burden of demonstrating that a waiver is necessary pursuant to section 17.86.090. The applicant claims the proposed 85-foot wireless communication facility is necessary to ensure adequate wireless coverage and capacity within the service area. The applicant submitted a radio frequency propagation map demonstrating that the height of 85 feet significantly provides wider coverage and reliability compared to a facility limited to 55 feet. Verizon's engineering analysis confirms that a 55-foot cell tower would result in significant signal loss, coverage degradation, and potential service interruptions. The

applicant claims adherence to the City of Coachella's current regulations has the effect of prohibiting wireless service, and thus, a waiver is appropriate.

Section 5. Custodian of Records. The documents and materials that constitute the record of proceedings on which this Resolution has been based are located at [enter address here]. This information is provided in compliance with Public Resources Code Section 21081.6.

PASSED APPROVED and **ADOPTED** this 6th day of May 2026.

_____
Eva Lara, Chairperson
Coachella Planning Commission
ATTEST:

_____
Kendra Reif
Planning Commission Secretary

APPROVED AS TO FORM:

_____
Best, Best, and Krieger
City Attorney

STATE OF CALIFORNIA)
COUNTY OF RIVERSIDE) ss.
CITY OF COACHELLA)

I HEREBY CERTIFY that the foregoing Resolution No. PC2026-14, was duly adopted at a regular meeting of the Planning Commission of the City of Coachella, California, held on the 6th day of May 2026 by the following roll call vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

_____

Kendra Reif
Planning Secretary

CONDITIONS OF APPROVAL FOR CONDITIONAL USE PERMIT NO. 399 APC TOWERS

General Conditions

1. Conditional Use Permit No. 399 is approved for two years from the date of approval unless an extension of time is requested by the applicant and granted by the Planning Commission. A building permit for each CUP and diligent pursuit of construction shall vest this conditional use permit.

2. Two Date Palm trees of a minimum 20 to 30 foot brown trunk height shall be planted adjacent to the proposed wireless tower. The location of the Date Palm trees may be outside of the leased area.

3. The construction shall be in conformance with the plans submitted and conditions imposed herein for Conditional Use Permit No. 399. This shall include the materials and colors shown on the approved plans.

4. The cell tower shall consist of a stealth monopalm structure with a maximum height of 85-feet. The pole structure shall be designed and painted to mimic a tree trunk.

5. A landscape plan shall be submitted to the Planning Division. The Landscape Plan shall denote the botanical name, common name, legend, plant distribution, canopy spread and amount of material to be planted.

6. Each facility and site which contains trees, foliage or other landscaping elements, whether or not used as stealthing, shall be maintained in good condition at all times, and the owner or operator of the facility shall be responsible for replacing any damaged, dead or decayed landscaping as soon as practicable, and in accordance with the approved landscape plan.

7. Landscape plans shall be approved by the Planning Division and landscaping shall be in place before issuing a Certificate of Occupancy.

8. A landscape and maintenance agreement shall be in place between the operator and their successor prior to Certificate of Occupancy.

9. River rock or decorative gravel shall be installed as ground cover.

10. The facility shall be enclosed by a six-foot split face block wall to ensure restricted access to the facility.

11. The property owner shall remove all unpermitted uses of the site that include the unpermitted storage of vehicles and materials, or shall complete all required entitlement approvals necessary to have the project come into compliance, prior to building final of the project.

12. The applicant, or subsequent owners, shall bear all cost associated with relocation or removal of any of the telecommunication facilities hereby approved.

13. The applicant shall obtain encroachment permits from the Engineering Department.

Engineering inspections shall be required during the installation and final stage.

14. Improvement plans prepared by a California Registered Civil Engineer shall be submitted for Engineering plan check prior to issuance of permits. Plans shall clearly indicate existing and proposed facilities and identify/avoid conflicts. The applicant is directed to contact City Building staff to obtain existing improvement plans for utilities within the right-of way.

15. The applicant shall complete all utility clearances with the Coachella Valley Water District.

16. Submit a grading/site improvement plan for Building, Planning and Engineering Department plan check and approval.

17. The applicant shall defend, indemnify and hold harmless the City and its officers, agents and employees from any claim, action, or proceedings against the City or its officers, agents or employees to attack, set aside, void or annul any approval under this chapter. The applicant shall further defend, indemnify and hold harmless the City, its officers, agents and employees from any damages, liabilities, claims, suits, or causes of auction of any kind or form, whether for personal injury, death or property damage, arising out of or in connection with the activities or performance of the applicant, its agents, employees, licensees, contractors, subcontractors or independent contractors, pursuant to the approval issues by the City.

18. The applicant shall pay all necessary plan check, permit and inspection fees. Fees will be determined when plans are submitted to the City Engineering Department for plan check.

19. All proposed easement documents shall be prepared by a registered land surveyor or civil engineer authorized to practice land surveying and mapping and shall be submitted for engineering plan check and shall be recorded with the County prior to Issuance of permits.

20. The project shall conform to the City of Coachella Municipal Code.

21. The electrical service and all other utilities to the project shall be installed underground in accordance with the General Plan.

22. All existing and future wireless facilities shall meet all applicable FCC emissions and exposure standards for electromagnetic (EM) radiation, and all required notices and signs shall be posted on site as required by the FCC and PUC.

23. If the proposed wireless communication facility site is capable of accommodating a collocated facility upon the same site, the owner or operator of the existing facility shall allow another carrier to co-locate its facilities and equipment thereon, provided the parties can mutually agree upon reasonable terms and conditions. All co-located facilities upon the site shall be architecturally coordinated and "stealthed" consistent with each other.

24. Prior to the issuance of a grading, construction or building permit, the applicant shall obtain all applicable permits and/or clearances from the following agencies as required:

    • Riverside County Fire Department
    • City of Coachella Planning Department

- City of Coachella Engineering Department
- City of Coachella Public Works Department
- City of Coachella Building Department
- Coachella Valley Unified School District (CVUSD)
- Coachella Water Authority
- Imperial Irrigation District
- State Water Quality Control Board (SWQCB)
- South Coast Air Quality Management District (SCAQMD)
- Public Utilities Commission (PUC)
- Federal Communication Commission (FCC)
- Federal Aviation Agency (FAA)

The applicant is responsible for all requirements of the permits or clearances from the above listed agencies and departments. If the requirements include approval of improvement plans, the applicant shall furnish proof of said approvals prior to City approval.

25. The applicant shall bear the cost, of all measurements, sampling and testing procedures not included in the City's inspection program, but which may be required by the City, as evidence that the construction materials and methods employed comply with the plans, specifications and other applicable regulations.

26. All grading shall conform to the recommendation contained in the Preliminary Soils Report, and shall be certified as being adequate by a soils engineer, or by an engineering geologist.

27. The applicant shall furnish security, in a form acceptable to the requirements of Chapter 15.40 of the City of Coachella Municipal Code, and in an amount sufficient to guarantee compliance with the approved Storm Water Pollution Protection Plan (SWPPP), Fugitive Dust Control Plan and the provisions as submitted with its application for a grading permit.

28. The applicant shall pay the City's established fees for plan checking and construction inspection. Fee amounts shall be those in effect when the applicant makes application for plan checking and permits.

29. Permits issued under this approval shall be subject to the provisions of the Infrastructure Fee Program and Development Impact Fee program in effect at the time of issuance of building permit(s).

30. The applicant shall submit a concrete mix design for approval of the City's Building Official. The applicant shall not schedule construction operation until mix design is approved.

31. The applicant shall employ, or retain, qualified engineers, surveyors, and such other appropriate professionals as are required to provide the expertise with which to prepare and sign accurate record drawings, and to provide adequate construction supervision.

32. Improvement plans shall be prepared by or under the direct supervision of qualified engineers and/or architects, as appropriate, and shall comply with the provisions of the California Building Code and applicable State of California Business and Professions

Code.

33. In the event the applicant fails to construct the improvements for the development, or fails to satisfy its obligations for the development in a timely manner, the City shall have the right to halt issuance of all permits, and/or final inspections, withhold other approvals related to the development of the project, or call upon the surety to complete the improvements.

34. Upon completion of construction, the applicant shall furnish the City with reproducible record drawings of all improvement plans which were approved by the City. Each sheet shall be clearly marked "Record Drawing," "As-Built" or "As Constructed" and shall be stamped and signed by the engineer or surveyor certifying to the accuracy and completeness of the drawings. The applicant shall have all approved mylars previously submitted to the City, revised to reflect the as-built conditions. The applicant shall have all approved mylars previously submitted to the City, revised to reflect the as-built conditions. However, if subsequent approved revisions have been approved by the City Engineer and reflect said "As-Built" conditions, the Engineer of Record may submit a letter attesting to said fact to the City Engineer in lieu of mylar submittal.

35. No cables, conduit or other equipment on the monopalm tower pole shall be visible.

36. All electrical work for the proposed antennas shall be contained within the monopalm tower cavity.

37. The panel antennas shall be mounted securely to the monopalm tower. All antennas and antenna arrays shall be painted to match the faux design screening material shall be approved by the Design and Department Director.

38. Prior to building permit issuance, the Applicant and/or Property Owner shall address all existing code violations on the subject property, including but not limited to unpermitted structures, uses, or improvements. All such structures and uses shall either be removed or legalized through the appropriate planning and building permit processes, subject to review, approval, and discretion of the Development Services Department.

Maintenance

39. All facilities, including antennae, mounts, wires, conduit, lighting, fences, shields, cabinets, poles and ancillary equipment, shall be maintained by the owner or operator in good repair, free from trash, debris, litter and graffiti and other forms of vandalism, and any damage from any cause shall be repaired as soon as practicable so as to maintain the facility's original appearance and to minimize occurrences of dangerous conditions or visual blight, All trash, debris, litter and graffiti shall be removed by owner/operator within forty-eight (48) hours following notification from the City.

40. The owner or operator of the facility shall routinely and regularly inspect the site to ensure compliance with the standards set forth in this chapter. Further, the Planning Director, or designee, may, upon providing reasonable advance notice to the owner or operator, conduct an inspection of a facility to verify compliance with the provisions of this chapter.

41. The wireless telecommunication facility operators are required to notify the City of Coachella's Planning Division within sixty (60) days of any change of ownership of the facility.

42. Contact information for the owner or operator, in case of an emergency, fire, or report of any damage, destruction, or vandalism, must be posted in a conspicuous location on the outside of the wireless facility. The materials used must be of weather resistant composition.

Abandonment and Removal

43. Where the owner or operator intends to abandon the wireless communication facility or portion thereof, the owner or operator shall notify the City by certified U.S. mail of the proposed date of abandonment or discontinuation of operations and the date the facility shall be removed. The notice shall be given not less than sixty (60) days prior to abandonment. Failure to give notice shall not affect the owner's or operator's obligation to remove an abandoned facility.

44. Upon abandonment, revocation, or other lawful order of any federal, state or local agency to terminate facility operations, the owner or operator shall physically remove the facility or terminated/abandoned elements within thirty (30) days following the date of abandonment or termination of use. "physically remove" shall include, but not be limited to:

A. Removal of antennae, mounts, equipment cabinets and security barriers from the subject site;
B. Transportation of the antennae, mounts, equipment cabinets and security barriers to an appropriate repository;
C. Restoring the site to its natural condition except for retaining the landscaping improvements and any other improvements at the discretion of the Planning Director.

45. The Planning Director may stay the requirement to remove an abandoned/terminated wireless communication facility upon written request and evidence submitted by the owner or operator that another wireless provider is in reasonable negotiations to acquire and use the wireless communication facility.

46. If an owner/operator of an abandoned wireless communication facility fails to physically remove the facility and all related equipment within the time frames set forth herein, the City may do so at the owner/operators expense.

47. The owner/operator shall submit a lighting plan during plan check for the installation of lighting around the equipment enclosure, including the area between the enclosure and the restroom structure

Engineering Department

PRIOR TO APPROVAL OF ENGINEERING PLANS or ISSUANCE OF ENGINEERING PERMITS:

PRECISE GRADING:

48. A precise grading/improvement plan, prepared by a California Registered Civil Engineer, showing building footprints, pad elevations, finished grades, drainage routes, retaining walls, erosion control, slope easements, and all other pertinent information shall be submitted for review and approval by the City Engineer.

49. Garden wall permits shall be required for wall construction. The maximum height of any wall shall be limited to six (6) feet as measured from an average of the ground elevations on either side.

STREET IMPROVEMENTS:

50. Applicant shall construct appurtenant roadway components such as, but not limited to: commercial Driveway approach, paved street for missing gap from existing street to propose Driveway to the satisfaction of City Engineer prior to the issuance of the first COO.

PRIOR TO RELEASE OF OCCUPANCY PERMITS/ACCEPTANCE OF PUBLIC IMPROVEMENTS:

51. Prior to issuance of certificate of occupancy, all public improvements, including landscaping and lighting of the retention basins, and landscaped areas along the exterior streets, shall be completed to the satisfaction of the City Engineer. An engineering final inspection is required. "As-built" plans shall be submitted to and approved by the City Engineer. Prior to acceptance of the improvements by the City, such plans, once approved, shall be given to the city on compact disk in AutoCad format. All off-site and on-site improvements shall be completed to the satisfaction of the City Engineer prior to acceptance of improvements for maintenance by the City.

Riverside County Fire Department

52. A deferred submittal to the Riverside County Fire Department for the diesel generator is required.

53. A Fire Department Knox box will be required upon full submittal.

CODE COMPLIANCE

ALL WORK AND MATERIALS SHALL BE PERFORMED AND INSTALLED IN ACCORDANCE WITH THE CURRENT EDITIONS OF THE FOLLOWING CODES AS ADOPTED BY THE LOCAL GOVERNING AUTHORITIES. NOTHING IN THESE PLANS IS TO BE CONSTRUCTED TO PERMIT WORK NOT CONFORMING TO THESE CODES.

1. 2025 CALIFORNIA ADMINISTRATIVE CODE
2. 2025 CALIFORNIA BUILDING CODE
3. 2025 CALIFORNIA ELECTRIC CODE
4. 2025 CALIFORNIA MECHANICAL CODE
5. 2025 CALIFORNIA PLUMBING CODE
6. 2025 CALIFORNIA FIRE CODE
7. ANY LOCAL BUILDING CODE AMENDMENTS
8. CITY/COUNTY ORDINANCES
9. ANSI / TIA-222 STRUCTURAL CODE
10. NFPA 780 - LIGHTING PROTECTION CODE

HANDICAP REQUIREMENTS:
FACILITY IS UNMANNED AND NOT FOR HUMAN HABITATION, AND IS EXEMPTED FROM ACCESSIBILITY REQUIREMENTS IN ACCORDANCE WITH 2025 CALIFORNIA BUILDING CODE SECTION 11B-203.5.

THIS FACILITY IS UNMANNED AND NOT FOR HUMAN HABITATION. A TECHNICIAN WILL VISIT THE SITE AS REQUIRED FOR ROUTINE MAINTENANCE. THE PROJECT WILL NOT RESULT IN IN ANY SIGNIFICANT DISTURBANCE OR EFFECT ON DRAINAGE. NO SANITARY SEWER SERVICE, POTABLE WATER, OR TRASH DISPOSAL IS REQUIRED AND NO COMMERCIAL SIGNAGE IS PROPOSED.

GENERAL NOTES

THIS FACILITY IS UNMANNED AND NOT FOR HUMAN HABITATION. A TECHNICIAN WILL VISIT THE SITE AS REQUIRED FOR ROUTINE MAINTENANCE. THE PROJECT WILL NOT RESULT IN IN ANY SIGNIFICANT DISTURBANCE OR EFFECT ON DRAINAGE. NO SANITARY SEWER SERVICE, POTABLE WATER, OR TRASH DISPOSAL IS REQUIRED AND NO COMMERCIAL SIGNAGE IS PROPOSED.

IF CONTRACTOR ENCOUNTERS CONDITIONS IN FIELD, EITHER UNFORESEEN OR IN SOME MANNER IN CONFLICT WITH THESE DRAWINGS, THE CONTRACTOR SHALL NOTIFY THE REGISTERED DESIGN PROFESSIONAL OF SUCH CONDITIONS IN WRITING AND SHALL ACKNOWLEDGE ANY WORK DONE OUTSIDE OF JURISDICTIONAL PERMITTED PLANS IS DONE AT CONTRACTORS OWN RISK.

FOR "SPECIAL INSPECTIONS" SPECIFIC TO THIS PROJECT PURSUANT TO CBC SECTION 1704.3, SEE SHEET T-4, "STATEMENT OF SPECIAL INSPECTIONS"

SUBCONTRACTOR SHALL VERIFY ALL PLANS & EXISTING DIMENSIONS & CONDITIONS ON THE JOB SITE & SHALL IMMEDIATELY NOTIFY THE ENGINEER IN WRITING OF ANY DISCREPANCIES BEFORE PROCEEDING WITH THE WORK OR BE RESPONSIBLE FOR SAME.

FULL SIZE = 24"x36". ANY OTHER SIZE PRINT IS NOT ORIGINAL SCALE.

ALL INDICATED DIMENSIONS SHALL TAKE PRECEDENT OVER SCALED DIMENSIONS.

UNDERGROUND SERVICE ALERT
UTILITY NOTIFICATION CENTER OF CALIFORNIA
(800) 422-4133
WWW.CALIFORNIA811.ORG

CALL 2-14 WORKING DAYS UTILITY NOTIFICATION PRIOR TO CONSTRUCTION

SITE INFORMATION

PROPERTY OWNER:	JULIA MOLINAR	TOWER OWNER:	APC TOWERS
PHONE:	TBD	ADDRESS:	8601 SIX FORKS RD SUITE 250 RALEIGH, NC 27615
COUNTY:	RIVERSIDE COUNTY	CONTACT:	ABIGAIL JOHNSON (614) 946-0819 ajohnson@apctowers.com
ZONING JURISDICTION:	CITY OF COACHELLA	TOWER CO SITE ID:	CA-4009
ZONING DISTRICT:	TBD	TOWER APP NUMBER:	--
PARCEL NUMBER:	603-300-013	LATITUDE (NAD 83):	33° 41' 13.13" N 33.686981°
OCCUPANCY GROUP:	U	LONGITUDE (NAD 83):	116° 10' 36.14" W 116.176706°
CONSTRUCTION TYPE:	II-B		
POWER COMPANY:	IID		
TELEPHONE COMPANY:	TWC		
LEASE AREA:	2500 SQFT		

PROJECT TEAM

PROJECT MANAGER:
APC TOWERS
8601 SIX FORKS ROAD, SUITE 250
RALEIGH, NC 27615
CONTACT: ABIGAIL JOHNSON
PHONE: (919) 346-8799
EMAIL: ajohnson@apctowers.com

SITE ACQUISITION:
EUKON GROUP
65 POST, SUITE 1000
IRVINE, CA 92618
CONTACT: JON SILVA
PHONE: (714) 393-7963
EMAIL: jon.silvia@eukongroup.com

A&E CONTACT:
EUKON GROUP
65 POST, SUITE 1000
IRVINE, CA 92618
CONTACT: RICH BRUNET
PHONE: (949) 899-5597
EMAIL: rich.brunet@eukongroup.com

RF ENGINEER:
-

ZONING:
EUKON GROUP
65 POST, SUITE 1000
IRVINE, CA 92618
CONTACT: JERRY AMBROSE
PHONE: (805) 637-7407
EMAIL: jambrose@wireless01.com

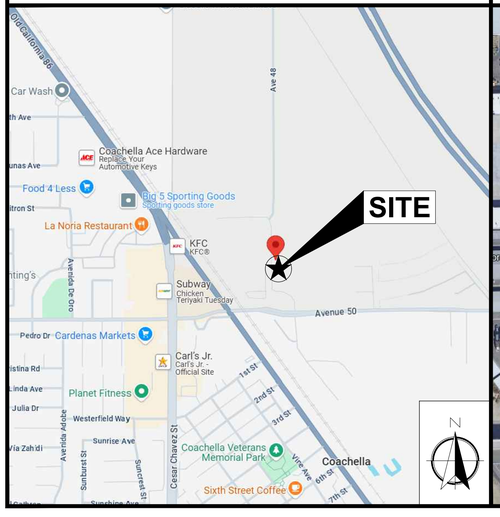
CONSTRUCTION:
-

SITE NUMBER: CA-4009
SITE NAME: STARFRUIT

APC Towers

PROJECT: APC TOWERS
SITE TYPE:MONOPALM
SITE ADDRESS: 49640 OATES LANE, COACHELLA, CA 92236

VICINITY MAP



AERIAL VIEW



DRIVING DIRECTIONS

DIRECTIONS FROM HARRY REID INTERNATIONAL AIRPORT AT 5757 WAYNE PROPOSEDTON BLVD, LAS VEGAS, NV 89119

1. HEAD EAST ON KIRK DOUGLAS WAY TOWARD E BARISTO RD
2. TURN LEFT ONTO RAMON RD
3. SLIGHT RIGHT TO MERGE ONTO I-10 E TOWARD INDIO
4. MERGE ONTO I-10 E
5. TAKE EXIT 145 FOR CALIFORNIA 86 S TOWARD BRAWLEY/EL CENTRO
6. CONTINUE ON CA-86 S. DRIVE TO OATES LN IN COACHELLA
7. CONTINUE ONTO CA-86 S
8. TURN RIGHT ONTO AVENUE 50/TYLER ST
9. CONTINUE TO FOLLOW AVENUE 50
10. TURN RIGHT ONTO OATES LN
11. DESTINATION WILL BE ON THE RIGHT

APPROVALS

THE FOLLOWING PARTIES HEREBY APPROVE AND ACCEPT THESE DOCUMENTS & AUTHORIZE THE SUBCONTRACTOR TO PROCEED WITH THE ZONING DESCRIBED HEREIN. ALL DOCUMENTS ARE SUBJECT TO REVIEW BY THE LOCAL BUILDING DEPARTMENT & MAY IMPOSE CHANGES OR MODIFICATIONS.

APPROVED BY:	DATE:
APC OPERATIONS:	
SAQ MANAGER:	
PROJECT MANAGER:	
ZONING VENDOR:	
LEASING VENDOR:	
ZONING MANAGER:	
PROPERTY OWNER:	

PROJECT DESCRIPTION

APC PROPOSES TO INSTALL A WIRELESS COMMUNICATIONS FACILITY. THE SCOPE WILL CONSIST OF THE FOLLOWING:

VERIZON WIRELESS SCOPE OF WORK:
- (12) PROPOSED ANTENNAS ON MONOPALM
- (12) PROPOSED RRUS ON MONOPALM
- (1) PROPOSED RAYCAP ON MONOPALM
- (3) PROPOSED EQUIPMENT CABINETS AT GRADE
- (2) PROPOSED H-FRAME WITH CABINETS
- (1) PROPOSED EMERGENCY DIESEL GENERATOR AT GRADE
- (1) PROPOSED MICROWAVE ON MONOPALM

APC SCOPE OF WORK:
- (1) PROPOSED 85'-0" HIGH MONOPALM
- (1) PROPOSED METERING H-FRAME
- (1) PROPOSED UTILITY COMPANY TRANSFORMER
- (2) PROPOSED UTILITY TRENCHES
- (1) PROPOSED 6' HIGH SPLIT FACE BLOCK WALL
- (1) NEW KNOX KEY VAULT FOR ACCESS GATE

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		F

APC Towers
8601 SIX FORKS ROAD, SUITE 250
RALEIGH, NC 27615
WWW.APCTOWERS.COM

Eukon
an SFC Communications, Inc. Company
65 POST, SUITE 1000
IRVINE, CA 92618
TEL: (949) 553-8566
www.eukongroup.com

NOT FOR CONSTRUCTION

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DRAWN BY:	UTILITIES CHECKED BY:	A&E CHECKED BY:
FG	GD	RB

ZONING DRAWINGS

SUBMITTALS

REV	DATE	DESCRIPTION
A	07/01/25	90% ZONING DRAWINGS
B	08/28/25	RFDS UPDATE
C	10/13/25	JX COMMENTS
D	12/08/25	PLANING COMMENTS
E	01/15/26	FIRE COMMENTS
F	01/7/26	ENGINEERING COMMENTS

PROJECT INFORMATION

CA-4009

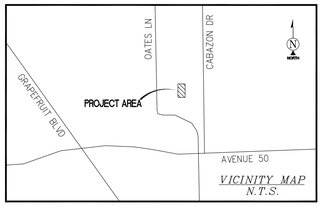
49640 OATES LANE,
COACHELLA, CA 92236

SHEET TITLE

TITLE SHEET

SHEET NUMBER

T-1



SURVEY DATE
06/16/2025

BASIS OF BEARING
BEARINGS SHOWN HEREON ARE BASED UPON THE CALIFORNIA ZONE SIX STATE PLANE COORDINATE SYSTEM BASED ON THE NORTH AMERICAN DATUM OF 1983(2011) (EPOCH 2019.25). DETERMINED BY GLOBAL POSITIONING SYSTEM EQUIPMENT ON THE SMARTNET REFERENCE NETWORK.

BENCHMARK
PROJECT ELEVATIONS ESTABLISHED FROM GPS DERIVED ORTHOMETRIC HEIGHTS BY APPLICATION OF NGS 'GEOID 18' MODELED SEPARATIONS TO ELLIPSOID HEIGHTS DETERMINED BY OBSERVATIONS OF THE 'SMARTNET' REAL TIME NETWORK. ALL ELEVATIONS SHOWN HEREON ARE REFERENCED TO NAVD88.

GRID-TO-GROUND SCALE FACTOR NOTE
ALL BEARINGS AND DISTANCES ARE BASED ON THE CALIFORNIA SIX STATE PLANE COORDINATE ZONE GRID. TO DERIVE GROUND DISTANCES DIVIDE BY 0.99998134

FLOOD ZONE
THIS PROJECT APPEARS TO BE LOCATED WITHIN FLOOD ZONE "X". ACCORDING TO FEDERAL EMERGENCY MANAGEMENT AGENCY FLOOD INSURANCE RATE MAP(S), MAP ID #06065C2260H, DATED 03/06/2008

UTILITY NOTES
SURVEYOR DOES NOT GUARANTEE THAT ALL UTILITIES ARE SHOWN OR THEIR LOCATIONS ARE DEFINITE. IT IS THE RESPONSIBILITY OF THE CONTRACTOR AND DEVELOPER TO CONTACT 811 AND ANY OTHER INVOLVED AGENCIES TO LOCATE ALL UTILITIES PRIOR TO CONSTRUCTION, REMOVAL, RELOCATION AND/ OR REPLACEMENT IS THE RESPONSIBILITY OF THE CONTRACTOR.

SURVEYOR'S NOTES
CONTOURS DERIVED FROM DIRECT FIELD OBSERVATIONS AND FOLLOW THE CURRENT NATIONAL MAP STANDARDS FOR VERTICAL ACCURACY.

THE BOUNDARY LINES SHOWN HEREON ARE BASED ON MAPS OF RECORD AND DEED INFORMATION AS PROVIDED BY A TITLE REPORT AND A SEARCH OF THE COUNTY RECORDER AND SURVEYOR ONLINE DATABASE. A FIELD SURVEY HAS BEEN PERFORMED AND MONUMENTATION HAS BEEN RECOVERED TO PLACE THE RECORD INFORMATION. RECORD BEARINGS HAVE BEEN ADJUSTED TO THE BASIS OF BEARING STATEMENT SHOWN ON THIS SURVEY. THIS SURVEY DOES NOT MAKE ANY ATTEMPT TO RECONCILE ANY ERRORS IN THE RECORD MAPS OR DEEDS OF RECORD.

ALL DISTANCES SHOWN HEREON ARE GRID DISTANCES.

SURVEYOR HAS NOT PERFORMED A SEARCH OF PUBLIC RECORDS TO DETERMINE ANY DEFECT IN TITLE ISSUED.

SCHEDULE "B" NOTE
REFERENCE IS MADE TO THE TITLE REPORT ORDER #01-25004543-01T, ISSUED BY OLD REPUBLIC NATIONAL TITLE INSURANCE COMPANY, DATED JANUARY 28, 2025. ALL EASEMENTS CONTAINED WITHIN SAID TITLE REPORT AFFECTING THE IMMEDIATE AREA SURROUNDING THE LEASE HAVE BEEN PLOTTED.

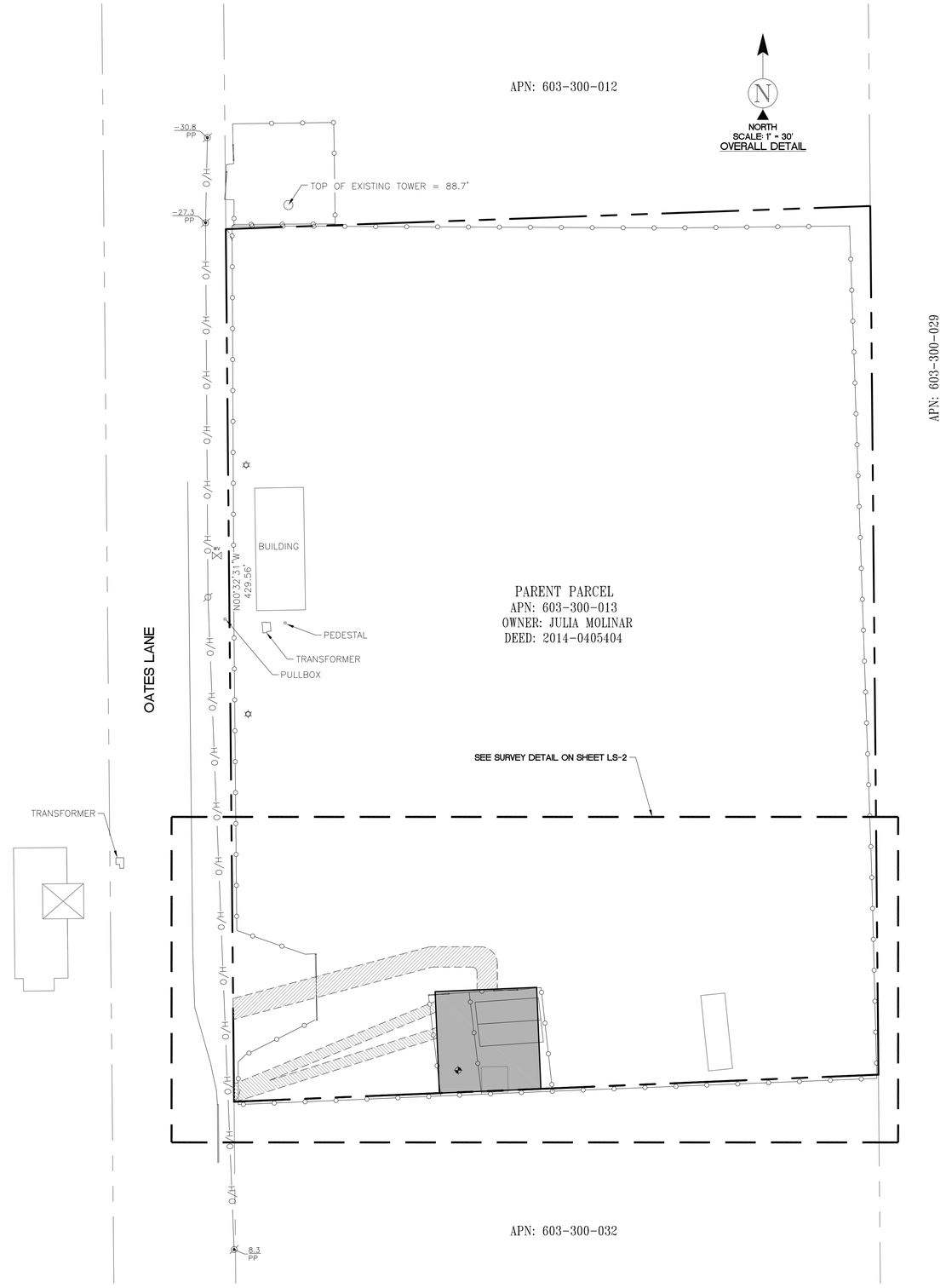
ITEMIZED NOTES:

1. ANY DEFECT, LIEN, ENCUMBRANCE, ADVERSE CLAIM, OR OTHER MATTER THAT APPEARS FOR THE FIRST TIME IN THE PUBLIC RECORDS OR IS CREATED, ATTACHES, OR IS DISCLOSED BETWEEN THE COMMITMENT DATE AND THE DATE ON WHICH ALL OF THE SCHEDULE B, PART I-- REQUIREMENTS ARE MET. (THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)
2. FACTS WHICH WOULD BE DISCLOSED BY A COMPREHENSIVE SURVEY OF THE PREMISES HEREIN DESCRIBED. (THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)
3. RIGHTS OR CLAIMS OF PARTIES IN POSSESSION. (THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)
4. MECHANICS', CONTRACTORS' OR MATERIAL MEN'S LIENS AND LIEN CLAIMS, IF ANY, WHERE NO NOTICE THEREOF APPEARS OF RECORD. (THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)
5. ANY CHANGES IN TITLE OCCURRING SUBSEQUENT TO THE EFFECTIVE DATE OF THIS COMMITMENT AND PRIOR TO THE DATE OF ISSUANCE OF THE TITLE POLICY. (THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)
6. TAXES AND SPECIAL ASSESSMENTS FOR CURRENT TAX YEAR AND ALL SUBSEQUENT YEARS. (THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)
7. A. UNPATENTED MINING CLAIMS. B. RESERVATIONS OR EXCEPTION IN PATENTS, OR ACTS AUTHORIZING THE ISSUANCE THEREOF. C. WATER RIGHTS, CLAIMS, OR TITLE TO WATER, WHETHER OR NOT THE MATTERS EXCEPTED UNDER (A), (B), OR (C) ARE SHOWN BY THE PUBLIC RECORDS (THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)
8. ANY CLAIM TO (A) OWNERSHIP OF OR RIGHTS TO MINERALS AND SIMILAR SUBSTANCES, INCLUDING BUT NOT LIMITED TO ORES, METALS, COAL, LIGNITE, OIL, GAS, URANIUM, CLAY, ROCK, SAND, AND GRAVEL LOCATED IN, ON, OR UNDER THE LAND OR PRODUCED FROM THE LAND, WHETHER SUCH OWNERSHIP OR RIGHTS ARISE BY LEASE, GRANT, EXCEPTION, CONVEYANCE, RESERVATION, OR OTHERWISE; AND (B) ANY RIGHTS, PRIVILEGES, IMMUNITIES, RIGHTS OF WAY, AND EASEMENTS ASSOCIATED THEREWITH OR APPURTENANT THERETO, WHETHER OR NOT THE INTERESTS OR RIGHTS EXCEPTED IN (A) OR (B) APPEAR IN THE PUBLIC RECORDS OR ARE SHOWN IN SCHEDULE B (THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)
9. SUBJECT TO EASEMENT AND RIGHTS OF WAY, IF ANY, AS SHOWN ON THE PARCEL MAP NO. 3, AS RECORDED ON 07/24/1972, IN PLAT BOOK 5, PAGE 61, F THE RIVERSIDE COUNTY RECORDS. (NOTHING TO PLOT)
10. SUBJECT TO TERMS AND CONDITIONS OF STATEMENT OF REDEVELOPMENT PROCEEDINGS RECORDED 07/10/2007 AS DOCUMENT NO. 2007--0449637 O THE RIVERSIDE COUNTY RECORDS. (BLANKET IN NATURE-AFFECTS THE LEASE AND EASEMENT AREAS)
11. SUBJECT TO TERMS AND CONDITIONS OF WQMP COVENANT AND AGREEMENT, WATER QUALITY MANAGEMENT PLAN AND URBAN RUNOFF BMP TRANSFER, ACCESS AND MAINTENANCE AGREEMENT, BY AND BETWEEN JULIA MOLINAR AND THE CITY OF COACHELLA, RECORDED 003/20/2017, AS DOCUMENT NO. 2017-0111945 OF THE RIVERSIDE COUNTY RECORDS. (BLANKET IN NATURE-AFFECTS THE LEASE AND EASEMENT AREAS)

LEGEND

AP	ASPHALT		UTILITY POLE
BLDG	TOP OF BUILDING		LIGHT POLE
FENCE	TOP OF FENCE		POSITION OF GEODETIC COORDINATES
FC	FACE OF CURB	XX.X PAD	SPOT ELEVATION
LP	LIGHT POLE		
NG	NATURAL GRADE		
PP	TOP OF UTILITY POLE		
PEAK	BUILDING PEAK		
P.O.B.	POINT OF BEGINNING		
P.O.C.	POINT OF COMMENCEMENT		
P.O.T.	POINT OF TERMINUS		

- CHAIN LINK FENCE
- CURBLINES
- EXISTING BUILDINGS
- O/H O/H O/H — OVERHEAD LINES
- STREET CENTERLINES
- SUBJECT PROPERTY LINE
- ADJACENT PROPERTY LINE
- EASEMENT LINES
- TIE LINES
- LEASE AREA LIMITS
- MAJOR CONTOUR INTERVAL
- MINOR CONTOUR INTERVAL



APC Towers
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PROJECT INFORMATION:

CA-4009
STARFRUIT
49640 OATES LANE
COACHELLA, CA 92236
RIVERSIDE COUNTY

ORIGINAL ISSUE DATE:
06/19/2025

REV.:	DATE:	DESCRIPTION:	BY:
A	06/19/25	PRELIM SUBMITTAL	AC
0	07/25/25	DESIGN (C)	CK
1	01/19/26	REVISE DESIGN (C)	CK

SURVEY PREPARED BY:
ambit consulting
428 MAIN STREET
SUITE 206
HUNTINGTON BEACH, CA 92648
PH. (480) 659-4072
www.ambitconsulting.us

CONSULTANT:

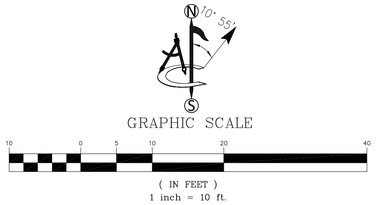
DRAWN BY:	CHK.:	APV.:
AC	PD(1)	PD

LICENSER:
LICENSED LAND SURVEYOR
PATRICK B. DONOHOE
No. 9332
STATE OF CALIFORNIA
01/20/2026

SHEET TITLE:
SITE SURVEY

SHEET NUMBER:
LS-1

LINE TABLE		
LINE#	LENGTH	DIRECTION
L1	12.48'	S00°00'15"E
L2	8.73'	N00°00'15"W
L3	5.32'	S02°24'31"E
L4	5.16'	S02°24'31"E



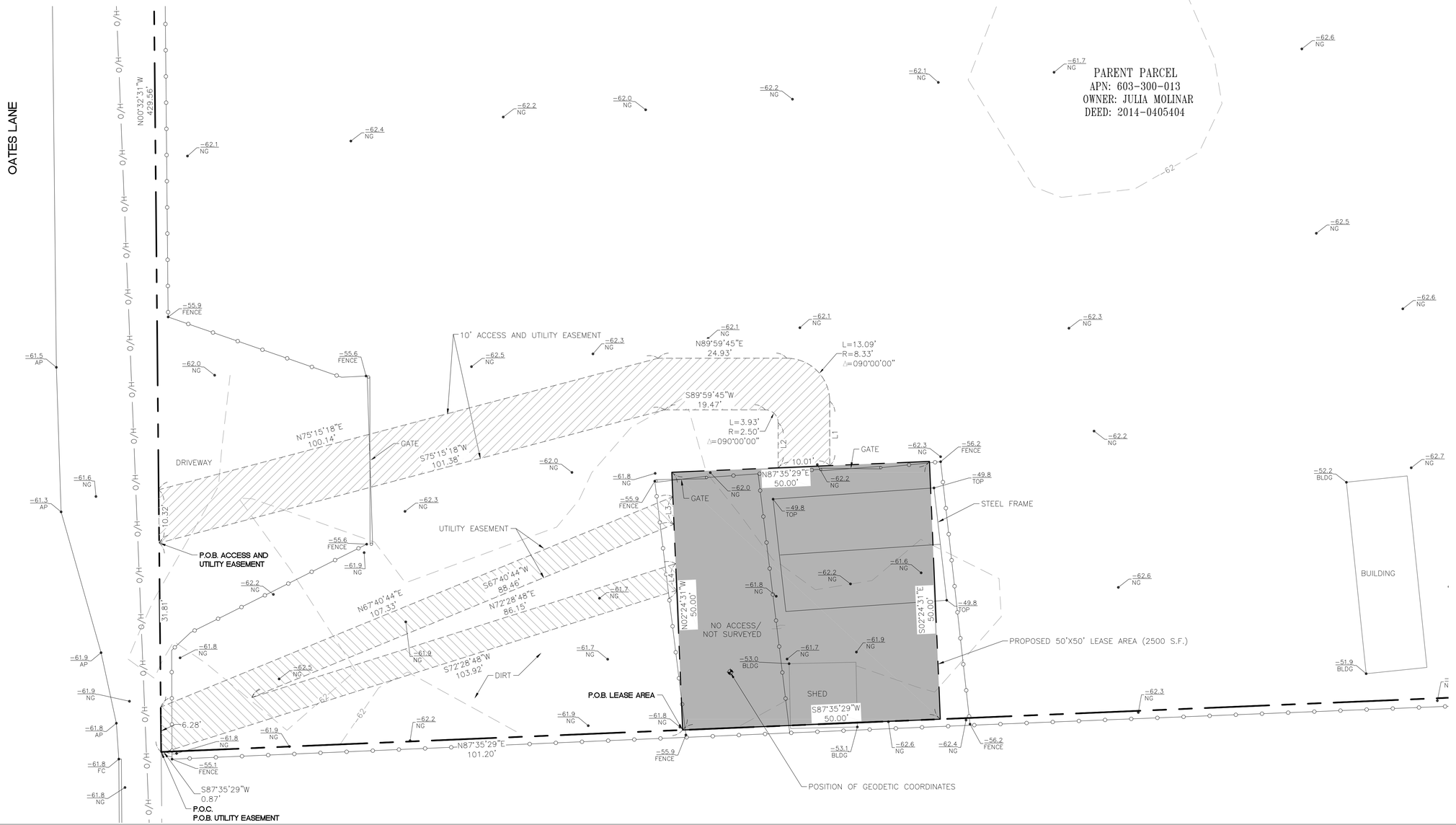
POSITION OF GEODETIC COORDINATES
LATITUDE 33° 41' 13.13" (33.686981°) NORTH (NAD83)
LONGITUDE 116° 10' 36.14" (116.176706°) WEST (NAD83)
GROUND ELEVATION @ -61.8' (NAVD88)

LEGEND

AP	ASPHALT
BLDG	TOP OF BUILDING
FENCE	TOP OF FENCE
FC	FACE OF CURB
LP	LIGHT POLE
NG	NATURAL GRADE
PP	TOP OF UTILITY POLE
PEAK	BUILDING PEAK
P.O.B.	POINT OF BEGINNING
P.O.C.	POINT OF COMMENCEMENT
P.O.T.	POINT OF TERMINUS

UTILITY POLE
LIGHT POLE
POSITION OF GEODETIC COORDINATES
XXXX.X NG SPOT ELEVATION

CHAIN LINK FENCE
CURBLINES
EXISTING BUILDINGS
O/H O/H O/H OVERHEAD LINES
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LEASE AREA LIMITS
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PROJECT INFORMATION:

CA-4009
STARFRUIT
49640 OATES LANE
COACHELLA, CA 92236
RIVERSIDE COUNTY

ORIGINAL ISSUE DATE:

06/19/2025

REV.:	DATE:	DESCRIPTION:	BY:
A	06/19/25	PRELIM SUBMITTAL	AC
0	07/25/25	DESIGN (C)	CK
1	01/19/26	REVISE DESIGN (C)	CK

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HUNTINGTON BEACH, CA 92648
PH. (480) 659-4072
www.ambitconsulting.us
ambit consulting

CONSULTANT:

DRAWN BY:	CHK.:	APV.:
AC	PD(1)	PD

LICENSER:

LICENSED LAND SURVEYOR
PATRICK B. DONOHOE
No. 9332
STATE OF CALIFORNIA
01/20/2026

SHEET TITLE:

SURVEY DETAIL

SHEET NUMBER:

LS-2

LESSOR'S LEGAL DESCRIPTION (PER TITLE)

THE REAL PROPERTY IN THE CITY OF COACHELLA, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, DESCRIBED AS:

PARCEL 4 OF PARCEL MAP NO. 3, AS SHOWN BY MAP ON FILE IN BOOK 5, PAGE 61 OF PARCEL MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA

TAX ID: 603-300-013

BEING THE SAME PROPERTY CONVEYED TO JULIA MOLINAR, A SINGLE WOMAN, GRANTEE, FROM MELVIN L. CURCI AND CAROLYN S. CURCI, TRUSTEES OF THE CURCI INTERVIVOS TRUST, DATED MAY 31, 1985, GRANTOR, BY DEED RECORDED 10/24/2014, AS DOCUMENT # 2014-0405404 OF THE COUNTY RECORDS.

LEASE AREA LEGAL DESCRIPTION

A PORTION OF PARCEL 4 OF PARCEL MAP NO. 3, AS SHOWN BY MAP ON FILE IN BOOK 5, PAGE 61 OF PARCEL MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT THE SOUTHWEST CORNER OF SAID PARCEL 4, FROM WHICH THE NORTHWEST CORNER OF SAID PARCEL BEARS NORTH 00°32'31" WEST, 429.56 FEET; THENCE FROM SAID POINT OF COMMENCEMENT NORTH 87°35'29" EAST ALONG THE SOUTH LINE OF SAID PARCEL, 101.20 FEET TO THE POINT OF BEGINNING;

THENCE NORTH 0°24'31" WEST, 50.00 FEET; THENCE NORTH 87°35'29" EAST, 50.00 FEET; THENCE SOUTH 02°24'31" EAST, 50.00 FEET; THENCE SOUTH 87°35'29" WEST, 50.00 FEET TO A POINT ON THE SOUTH LINE OF PARCEL 4 AND THE POINT OF BEGINNING.

CONTAINING 2500 SQUARE FEET (0.057 ACRES) OF LAND, MORE OR LESS.

ACCESS AND UTILITY EASEMENT LEGAL DESCRIPTION

A PORTION OF PARCEL 4 OF PARCEL MAP NO. 3, AS SHOWN BY MAP ON FILE IN BOOK 5, PAGE 61 OF PARCEL MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT THE SOUTHWEST CORNER OF SAID PARCEL 4, FROM WHICH THE NORTHWEST CORNER OF SAID PARCEL BEARS NORTH 00°32'31" WEST, 429.56 FEET; THENCE FROM SAID POINT OF COMMENCEMENT NORTH 00°32'31" WEST ALONG THE WEST LINE OF SAID PARCEL, ALSO BEING THE EASTERLY RIGHT OF WAY OF OATES LANE, 38.09 FEET TO THE POINT OF BEGINNING;

THENCE CONTINUING NORTH 00°32'31" WEST ALONG SAID RIGHT OF WAY, 10.32 FEET; THENCE DEPARTING SAID RIGHT OF WAY NORTH 75°15'18" EAST, 100.14 FEET; THENCE NORTH 89°59'45" EAST, 24.93 FEET TO A POINT OF TANGENT CURVE TO THE RIGHT HAVING A RADIUS OF 8.33 FEET; THENCE SOUTHEASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 90°00'00" AN ARC DISTANCE OF 13.09 FEET; THENCE SOUTH 00°00'15" EAST, 12.48 FEET; THENCE SOUTH 87°35'29" WEST, 10.01 FEET; THENCE NORTH 00°00'15" WEST, 8.73 FEET TO A POINT OF TANGENT CURVE TO THE LEFT HAVING A RADIUS OF 2.50 FEET; THENCE NORTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 90°00'00" AN ARC DISTANCE OF 3.93 FEET; THENCE SOUTH 89°59'45" WEST, 19.47 FEET; THENCE SOUTH 75°15'18" WEST, 101.38 FEET TO A POINT ON THE EASTERLY RIGHT OF WAY OF OATES LANE AND THE POINT OF BEGINNING.

UTILITY EASEMENT LEGAL DESCRIPTION

A PORTION OF PARCEL 4 OF PARCEL MAP NO. 3, AS SHOWN BY MAP ON FILE IN BOOK 5, PAGE 61 OF PARCEL MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT THE SOUTHWEST CORNER OF SAID PARCEL 4, FROM WHICH THE NORTHWEST CORNER OF SAID PARCEL BEARS NORTH 00°32'31" WEST, 429.56 FEET; SAID POINT ALSO BEING THE POINT OF BEGINNING;

THENCE NORTH 00°32'31" WEST ALONG THE WEST LINE OF SAID PARCEL 4, ALSO BEING THE EASTERLY RIGHT OF WAY OF OATES LANE, 6.28 FEET, THENCE DEPARTING SAID RIGHT OF WAY NORTH 67°40'44" EAST, 107.33 FEET; THENCE SOUTH 02°24'31" EAST, 5.32 FEET; THENCE SOUTH 67°40'44" WEST, 88.46 FEET; THENCE NORTH 72°28'48" EAST, 86.15 FEET; THENCE SOUTH 02°24'31" EAST, 5.16 FEET; THENCE SOUTH 72°28'48" WEST, 103.92 FEET TO A POINT ON THE SOUTHERLY LINE OF SAID PARCEL; THENCE SOUTH 87°35'29" WEST ALONG SAID SOUTHERLY LINE 0.87 FEET TO THE POINT OF BEGINNING.

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CA-4009
STARFRUIT
49640 OATES LANE
COACHELLA, CA 92236
RIVERSIDE COUNTY

ORIGINAL ISSUE DATE:

06/19/2025

REV.: | DATE: | DESCRIPTION: | BY:

A	06/19/25	PRELIM SUBMITTAL	AC
0	07/25/25	DESIGN (C)	CK
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CONSULTANT:

DRAWN BY: | CHK.: | APV.:

AC	PD(1)	PD

LICENSER:

LICENSED LAND SURVEYOR
PATRICK B. DONOHOE
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STATE OF CALIFORNIA
01/20/2026

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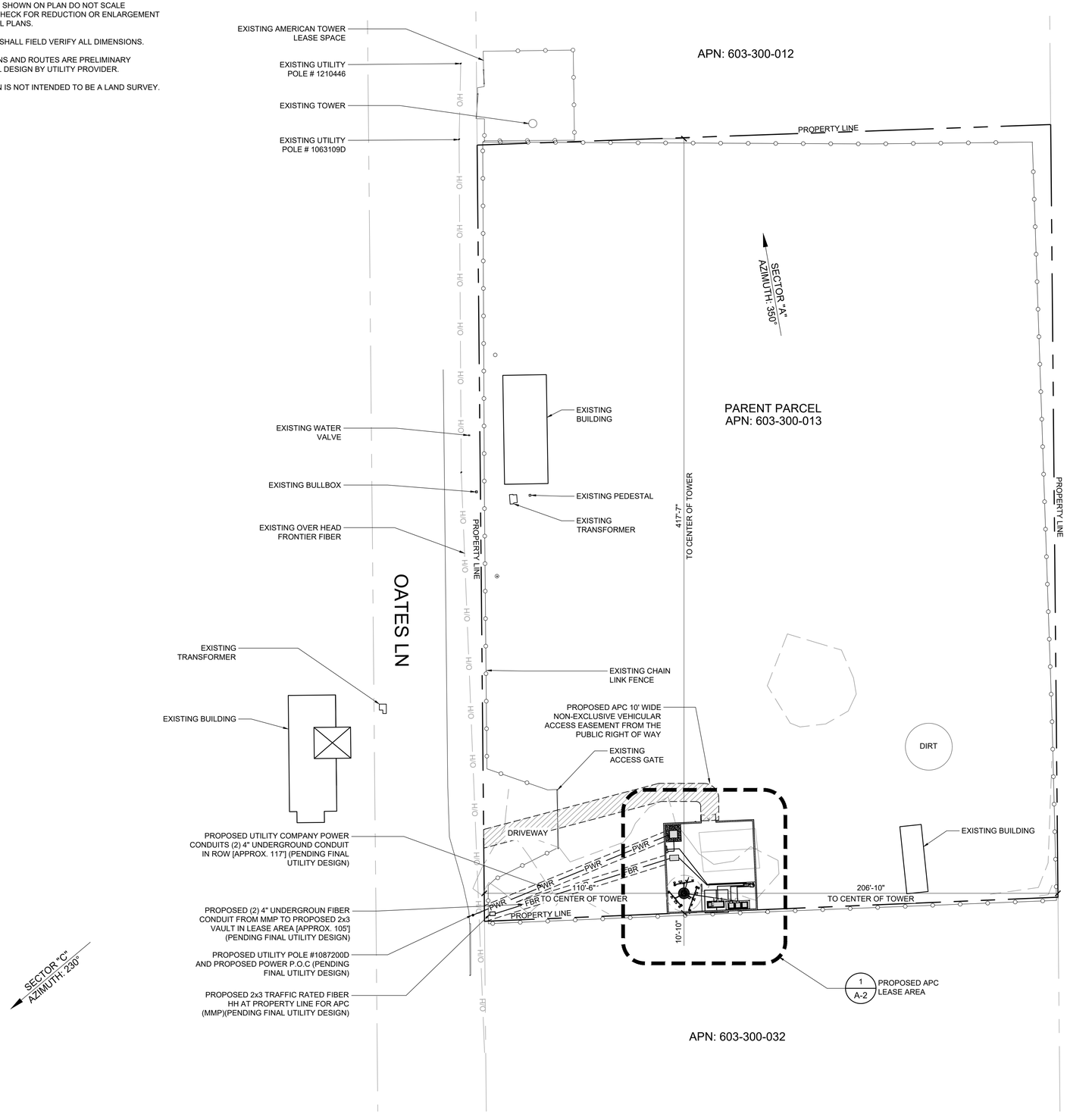
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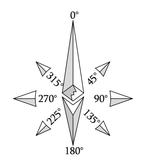
SHEET NUMBER:

LS-3

NOTES:

1. IF DIMENSIONS SHOWN ON PLAN DO NOT SCALE CORRECTLY, CHECK FOR REDUCTION OR ENLARGEMENT FROM ORIGINAL PLANS.
2. CONTRACTOR SHALL FIELD VERIFY ALL DIMENSIONS.
3. UTILITY DESIGNS AND ROUTES ARE PRELIMINARY PENDING FINAL DESIGN BY UTILITY PROVIDER.
4. THIS SITE PLAN IS NOT INTENDED TO BE A LAND SURVEY.





SITE PLAN

SCALE	
1"=30'-0"	30' 0 15' 30' 60' 120'

1

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RALEIGH, NC 27615
WWW.APCTOWERS.COM

Eukon
an SFC Communications, Inc. Company
65 POST, SUITE 1000
IRVINE, CA 92618
TEL: (949) 553-8566
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DRAWN BY:	UTILITIES CHECKED BY:	A&E CHECKED BY:
FG	GD	RB

ZONING DRAWINGS

SUBMITTALS

REV	DATE	DESCRIPTION
A	07/01/25	90% ZONING DRAWINGS
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PROJECT INFORMATION

CA-4009

49640 OATES LANE,
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SHEET TITLE

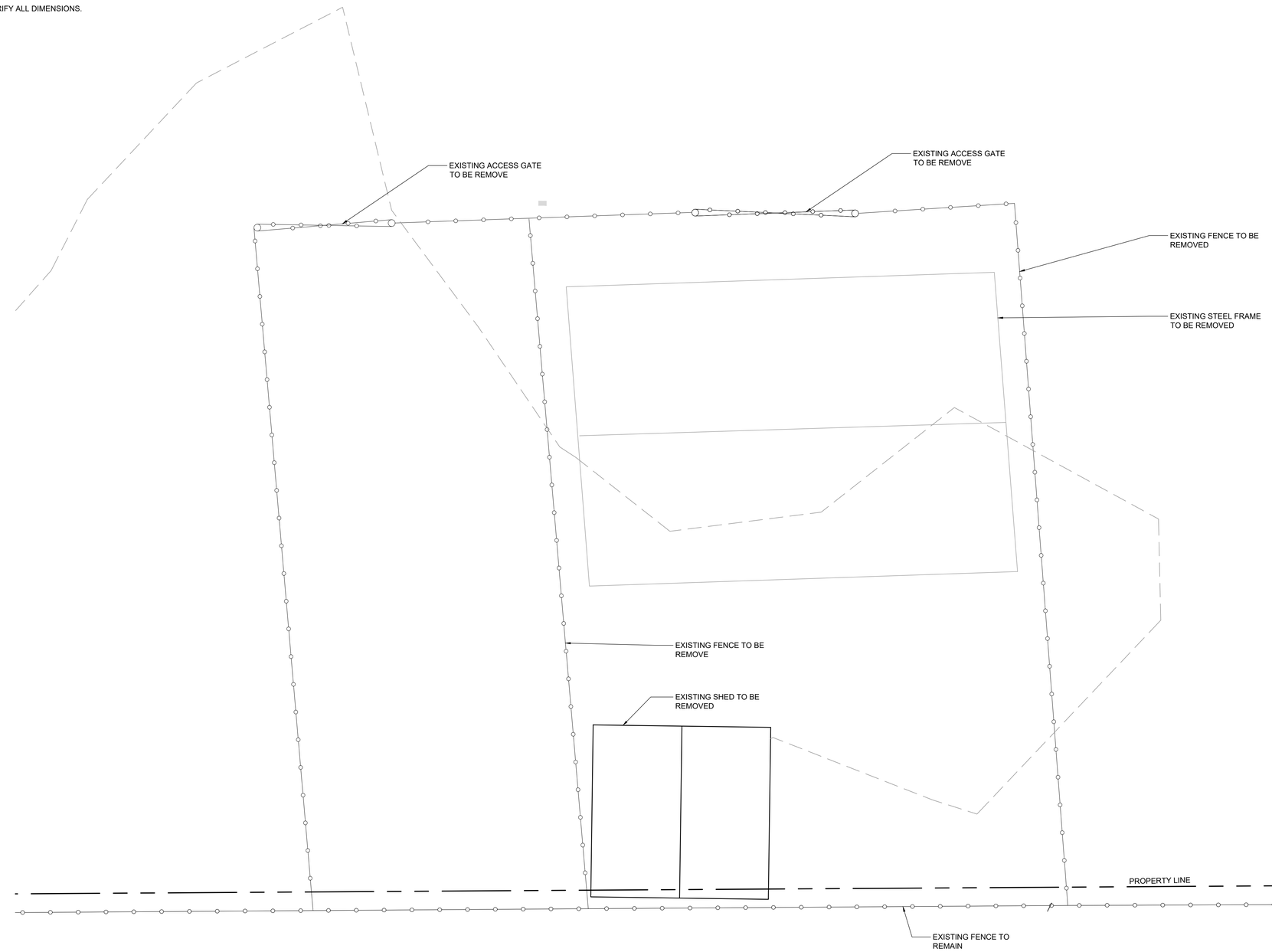
SITE PLAN

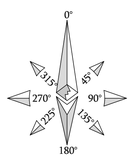
SHEET NUMBER

A-1

NOTES:

1. IF DIMENSIONS SHOWN ON PLAN DO NOT SCALE CORRECTLY, CHECK FOR REDUCTION OR ENLARGEMENT FROM ORIGINAL PLANS.
2. CONTRACTOR SHALL FIELD VERIFY ALL DIMENSIONS.





EXISTING/DEMO COMPOUND PLAN

SCALE 1/4"=1'-0"

4' 0 2' 4' 8' 16'

1

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EXISTING/DEMO COMPOUND PLAN

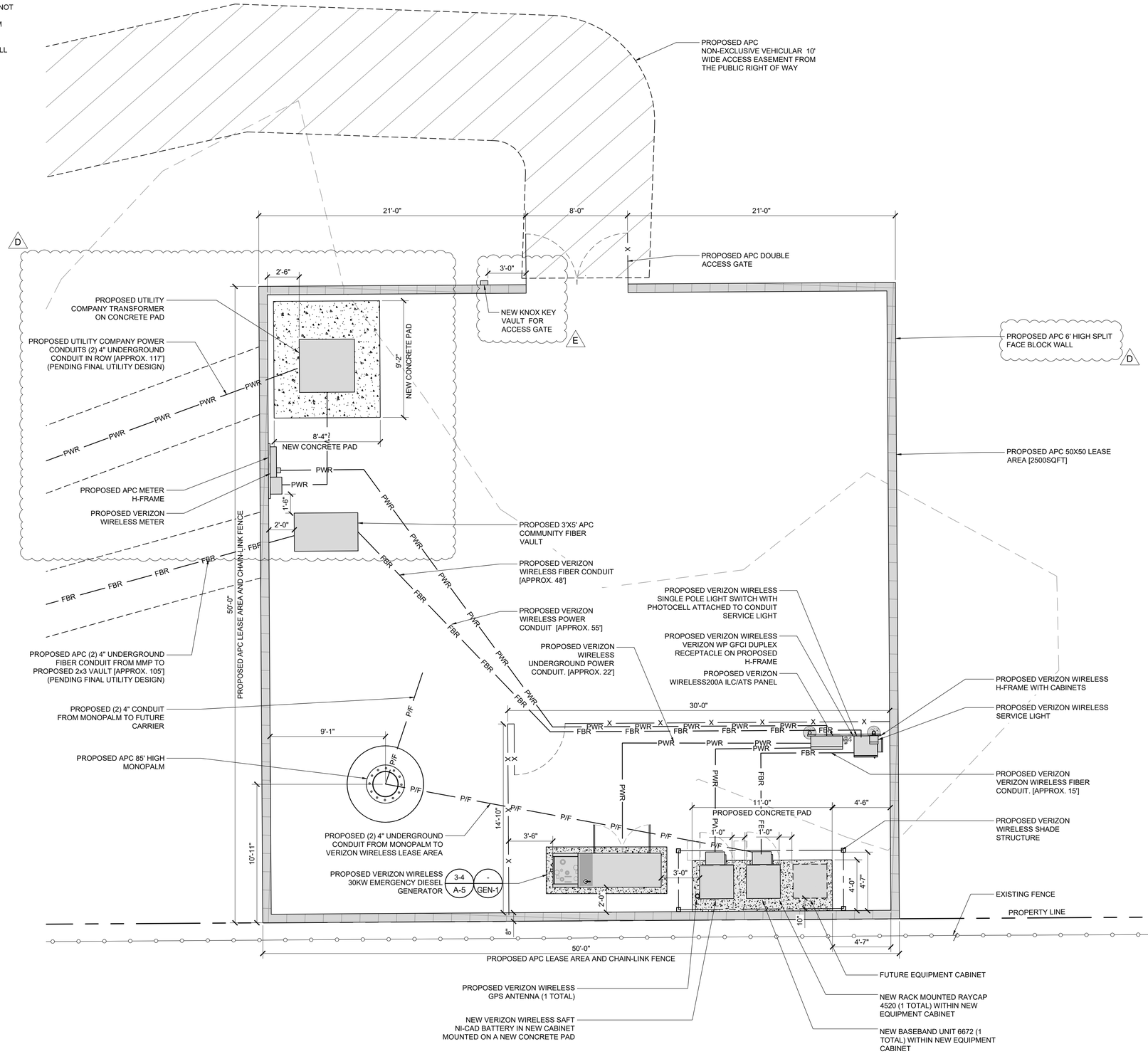
SHEET NUMBER

A-2

EUKON_AT&T_90CD_MONOPALM TEMPLATE_V2_11-18-22

NOTES:

1. IF DIMENSIONS SHOWN ON PLAN DO NOT SCALE CORRECTLY, CHECK FOR REDUCTION OR ENLARGEMENT FROM ORIGINAL PLANS.
2. CONTRACTOR SHALL FIELD VERIFY ALL DIMENSIONS.



PROPOSED COMPOUND PLAN

SCALE 1/4"=1'-0" (4' 0 2' 4' 8' 16')

1

EUKON_AT&T_90CD_MONOPALM TEMPLATE_V2_11-18-22

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49640 OATES LANE,
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SHEET TITLE

PROPOSED COMPOUND PLAN

SHEET NUMBER

A-2.1

	ANTENNA SCHEDULE (VERIFY WITH CURRENT RFDS)						
	SECTOR	TECHNOLOGY	ANTENNA MODEL	ANTENNA SIZE	ANTENNA AZIMUTH	RAD CENTER	TRANSMISSION CABLE LENGTH
ALPHA SECTOR	A1	700/850/PCS/AWS	NN-65C-HG-R1B	8'-0"	350°	80'-0"	105'
	A2	L6	AIR3283	4'-0"	350°	80'-0"	105'
	A3	CBAND NR	AIR6419_B77D	2'-6"	350°	80'-0"	105'
	A4	CBRS LTE	AIR3268	1'-10"	350°	80'-0"	105'
	-	-	-	-	-	-	-
BETA SECTOR	B1	700/850/PCS/AWS	NN-65C-HG-R1B	8'-0"	110°	80'-0"	105'
	B2	L6	AIR3283	4'-0"	110°	80'-0"	105'
	B3	CBAND NR	AIR6419_B77D	2'-6"	110°	80'-0"	105'
	B4	CBRS LTE	AIR3268	1'-10"	110°	80'-0"	105'
	-	-	-	-	-	-	-
GAMMA SECTOR	C1	700/850/PCS/AWS	NN-65C-HG-R1B	8'-0"	230°	80'-0"	105'
	C2	L6	AIR3283	4'-0"	230°	80'-0"	105'
	C3	CBAND NR	AIR6419_B77D	2'-6"	230°	80'-0"	105'
	C4	CBRS LTE	AIR3268	1'-10"	230°	80'-0"	105'
	-	-	-	-	-	-	-

NOTES TO CONTRACTOR:

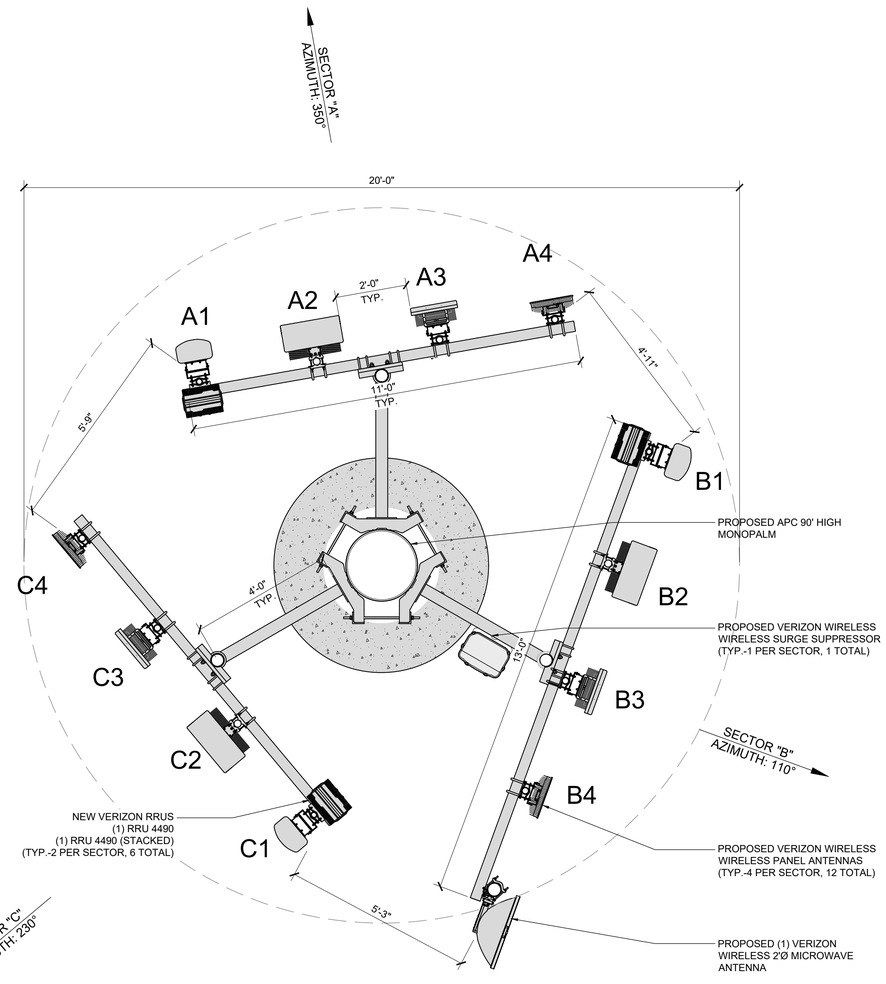
1. CONTRACTOR IS TO REFER TO T-MOBILE'S MOST CURRENT RADIO FREQUENCY DATA SHEET (RFDS) PRIOR TO CONSTRUCTION.
2. CABLE LENGTHS WERE DETERMINED BASED ON A VISUAL INSPECTION DURING SITE WALK. CONTRACTOR TO VERIFY ACTUAL LENGTH DURING PRE-CONSTRUCTION WALK.
3. CONTRACTOR TO USE ROSENBERGER FIBER LINE HANGER COMPONENTS (OR ENGINEER APPROVED EQUAL).
4. CONTRACTOR TO USE CABLES SPECIFIED (OR ENGINEER APPROVED EQUAL).

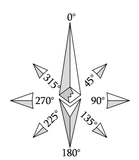
	REMOTE RADIO UNIT SCHEDULE					
	SECTOR	RRU TYPE	RRU LOCATION (DISTANCE FROM ANTENNA)	MINIMUM CLEARANCES ABOVE	BELOW	SIDES
ALPHA SECTOR	A1	(1) ERICSSON RRU 4490 B5 / B12	±15'	16"	8"	0"
	A1	(1) ERICSSON RRU 3283 B25+B66	±15'	16"	8"	0"
	A2	(1) ERICSSON RRU 4419 B77D	±15'	16"	8"	0"
	A3	(1) ERICSSON RRU 3283 B25+B66	±15'	16"	8"	0"
	A4					
	A4					
	A5					
	A5					
BETA SECTOR	B1	(1) ERICSSON RRU 4490 B5 / B12	±15'	16"	8"	0"
	B1	(1) ERICSSON RRU 3283 B25+B66	±15'	16"	8"	0"
	B2	(1) ERICSSON RRU 4419 B77D	±15'	16"	8"	0"
	B3	(1) ERICSSON RRU 3283 B25+B66	±15'	16"	8"	0"
	B4					
	B4					
	B5					
	B5					
GAMMA SECTOR	C1	(1) ERICSSON RRU 4490 B5 / B12	±15'	16"	8"	0"
	C1	(1) ERICSSON RRU 3283 B25+B66	±15'	16"	8"	0"
	C2	(1) ERICSSON RRU 4419 B77D	±15'	16"	8"	0"
	C3	(1) ERICSSON RRU 3283 B25+B66	±15'	16"	8"	0"
	C4					
	C4					
	C5					
	C5					

ANTENNA AND RRU SCHEDULE | 2

NOTES:

1. IF DIMENSIONS SHOWN ON PLAN DO NOT SCALE CORRECTLY, CHECK FOR REDUCTION OR ENLARGEMENT FROM ORIGINAL PLANS.
2. CONTRACTOR SHALL FIELD VERIFY ALL DIMENSIONS.
3. FOR ANTENNA AND MW SPECIFICATIONS REFER TO ANTENNA SCHEDULE AND TO FINAL CONSTRUCTION RFDS FOR ALL RF DETAILS.





ANTENNA PLAN | SCALE 1/2"=1'-0" (2' 0 1' 2' 4' 8') | 1

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DRAWN BY:	UTILITIES CHECKED BY:	A&E CHECKED BY:
FG	GD	RB

ZONING DRAWINGS

SUBMITTALS

REV	DATE	DESCRIPTION
A	07/01/25	90% ZONING DRAWINGS
B	08/28/25	RFDS UPDATE
C	10/13/25	JX COMMENTS
D	12/08/25	PLANING COMMENTS
E	01/15/26	FIRE COMMENTS
F	01/7/26	ENGINEERING COMMENTS

PROJECT INFORMATION

CA-4009

49640 OATES LANE,
COACHELLA, CA 92236

SHEET TITLE

ANTENNA PLAN AND SCHEDULE

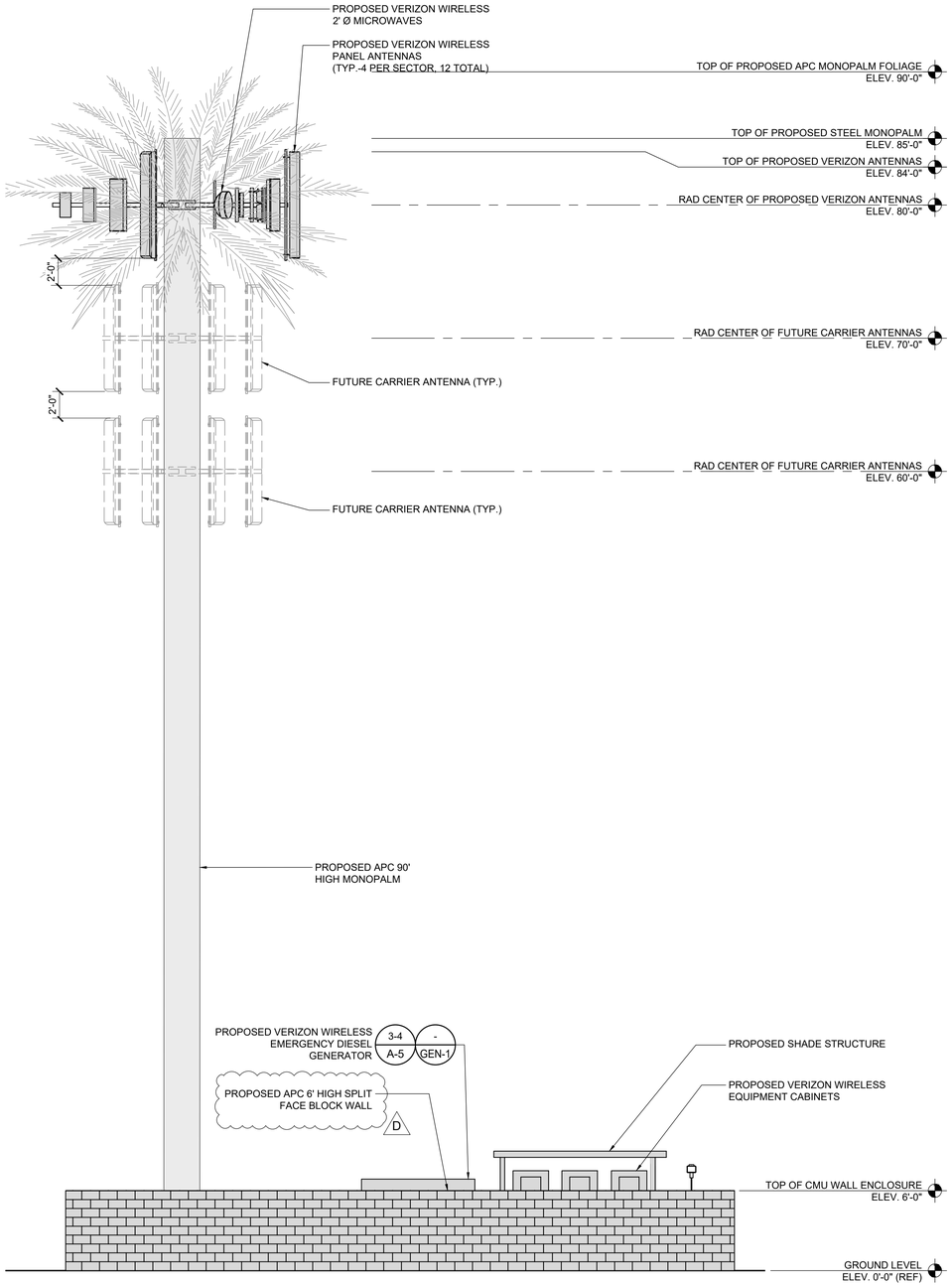
SHEET NUMBER

A-3

EUKON_AT&T_90CD_MONOPALM TEMPLATE_V2_11-18-22

NOTES:

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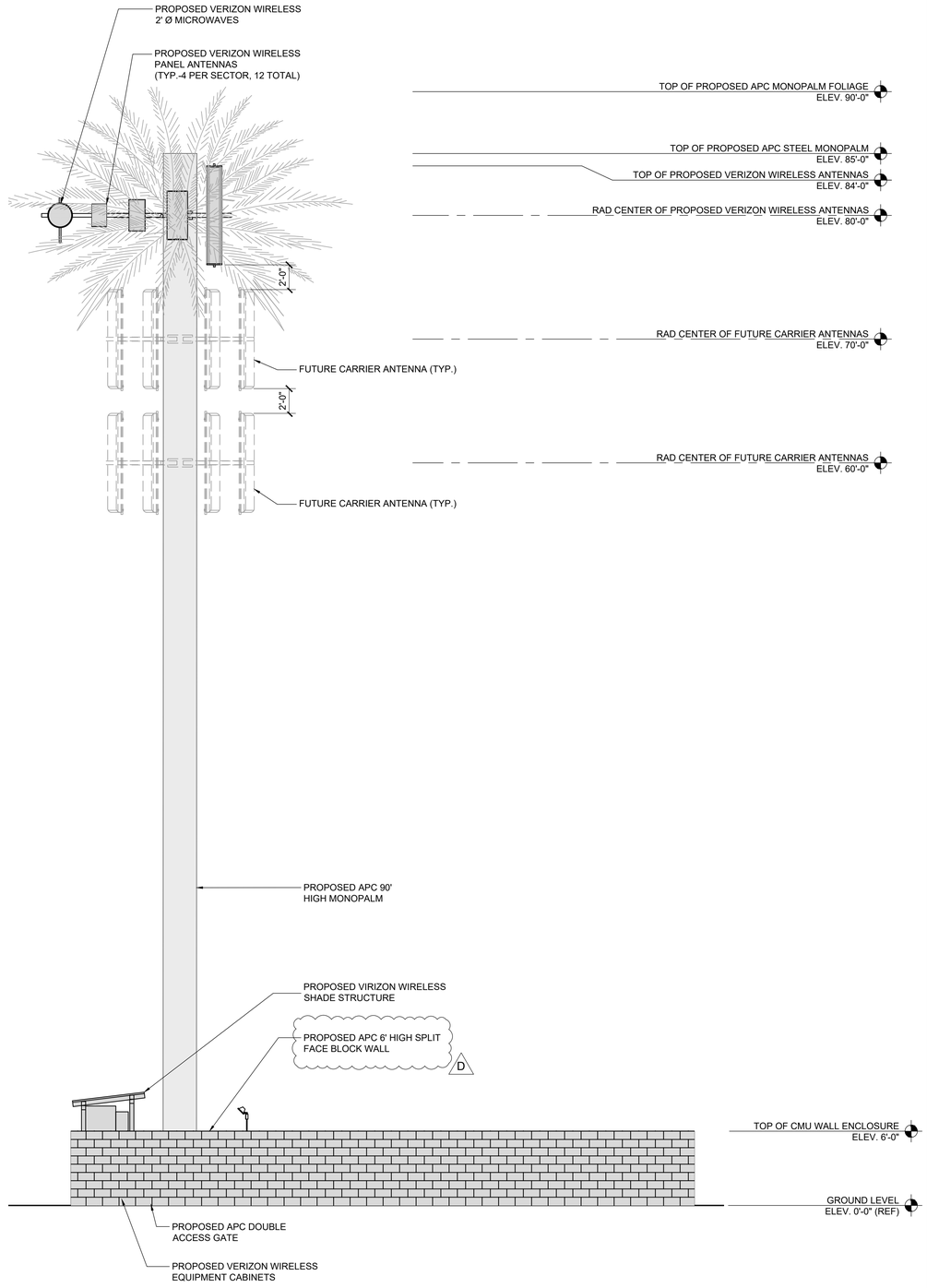


PROPOSED SOUTH ELEVATION

SCALE 3/16"=1'-0"

4' 0 2' 4' 8' 16'

2



PROPOSED EAST ELEVATION

SCALE 3/16"=1'-0"

4' 0 2' 4' 8' 16'

1

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ZONING DRAWINGS

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PROJECT INFORMATION

CA-4009

49640 OATES LANE,
COACHELLA, CA 92236

SHEET TITLE

ELEVATIONS

SHEET NUMBER

A-4

EUKON_AT&T_90CD_MONOPALM TEMPLATE_V2_11-18-22

CONCRETE AND REINFORCING STEEL NOTES:

ALL CONCRETE WORK SHALL BE IN ACCORDANCE WITH THE ACI 301, ACI 318, ACI 336, ASTM A184, ASTM A185 AND THE DESIGN AND CONSTRUCTION SPECIFICATION PER CAST-IN-PLACE CONCRETE.

ALL CONCRETE SHALL HAVE A MINIMUM COMPRESSIVE STRENGTH OF 3,000 PSI AT 28 DAYS, UNLESS NOTED OTHERWISE.

REINFORCING STEEL SHALL CONFORM TO ASTM A615, GRADE 60, DEFORMED UNLESS NOTED OTHERWISE. WELDED WIRE FABRIC SHALL CONFORM TO ASTM A185 WELDED STEEL WIRE FABRIC UNLESS NOTED OTHERWISE. SPLICES SHALL BE CLASS "B" AND ALL HOOKS SHALL BE STANDARD, UNO.

THE FOLLOWING MINIMUM CONCRETE COVER SHALL BE PROVIDED FOR REINFORCING STEEL UNLESS SHOWN OTHERWISE ON DRAWINGS:

CONCRETE CAST AGAINST EARTH.....3 IN.
CONCRETE EXPOSED TO EARTH OR WEATHER:

#6 AND LARGER .....2 IN.
#5 AND SMALLER & WWF .....1 1/2 IN.

CONCRETE NOT EXPOSED TO EARTH OR WEATHER OR NOT CAST AGAINST THE GROUND:

SLAB AND WALL .....3/4 IN.
BEAMS AND COLUMNS .....1 1/2 IN.

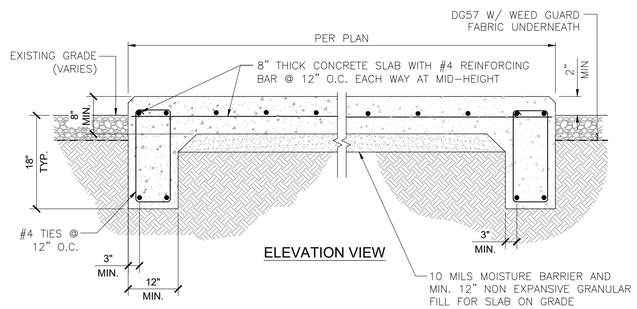
A CHAMFER 3/4" SHALL BE PROVIDED AT ALL EXPOSED EDGES OF CONCRETE, UNO, IN ACCORDANCE WITH ACI 301 SECTION 4.2.4.

INSTALLATION OF CONCRETE EXPANSION/WEDGE ANCHOR SHALL BE PER MANUFACTURER'S WRITTEN RECOMMENDED PROCEDURE. THE ANCHOR BOLT, DOWEL OR ROD SHALL CONFORM TO MANUFACTURER'S RECOMMENDATION FOR EMBEDMENT DEPTH OR AS SHOWN ON THE DRAWINGS. NO REBAR SHALL BE CUT WITHOUT PRIOR ENGINEERING APPROVAL WHEN DRILLING HOLES IN CONCRETE. EXPANSION BOLTS SHALL BE PROVIDED BY RAMSET/REDHEAD OR APPROVED EQUAL, UNLESS NOTED OTHERWISE.

GRAVEL SHALL BE NATURAL OR CRUSHED STONE WITH 100% PASSING 1 INCH SIEVE.

DIMENSIONS SHOWN ARE EXACT MINIMUM PAD SIZES REQUIRED FOR EQUIPMENT LAYOUTS – CONTRACTOR MAY ROUND UP TO THE NEAREST FOOT (OR HALF FOOT) IF LEASE AREA AND SPACE PERMIT.

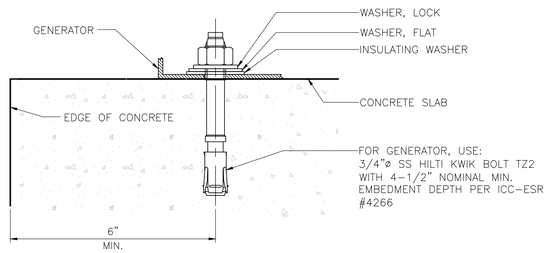
NOTE:
1. CONTRACTOR SHALL MEET ALL REQUIREMENTS SPECIFIED IN THE GEOTECHNICAL REPORT PREPARED BY OTHERS.



ELEVATION VIEW

CONCRETE SLAB DETAIL

SCALE: NONE | 4



NOTES:
1. MIN. (4) 3/4"ø HILTI KWIK BOLT TZ2 (OR EQUIVALENT) PER GENERATOR, UNO.

EQUIPMENT ANCHORAGE DETAIL

SCALE: NONE | 3

NOT USED

SCALE: NONE | 1

NOT USED

SCALE: NONE | 2

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ZONING DRAWINGS

SUBMITTALS

REV	DATE	DESCRIPTION
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F	01/7/26	ENGINEERING COMMENTS

PROJECT INFORMATION

CA-4009

49640 OATES LANE,
COACHELLA, CA 92236

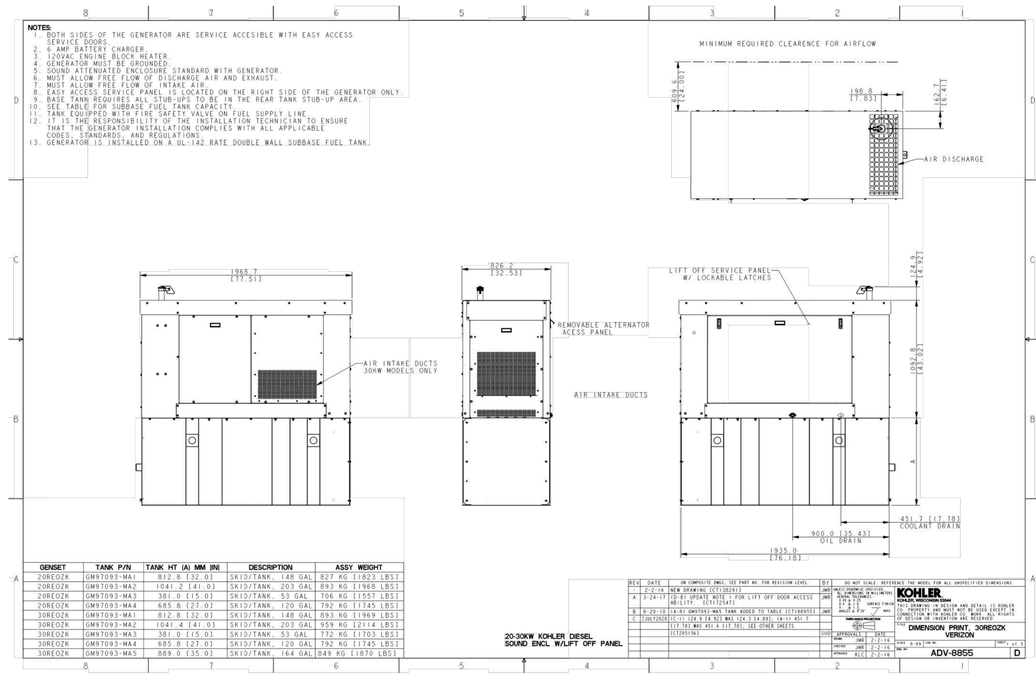
SHEET TITLE

EQUIPMENT DETAIL

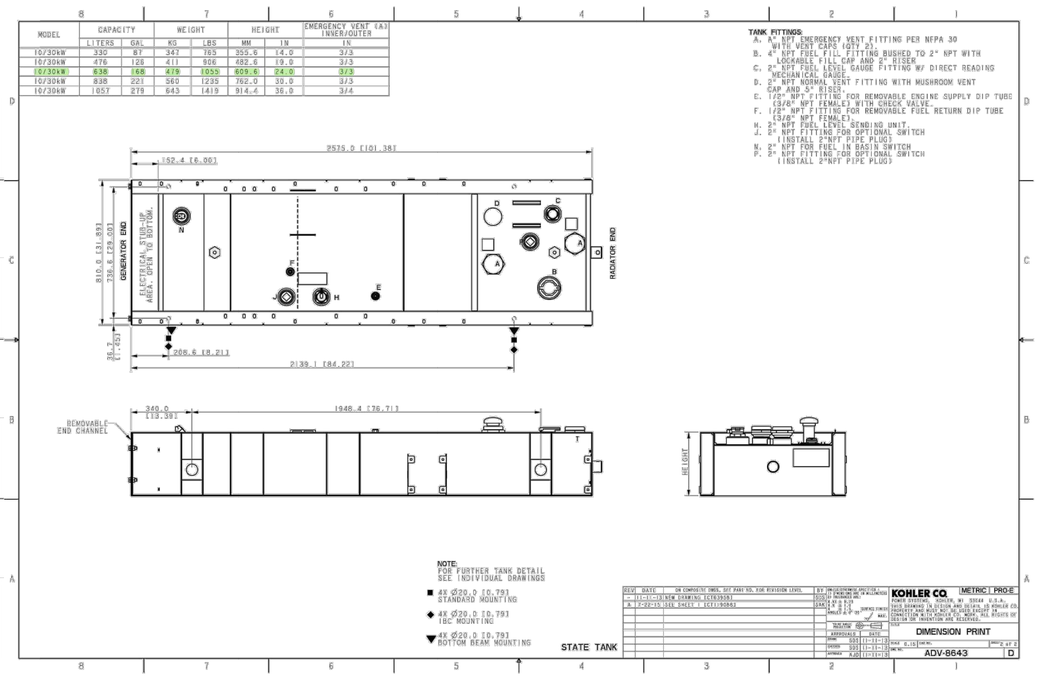
SHEET NUMBER

A-5

EUKON_AT&T_90CD_MONOPALM TEMPLATE_V2_11-18-22



GENSET	TANK P/N	TANK HT (A) MM [IN]	DESCRIPTION	ASSY WEIGHT
20REOZK	GM97093-MA1	812.8 [32.0]	SKID/TANK, 148 GAL	827 KG [1823 LBS]
20REOZK	GM97093-MA2	1041.2 [41.0]	SKID/TANK, 203 GAL	893 KG [1968 LBS]
20REOZK	GM97093-MA3	381.0 [15.0]	SKID/TANK, 53 GAL	706 KG [1557 LBS]
20REOZK	GM97093-MA4	685.8 [27.0]	SKID/TANK, 120 GAL	792 KG [1745 LBS]
30REOZK	GM97093-MA1	812.8 [32.0]	SKID/TANK, 148 GAL	893 KG [1969 LBS]
30REOZK	GM97093-MA2	1041.4 [41.0]	SKID/TANK, 203 GAL	959 KG [2114 LBS]
30REOZK	GM97093-MA3	381.0 [15.0]	SKID/TANK, 53 GAL	772 KG [1703 LBS]
30REOZK	GM97093-MA4	685.8 [27.0]	SKID/TANK, 120 GAL	792 KG [1745 LBS]
30REOZK	GM97093-MA5	889.0 [35.0]	SKID/TANK, 164 GAL	849 KG [1870 LBS]



MODEL	CAPACITY		WEIGHT		HEIGHT		EMERGENCY VENT (A) INNER/OUTER
	LITERS	GAL	KG	LBS	MM	IN	IN
10/30kW	330	87	347	765	355.6	14.0	3/3
10/30kW	476	126	411	906	482.6	19.0	3/3
10/30kW	638	168	478	1053	609.6	24.0	3/3
10/30kW	838	221	560	1235	762.0	30.0	3/3
10/30kW	1057	279	643	1419	914.4	36.0	3/4

TANK FITTINGS:
A. 4" NPT EMERGENCY VENT FITTING PER NFPA 30 WITH VENT CAPS (QTY 2).
B. 4" NPT FUEL FILL FITTING BUSHED TO 2" NPT WITH LOCKABLE FILL CAP AND 2" RISER.
C. 2" NPT FUEL LEVEL GAUGE FITTING W/ DIRECT READING MECHANICAL GAUGE.
D. 2" NPT NORMAL VENT FITTING WITH MUSHROOM VENT CAP AND 2" RISER.
E. 1/2" NPT FITTING FOR REMOVABLE ENGINE SUPPLY DIP TUBE (3/8" NPT FEMALE) WITH CHECK VALVE.
F. 1/2" NPT FITTING FOR REMOVABLE FUEL RETURN DIP TUBE (3/8" NPT FEMALE).
H. 2" NPT FUEL LEVEL SENDING UNIT
J. 2" NPT FITTING FOR OPTIONAL SWITCH (INSTALL 2"NPT PIPE PLUG)
N. 2" NPT FOR FUEL IN BASIN SWITCH
P. 2" NPT FITTING FOR OPTIONAL SWITCH (INSTALL 2"NPT PIPE PLUG)

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FG	GD	RB

ZONING DRAWINGS

SUBMITTALS

REV	DATE	DESCRIPTION
A	07/01/25	90% ZONING DRAWINGS
B	08/28/25	RFDS UPDATE
C	10/13/25	JX COMMENTS
D	12/08/25	PLANING COMMENTS
E	01/15/26	FIRE COMMENTS
F	01/7/26	ENGINEERING COMMENTS

PROJECT INFORMATION

CA-4009

49640 OATES LANE,
COACHELLA, CA 92236

SHEET TITLE

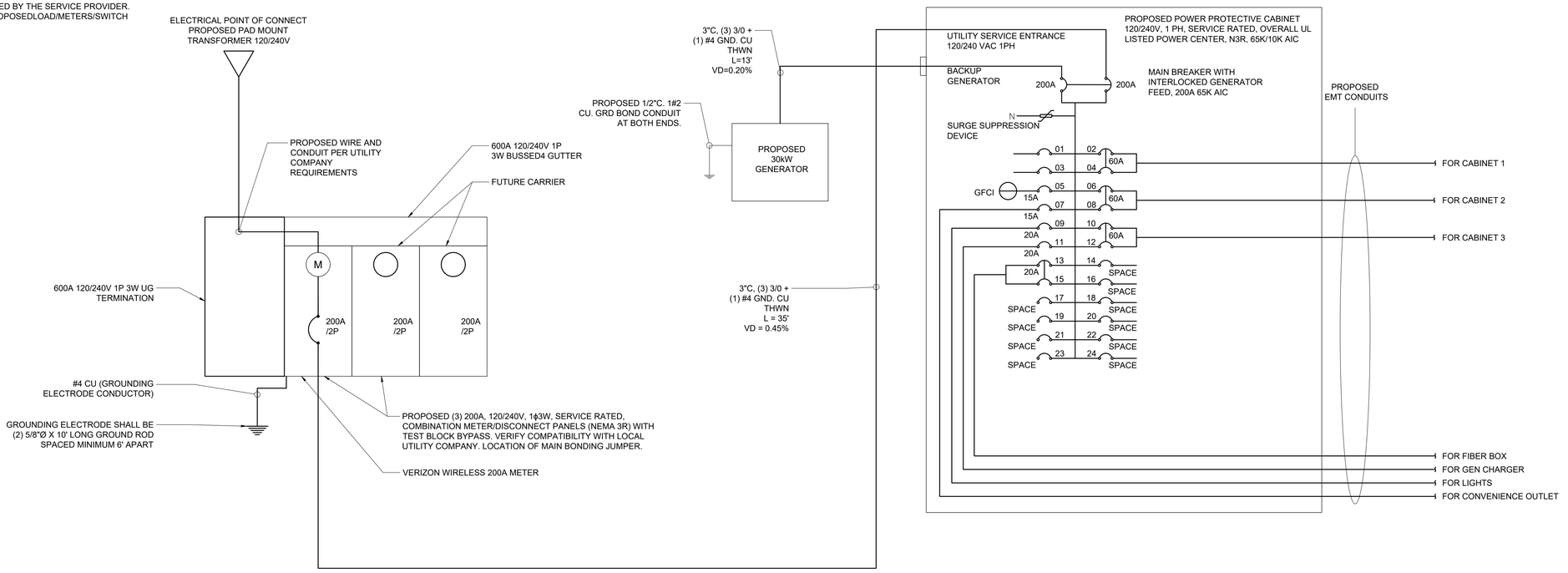
GENERATOR SPECIFICATIONS

SHEET NUMBER

GEN-1

EUKON_AT&T_90CD_MONOPALM TEMPLATE_V2_11-18-22

NOTES:
1. FOR WIRING FROM LOAD CENTER TO EQUIPMENT REFER TO DRAWINGS PROVIDED BY MANUFACTURER.
2. FOR COMPLETE INTERNAL WIRING AND ARRANGEMENT REFER TO DRAWINGS PROVIDED BY MANUFACTURER.
3. AIC RATING FOR NEW METER AND/OR PANEL BOARDS MUST MATCH OR EXCEED THE RATINGS AS DETERMINED BELOW:
- AIC RATING AS REQUIRED BY THE SERVICE PROVIDER.
- AIC RATINGS AS OF PROPOSEDLOAD/METERS/SWITCH GEAR EQUIPMENT.



ELECTRICAL SINGLE DIAGRAM

SCALE NONE 2

PANEL PPC

MOUNTING SURFACE — DOUBLE LUG — NO — VOLTS 120|240 — PHASE 1 — WIRE 3 — MAIN 200A/2P — BUS 200A — A.I.C. 65K SERIES W/ MAIN

WIRE SIZE	LOCATION	A	B	LCL	CONV	KIT	RECP	MISC	BKR	CIRC	A/B	CIRC	BKR	MISC	RECP	KIT	CONV	LCL	A	B	LOCATION	WIRE SIZE
10	SURGE SUPPRESSOR	-----						1	30/2	1	A	2	40/2	1					2880		RECTIFIER	8
10	-----		-----					1	-	3	B	4	-	1						2880	-----	8
12	GFI RECEPTACLE	360					1		15/1	5	A	6	40/2	1					2880		RECTIFIER	8
12	GFI RECEPTACLE		360				1		15/1	7	B	8	-	1						2880	-----	8
12	EXTERIOR LIGHT	500		1					20/1	9	A	10	40/2	1					2880		RECTIFIER	8
	SPACE									11	B	12	-	1						2880	-----	8
	SPACE									13	A	14	40/2	1					2880		RECTIFIER	8
	SPACE									15	B	16	-	1						2880	-----	8
	SPACE									17	A	18	40/2	1					2880		RECTIFIER	8
	SPACE									19	B	20	-	1						2880	-----	8
	SPACE									21	A	22	40/2	1					2880		RECTIFIER	8
	SPACE									23	B	24	-	1						2880	-----	8

A= 18140 B= 17640
W/LCL A= 18265 W/LCL B= 17640
TOTAL VA= 35780 W/LCL= 35905 W/LCL AMPS= **150** TOTAL LCL= 500 X .25 = 125
HIGH PHASE VA= 18140 W/LCL= 18265 HIGH PH AMPS= **152** HIGH PHASE LCL= 500 X .25 = 125
TOTAL kVA= 35.78 W/LCL= 35.91

FUTURE CARRIER(S) PANEL SCHEDULE

SCALE NONE 3

PANEL PPC

MOUNTING SURFACE — DOUBLE LUG — NO — VOLTS 120|240 — PHASE 1 — WIRE 3 — MAIN 200A/2P — BUS 200A — A.I.C. 65K SERIES W/ MAIN

WIRE SIZE	LOCATION	A	B	LCL	CONV	KIT	RECP	MISC	BKR	CIRC	A/B	CIRC	BKR	MISC	RECP	KIT	CONV	LCL	A	B	LOCATION	WIRE SIZE
10	SURGE SUPPRESSOR	-----						1	30/2	1	A	2	60/2	1					4320		DELTA ECA CABINET	1
10	-----		-----					1	-	3	B	4	-	1						4320	-----	1
12	GFI RECEPTACLE	360					1		15/1	5	A	6	60/2	1					4320		DELTA ECA CABINET	1
12	GFI RECEPTACLE		360				1		15/1	7	B	8	-	1						4320	-----	1
12	EXTERIOR LIGHT	500		1					20/1	9	A	10	60/2	1					4320		DELTA ECB CABINET	1
14	CHARGER (GEN)		500					1	20/1	11	B	12	-	1						4320	-----	1
10	FIBER BOX	750						1	20/2	13	A	14									SPACE	
10	-----		750					1	-	15	B	16									SPACE	
	SPACE								-	17	A	18									SPACE	
	SPACE								-	19	B	20									SPACE	
	SPACE								-	21	A	22									SPACE	
	SPACE								-	23	B	24									SPACE	

A= 14570 B= 14570
W/LCL A= 14695 W/LCL B= 14570
TOTAL VA= 29140 W/LCL= 29265 W/LCL AMPS= **122** TOTAL LCL= 500 X .25 = 125
HIGH PHASE VA= 14570 W/LCL= 14695 HIGH PH AMPS= **122** HIGH PHASE LCL= 500 X .25 = 125
TOTAL kVA= 29.14 W/LCL= 29.27

VERIZON PANEL SCHEDULE

SCALE NONE 1

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FG	GD	RB

ZONING DRAWINGS

SUBMITTALS

REV	DATE	DESCRIPTION
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PROJECT INFORMATION

CA-4009

49640 OATES LANE,
COACHELLA, CA 92236

SHEET TITLE

SINGLE-LINE DIAGRAM/AC PANEL SCHEDULE

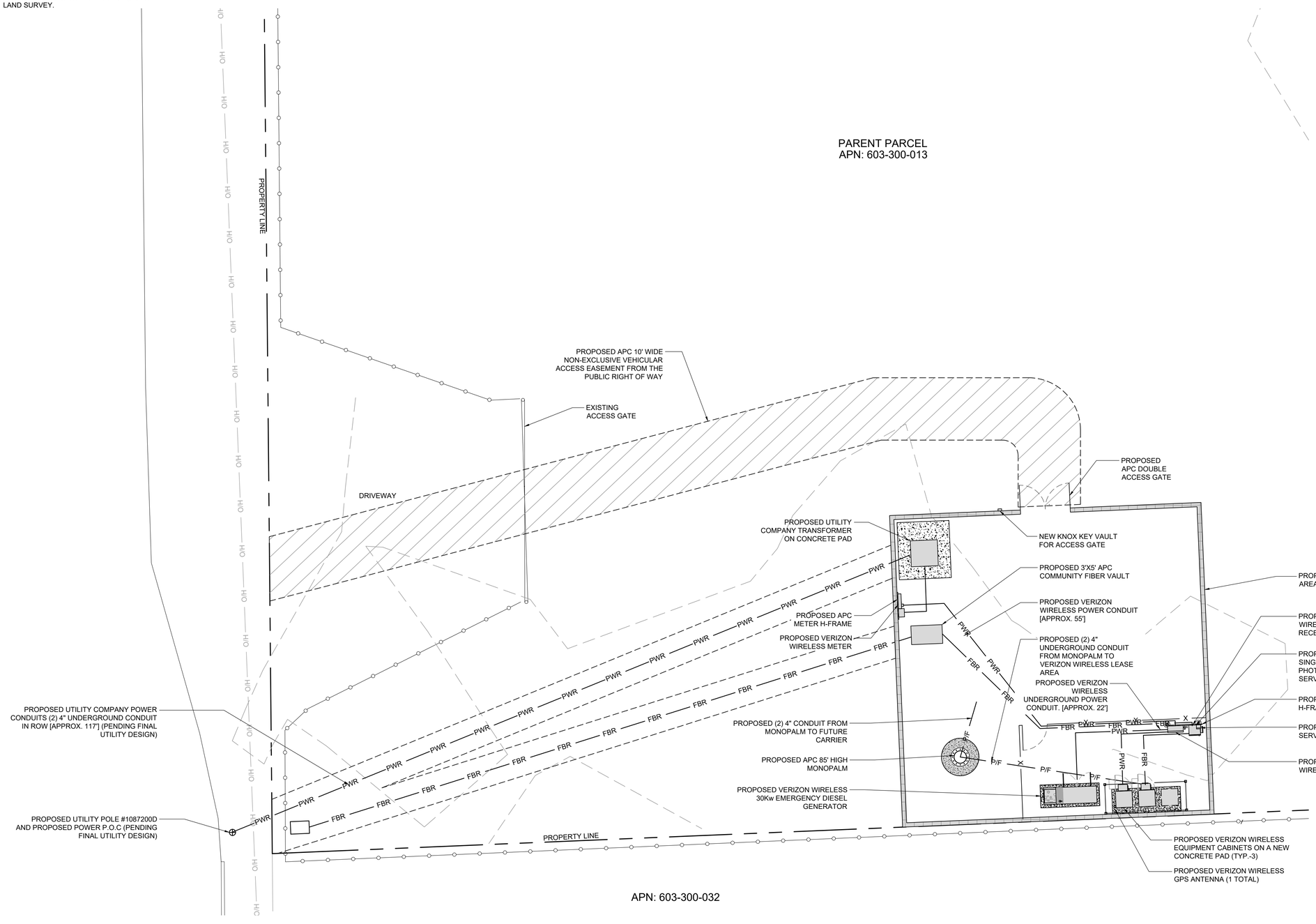
SHEET NUMBER

E-1

EUKON_AT&T_90CD_MONOPALM TEMPLATE_V2_11-18-22

NOTES:

1. IF DIMENSIONS SHOWN ON PLAN DO NOT SCALE CORRECTLY, CHECK FOR REDUCTION OR ENLARGEMENT FROM ORIGINAL PLANS.
2. CONTRACTOR SHALL FIELD VERIFY ALL DIMENSIONS.
3. UTILITY DESIGNS AND ROUTES ARE PRELIMINARY PENDING FINAL DESIGN BY UTILITY PROVIDER.
4. THIS SITE PLAN IS NOT INTENDED TO BE A LAND SURVEY.



ELECTRICAL SITE PLAN

SCALE 1/8"=1'-0"

8' 0 4' 8' 16' 32'

1

EUKON_AT&T_90CD_MONOPALM TEMPLATE_V2_11-18-22

APC Towers
8601 SIX FORKS ROAD, SUITE 250
RALEIGH, NC 27615
WWW.APCTOWERS.COM

Eukon
an SFC Communications, Inc. Company
65 POST, SUITE 1000
IRVINE, CA 92618
TEL: (949) 553-8566
www.eukongroup.com

NOT FOR CONSTRUCTION

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DRAWN BY:	UTILITIES CHECKED BY:	A&E CHECKED BY:
FG	GD	RB

ZONING DRAWINGS

SUBMITTALS

REV	DATE	DESCRIPTION
A	07/01/25	90% ZONING DRAWINGS
B	08/28/25	RFDS UPDATE
C	10/13/25	JX COMMENTS
D	12/08/25	PLANING COMMENTS
E	01/15/26	FIRE COMMENTS
F	01/7/26	ENGINEERING COMMENTS

PROJECT INFORMATION

CA-4009

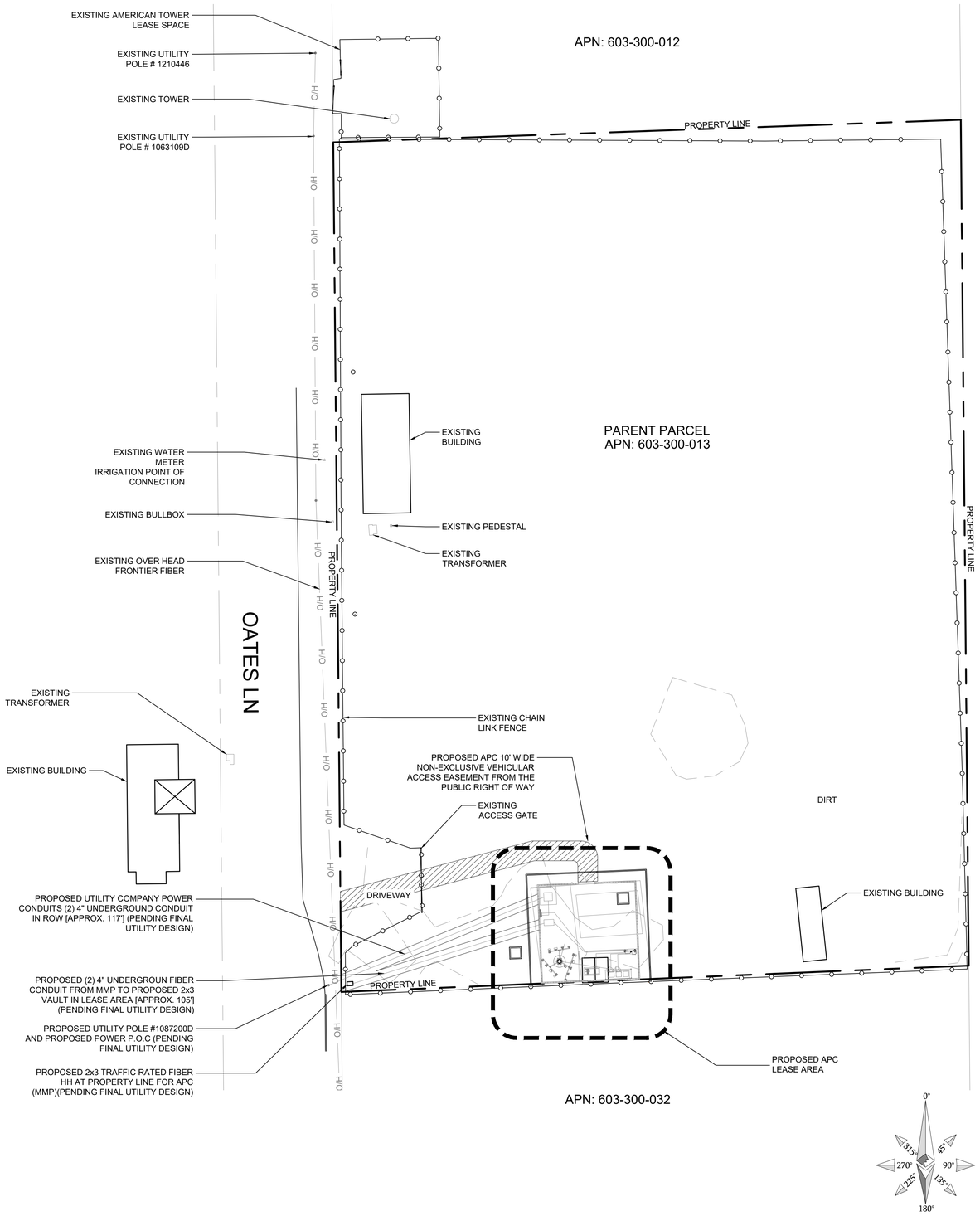
49640 OATES LANE,
COACHELLA, CA 92236

SHEET TITLE

ELECTRICAL SITE PLAN

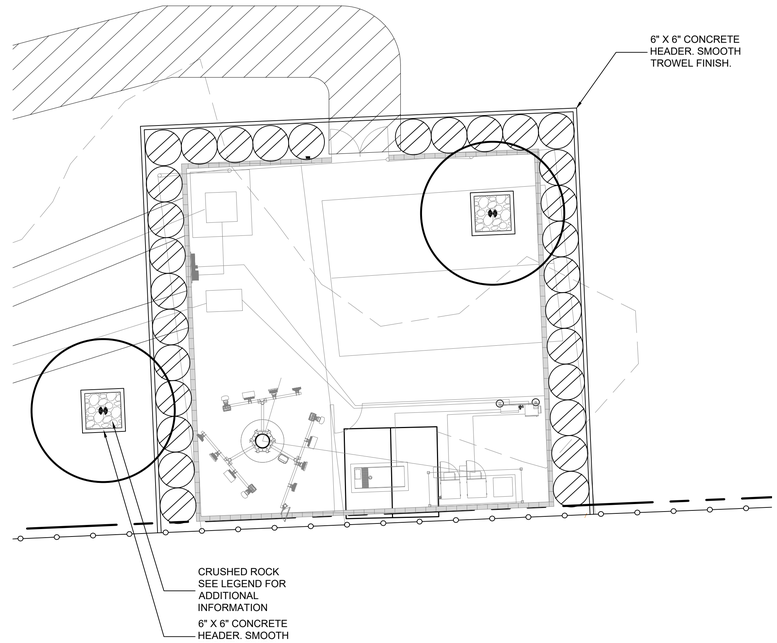
SHEET NUMBER

E-2



OVERALL SITE PLAN

SCALE 1"=30'-0" | 30' 0 15' 30' 60' 120' | 1

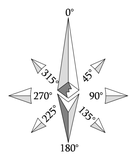


PLANT LEGEND

SYM	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	REMARKS	WATER USE
						REGION 6
	TREES					
•	PHOENIX DACTYLIFERA	DATE PALM	25' B.T.H.	2	BROWN TRUNK HEIGHT	MOD
	SHRUBS/GROUNDCOVERS					
	LEUCOPHYLLUM LANGMANIAE LYNN'S LEGACY'	CANYON RAIN SAGE	5 GAL.	30	5'–0" O.C.	LOW
	CRUSHED ROCK	PEWTER GREY	1"–3" DIA.	50 S.F.	MIN. 3" LAYER	

PLANTING NOTE

1. CRUSHED ROCK SHALL BE PLACED AS SHOWN PER THE PLAN.
2. ALL PLANTING AREAS TO RECEIVE LOW VOLUME HIGH EFFICIENCY SPRAY HEADS, BUBBLERS, OR DRIP EMITTERS AND SHALL FOLLOW CITY AND LOCAL AGENCY GUIDELINES. CALCULATIONS FOR WATER EFFICIENCY SHALL BE INCORPORATED INTO CONSTRUCTION DOCUMENT PHASE.



PRELIMINARY LANDSCAPE PLAN

SCALE 1"=10'-0" | 10' 0 5' 10' 20' 40' | 2

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TEL: (949) 553-8566
www.eukongroup.com

LICENSED LANDSCAPE ARCHITECT
Robert John Cunningham No. 5854
Signature 8/31/2026
Renewal Date
3/11/2026
Date
STATE OF CALIFORNIA

RJCLA
LANDSCAPE ARCHITECTURE
Landscape Architects
11 Villanoura
Laguna Niguel, CA 92677
(949) 201-8074
rjcla19690@gmail.net

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF THE LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT.

DRAWN BY:	CHECKED BY:
mdm	RJC

ZONING DRAWINGS

SUBMITTALS

REV	DATE	DESCRIPTION
A	12/21/25	90% ZONING DRAWINGS
B	2/6/26	100% ZONING DRAWINGS
C	3/11/26	100% ZONING REVISED

PROJECT INFORMATION

CA-4009

49640 OATES LANE,
COACHELLA, CA 92236

SHEET TITLE

PRELIMINARY LANDSCAPE PLAN

SHEET NUMBER

L-1

EUKON_AT&T_90CD_MONOPOLE TEMPLATE_V2_11-18-22

PROPERTY INFORMATION

- **PROPERTY ADDRESS 49640 OATES LANE, COACHELLA, CA 92236**
- **PROPERTY OWNER JULIA MOLINAR**
- **ASSESSORS ID NUMBER(S) 603-300-013**

BASIS OF BEARING INFORMATION

BEARING SHOWN HEREON ARE BASED UPON THE CALIFORNIA ZONE SIX STATE PLANE COORDINATE SYSTEM BASED ON THE NORTH AMERICAN DATUM OF 1983 (2011) (EPOCH 2019.25). DETERMINED BY GLOBAL POSITIONING SYSTEM EQUIPMENT ON THE SMARTNET REFERENCE NETWORK.

BENCHMARK INFORMATION

PROJECT ELEVATIONS ESTABLISHED FROM GPS DERIVED ORTHOMETRIC HEIGHTS BY APPLICATION OF NGS 'GEOID 18' MODELED SEPARATIONS TO ELLIPSOID HEIGHTS DETERMINED BY OBSERVATIONS OF THE 'SMARTNET' REAL TIME NETWORK. ALL ELEVATIONS SHOWN HEREON ARE REFERENCED TO NAVD88.

CIVIL ENGINEER INFORMATION

COMPANY	WINATA ENGINEERING, INC.
CONTACT	ERIK WINATA, P.E.
ADDRESS	P.O. BOX 52692 IRVINE, CA 92619-2692
PHONE	(626) 890-9649
EMAIL	ERIKWINATA@WINATAINC.COM

GEOTECHNICAL ENGINEER INFORMATION

COMPANY

CONTACT

ADDRESS

PHONE

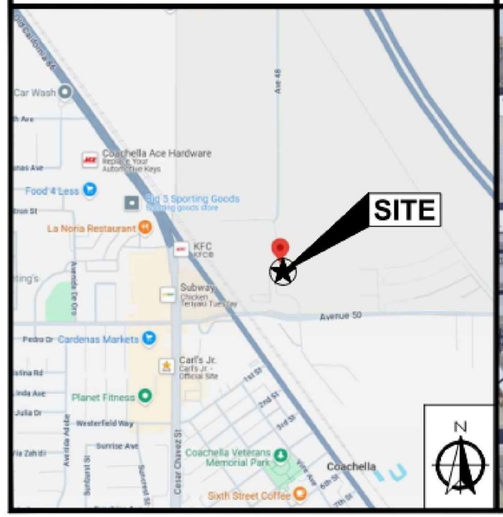
SOILS REPORT REFERENCE

NOTE:

EARTHWORK NUMBERS ARE SHOWN FOR REFERENCE ONLY. CONTRACTOR IS RESPONSIBLE FOR VERIFYING THE EARTHWORK NUMBERS.

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VICINITY MAP



AERIAL VIEW



APPLICANT:

APC Towers

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RALEIGH, NC 27615
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ENGINEER:

Eukon
www.eukongroup.com

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IRVINE, CA 92618
TEL: (949) 553-8566

DRAWN BY:	EW
CHECKED BY:	EW

REVISIONS:

REV	DATE	DESCRIPTION
A	01/26/26	ISSUED FOR PERMITS

LICENSER:

REGISTERED PROFESSIONAL ENGINEER
ERIK WINATA
C 67285
Exp. 09/30/28
STATE OF CALIFORNIA
01/26/26

CIVIL ENGINEER

WINATA ENGINEERING, INC.
ERIK WINATA, P.E., LEED AP
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(626) 890-9649
erikwinata@winatainc.com

PROJECT INFORMATION:

APC TOWERS
STARFRUIT

CA-4009

49640 OATES LANE
COACHELLA, CA 92236

SHEET TITLE:

PROJECT INFORMATION

SHEET NUMBER:

C-1

CITY OF COACHELLA GENERAL CONSTRUCTION NOTES

1. ALL DESIGN, MATERIALS, AND CONSTRUCTION WORK SHALL CONFORM TO THE CITY OF COACHELLA STANDARD SPECIFICATIONS AND PROCEDURES AND THE CITY OF COACHELLA STANDARD DRAWINGS AND TO THE REQUIREMENTS OF THE STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION (GREENBOOK), MOST CURRENT EDITIONS AND THESE APPROVED PLANS.
2. THE CONTRACTOR SHALL, AT NO EXPENSE TO THE CITY, PROVIDE ALL NECESSARY SAMPLES AND TESTS REQUIRED BY THE CITY TO ASSURE THAT THE QUALITY OF THE MATERIALS AND WORKMANSHIP ARE IN ACCORDANCE WITH THESE PLANS AND SAID SPECIFICATIONS.
3. THE CONTRACTOR SHALL BE RESPONSIBLE FOR ALL WORK AND SHALL MAINTAIN ALL FACILITIES COMPLETE AND UNCOMPLETED UNTIL ACCEPTED BY THE CITY.
4. IT SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR TO CLEAR THE RIGHT-OF-WAY IN ACCORDANCE WITH THE PROVISIONS OF LAW AS IT AFFECTS EACH UTIILTY INCLUDING IRRIGATION LINES AND APPURTENANCES AT NO COST TO THE CITY.
5. THE CONTRACTOR SHALL OBTAIN AND REVIEW ALL NECESSARY STANDARDS, PLANS, AND SPECIFICATIONS IN DETAIL PRIOR TO START OF CONSTRUCTION. ALL DOCUMENTS, INCLUDING APPROVED PLANS AND REFERENCED STANDARDS SHALL BE ON-SITE AT ALL TIMES. CONFLICTS SHALL BE BROUGHT TO THE ATTENTION OF THE CITY INSPECTOR PRIOR TO WORK IN THAT AREA.
6. ALL ELEVATIONS SHOWN TO BE EXISTING FROM RECENT SURVEY OF THE ENGINEER AND SHALL BE VERIFIED BY THE CONTRACTOR PRIOR TO CONSTRUCTION.
7. PRIOR TO BEGINNING ANY WORK, CONTRACTOR SHALL SECURE A CITY OF COACHELLA PERMIT FOR CONSTRUCTION. THE CONTRACTOR SHALL NOTIFY THE CITY OF COACHELLA (760) 398-5744, 72 HOURS PRIOR TO STARTING ANY WORK. A PRE-CONSTRUCTION MEETING SHALL BE SET UP WITH THE CITY OF COACHELLA ENGINEERING DEPARTMENT AND ALL AFFECTED UTILITY COMPANIES SHALL BE PRESENT.
8. CONTRACTOR SHALL CALL U.S.A., UNDERGROUND SERVICE ALERT, AT 1-800-227-2600 AND SHALL VERIFY LOCATION OF ALL EXISTING UTILITIES 24 HOURS IN ADVANCE OF THE COMMENCMENT OF CONSTRUCTION.
9. OSHA SAFETY ORDERS AND OSHA CONFINED SPACE ENTRY REQUIREMENTS SHALL BE FOLLOWED AT ALL TIMES WITHOUT EXCEPTION.
10. THE CONTRACTOR SHALL GUARANTEE ALL WORK FOR A PERIOD OF ONE YEAR AFTER THE DATE OF FINAL ACCEPTANCE BY CITY OF COACHELLA IN ACCORDANCE WITH THE CITY OF COACHELLA STANDARD SPECIFICATIONS.
11. QUANTITIES SHOWN HEREON ARE FOR ESTIMATE PURPOSES ONLY. NEITHER THE DESIGN ENGINEER NOR THE CITY OF COACHELLA GUARANTEE THE ACCURACY OR COMPLETENESS OF THE CONSTRUCTION QUANTITIES.
12. CONTRACTOR SHALL CONFORM TO LABOR CODE SECTION 6705 BY SUBMITTING A DETAIL PLAN TO THE CITY ENGINEER SHOWING THE DESIGN OF SHORING, BRACING, SLOPING, OR OTHER PROVISIONS TO BE MADE FOR PROTECTION OF WORKERS FROM THE HAZARD OF CAVING GROUND DURING TRENCH EXCAVATION AND PIPE INSTALLATION THEREIN. THIS PLAN MUST BE PREPARED FOR ALL TRENCHES FIVE FEET OR MORE IN DEPTH. IF THE PLAN VARIES FROM THE SHORING SYSTEM STANDARDS ESTABLISHED BY THE CONSTRUCTION SAFETY ORDERS, TITLE 8, CALIFORNIA ADMINISTRATIVE CODE, THE PLAN SHALL BE PREPARED BY A REGISTERED ENGINEER. A COPY OF THE OSHA EXCAVATION PERMIT MUST BE SUBMITTED TO THE CITY OF COACHELLA INSPECTOR PRIOR TO EXCAVATION.
13. THE EXISTENCE AND LOCATION OF UNDERGROUND UTILITIES SHOWN ON THESE PLANS WAS OBTAINED BY AVAILABLE RECORDS SEARCH BY THE DESIGN ENGINEER. TO THE BEST OF THE DEISGN ENGINEER'S KNOWLEDGE, THERE ARE NO EXISTING UTILITIES EXCEPT THOSE SHOWN ON THESE PLANS. ATTENTION IS CALLED TO THE POSSIBLE EXISTENCE OF OTHER UTILITIES OR STRUCTURES NOT SHOWN, OR IN A DIFFERENT LOCATION FROM THAT SHOWN ON THE PLANS. THE CONTRACTOR SHALL TAKE DUE PRECAUTIONARY MEASURES TO PROTECT THE UTILITIES SHOWN ON THE PLANS AND OTHER EXISTING FACILITIES OR STRUCTURES NOT SHOWN.
14. APPROVAL OF THIS PLAN BY THE CITY OF COACHELLA DOES NOT CONSTITUTE A REPRESENTATION OF THE ACCURACY OF THE LOCATION OF, OR THE EXISTENCE OR NON-EXISTENCE OF, ANY UNDERGROUND UTILITY, PIPE, OR STRUCTURE WITHIN THE LIMITS OF THIS PROJECT.
15. CONTRACTOR IS RESPONSIBLE FOR COMPLYING WITH ALL LOCAL, STATE, AND FEDERAL SAFETY REGULATIONS INCLUDING, BUT NOT LIMITED TO, TRENCH SAFETY AND CONFINED SPACE ENTRY.
16. SOILS REPORTS SHALL BE SUBMITTED TO THE CITY OF COACHELLA BY A QUALIFIED SOILS ENGINEER WHICH CERTIFIES THAT TRENCH BACKFILL WAS COMPACTED AS DIRECTED BY THE SOILS ENGINEER IN ACCORDANCE WITH ON SITE EARTHWORK SPECIFICATIONS AND THE CITY OF COACHELLA STANDARD SPECIFICATIONS.
17. ALL REVISIONS TO DRAWINGS SHALL BE APPROVED BY THE CITY ENGINEER IN WRITING PRIOR TO CONSTRUCTION.
18. CONTRACTOR IS RESPONSIBLE FOR KEEPING COMPLETE RECORD OF CHANGES AND SHALL MAKE SUCH RECORD AVAILABLE TO THE DESIGN ENGINEER. THE PRIVATE ENGINEER SHALL PROVIDE AS-BUILT DRAWINGS TO THE CITY OF COACHELLA FOR REVIEW AND APPROVAL PRIOR TO FINAL ACCEPTANCE OF THE PROJECT.
19. THE CONTRACTOR SHALL PROTECT ALL SURVEY MONUMENTATION. IF ANY SURVEY MONUMENTS ARE DISTURBED OR DESTROYED, THE CONTRACTOR SHALL RETAIN A LICENSED SURVEYOR TO RE-ESTABLISH AND RECORD THE MONUMENT CHANGE PER STATE LAW.
20. CONTRACTOR SHALL NOT INTERRUPT OR DISTURB ANY UTILITY FACILITY WITHOUT AUTHORITY FROM THE UTILITY COMPANIES. WHERE PROTECTION IS REQUIRED TO ENSURE INTEGRITY OF UTILITY FACILITIES (INCLUDING CITY-OWNED UTILITIES). CONTRACTOR SHALL FURNISH AND PLACE ALL NECESSARY PROTECTION.

CITY OF COACHELLA GENERAL NOTES FOR GRADING PLANS

1. ALL CONSTRUCTION ON-SITE SHALL CONFORM TO THE REQUIREMENTS OF THE CITY OF COACHELLA, TITLE 24 OF THE CALIFORNIA ADMINISTRATIVE CODE, CHAPTER 2 AND THE CALIFORNIA BUILDING CODE.
2. ALL GRADING SHALL BE DONE IN CONFORMANCE WITH THE CALIFORNIA BUILDING CODE, APPENDIX CHAPTER 33, REGULATING THE EXCAVATION AND GRADING OF LAND AND AMENDMENTS THERETO, THE REQUIREMENTS OF THE CITY OF COACHELLA AND THE RECOMMENDATIONS OF THE SOILS REPORT, PREPARED BY _____, DATED _____.
3. CARE SHALL BE TAKEN TO PROTECT ALL CONSTRUCTION STAKES. RESURVEY RESULTING FROM CARELESS OPERATION SHALL BE BACK-CHARGED TO THE CONTRACTOR.
4. NO GRADING WORK SHALL BE ACCOMPLISHED WITHOUT A CITY PERMIT.
5. THE ENGINEERING DEPARTMENT SHALL BE NOTIFIED 48 HOURS IN ADVANCE OF ANY GRADING OPERATION, TO SCHEDULE A PRE-GRADING MEETING AT THE SITE. THE DEVELOPER/OWNER, GRADING CONTRACTOR, DESIGN CIVIL ENGINEER, SOILS ENGINEER, CITY ENGINEER AND THE CITY INSPECTOR SHALL BE PRESENT AT THIS MEETING.
6. THE PERMITTEE OR HIS AGENT SHALL NOTIFY THE ENGINEERING DEPARTMENT WHEN GRADING IS READY FOR EACH OF THE FOLLOWING INSPECTIONS:
   A. INITIAL INSPECTION. WHEN THE PERMITTEE IS READY TO BEGIN WORK, BUT NOT LESS THAN TWO (2) DAYS BEFORE ANY GRADING OR CLEARING/SHRUBING IS STARTED.
   B. ROUGH GRADING. WHEN ALL ROUGH GRADING HAS BEEN COMPLETED. THIS INSPECTION MAY BE CALLED FOR AT THE COMPLETION OF ROUGH GRADING.
   C. FINAL INSPECTION. WHEN ALL WORK, INCLUDING INSTALLATION OF PROTECTIVE DEVICES HAS BEEN COMPLETED AND THE AS-GRADED PLAN, PROFESSIONAL CERTIFICATIONS, AND THE REQUIRED REPORTS HAVE BEEN SUBMITTED.
7. FILLS SHALL BE COMPLETED THROUGHOUT TO 90% RELATIVE COMPACTION AS DETERMINED BY ASTM STD NO. D-1557, LATEST EDITION, 5 LAYER METHOD AND CERTIFIED BY THE SOILS ENGINEER.
8. AREAS TO BE GRADED SHALL BE PROPERLY PREPARED IN ACCORDANCE WITH THE PRELIMINARY SOILS REPORT AND APPROVED BY THE CITY ENGINEER AND THE SOILS ENGINEER PRIOR TO PLACING OF FILL.
9. THE EXISTING IRRIGATION LINES AND CISTERNS SHALL BE REMOVED OR CRUSHED IN PLACE AND BACKFILLED, AND APPROVED BY THE CITY ENGINEER AND SOILS ENGINEER.
10. THE SOILS ENGINEER SHALL BE RESPONSIBLE FOR THE QUALITY OF THE WORK PERFORMED BY THE GRADING CONTRACTOR, AND EXERCISE SUFFICIENT SUPERVISORY CONTROL DURING GRADING TO INSURE COMPLIANCE WITH THE PLANS, SPECIFICATIONS, AND CODES WITHIN HIS PURVIEW.
11. THE DESIGN CIVIL ENGINEER SHALL EXERCISE SUFFICIENT SUPERVISORY CONTROL DURING GRADING AND CONSTRUCTION TO INSURE COMPLIANCE WITH THE PLANS, SPECIFICATIONS, AND THE CODES WITHIN HIS PURVIEW.
12. DUST SHALL BE CONTROLLED BY WATERING AND OTHER BEST MANAGEMENT PRACTICES PER APPROVED FUGITIVE DUST CONTROL PLAN (PM-10).
13. APPROVED PROTECTION MEASURES AND TEMPORARY DRAINAGE PROVISIONS MUST BE USED TO PROTECT ADJOINING PROPERTIES DURING GRADING OF PROJECT.
14. PRIOR TO FINAL APPROVAL, THE DESIGN CIVIL ENGINEER SHALL CERTIFY TO THE CITY ENGINEER THAT THE SITE HAS BEEN GRADED TO THE LINE AND GRADE SHOWN ON THE APPROVED GRADING PLANS.
15. THE DESIGN CIVIL ENGINEER SHALL CERTIFY THAT THE GRADES SHOWN ON THE PLANS MEET THE FEMA FLOOD INSURANCE RATE MAP REQUIREMENTS AND THE CITY OF COACHELLA FLOOD PROTECTION ORDINANCE.
16. THE CONTRACTOR SHALL NOT DISTURB EXISTING SURVEY MONUMENTS OR BENCHMARKS NOTED ON THE PLANS OR DISCOVERED IN THE FIELD. REMOVAL AND REPLACEMENT SHALL BE DONE BY A REGISTERED CIVIL ENGINEER OR LICENSED SURVEYOR ONLY.
17. THE LOCATION AND PROTECTION OF ALL UTILITIES IS THE RESPONSIBILITY OF THE PERMITTEE AND THE PERMITTEE SHALL NOTIFY ALL AFFECTED UTILITIES 18 HOURS IN ADVANCE OF ANY WORK.

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APPLICANT:

APC Towers

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WWW.APCTOWERS.COM

ENGINEER:

Eukon
www.eukongroup.com

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IRVINE, CA 92618
TEL: (949) 553-8566

DRAWN BY:	EW
CHECKED BY:	EW

REVISIONS:

REV	DATE	DESCRIPTION
A	01/26/26	ISSUED FOR PERMITS

LICENSER:

REGISTERED PROFESSIONAL ENGINEER — ERIK WINATA — C 67285 — Exp. 09/30/28 — STATE OF CALIFORNIA

01/26/26

CIVIL ENGINEER
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ERIK WINATA, P.E., LEED AP
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(626) 890-9649
erikwinata@winatainc.com

PROJECT INFORMATION:

APC TOWERS
STARFRUIT

CA-4009

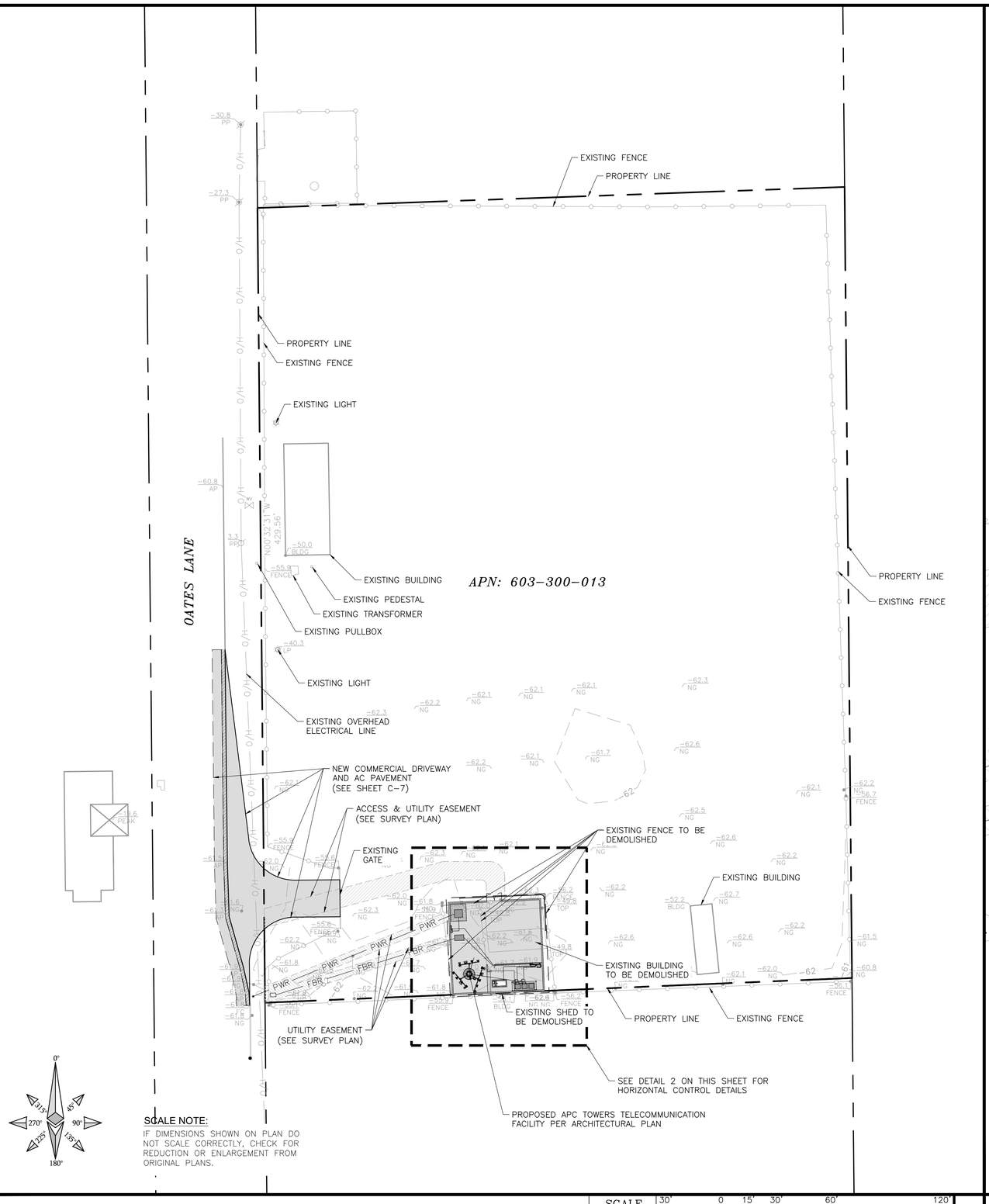
49640 OATES LANE
COACHELLA, CA 92236

SHEET TITLE:

GRADING NOTES

SHEET NUMBER:

C-2

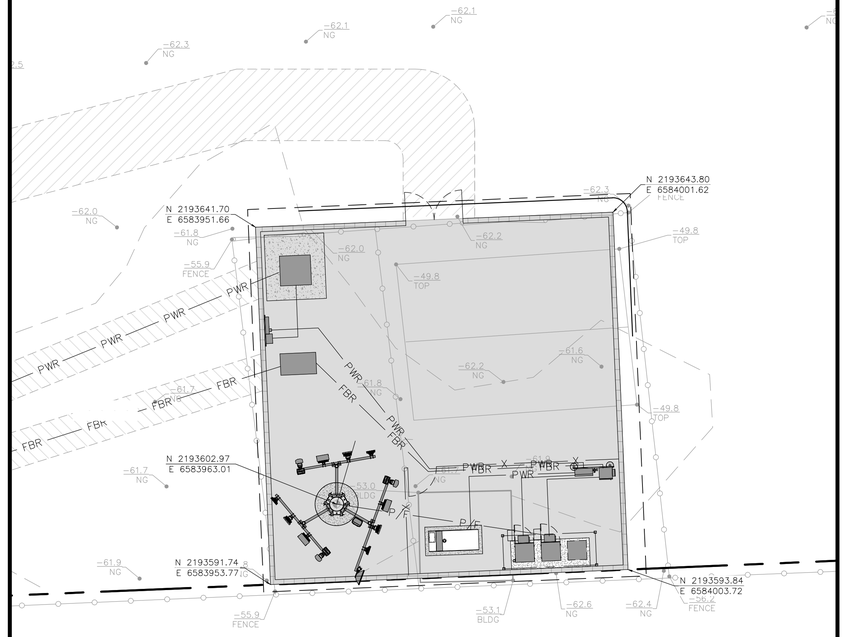


SCALE NOTE:
IF DIMENSIONS SHOWN ON PLAN DO NOT SCALE CORRECTLY, CHECK FOR REDUCTION OR ENLARGEMENT FROM ORIGINAL PLANS.

SITE PLAN

SCALE 1"=30'-0" (30' 0 15' 30' 60' 120')

1



SCALE NOTE:
IF DIMENSIONS SHOWN ON PLAN DO NOT SCALE CORRECTLY, CHECK FOR REDUCTION OR ENLARGEMENT FROM ORIGINAL PLANS.

SCALE 1"=10'-0" (10' 0 5' 10' 20' 40')

2

APPLICANT:

APC Towers

8601 SIX FORKS ROAD, SUITE 250
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WWW.APCTOWERS.COM

ENGINEER:

Eukon
www.eukongroup.com

65 POST, SUITE 1000
IRVINE, CA 92618
TEL: (949) 553-8566

DRAWN BY:	EW
CHECKED BY:	EW

REVISIONS:

REV	DATE	DESCRIPTION
A	01/26/26	ISSUED FOR PERMITS

LICENSER:

REGISTERED PROFESSIONAL ENGINEER
ERIK WINATA
C 67285
Exp. 09/30/28
STATE OF CALIFORNIA

01/26/26

CIVIL ENGINEER
WINATA ENGINEERING, INC.
ERIK WINATA, P.E., LEED AP
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IRVINE, CA 92619-2692
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erikwinata@winatainc.com

PROJECT INFORMATION:

APC TOWERS STARFRUIT

CA-4009

49640 OATES LANE
COACHELLA, CA 92236

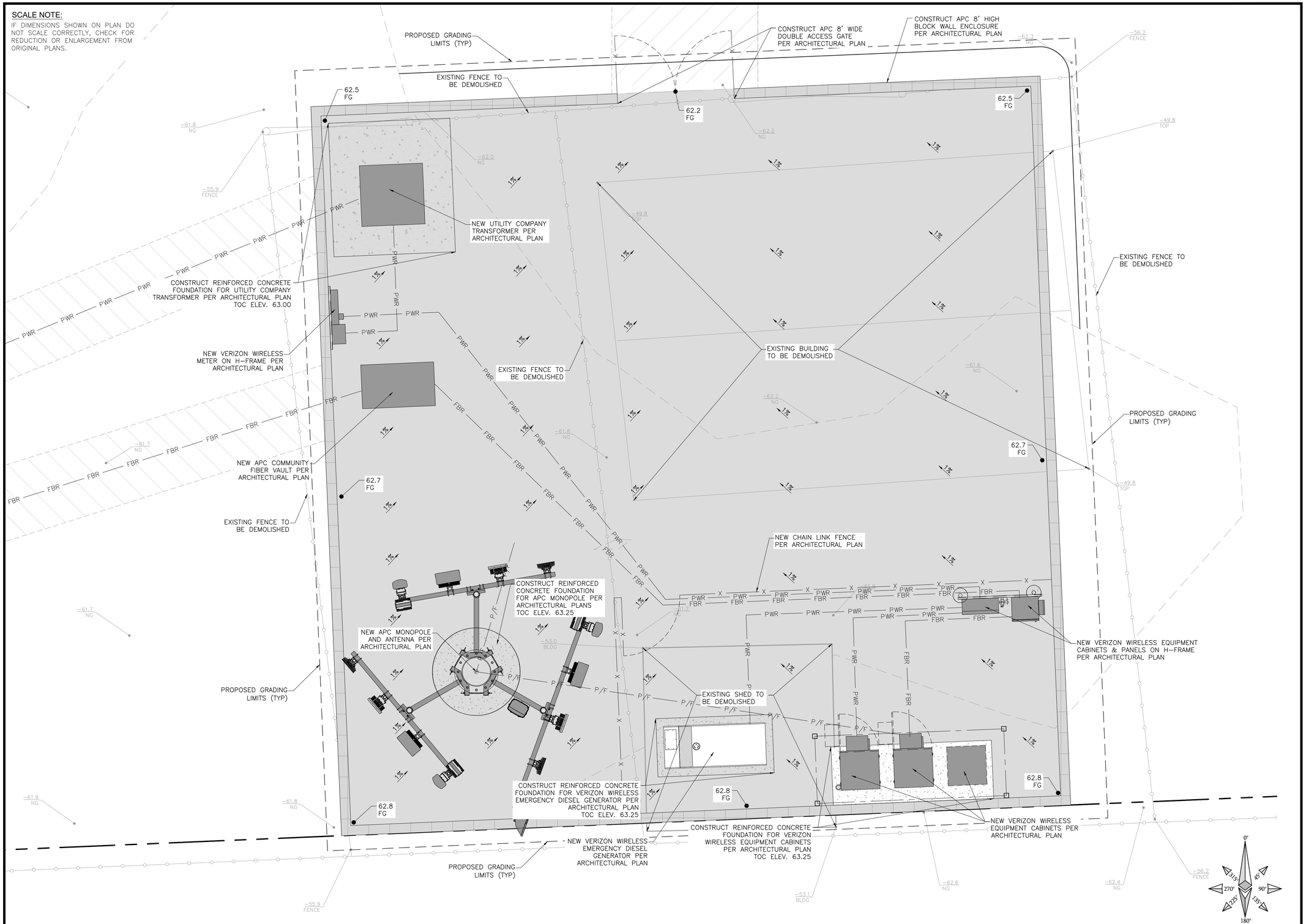
SHEET TITLE:

SITE PLAN & HORIZONTAL CONTROL PLAN

SHEET NUMBER:

C-3

SCALE NOTE:
IF DIMENSIONS SHOWN ON PLAN DO NOT SCALE CORRECTLY, CHECK FOR REDUCTION OR ENLARGEMENT FROM ORIGINAL PLANS.



GRADING & DRAINAGE PLAN

SCALE 1"=3'-0" (3' 0 1.5' 3 6' 12')

1

APPLICANT:

APC Towers

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RALEIGH, NC 27615
WWW.APCTOWERS.COM

ENGINEER:

Eukon
www.eukongroup.com

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TEL: (949) 553-8566

DRAWN BY:	EW
CHECKED BY:	EW

REVISIONS:

REV	DATE	DESCRIPTION
A	01/26/26	ISSUED FOR PERMITS

LICENSER:

REGISTERED PROFESSIONAL ENGINEER
ERIK WINATA
C 67285
Exp. 09/30/28
STATE OF CALIFORNIA

01/26/26

CIVIL ENGINEER

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erikwinata@winatainc.com

PROJECT INFORMATION:

APC TOWERS STARFRUIT

CA-4009

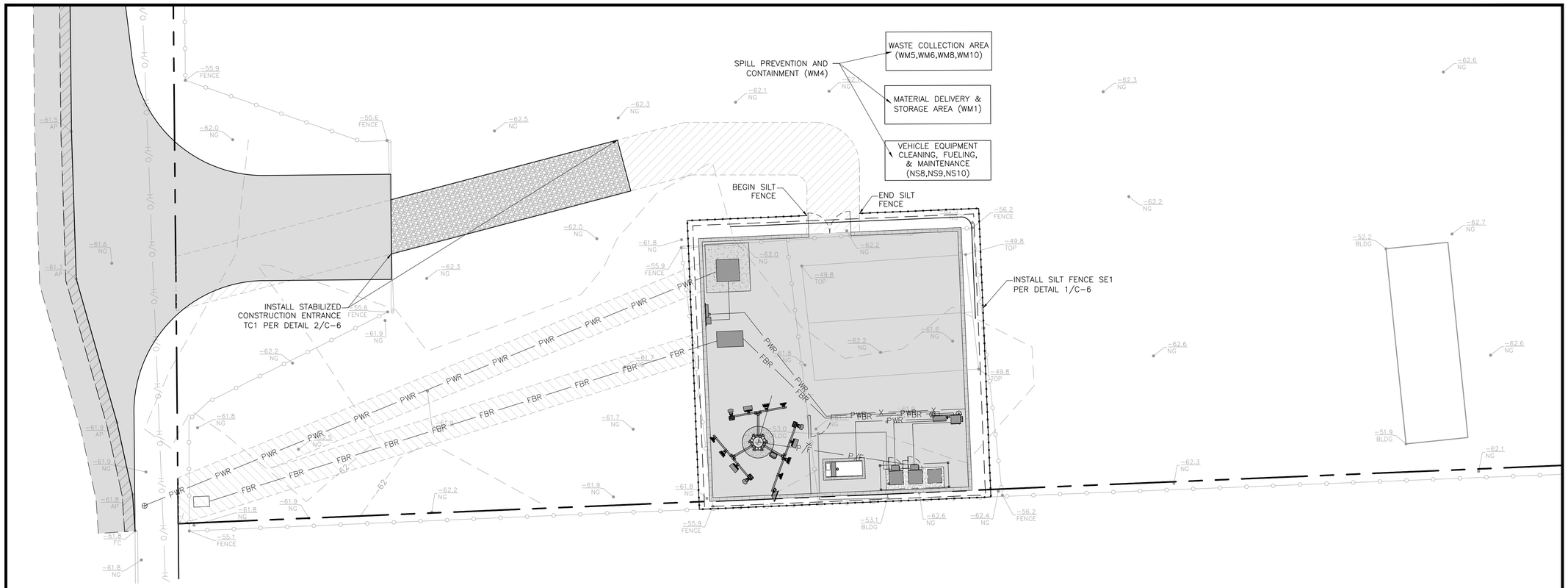
49640 OATES LANE
COACHELLA, CA 92236

SHEET TITLE:

GRADING & DRAINAGE PLAN

SHEET NUMBER:

C-4



EROSION CONTROL NOTES:

1. **IN CASE OF EMERGENCY, CALL _____ AT _____.**
2. **POLLUTION AND EROSION PREVENTION MEASURES, ALSO KNOWN AS BEST MANAGEMENT PRACTICES (BMPS), MUST BE INSTALLED PRIOR TO GRADING. THESE MEASURES, INCLUDING THE PREVENTION OF SEDIMENTATION OR FLOOD DAMAGE, TO OFFSITE PROPERTY SHALL BE ADEQUATE WHETHER OR NOT AN EROSION CONTROL PERMIT IS REQUIRED.**
3. **ERODED SEDIMENTS AND OTHER POLLUTANTS MUST BE RETAINED ONSITE AND MAY NOT BE TRANSPORTED FROM THE SITE VIA SHEET FLOW, SWALES, AREA DRAINS, NATURAL DRAINAGE COURSES, OR WIND.**
4. **EROSION CONTROL DEVICES SHALL BE FUNCTIONING AT ALL TIMES. IN CASE OF FAILURE, RAPID CONSTRUCTION OF EMERGENCY DEVICES SHALL BE IMPLEMENTED.**
5. **STOCKPILES OF EARTH AND OTHER CONSTRUCTION-RELATED MATERIALS MUST BE PROTECTED FROM BEING TRANSPORTED FROM THE SITE BY THE FORCES OF WIND OR WATER.**
6. **FUELS, OILS, SOLVENTS, AND OTHER TOXIC MATERIALS MUST BE STORED IN ACCORDANCE WITH THEIR LISTING AND ARE NOT TO CONTAMINATE THE SOILS AND SURFACE WATERS. ALL APPROVED STORAGE CONTAINERS ARE TO BE PROTECTED FROM THE WEATHER. SPILLS MUST BE CLEANED UP IMMEDIATELY AND DISPOSED OF IN A PROPER MANNER. SPILLS MAY NOT BE WASHED INTO THE DRAINAGE SYSTEM.**
7. **EXCESS OR WASTE CONCRETE MUST BE CONTAINED ONSITE. PROVISIONS SHALL BE MADE TO RETAIN CONCRETE WASTES ONSITE UNTIL THEY CAN BE DISPOSED OF AS SOLID WASTE.**
8. **DEVELOPERS/CONTRACTORS ARE RESPONSIBLE TO ENSURE ALL EROSION CONTROL DEVICES AND BMPS ARE INSTALLED AND FUNCTIONING PROPERLY PER PLAN. PROPER PRECAUTION SHALL BE CONSIDERED WHEN 50% OR GREATER PROBABILITY OF PREDICTED PRECIPITATION, AND AFTER ACTUAL PRECIPITATION. A CONSTRUCTION SITE INSPECTION CHECKLIST AND INSPECTION LOG SHALL BE MAINTAINED AT THE PROJECT SITE AT ALL TIMES AND AVAILABLE FOR REVIEW BY THE BUILDING OFFICIAL.**
9. **TRASH AND CONSTRUCTION-RELATED SOLID WASTES MUST BE DEPOSITED INTO A COVERED RECEPTACLE TO PREVENT CONTAMINATION OF RAINWATER AND DISPERSAL BY WIND.**
10. **SEDIMENTS AND OTHER MATERIALS MAY NOT BE TRACKED FROM THE SITE BY VEHICLE TRAFFIC. THE CONSTRUCTION ENTRANCE ROADWAYS MUST BE STABILIZED SO AS TO INHIBIT SEDIMENTS FROM BEING DEPOSITED INTO THE PUBLIC WAY. ACCIDENTAL DEPOSITIONS MUST BE SWEPT UP IMMEDIATELY AND MAY NOT BE WASHED DOWN BY RAIN OR OTHER MEANS.**
11. **ANY SLOPES WITH DISTURBED SOILS OR DENUDED OF VEGETATION MUST BE STABILIZED SO AS TO INHIBIT EROSION BY WIND AND WATER.**
12. **ALL SILT AND DEBRIS SHALL BE REMOVED FROM ALL DEVICES WITHIN 24 HOURS AFTER EACH RAINSTORM AND BE DISPOSED OF PROPERLY.**
13. **ALL STORM WATER CAPTURE DEVICES SHALL BE PROTECTED AT ALL TIMES.**
14. **EROSION AND SEDIMENT CONTROL PRACTICES SHOULD BE IN CONFORMANCE WITH THE "CALIFORNIA STORMWATER BEST MANAGEMENT PRACTICE HANDBOOK" (WWW.CASQA.ORG).**
15. **DUST SHALL BE CONTROLLED BY WATERING.**

THE FOLLOWING BMPS AS OUTLINED IN, BUT NOT LIMITED TO, THE LATEST EDITION OF THE CASQA CONSTRUCTION BMP ONLINE HANDBOOK OR CALTRANS STORMWATER QUALITY HANDBOOKS (CONSTRUCTION SITE BMP MANUAL), MAY APPLY DURING THE CONSTRUCTION OF THIS PROJECT (ADDITIONAL MEASURES MAY BE REQUIRED IF DEEMED APPROPRIATE BY THE PROJECT ENGINEER OR THE BUILDING OFFICIAL)

EROSION CONTROL

EC1 – SCHEDULING
EC2 – PRESERVATION OF EXISTING VEGETATION
EC3 – HYDRAULIC MULCH
EC4 – HYDROSEEDING
EC5 – SOIL BINDERS
EC6 – STRAW MULCH
EC7 – GEOTEXTILES & MATS
EC8 – WOOD MULCHING
EC9 – EARTH DIKES AND DRAINAGE SWALES
EC10 – VELOCITY DISSIPATION DEVICES
EC11 – SLOPE DRAINS
EC12 – STREAMBANK STABILIZATION
EC13 – RESERVED
EC14 – COMPOST BLANKETS
EC15 – SOIL PREPARATION\ROUGHENING
EC16 – NON-VEGETATED STABILIZATION

TEMPORARY SEDIMENT CONTROL

SE1 – SILT FENCE
SE2 – SEDIMENT BASIN
SE3 – SEDIMENT TRAP
SE4 – CHECK DAM
SE5 – FIBER ROLLS
SE6 – GRAVEL BAG BERM
SE7 – STREET SWEEPING AND VACUUMING
SE8 – SANDBAG BARRIER
SE9 – STRAW BALE BARRIER
SE10 – STORM DRAIN INLET PROTECTION
SE11 – ACTIVE TREATMENT SYSTEMS
SE12 – TEMPORARY SILT DIKE
SE13 – COMPOST SOCKS & BERMS
SE14 – BIOFILTER BAGS

WIND EROSION CONTROL

WE1 – WIND EROSION CONTROL

EQUIPMENT TRACKING CONTROL

TC1 – STABILIZED CONSTRUCTION ENTRANCE EXIT
TC2 – STABILIZED CONSTRUCTION ROADWAY
TC3 – ENTRANCE/OUTLET TIRE WASH

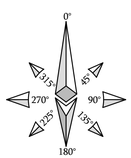
NON-STORMWATER MANAGEMENT

NS1 – WATER CONSERVATION PRACTICES
NS2 – DEWATERING OPERATIONS
NS3 – PAVING AND GRINDING OPERATIONS
NS4 – TEMPORARY STREAM CROSSING
NS5 – CLEAR WATER DIVERSION
NS6 – ILLICIT CONNECTION/DISCHARGE
NS7 – POTABLE WATER/IRRIGATION
NS8 – VEHICLE AND EQUIPMENT CLEANING
NS9 – VEHICLE AND EQUIPMENT FUELING
NS10 – VEHICLE AND EQUIPMENT MAINTENANCE
NS11 – PILE DRIVING OPERATIONS
NS12 – CONCRETE CURING
NS13 – CONCRETE FINISHING
NS14 – MATERIAL AND EQUIPMENT USE
NS15 – DEMOLITION ADJACENT TO WATER
NS16 – TEMPORARY BATCH PLANTS

WASTE MANAGEMENT & MATERIAL POLLUTION CONTROL

WM1 – MATERIAL DELIVERY AND STORAGE
WM2 – MATERIAL USE
WM3 – STOCKPILE MANAGEMENT
WM4 – SPILL PREVENTION AND CONTROL
WM5 – SOLID WASTE MANAGEMENT
WM6 – HAZARDOUS WASTE MANAGEMENT
WM7 – CONTAMINATION SOIL MANAGEMENT
WM8 – CONCRETE WASTE MANAGEMENT
WM9 – SANITARY/SEPTIC WASTE MANAGEMENT
WM10 – LIQUID WASTE MANAGEMENT

SCALE NOTE:
IF DIMENSIONS SHOWN ON PLAN DO NOT SCALE CORRECTLY, CHECK FOR REDUCTION OR ENLARGEMENT FROM ORIGINAL PLANS.



EROSION CONTROL PLAN

SCALE 1"=10'-0" (10' 0 5' 10' 20' 40')

1

APPLICANT:

APC Towers
8601 SIX FORKS ROAD, SUITE 250
RALEIGH, NC 27615
WWW.APCTOWERS.COM

ENGINEER:

Eukon
www.eukongroup.com
65 POST, SUITE 1000
IRVINE, CA 92618
TEL: (949) 553-8566

DRAWN BY:	EW
CHECKED BY:	EW

REVISIONS:

REV	DATE	DESCRIPTION
A	01/26/26	ISSUED FOR PERMITS

LICENSER:

REGISTERED PROFESSIONAL ENGINEER
ERIK WINATA
C 67285
Exp. 09/30/28
STATE OF CALIFORNIA
01/26/26

CIVIL ENGINEER

WINATA ENGINEERING, INC.
ERIK WINATA, P.E., LEED AP
PO BOX 52692
IRVINE, CA 92619-2692
(626) 890-9649
erikwinata@winatainc.com

PROJECT INFORMATION:

APC TOWERS
STARFRUIT

CA-4009

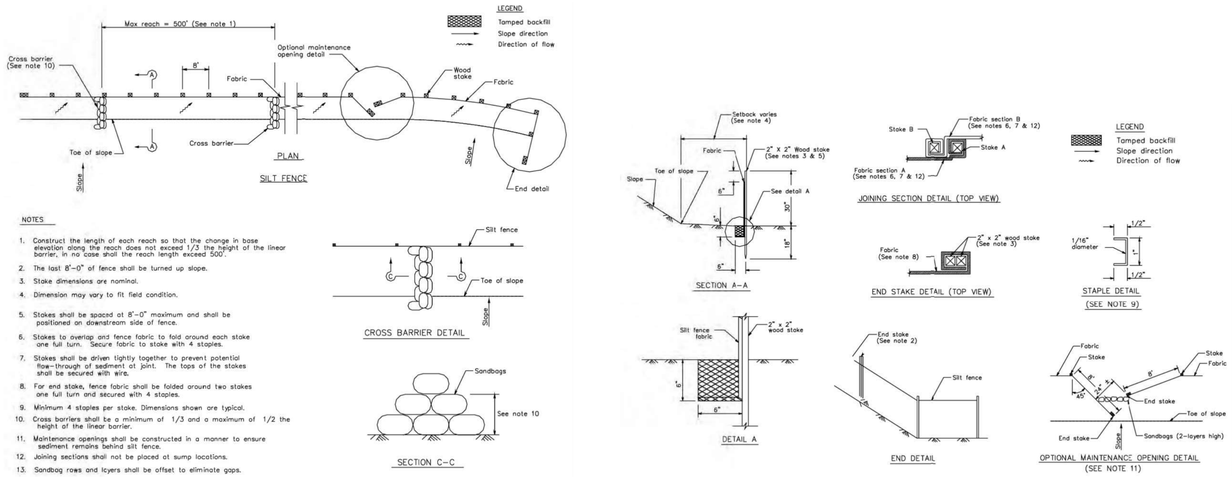
49640 OATES LANE
COACHELLA, CA 92236

SHEET TITLE:

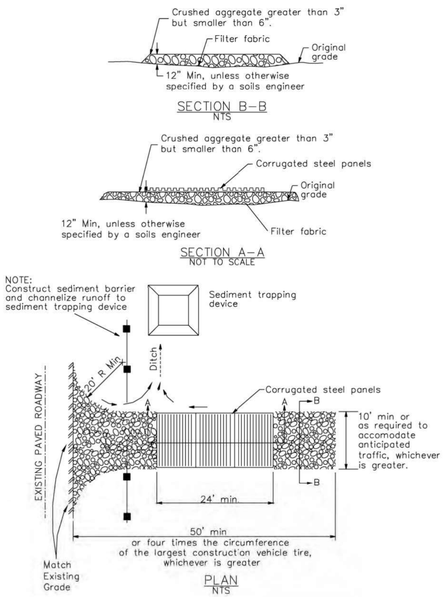
EROSION CONTROL PLAN

SHEET NUMBER:

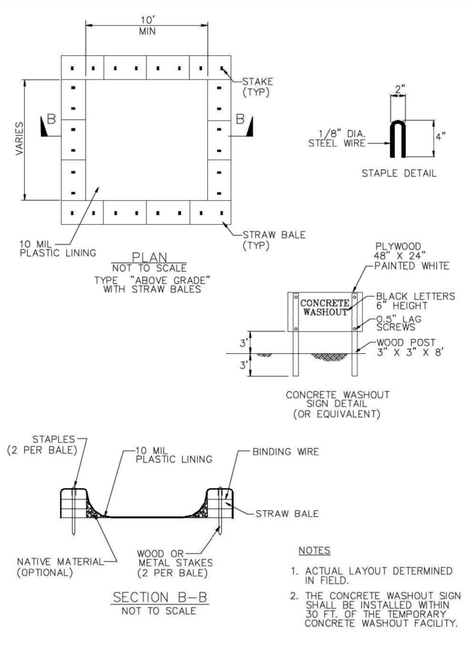
C-5

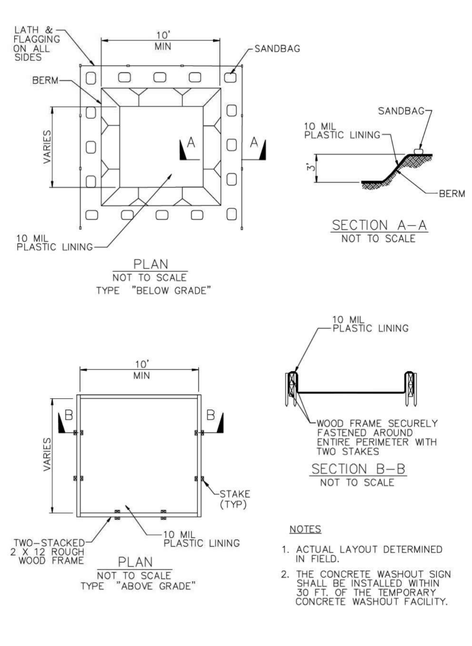


SILT FENCE DETAIL — NO SCALE — 1



STABILIZED CONSTRUCTION ENTRANCE DETAIL — NO SCALE — 2





CONCRETE WASHOUT DETAIL — NO SCALE — 3

NO SCALE — 4

APPLICANT:

APC Towers

8601 SIX FORKS ROAD, SUITE 250
RALEIGH, NC 27615
WWW.APCTOWERS.COM

ENGINEER:

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www.eukongroup.com

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TEL: (949) 553-8566

DRAWN BY:	EW
CHECKED BY:	EW

REVISIONS:

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A	01/26/26	ISSUED FOR PERMITS

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erikwinata@winatainc.com

PROJECT INFORMATION:

APC TOWERS
STARFRUIT

CA-4009

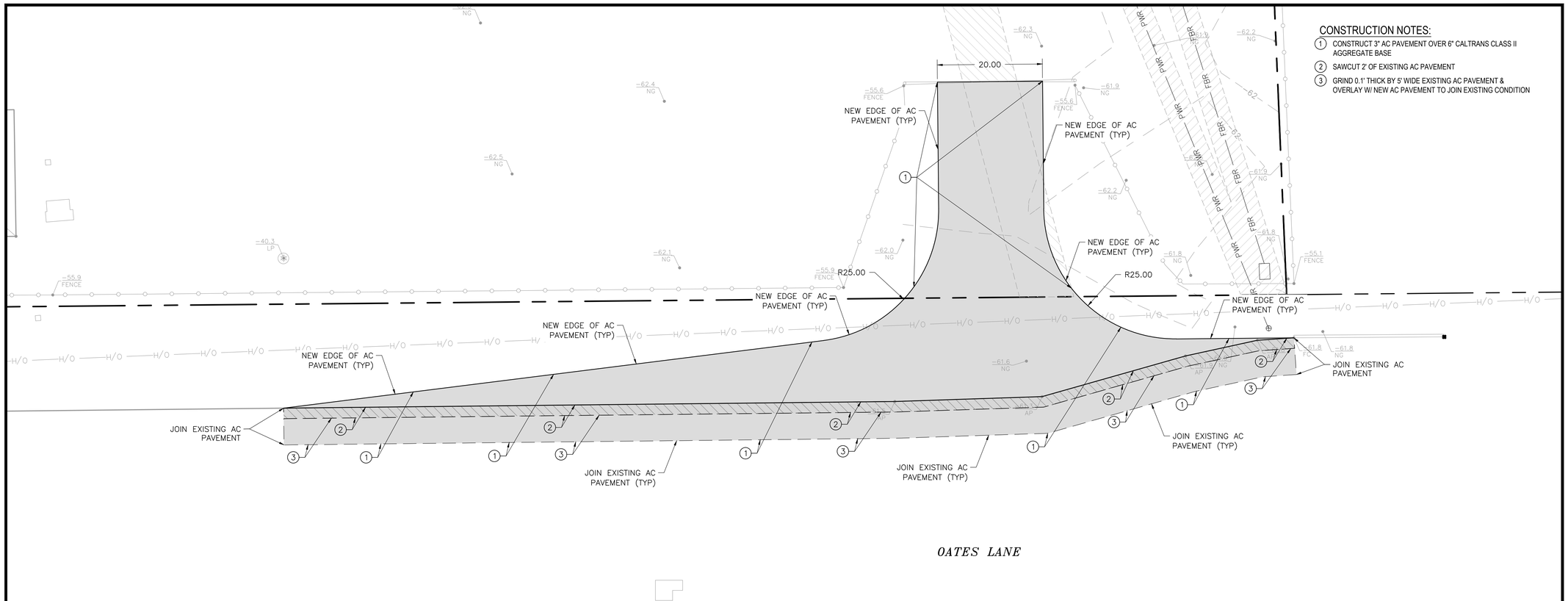
49640 OATES LANE
COACHELLA, CA 92236

SHEET TITLE:

EROSION CONTROL DETAILS

SHEET NUMBER:

C-6

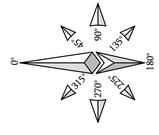


CONSTRUCTION NOTES:

1. CONSTRUCT 3" AC PAVEMENT OVER 6" CALTRANS CLASS II AGGREGATE BASE
2. SAWCUT 2' OF EXISTING AC PAVEMENT
3. GRIND 0.1' THICK BY 5' WIDE EXISTING AC PAVEMENT & OVERLAY W/ NEW AC PAVEMENT TO JOIN EXISTING CONDITION

CITY OF COACHELLA GENERAL NOTES FOR STREET IMPROVEMENT PLANS

1. CONTRACTOR SHALL BE RESPONSIBLE FOR CLEARING OF THE PROPOSED WORK AREA AND RELOCATION COSTS OF ALL EXISTING UTILITIES. ALL UNDERGROUND FACILITIES WITH LATERALS SHALL BE IN PLACE PRIOR TO PAVING THE STREET SECTION, INCLUDING, BUT NOT LIMITED TO SEWER, WATER, ELECTRIC, GAS, DRAINAGE, TELEPHONE, CABLE TV, ETC.
2. THE CONTRACTOR SHALL TAKE ALL NECESSARY PRECAUTIONS TO PROTECT ADJACENT PROPERTY OWNERS FROM ANY AND ALL DAMAGE THAT MAY OCCUR FROM STORM WATER RUNOFF AND/OR DEPOSITION OF DEBRIS FROM ANY AND ALL WORK IN CONJUNCTION WITH CONSTRUCTION OF THESE IMPROVEMENTS.
3. THE CONTRACTOR SHAL BE RESPONSIBLE FOR ALL DAMAGES TO ON-SITE, OFF-SITE, AND ADJACENT UTILITIES, FACILITIES, AND PROPERTY AND SHALL CARRY SUFFICIENT INSURANCE TO PROTECT THE CITY AND THE ADJACENT PROPERTY.
4. DEPTH OF BASE MATERIALS AND A.C. PAVING SHALL BE DETERMINED BY THE R-VALUE METHOD, DESIGNATED AS TEST NO. 301-F OF THE STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION, HIGHWAY DESIGN MANUAL.
5. STREET PAVING SHALL BE INSTALLED IN TWO (2) LIFTS: TOP COURSE 1" THICK (MINIMUM) 1/2" A.C. PG-70-10 (D1) AND BOTTOM COURSE 2" THICK (MINIMUM), 3/4" A.C. PG-70-10 (C2).
6. WHEEL CHAIR RAMPS SHALL BE CONSTRUCTED AT ALL CURB RETURNS IN CONFORMANCE WITH CITY STANDARD DRAWING S-26 AND ADA REQUIREMENTS.
7. THE CONTRACTOR SHALL INSTALL STREET NAME AND STOP SIGNS CONFORMING TO THE CITY STANDARD DRAWING S-27.
8. ALL MANHOLE COVERS AND WATER VALVE COVERS SHALL BE ADJUSTED TO GRADE AFTER THE STREETS HAVE BEEN FINAL PAVED PER CITY STDS.
9. ALL PRIVATE STREETS AND DRIVEWAYS SHALL BE CONSTRUCTED TO THE STRUCTURAL SECTION DETERMINED BY THE CITY ENGINEER.
10. TRIM (SAWCUT) EDGE OF EXISTING PAVEMENT WHERE NEW PAVING JOINS EXISTING TO FORM A CLEAN, SMOOTH STRAIGHT LINE.
11. THE CONTRACTOR SHALL NOTIFY THE CITY OF COACHELLA ENGINEERING DEPARTMENT, 619-398-5744, 72 HOURS PRIOR TO STARTING ANY STREET WORK.
12. ALL WORKS SHALL CONFORM WITH THE CITY OF COACHELLA IMPROVEMENT STANDARDS AND SPECIFICATIONS AND THE STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION (GREEN BOOK) LATEST EDITION AND THESE PLANS.
13. THE CONTRACTOR SHALL BE RESPONSIBLE FOR ALL WORK AND SHALL MAINTAIN ALL FACILITIES COMPLETE AND INCOMPLETE UNTIL ACCEPTED BY THE CITY.



SCALE NOTE:
IF DIMENSIONS SHOWN ON PLAN DO NOT SCALE CORRECTLY, CHECK FOR REDUCTION OR ENLARGEMENT FROM ORIGINAL PLANS.

SITE PLAN

SCALE 1"=10'-0"

10' 0 5' 10' 20' 40'

1

APPLICANT:

APC Towers

8601 SIX FORKS ROAD, SUITE 250
RALEIGH, NC 27615
WWW.APCTOWERS.COM

ENGINEER:

Eukon
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TEL: (949) 553-8566

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erikwinata@winatainc.com

PROJECT INFORMATION:

APC TOWERS
STARFRUIT

CA-4009

49640 OATES LANE
COACHELLA, CA 92236

SHEET TITLE:

STREET IMPROVEMENT PLAN

SHEET NUMBER:

C-7

EukonGroup
an SFC Communications, Inc. Company

David Elliott, Eukon Group, APC Towers
65 Post Suite 1000,
Irvine CA. 92618
808-489-1191
David.Elliott@EukonGroup.com
Date: October 8, 2025
To:
Planning Department
City of Coachella
1515 Sixth Street
Coachella, CA 92236

Project Description: Request for Construction of New Wireless Tower, Height Increase, and Stealthing Waiver for APC Towers and Verizon Wireless Facility
Site Address / APN: 49640 Oates Lane/ 603-300-013
Dear Planning Staff,
On behalf of **APC Towers and Verizon Wireless**, we respectfully submit this project description letter to request approval for the following wireless communication facility modifications at the above-referenced parcel:

1. **Construction of a new monopole** to relocate off of the existing ATC tower;
2. **A height increase from 55 feet to 85 feet** for the new structure; and
3. **A waiver from the stealthing requirements** to allow a **non-stealth (naked) monopole**, consistent with existing conditions at the site.

These requests are essential to maintain reliable wireless coverage for Verizon customers in the area and are supported by a combination of **technical necessity**, **regulatory compliance**, and **existing site constraints**.

Justification for New Tower Construction on Same Parcel
The current Verizon Wireless colocation on the APC Tower, located on this parcel must be **decommissioned and removed**. As a result, Verizon is **unable to remain on the existing coverage** and must construct a **new monopole** to ensure continuity of service in this area.
To maintain **existing coverage levels**, the new monopole must be sited in close proximity to the current structure. Relocation to a new parcel would result in **significant coverage gaps** and require the buildout of additional facilities to compensate for the loss—an inefficient and unnecessarily impactful outcome for the City and its residents.

Exhaustion of Co-Location Opportunities
The Eukon Group has conducted a thorough **site acquisition and co-location analysis** as part of its due diligence process. **All viable co-location options within the area have been evaluated and exhausted**.
Unfortunately, **no existing towers or structures are available that can accommodate Verizon's equipment at the necessary height, configuration, or location** to meet current and future **RF coverage and capacity objectives**. Further, no existing facilities provide the same network footprint required to maintain seamless service in this portion of the City.
Accordingly, the construction of a **new, standalone monopole** on the same parcel as the existing facility is the **only feasible solution** to preserve Verizon's service in the area.

Height Increase Justification (From 55’ to 85’)
The proposed **85-foot height** is essential to replicate the RF coverage currently provided by the existing tower. Verizon’s engineering analysis confirms that a 55-foot tower would result in **significant signal loss**, coverage degradation, and potential service interruptions—particularly indoors and at the network’s edge.
Under **Coachella Municipal Code Section 17.86.090(A)(1)**, a waiver is appropriate where adherence to local regulations would **have the effect of prohibiting wireless service**, as defined by the **United States Telecommunications Act of 1996 (47 U.S.C. §332(c)(7)(B)(i)(II))**.

Stealthing Waiver Justification
While **Section 17.86.080(C)** of the Coachella Municipal Code generally requires stealthing measures for wireless facilities, Verizon respectfully requests a waiver under **Section 17.86.090(A)(2)** based on the following:

- **Visual Consistency:** The existing facility on this parcel is a **non-stealth (naked) monopole**. Replacing it with a stealthed structure, such as a monopalm, would introduce **visual inconsistency** and draw more attention to the site, thereby defeating the intended aesthetic purpose.
- **Engineering Limitations:** Stealth structures often restrict the number and orientation of antennas that can be deployed. A camouflaged design may not accommodate the **technical and RF performance requirements** needed for Verizon’s network in this location.
- **Non-Discrimination:** Denial of a non-stealth structure in this case would **unreasonably discriminate** against Verizon Wireless under **47 U.S.C. §332(c)(7)(B)(i)(I)**, given that **functionally equivalent, non-stealth facilities already exist**—including on this very parcel.

Consistency with Code Intent and Public Interest
This proposal complies with the broader **intent of the City’s wireless ordinance** by minimizing new site development, maintaining existing coverage, and providing essential service continuity—all while staying within an already developed wireless use parcel.
This project will:

- Preserve existing RF coverage without degradation;
- Minimize the introduction of new sites elsewhere in the community;
- Continue to support reliable wireless and emergency communications; and
- Comply with all applicable FCC and FAA regulations.

Independent Consultant Review
In accordance with **Section 17.86.090(B)**, APC Towers agrees to fund and support the City’s engagement of an **independent third-party consultant** to evaluate this waiver request. A deposit and full reimbursement for the consultant's services will be provided as required.

Conclusion
In summary, APC Towers and Verizon Wireless respectfully requests the City’s approval for:

- Construction of a **new, standalone monopole** on the existing parcel;
- A **height waiver to 85 feet** to maintain service coverage; and
- A **stealthing waiver** to permit a **non-stealth monopole**, consistent with the visual character of the existing facility.

These requests are supported by **exhaustive co-location analysis**, detailed engineering review, and legal protections under federal law. They are also in the **public interest**, ensuring uninterrupted wireless service for residents, businesses, and emergency responders in Coachella.
The full application package includes:

- Site plans and elevations

- RF coverage maps (existing vs. proposed)
- Photo simulations
- Authorization for independent consultant review

We appreciate your time and consideration of this critical infrastructure request. Please do not hesitate to contact us if additional information is needed.
Sincerely,

David Elliott
Site Acquisition
Eukon Group, Agent of APC Towers
808-489-1191
David.Elliott@Eukongroup.com

APC Towers

CA-4009

STARFRUIT

49640 OATES LANE COACHELLA CA 92236

ARTISTIC engineering
AEsims.com
877.9AE.sims

VIEW 1



EXISTING

PROPOSED

PROPOSED MONOPALM

FUTURE CARRIER ANTENNAS

PROPOSED LOOKING NORTHEAST FROM AVENUE 50

ACCURACY OF PHOTO SIMULATION BASED UPON INFORMATION PROVIDED BY PROJECT APPLICANT.

APC Towers

CA-4009

STARFRUIT

49640 OATES LANE COACHELLA CA 92236

ARTISTIC engineering
AEsims.com
877.9AE.sims

VIEW 2



EXISTING



PROPOSED — LOOKING SOUTHEAST FROM OATES LANE

Accuracy of photo simulation based upon information provided by project applicant.

APC Towers

CA-4009

STARFRUIT

49640 OATES LANE COACHELLA CA 92236

ARTISTIC engineering
AEsims.com
877.9AE.sims

VIEW 3



EXISTING



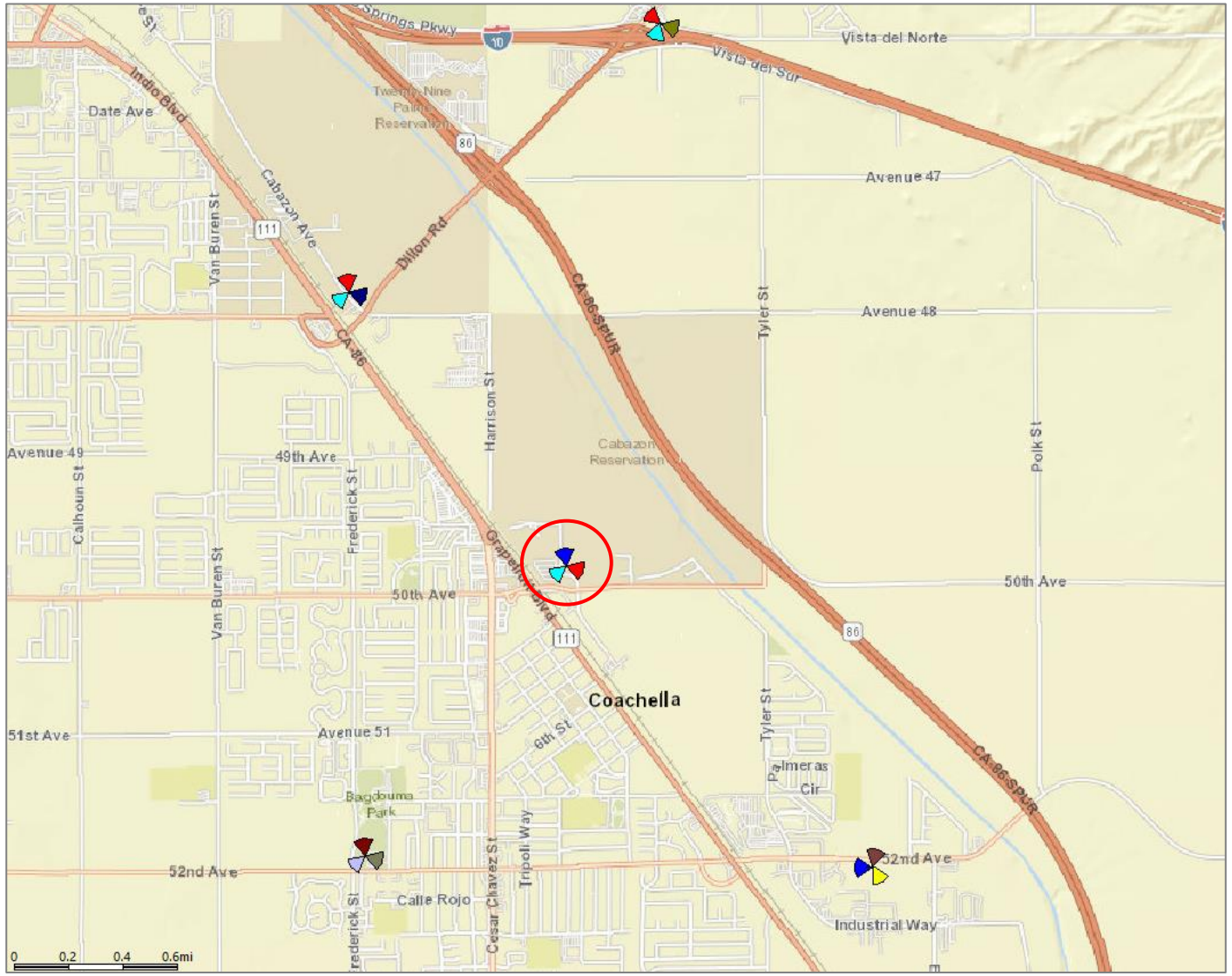
PROPOSED LOOKING NORTHWEST FROM AVENUE 50

ACCURACY OF PHOTO SIMULATION BASED UPON INFORMATION PROVIDED BY PROJECT APPLICANT.

STARFRUIT_RELHR Propagation Map

September 18, 2025

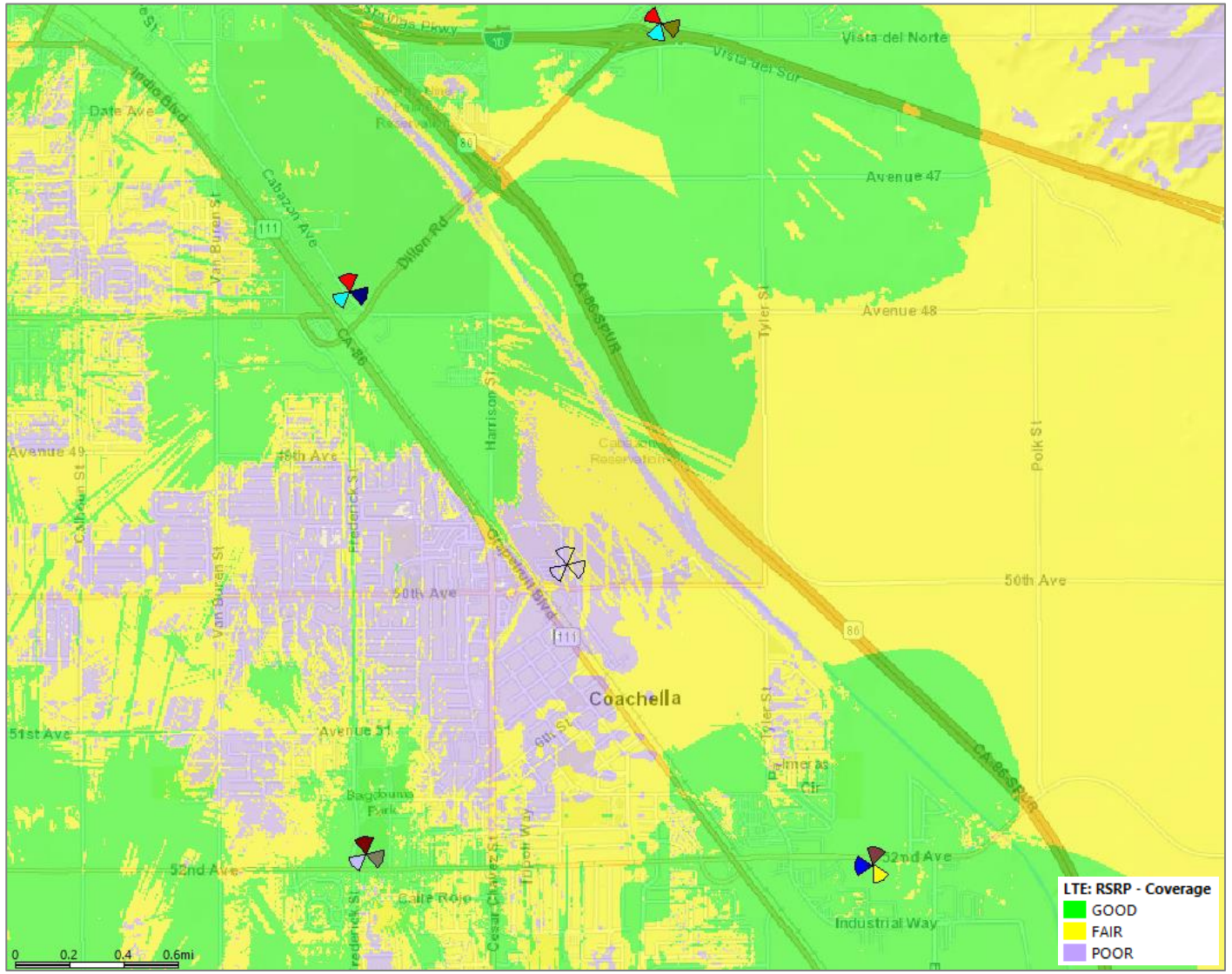
Map Overview



verizon

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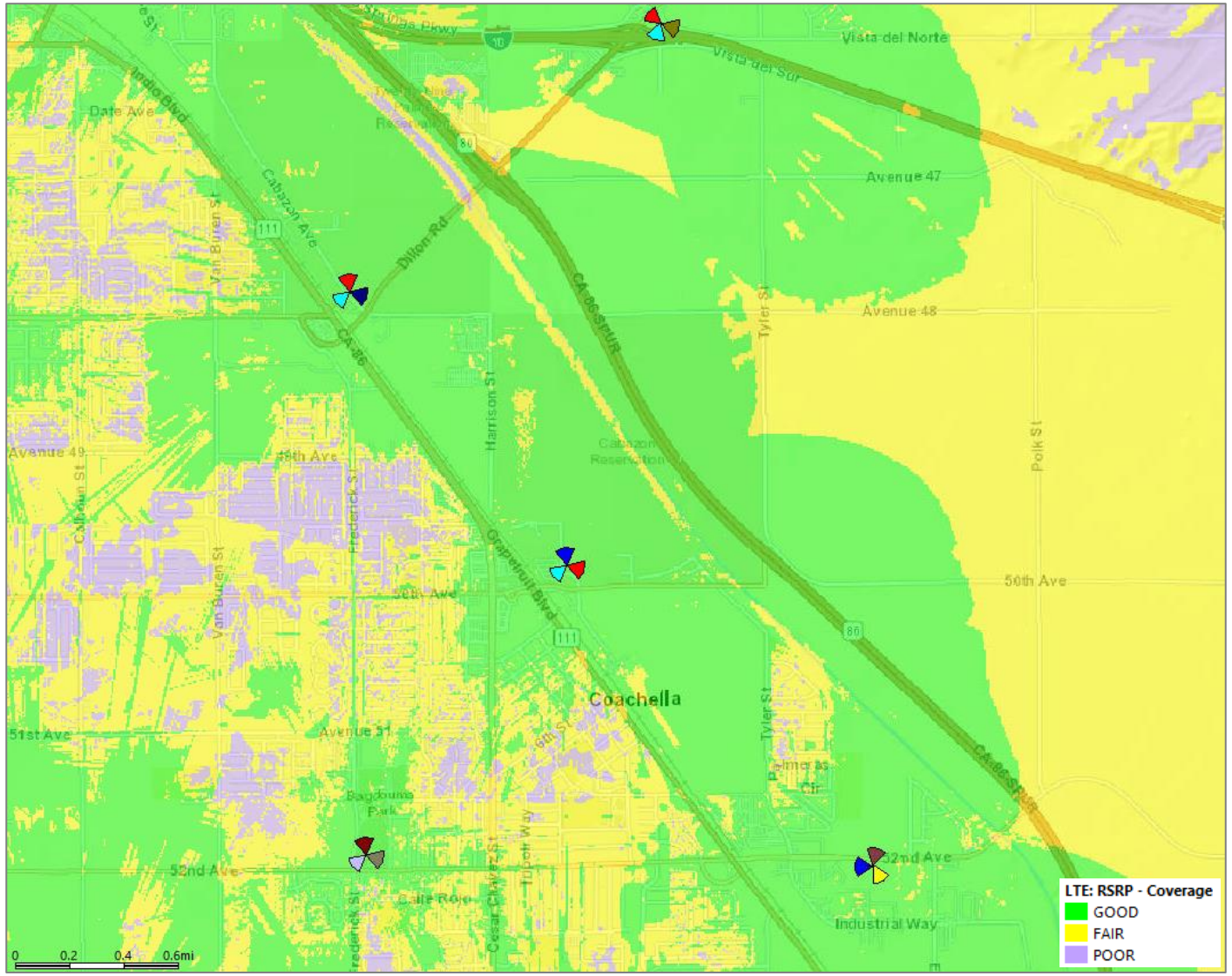
Verizon Coverage without STARFRUIT_RELHR



verizon

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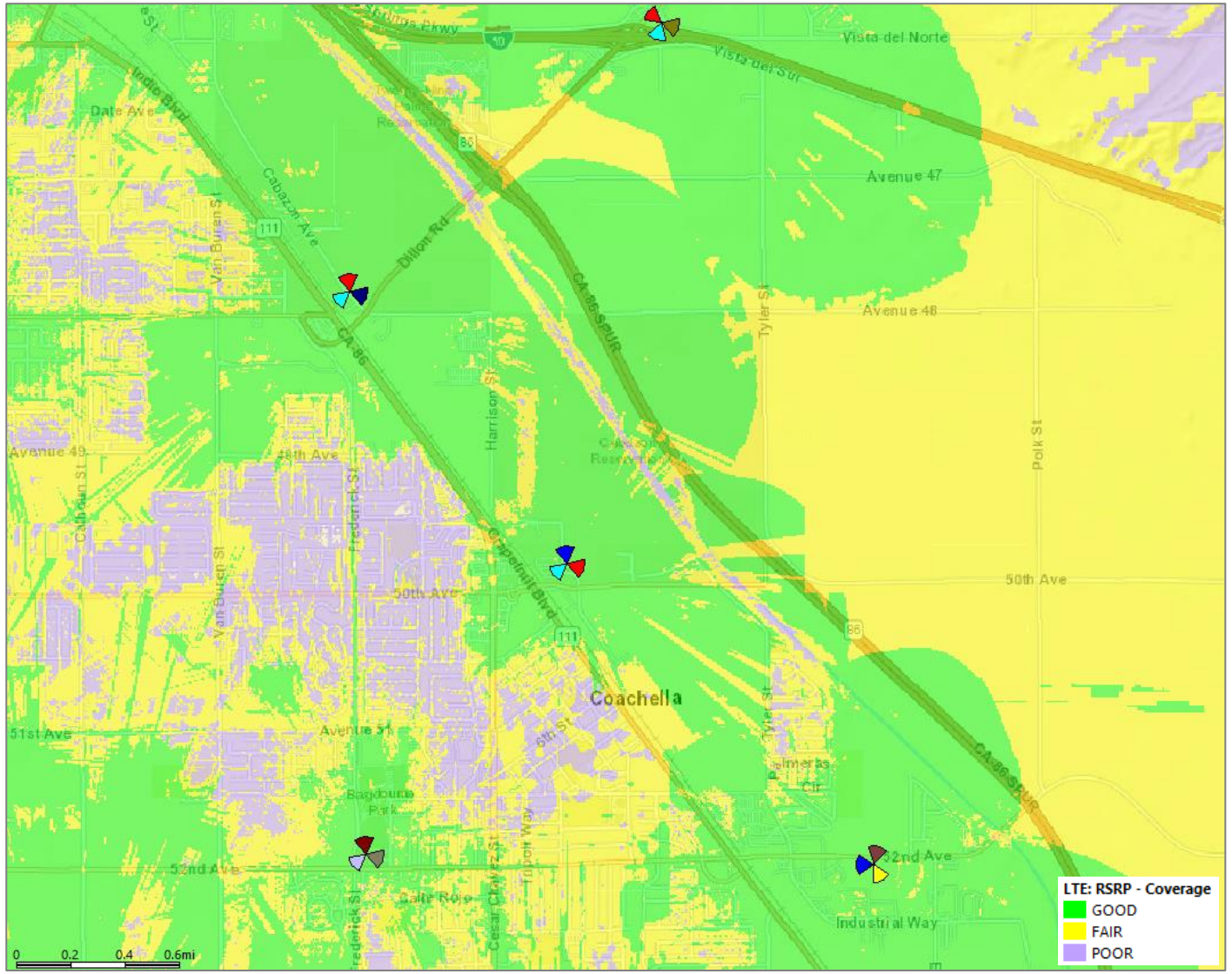
Verizon Coverage with STARFRUIT_RELHR at 80' RAD



verizon

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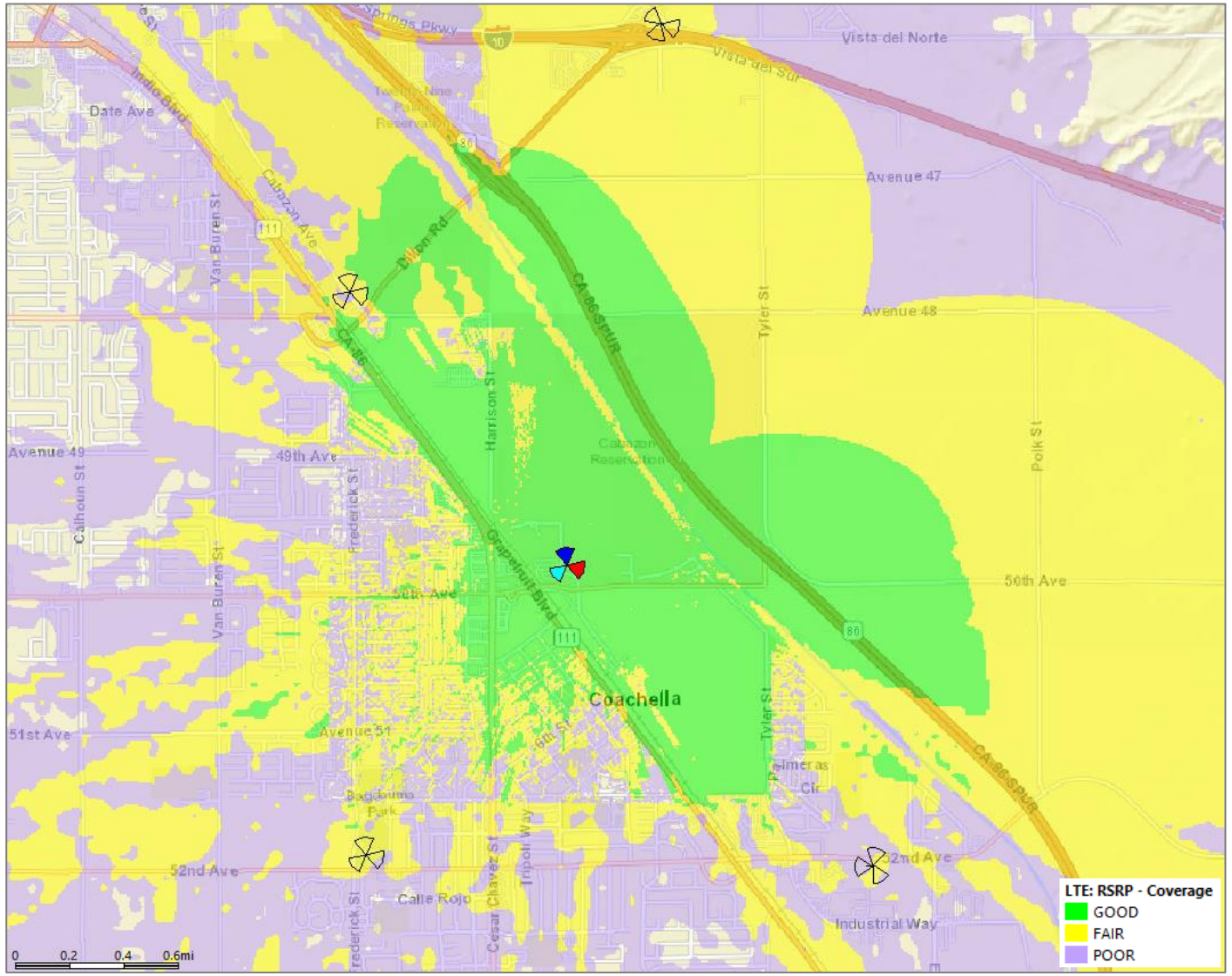
Verizon Coverage with STARFRUIT_RELHR at 45' RAD



verizon

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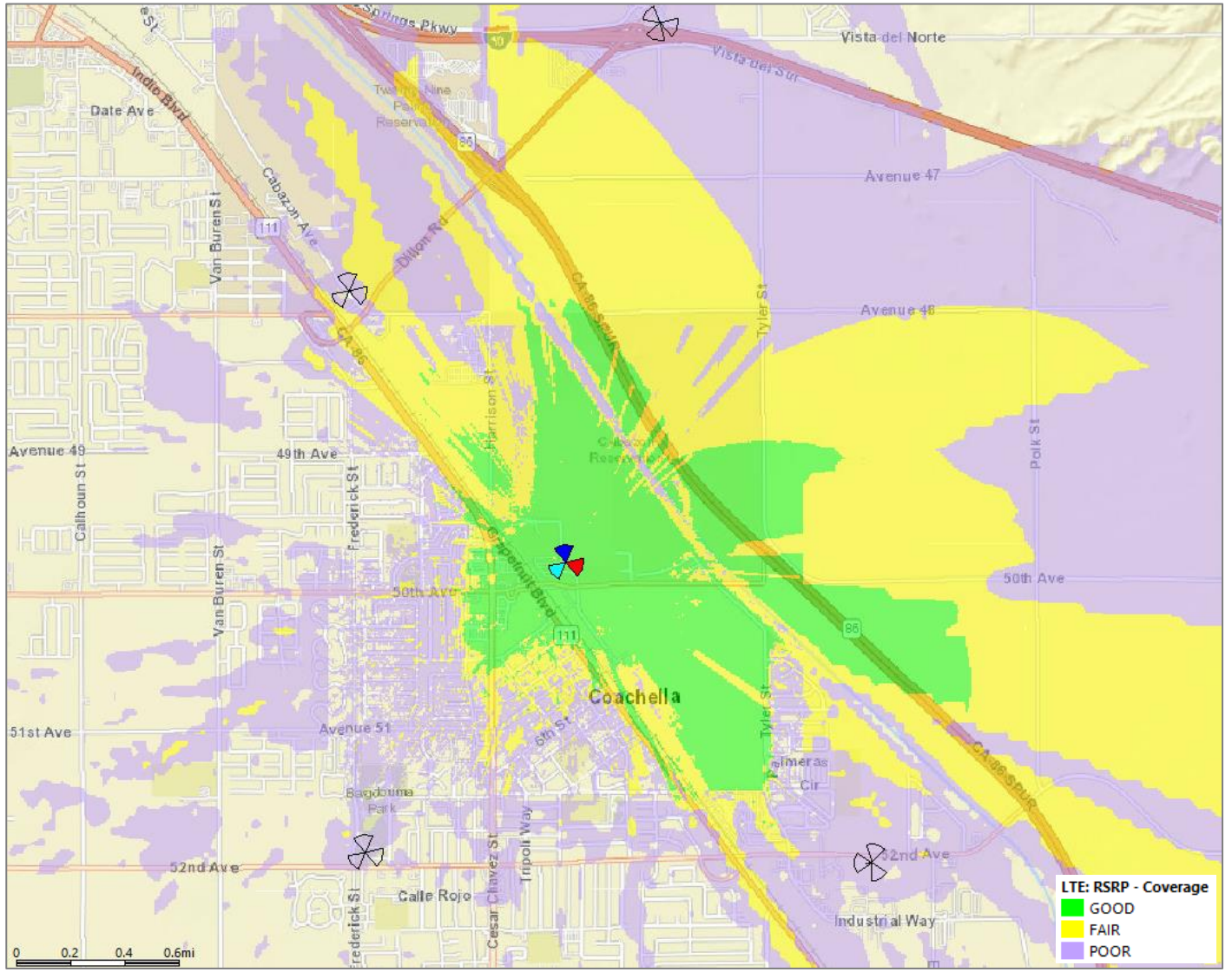
STARFRUIT_RELHR Coverage Only at 80’ RAD



verizon

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STARFRUIT_RELHR Coverage Only at 45’ RAD



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STAFF REPORT
5/6/2026

TO: Planning Commission Chair and Commissioners

FROM: Anahi Fernandez, Management Analyst

SUBJECT: Resolution No. PC2026-16: Request for Conditional Approval of Conditional Use Permit No. 401 Clamatosdel43 – Type 40 ABC License

SPECIFICS: Request for conditional approval for Conditional Use Permit No. 401 to allow liquor sales (ABC Type 40, On-Sale Beer) within an existing 1,625 square-foot commercial suite located at 49915 Cesar Chavez Street (APN 603-281-044); and determining that the proposed project is categorically exempt from California Environmental Quality Act (CEQA) review pursuant to State CEQA Guidelines Section 15301 (Existing Facilities). Applicant: Salvador Islas

---

STAFF RECOMMENDATION:

Staff recommends that the Planning Commission adopt Resolution No. PC2026-16 approving Conditional Use Permit (CUP) No. 401 to allow a liquor sales license (Type 40, On-Sale Beer) at a proposed sports bar located at 49915 Cesar Chavez Street, pursuant to the findings and conditions in the staff report and the attached resolution.

BACKGROUND:

Clamatosdel43 Sports Bar will occupy a vacant tenant space within the Coachella Shopping Center, located in the Neighborhood Commercial (C-N) zone at 49915 Cesar Chavez Street (APN 603-281-044). The subject tenant space was previously occupied by a furniture retailer, California Furniture.

Per City of Coachella Municipal Code Section 17.74.015(A)(1), establishments that do not currently but propose to sell liquor must obtain a CUP. The applicant is requesting the approval of the conditional use permit for the Type 40 alcohol license.

DISCUSSION/ANALYSIS:

The applicant, Salvador Islas, submitted a request for a CUP to allow the ABC Type 40 (On- Sale Beer) at the existing commercial suite on February 17, 2026. The restaurant has a zoning designation of Neighborhood Commercial (C-N). The C-N zone allows for liquor sales with the approval of a CUP. In December of 2016, the City adopted an ordinance requiring a Conditional Use Permit for any off-sale and on-sale alcohol sales establishment, with additional land use

regulations contained in Section 17.74.015 of the Coachella Municipal Code. The CUP findings are required to be made by the Planning Commission.

The subject site is located within Census Tract 9404.00 with a population of 6,242 persons, where ABC concentration standards allow a maximum of six (6) on-sale licenses, where eighteen (18) active on-sale licenses exist. The applicant is not applying for an off-sale license, however there are fifteen (15) active off-sale licenses where ABC concentration standards allow a maximum of three (3) off-sale licenses.

Table 1 – On-Sale Alcohol Licenses

On-Sale Alcohol License within Census Tract 9404.00			
	Business Name	**Address**	**License Type**
1	Fratneral Order of Eagles Aerie No 2594	46425 Tyler Street	51 (Club)
2	Fratneral Order of Eagles Aerie No 2594	46425 Tyler Street	58 (Caterer's Permit)
3	Spotlight 29 Casino	46200 Harrison Street	77 (Event Permit)
4	Spotlight 29 Casino	46200 Harrison Street	47 (General)
5	Spotlight 29 Casino	46200 Harrison Street	68 (Portable Bar)
6	Spotlight 29 Casino	46200 Harrison Street	58 (Caterer)
7	Taqueria Allende	49715 Harrison Street	41 (Eating Place)
8	Santa Fe Restaurant	49305 Grapefruit Blvd, #3, #4	58 (Caterer's Permit)
9	Santa Fe Restaurant	49305 Grapefruit Blvd, #3, #4	47 (General)
10	Asadero Los Corrales	49975 Harrison Street STE G & H	41 (Eating Place)
11	Eastern Buffet	49211 Grapefruit Blvd, STE 7	41 (Eating Place)
12	Pizza Hut	49954 Harrison Street	41 (Eating Place)
13	Carnitas La Piedad	49625 Highway 86	41 (Eating Place)
14	Carnitas La Piedad	49625 Highway 86	58 (Caterer's Permit)
15	Sushi & Mariscos Guamuchil	49405 Grapefruit Blvd	47 (General)
16	Taco Shop 760	48975 Grapefruit Blvd	47 (General)
17	Taco Shop 760	48975 Grapefruit Blvd	58 (Caterer's Permit)
18	La Noria Fonda Cenaduria & Cafe	49613 Cesar Chavez St, B-106	41 (Eating Place)

Table 2– Off-Sale Alcohol Licenses

Off-Alcohol License within Census Tract 9404.00			
	Business Name	**Address**	**License Type**
1	Food 4 Less	49241 Grapefruit Blvd	21 (General)
2	Coachella Travel Center	46155 Dillon Road	20 (Beer & Wine)
3	Victory Liquor & Sports Goods	49968 Cesar Chavez Street	21 (General)

4	CVS Pharmacy	84010 Avenue 50	21 (General)
5	Garibaldi Meat Market	49975 Harrison Street, STE A & B	20 (Beer & Wine)
6	Coachella Florist	49889 Harrison Street	20 (Beer & Wine)
7	Family Dollar	49681 Harrison Street	20 (Beer & Wine)
8	Coachella Oil Corporation	46651 Dillon Road	20 (Beer & Wine)
9	Smart & Final	49978 Harrison Street	21 (General)
10	Baja Meat Market	47570 Van Buren Street	21 (General)
11	Tower Market	84417 Indio Blvd	21 (General)
12	Arco AMPM	48055 Grapefruit Blvd	21 (General)
13	El Dorado Liquor	49647 Cesar Chavez Street	20 (Beer & Wine)
14	C-Store	46355 Dillon Road	21 (General)
15	Tropicana Supermarket	84075 Avenue 50	20 (Beer & Wine)

Section 17.74.015(C) of the Coachella Municipal Code states that on-sale establishments may not
fall within 700 feet, measured from property line to property line, of a use for religious worship, school (public or private), park, playground, residential or any similar sensitive use nor can the establishment fall within 700 feet of an existing liquor, on-sale use. Section 17.74.015(C)(1)(b)(i) of the
Municipal Code states that the Planning Commission may find that the public benefit outweighs the distance restrictions of subsection 17.74.015(B) upon additional findings that:

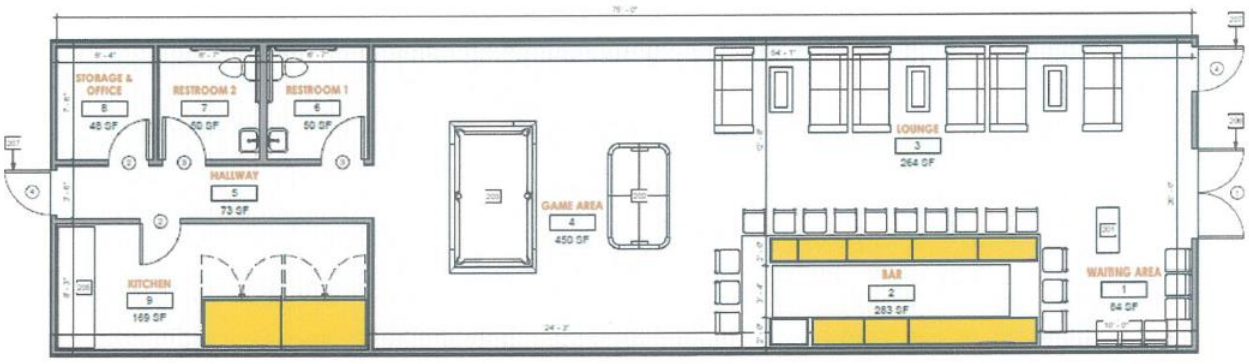
I. The establishment provides a substantial benefit to the immediate neighborhood not provided by another existing establishment within the restricted distance; and

II. Not greater than five percent of the sales floor area or 1,000 square feet, whichever is less, shall be used for the display or sale of alcoholic beverages.

The subject site is within 700 feet of the following on-sale liquor uses: Asadero Los Corrales and Taqueria Allende, both located within the same commercial center. Additionally, the subject site is within 700 feet of two residential communities, situated approximately 90 feet to the west and 300 feet to the south.

The floor plan for Calamtosdel43 sports bar includes a total floor area of 1,625 square feet (SF). There is no alcohol display, storage will be located within a storage room and stored under the service counter in a cooler, and will not be within the sales floor area. The establishment is proposing to utilize 73 sq. ft. for alcohol storage and does not exceed the 5% maximum sales floor area (81.25 SF) that may be dedicated to alcohol.

Image 1 - Floor Plan



PROJECT AREA = 1,625 SQ FT

STORAGE AREA= 73 SQ FT

DISPLAY AREA = NONE

APN: 603281044

ZONING: NEIGHBORHOOD COMMERCIAL (C-N)

Staff contacted Lieutenant Robert Garcia with the Riverside County Sheriff Office regarding any concerns for the proposed business that the Planning Commission may want to consider when making findings or including conditions of approval for the CUP. Lieutenant Garcia identified no recommendations. At the time of the publication of this staff report, no comments have been received from the public with any concerns regarding the approval of the proposed CUP for Type 40 (On-Sale Beer) alcohol sales.

Hours of Operation:

The Clamatosdel43 sports bar will operate Monday-Thursday from 10:00 AM to 9:00 PM and Friday-Sunday from 10:00 AM to 11:00 PM.

Environmental Setting:
The subject business is located at 49915 Cesar Chavez Street within the within the Coachella Shopping Center. The General Plan Land Use Designations, Zoning Designations, and Existing uses are identified below:

Table 2 – General Plan, Zoning, and Surrounding Existing Uses

	General Plan	Zoning	Surrounding Existing Uses
Site:	Neighborhood Center	Neighborhood Commercial	Commercial
North:	Neighborhood Center	Neighborhood Commercial	Commercial

South:	Neighborhood Center	Neighborhood Commercial	Commercial
East:	Downtown Center	Downtown	Commercial
West:	Suburban Neighborhood	Suburban Neighborhood	Single Family Residential

Parking:

In the Neighborhood Commercial zone, restaurants and other eating establishments are required to provide one (1) space for each forty-five (45) square feet of customer area, plus one space for each two hundred (200) square feet of noncustomer area. The subject site has a total area of 1,625 SF, with about 1,125 SF being for customer area, and 500 square feet being noncustomer area; which would require the subject site to provide 28 parking spaces. The commercial center has sufficient parking for the proposed commercial uses.

PUBLIC HEARING NOTICE:

A public hearing notice for the Project was published in the Desert Sun, the newspaper of record, on April 26, 2026, and a public hearing notice was mailed to property owners within a radius of 300 feet of the subject property on April 22, 2026, pursuant to Section 17.74.010 of the Coachella Municipal Code. At the time of issuance of this staff report, staff had not received public comments on this application.

ENVIRONMENTAL REVIEW:

Staff has determined that the proposed project is categorically exempt from environmental review pursuant to the guidelines of the California Environmental Quality Act as "Existing Facilities" (CEQA Guidelines, Section 15301). The proposed project consists of the operation, permitting, licensing and minor alteration of an existing private commercial structure involving negligible or no expansion of existing or former commercial use on the property. The subject site has been used for commercial retail establishments and no expansions of use are proposed. Furthermore, none of the exceptions to the use of categorical exemptions set forth in State CEQA Guidelines Section 15300.2 apply. There is no possibility of a significant cumulative impact as staff does not anticipate that other projects of the same type will take place at the project site or the surrounding area. The tenant space does not present any unusual circumstances such as unusual resources, an unusual location, or unusual physical qualities inherent to the project site that might result in significant impacts. The project area is developed and does not contain any environmentally sensitive areas. The project would not damage any scenic resources, including trees, historic buildings, rock outcroppings or similar resources, within a highway officially designated as a state scenic highway. The project is not located on a hazardous waste site or any other site included on a list compiled pursuant to Government Code section 65962.5 and the proposed project will not cause a substantial adverse change in the significance of a historical resource because there are no historical resources near the proposed project such that project impacts would not have any substantial adverse changes in the significance of a historical resource.

ALTERNATIVES:

1) Approve Resolution No. PC 2026-16 that approves CUP No. 401 with the findings and conditions as recommended by Staff.

2) Approve Resolution No. PC 2026-16 that approves CUP No. 401 with the findings and conditions as recommended by Staff with modifications as proposed by the Planning Commission.

3) Deny the approval of Resolution No. PC 2026-16 and request that staff prepare a Planning Commission Resolution for denial of CUP No. 401.

3) Issue a continuance for this item and provide staff and the applicant with direction.

CONCLUSIONS AND RECOMMENDATIONS:

Based on the analysis contained herein and the findings listed below, staff is recommending that the Planning Commission approve CUP No. 401 with the findings and conditions listed in Resolution No. PC 2026-16. Staff recommends that the Planning Commission makes the findings that the public convenience or necessity is justified to issue the Type 40 license (On-Sale Beer). Furthermore, the Sherriff's Department has not raised concerns about granting the CUP for Type 40 alcohol sales at this site.

Attachments:

1. Attach 1 - Resolution No. PC2026-16
2. Attach 1 – Exhibit A - Conditions of Approval RESO PC2026-16 CUP 401
3. Attach 1 – Exhibit B – Floor Plan
4. Attach 2 – Vicinity Map
5. Attach 3 – Site Photos

RESOLUTION NO. PC2026-16

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF COACHELLA, CALIFORNIA CONDITIONALLY APPROVING CONDITIONAL USE PERMIT NO. 401 TO ALLOW LIQUOR SALES (ABC TYPE 40, ON-SALE BEER) WITHIN AN EXISTING 1,625 SQUARE-FOOT SPORTS BAR LOCATED AT 49915 CESAR CHAVEZ STREET, AND FINDING THAT THE PROPOSED PROJECT IS CATEGORICALLY EXEMPT PURSUANT TO CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) GUIDELINES SECTION 15301 (EXISTING FACILITIES)

WHEREAS, on February 17, 2026, the applicant Salvador Islas, filed an application for a Conditional Use Permit No. 401 (CUP No. 401) to allow for a Type 40 (On-Sale Beer) liquor license for the Clamatosdel43 Sports Bar located at 49915 Cesar Chavez Street (APN 603-281-044); and

WHEREAS, the establishment has a land use designation of Neighborhood Center pursuant to the City of Coachella General Plan; and

WHEREAS, the establishment has a zoning designation of Neighborhood Commercial (C-N) pursuant to the City of Coachella Municipal Code; and

WHEREAS, the Neighborhood Commercial zoning designation allows for alcohol sales with the approval of a conditional use permit pursuant to Section 17.74.05 of the City of Coachella Municipal Code; and

WHEREAS, the proposed use is consistent with and intended to implement the vision of the City's General Plan and the Municipal Code pertaining to neighborhood-scale retail, and a diverse economy and jobs center; and

WHEREAS, the proposed use is consistent with and intended to implement the vision of the Neighborhood Center General Plan by providing work and accessible goods to neighboring residents; and

WHEREAS, the project was reviewed for compliance with the California Environmental Quality Act ("CEQA") and staff determined that the project is exempt from further environmental review under CEQA Section 15301, Existing Facilities; and,

WHEREAS, a notice of a public hearing to consider the Conditional Use Permit application (CUP No. 401) was issued in accordance with Coachella Municipal Code Section 17.74.010(G), inclusive of the publication on April 26, 2026, of a legal public hearing notice published in the Desert Sun, the City's newspaper of record, and the mailing of a public hearing notice to a certified list of property owners within 300 feet of the subject properties on April 22, 2026; and

WHEREAS, on May 6th, 2026, the Planning Commission of the City of Coachella held a duly noticed public hearing on the subject application, considered written and oral comments, and facts and evidence presented by the applicant, City staff, and other interested parties; and

WHEREAS, at the Planning Commission hearing, the Applicant and members of

the public were present and were afforded an opportunity to testify regarding the Project; and,

WHEREAS, at the conclusion of the public hearing and following discussion, the Planning Commission approved this Resolution for the conditional approval of the Type 40 liquor license for Clamatosdel43 (CUP No. 401) as conditioned, with the motion vote outcome specified in the meeting minutes for the May 6th, 2026, Planning Commission meeting.

NOW, THEREFORE, BE IT RESOLVED, that the Planning Commission of the City of Coachella, California hereby resolves, finds, and determines as follows:

Section 1. Incorporation of Recitals. The Planning Commission hereby finds that all of the facts in the Recitals are true and correct and are incorporated and adopted as findings of the Planning Commission as fully set forth in this resolution.

Section 2. CEQA Findings. The Planning Commission finds the Project categorically exempt from the provisions of the California Environmental Quality Act under Section 15301 of the State CEQA Guidelines. The entire Project is exempt under Section 15301 because it involves the operation, permitting, licensing and minor alteration of an existing private commercial structure involving negligible or no expansion of existing or former commercial use. The subject site has been used for commercial retail establishments and no expansions of use is propose.

Furthermore, none of the exceptions to the use of categorical exemptions set forth in State CEQA Guidelines Section 15300.2 apply. There is no possibility of a significant cumulative impact as staff does not anticipate that other projects of the same type will take place at the project site or the surrounding area. The tenant space does not present any unusual circumstances such as unusual resources, an unusual location, or unusual physical qualities inherent to the project site that might result in significant impacts. The project area is developed and does not contain any environmentally sensitive areas. The project would not damage any scenic resources, including trees, historic buildings, rock outcroppings or similar resources, within a highway officially designated as a state scenic highway. The project is not located on a hazardous waste site or any other site included on a list compiled pursuant to Government Code section 65962.5 and the proposed project will not cause a substantial adverse change in the significance of a historical resource because there are no historical resources near the proposed project such that project impacts would not have any substantial adverse changes in the significance of a historical resource.

Staff is hereby authorized and directed to prepare, execute, and file a Notice of Exemption with the County Clerk and the State Clearinghouse within five working days of approval of the Project.

Section 3. Conditional Use Permit Findings. Based upon the evidence presented at the hearing, including the staff report and written and verbal testimony, which are all incorporated herein by reference, the Planning Commission hereby finds that:

1. The proposed use will not be in conflict with, but will be in harmony with and in accordance with the objectives of the General Plan because the proposed restaurant use with alcohol sales is within the Neighborhood Center land use designation according to the General Plan 2035, which allows the intended physical character to provide a

comfortable, walkable environment for shoppers and diners and envisions neighborhood commercial uses mixed with high-density residential uses. The liquor sales establishment will be part of a restaurant that will serve nearby residents

2. The proposed use will be located, designed, constructed, operated and maintained so as to be compatible with the existing character of the general vicinity and shall not change the essential character of the same area because the proposed use is within the zoning designation of 'C-N' (Neighborhood Commercial) which permits restaurants subject to obtaining a conditional use permit to sell alcoholic beverages. The proposed use is located within an existing building that is compatible with the adjoining commercial uses and the conditional use permit can be revoked if any of the conditions of approval are violated.

3. Consideration has been given to harmony in scale, bulk, coverage and density, to the availability of public facilities and utilities, to harmful effect, if any, upon desirable neighborhood character, to the generation of traffic and the capacity of surrounding streets, and to any other relevant impact of development, because the existing commercial tenant space is within an existing commercial center with all infrastructure available on-site for the existing restaurant use. Additionally, there is adequate ingress and egress into and out of the existing center to maintain the adequacy of the traffic circulation system serving the proposed use.

4. Where the proposed use may be potentially hazardous or disturbing to existing or reasonably expected neighboring uses, it must be justified by the common public interest as a benefit to the community as a whole. As conditioned, the proposed use will provide for the sale of alcoholic beverages in conjunction with a restaurant use with limitations on hours of operation. As such, there will be no hazardous or disturbing effects to the existing and neighboring uses.

5. The proposed use provides vehicular approaches to the property designed for reasonable minimal interference with traffic on surrounding public streets or roads, because all approaches are in full use for the patrons of the commercial center and no alterations are proposed as part of the request to sell and/or serve alcohol at the existing 1,625 square foot commercial space and no negative effects exists. Further, there is an existing striped parking lot available for use for patrons.

6. The City of Coachella has determined that the proposed project is categorically exempt from environmental review pursuant to the guidelines of the California Environmental Quality Act as an "Existing Facilities" project (CEQA Guidelines, Section 15301). The project involves the issuance of a liquor license. The issuance of the liquor license will involve a negligible expansion of the use. Therefore, the project is categorically exempt from CEQA.

7. No greater than five percent of the sales floor area or one thousand (1,000) square feet, whichever is less, will be used for the display or sale of alcoholic beverages. The project is conditioned to ensure that the display area for alcohol does not exceed the limits of the Coachella Municipal Code and requires that the Development Services Director conduct an inspection of the display prior to business operation.

Section 4. Planning Commission Approval. Based on the foregoing, the Planning Commission hereby **CONDITIONALLY APPROVES** the Conditional Use Permit application (CUP No. 401) and finds that the Project is exempt from CEQA pursuant to CEQA Guidelines Section 15301 – Existing Facilities. The Applicant shall demonstrate compliance with ALL Conditions of Approval, as set forth in "Exhibit A" and "Exhibit B" of this Resolution. Failure to demonstrate compliance with these conditions of approval may result in the delay of the Proposed Use or the rescinding of the City of Coachella's conditional use permit approval. Where the term "Applicant" is used in any condition of approval, this term shall also apply to the Property Owner, any developer, or any successor in the interest of the Applicant. It is the Applicant's or Applicant's successor in interest responsibility to fully comply with the conditions of approval unless subsequently modified in accordance with the City's required processes and procedures.

Section 5. Custodian of Records. The documents and materials that constitute the record of proceedings on which this Resolution has been based are located at 53990 Enterprise Way Coachella, CA 92236. This information is provided in compliance with Public Resources Code Section 21081.6.

PASSED APPROVED and ADOPTED this 6th day of May 2026 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

_____
Eva Lara
Planning Commission Chairperson

ATTEST:

_____
Kendra Reif
Planning Commission Secretary

APPROVED AS TO FORM:

_____

City Attorney

STATE OF CALIFORNIA)
COUNTY OF RIVERSIDE) ss.
CITY OF COACHELLA)

I HEREBY CERTIFY that the foregoing Resolution No. PC2026-16 was duly adopted by the Planning Commission of the City of Coachella at a regular meeting thereof, held on this 6th day of May 2026 by the following vote of the Planning Commission:

AYES:

NOES:

ABSENT:

ABSTAIN:

_____
Kendra Reif
Planning Commission Secretary

CONDITIONS OF APPROVAL
CONDITIONAL USE PERMIT NO. 401 CLAMATOSDEL43 TYPE 40 LIQUOR LICENSE

General Conditions

1. The applicant shall comply with all requirements and conditions of approval as included in CUP No. 401, and any modifications or extensions thereof, for the respective approval and Resolution No. PC2026-16.

2. The conditional use permit shall expire and shall become void two years following the date on which the conditional use became effective unless alcohol sales are commenced within 24 months of the effective date of this Conditional Use Permit or an extension of time is reviewed by the Planning Commission. A request for time extension shall be filed in a timely manner with applicable fees.

3. Conditional Use Permit No. 401 is an approval for on-sale beer at Clamatosdel43. This approval is based on the floor plan submitted for the proposed project. Violation of any of the conditions of approval shall be cause for revocation of the Conditional Use Permit. Any modifications shall be administratively reviewed and approved by the Development Services Director and include a stamped approval by the Planning Division.

4. The applicant shall defend, indemnify and hold harmless the City of Coachella, its officials, officers, employees, and agents from and against any claim, action, or proceeding against the City, its officials, officers, employees or agents to attack, set aside, void or annul any project approval or condition of approval of the city concerning this project, including but not limited to any approval or condition of approval or mitigation measure imposed by the City Council or Planning Commission. The City shall promptly notify the applicant of any claim, action, or proceeding concerning the project and the City shall cooperate fully in the defense of the matter. The City reserves the right, at its own option, to choose its own attorney to represent the City, its officials, officers, employees and agents in the defense of the City Attorney, within five days of the effective date of this approval.

5. The use shall meet the standards within the limits established by the Coachella Municipal Code as related to emissions of noise, odor, dust, vibration, wastes, fumes, or any public nuisances arising or occurring incidental to the establishment or operation.

6. Hours of operation of the store may be no earlier than 6:00 a.m. and no later than 11:00 p.m. daily.

7. The applicant shall comply with all requirements imposed by the State Department of Alcoholic Beverage Control and a review of this conditional use permit will be required if the business results in an increase in floor area.

8. Not greater than 5% of the sales floor area, or 1,000 square feet, whichever is less, shall be used for the display or sale of alcoholic beverages. The applicant shall provide a revised floor plan with a compliant display area prior to issuance of a certificate of occupancy. The applicant shall request an inspection by the Development Services Director or designee for compliant of the store and displays with conditions of approval.

9. The applicant shall not store alcoholic beverages or boxes in sales areas beyond the 5% display limitation.

10. The exterior appearance of the structure of the proposed establishment shall not be inconsistent with the exterior appearance of commercial structures already constructed or under construction within the shopping center so as to cause blight or deterioration.

11. Allowable signs affixed to windows shall in no case exceed 20% of the occupancy frontage window area.

12. Any exterior wall signs shall consist of internally illuminated channel lettering and shall require a City building permit. Signage shall not provide flat signage backing. Signage shall be in compliance with the sign program of the commercial center to the satisfaction of the Community Development Director.

13. CUP No. 401 shall be considered effective upon the completion of all conditions of approval required prior to the sale of alcohol for this project, to the satisfaction of the Community Development Director. The Community Development Director will confirm with the CA Alcohol Beverage Control that this condition has been satisfied and that CUP No. 401 is considered effective.

Building & Safety Division

14. The applicant must dedicate 20% of the projects valuation to compliance with accessibility. Please reference the attached accessibility worksheet details.

15. Plans shall be prepared by a licensed architect.

16. Provide the equipment layout of the proposed kitchen and bar.

17. Entry to bar tender area must be left open, remove one bar stool.

18. Where food or drink is served for consumption at a counter exceeding 34 inches (864 mm) in height, a portion of the main counter 60 inches (1525 mm) minimum in length shall be provided in compliance with Section 11B-902.3. (CBC 11B-226.3)

19. Where dining surfaces are provided for the consumption of food or drink, at least 5 percent of the seating spaces and standing spaces at the dining surfaces shall comply with Section 11B-902. In addition, where work surfaces are provided for use by other than

employees, at least 5 percent shall comply with Section 11B-902. (CBC 11B-226.1)

Utilities Department

20. The project may be required to connect to the City's public water and wastewater systems. In the event that new connections are required, the applicant shall submit water and sewer plans for approval.

21. New water and sewer connections are subject to the collection of impact fees.

22. All fire lines require the installation of Double Check Detector Assemblies.

23. Backflow devices are required on all non-residential connections installed within 12" of the meter box.

24. All buildings may require individual meters.

25. Irrigation may require its own meter.

26. All water connections shall install 4G AMI master meters.

27. All service lines shall be copper tubing per the approved list of materials.

28. All materials shall be per the approved list of materials provided by the Engineering Department or the Utilities Department.

29. No new water connections shall be shown on landscaping plans, all connections shall be in the water improvement plans.

30. Trees/shrubs must have a minimum of 15' separation distance from the Utilities water/sewer laterals. Or minimum 10' separation distance from water/sewer laterals with root barrier.

Environmental Division

31. Provide plumbing blueprints depicting sanitary, industrial, and/or grease waste line (all lines that are applicable).

32. Illustrate domestic water and sewer point of connection to the City's utilities.

33. Provide plumbing code fixture schedule with total DFU's listed.

34. Complete Utilities Department's wastewater discharge survey and submit to Development Services.

35. For tenant improvements, current and proposed plumbing code fixture schedule must be provided.

36. Pretreatment equipment/Sample box: (if applicable) Provide manufacture specifications and sizing chart.

37. Pretreatment Equipment Minimum Requirements:
    a. 750 gal minimum.
    b. Clean outs and vents before and after pretreatment equipment.
    c. Sample box immediately downstream of the pretreatment equipment.
    d. Multi suite buildings requesting pretreatment installation require separate sewer lateral connection per pretreatment device made from precast concrete form.

CLAMATOSDEL43 LLC

DBA: CLAMATOSDEL43 SPORTS BAR

49915 CESAR CHAVEZ ST, COACHELLA, CA 92236



PROJECT AREA = 1,625 SQ FT

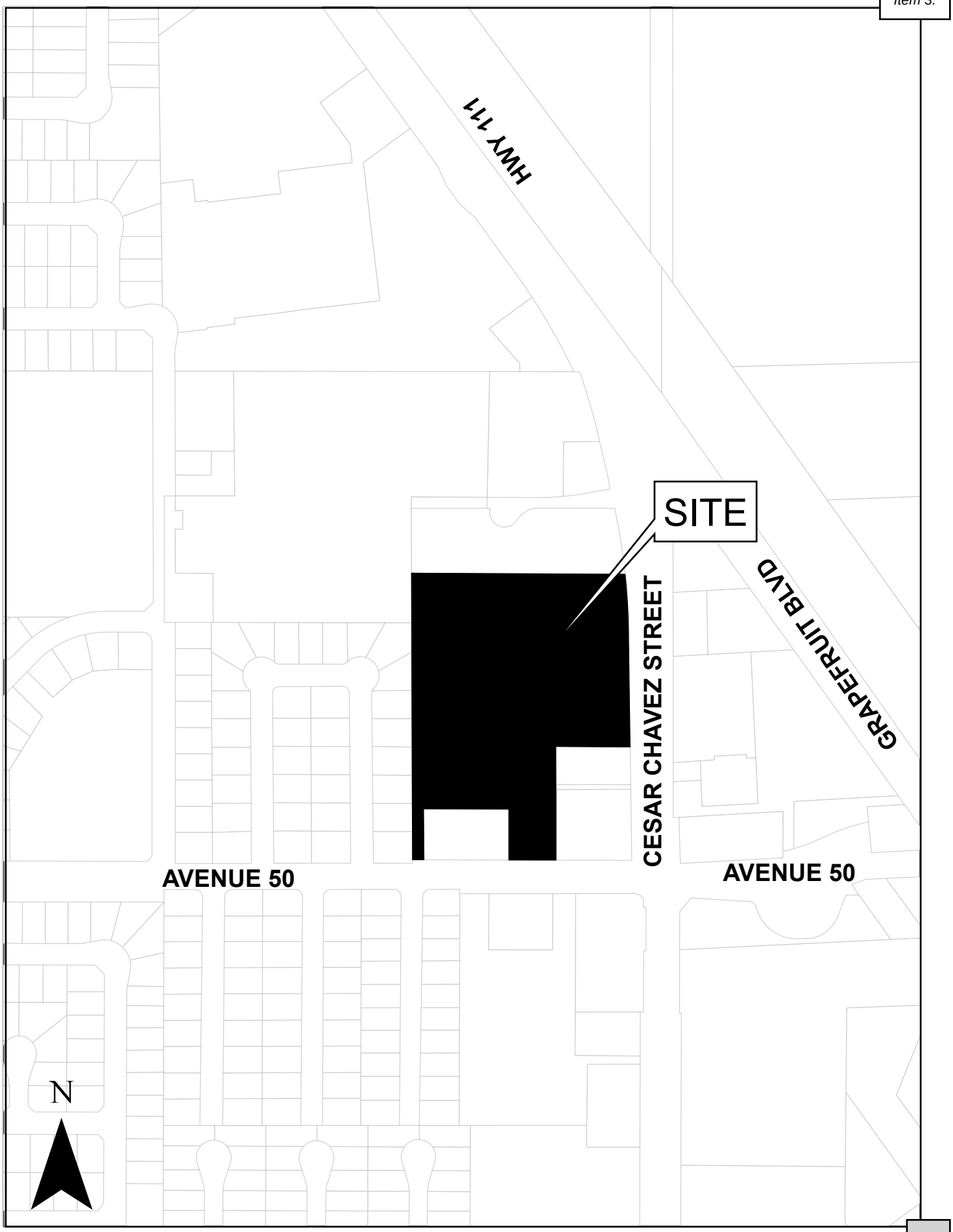
STORAGE AREA= 73 SQ FT

DISPLAY AREA = NONE

APN: 603281044

ZONING: NEIGHBORHOOD COMMERCIAL (C-N)

FLOOR PLAN



VICINITY MAP


49-919
Sealy
49915
SIMMONS
BeautySleep
49913
SERVICIOS DE
NO
NECESITA
CRÉDITO
100 DÍAS
(760) 398-1368


49-919
Sealy
49915
SIMMONS
BeautySleep
49913
NO
NECESITA
CRÉDITO
100 DÍAS

STAFF REPORT
5/6/2026

TO: Planning Commission Chair and Commissioners
FROM: Kendra Reif, Community Development Director
Nicole Sauviat Criste, Consulting Planner
SUBJECT: A Public Hearing to Consider Resolution No. PC 2026-09 of the Planning Commission of the City of Coachella: Request for Planning Commission recommendation of approval to the City Council of Change of Zone, CZ 20-01, from MH to MS and CG; and conditional approval of Tentative Parcel Map 39721; CUP 324 to allow commercial cannabis uses; CUP 325 to allow drive through restaurant; CUP 326 to allow service station and mini-mart; AR 20-04 to approve site design, architecture and signage (billboard) and DA 25-02 to approve a Development Agreement, for 43± acres of land located at the northwest corner of Airport Boulevard and SR 86 (APNs 763-330-013, 763-330-018, and 763-330-029), and recommending certification of the Coachella Airport Business Park Development Environmental Impact Report (SCH No. 2023040106), including Findings and a Statement of Overriding Considerations, in conformance with the California Environmental Quality Act. Applicant: Empire Airport LLC.

STAFF RECOMMENDATION

Staff recommends that the Planning Commission open the public hearing, receive public testimony, and recommend the conditional approval by the City Council of Change of Zone, CZ 20-01, Tentative Parcel Map 39721, CUP 324, CUP 325, AR 20-04 and DA 25-02 for 43± acres of land located at the northwest corner of Airport Boulevard and SR 86 (APNs 763-330-013, 763-330-018, and 763-330-029), and recommending certification of the Coachella Airport Business Park Development Environmental Impact Report (SCH No. 2023040106), including Findings and a Statement of Overriding Considerations, in conformance with the California Environmental Quality Act.

EXECUTIVE SUMMARY:

The applicant, Empire Airport LLC, requests that the Planning Commission recommend to the City Council the approval of:

- **Change of Zone No. 20-01** which changes the Zoning designation of the 40.8± acres from Heavy Industrial (MH) to Manufacturing Service (MS) and 2.2± acres from MH to General Commercial (CG);

- **Tentative Parcel Map 39721** which will subdivide the site into 8 lots, including the potential for condominium use;

- **CUP No. 324** which would allow the development of commercial cannabis uses on the 40.8± acres of MS land;

- **CUP No. 325** which would allow the development of a drive-through restaurant on the 2.2± acres of CG land (parcel no. 7 of the TPM);

- **CUP No. 326** which would allow the development of a service station and convenience store on the 2.2± acres of CG land (parcel no. 7 of the TPM);

- **AR 20-04** which provides for the design, architecture and landscaping for the Project, as well as allowing an electronic billboard on the east boundary of the site;

- **DA 25-02** which would establish the responsibilities of the developer and the City relating to the build out of the Project;

- **Coachella Airport Business Park Development Environmental Impact Report (SCH No. 2023040106)** which analyzed the environmental impacts of the Project, and an adjacent future Imperial Irrigation District (IID) substation on 4 acres north of the Project.



Figure 1 - Vicinity Map

BACKGROUND:

The Project site is an isolated parcel that occurs between the Coachella Valley Stormwater Channel (CVSC) and SR 86. Lands in this area are envisioned in the General Plan to be developed for industrial uses, and some of that type of development has occurred west of the Project site and beyond the CVSC along Grapefruit Boulevard. The Project site is located at the south boundary of the City, and the south side of Airport Boulevard is unincorporated Riverside County. The City and County are currently working toward improvements to the Airport Boulevard bridge immediately south of the Project site. These plans are well into design, and the Project has been designed to integrate into these improvements.

As shown in Figure 1, Vicinity Map, the Project site is located on currently vacant land at the northwest corner of Airport Boulevard and State Route 86. The site is bounded by the Coachella Valley Stormwater Channel to the west, vacant Caltrans right of way to the north, SR 86 and the Airport Boulevard on- and off-ramps to the east with agricultural lands beyond, and Airport Boulevard and an existing mobile home park beyond to the south. Table 1 provides the existing conditions, including General Plan and Zoning designations for the site and its surroundings.

Table 1
General Plan, Zoning, and Surrounding Existing Uses

	General Plan	Zoning	Surrounding Existing Uses
Site:	Industrial District	Current: Heavy Industrial Proposed: Manufacturing Service, General Commercial	Vacant
North:	Industrial District	Heavy Industrial	Vacant
South:	Riverside County	Riverside County	Occupied mobile home park
East:	Industrial District	Heavy Industrial	SR 86, Agriculture
West:	Industrial District, Public Facilities	Open Space	Coachella Valley Stormwater Channel

The Project site totals 42.69± acres, extending along the SR 86 right-of-way. The applicant proposes the development of a master planned mixed commercial/industrial Project that will consist of the following development types/areas which are described from south to north on the Project site. For reference, the corresponding parcel number from the TPM is provided with each development type. The TPM is provided in Attachment 2, Tentative Parcel Map, Grading and Phasing Plans. The Project site plan is provided in Figure 2 below, and in Attachment 3, Architectural Plan Set.

- A 4,000± square foot convenience store with 6 pump stations (12 pumps) and a 4,650± square foot retail/drive-through restaurant building on 2.2± acres at the south end of the site (Parcel 7 of TPM);
- 81,000± square feet of office/business park space in 18 buildings immediately north Parcels 5 and 6 of TPM);
- 76,800± square feet of auto storage in 4 buildings (Parcel 4 of TPM);
- 128,600± square feet of self-storage space in 17 buildings (Parcel 3 of TPM);

- 233,100± of large warehouse space in 6 buildings ranging in size from 22,400 to 48,800 square feet each (Parcel 1 of TPM);
- 96,000± square feet of small warehouse space in 5 buildings ranging in size from 9,600 to 24,000 square feet would be places along the east boundary of the site (Parcel 2 of the TPM).

In total, the Project would generate 624,500± square feet of building space. Due to its size, the Project will be phased. A Phasing Exhibit is included in Attachment 2.

Access to the Project is proposed from a central driveway on the north side of Airport Boulevard. A second emergency access point will be provided east of the primary access point, immediately west of the SR 86 off-ramp. The primary access will be signalized.

As described above, the Project TPM will divide the site based on the land use type envisioned for the property, and will result in 8 parcels. Table 2 provides a breakdown of the Project components, and Figure 2 represents the Project site plan.

Table 2
Project Information

Total Project Area	42.69
Parcels Created	8 Parcels
Convenience Store & Service Station	4,000 SF, 6 pump stations/2.2 acres
Retail/Drive Through	4,650 SF/2.2 acres
Business Park	81,000 SF/6.62 acres
Auto Storage	76,800 SF/4.62 acres
Self-Storage	128,600 SF/6.71 acres
Large Warehouse	233,100 SF/9.22 acres
Small Warehouse	96,000 SF/5.94 acres
Airport Boulevard ROW	0.8 acres
Internal Streets (TPM Parcel 8)	2.3 acres

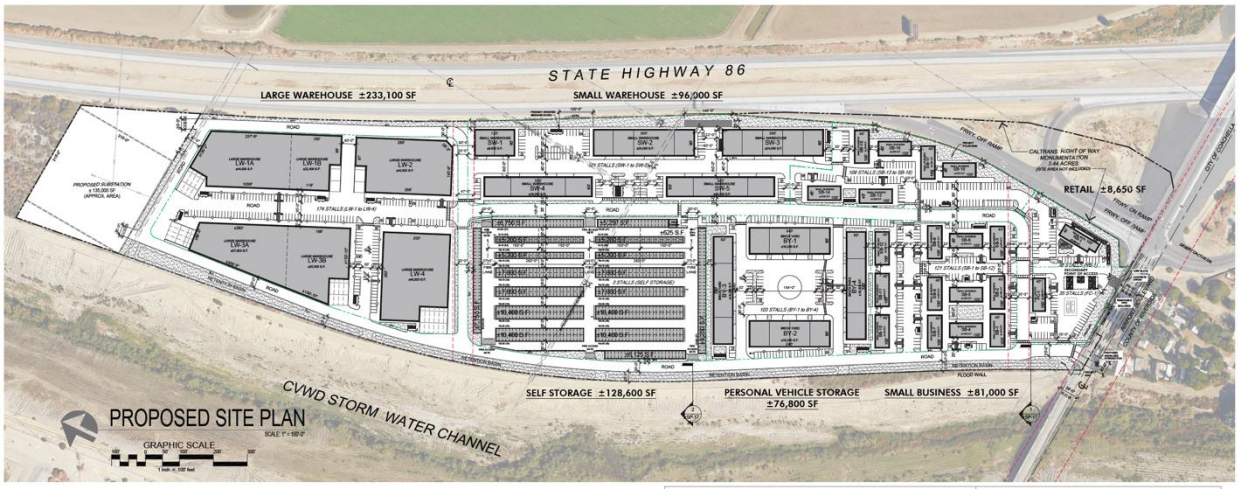


Figure 2 - Site Plan

The following sections address each of the applications described above individually. The Change of Zone application is the over-arching application for the Project. The three Conditional Use

Permits (CUP) address various specific land uses within the Project, and the Architectural Review application will guide the architecture and landscaping design through its ultimate build out. Finally, the Tentative Parcel Map provides for the legal means to convey the property to various potential ownership entities in the future, including the potential to establish a condominium map, which would function much like a residential condominium map, and provide for common area maintenance and coordinated implementation of Project plans.

CONSISTENCY WITH GENERAL PLAN

The Project site is located in an Industrial District, and further located in Subarea 8 as designated in the General Plan.

The Industrial District is envisioned to be made up of larger lots and buildings that support concentrations of business activity, with supporting retail and office uses. Projects are to be served by major City streets, and provide internal roadways that provide for internal circulation. Buildings are to be one- and two-story structures, with simple, attractive facades that face the street. Building materials should consist of masonry or concrete, and larger buildings should include multiple simple masses. Industrial Districts are intended to be separate from the City's neighborhoods and districts. Subarea 8 is envisioned as a transforming area that will create employment opportunities with a variety of industrial and office uses that take advantage of SR 86 and railroad proximity.

The Project conforms with the vision and policies established for the Industrial District and Subarea 8. It will provide a variety of employment opportunities from a broad range of business types, which are likely to include local business owners and regional or national brands. The Project will provide meaningful frontage on SR 86, and has been designed to provide defined architectural detail on the highway (see further discussion under Architectural Review, below). The Project is forecast to create about 740 jobs, which will range from professional and management position, to service industry employment. The commercial component located at the south end of the Project provides both a highway commercial function, and a local convenience for Project employees and surrounding businesses and residents.

CHANGE OF ZONE 20-01

As described above, the Project proposes a Change of Zone from Heavy Industrial (MH) to Manufacturing Service (MS) for 40.8± acres, and General Commercial (CG) for 2.2± acres of the site. Both these zoning designations are consistent with the Industrial District General Plan land use designation, insofar as MS allows a range of industrial uses, and CG in this case provides for supporting commercial uses that will serve both on-site employees and the general public. Given the site's location on SR 86, the less intense, more "industrial park" appearance generated by MS uses is desirable to provide a more attractive appearance on this regional roadway. Finally, the MS Zone, and the proposed Project, will create an employment center for the City in this location, and broaden residents' employment opportunities.

Conditional Use Permit 324
CUP 324 is proposed to allow for commercial cannabis businesses across the site. There are no specific users proposed at this time. However, by establishing the CUP, the individual buildings within the MS portion of the site could develop as cannabis businesses, without further consideration for their land use compatibility. Given the site's isolation from other parcels, and its location on a major City roadway, use of some of the buildings for cannabis cultivation or manufacturing would not impact residential neighborhoods within the City. The site provides for such a use in a controlled environment, and would be appropriate given the setting among other quasi-industrial uses. Cannabis uses, if proposed in the future, would be required to comply with Chapters 17.85 of the Zoning Ordinance, including the requirements for indoor use only, odor control, distance restrictions and compliance with all State laws and permitting. These restrictions ensure that the use can be operated with minimum conflicts with other land uses. Finally, any cannabis user would be required to the design established in Architectural Review 20-04, which ensures that the high quality of design required throughout the Project would be maintained. As described, the Findings for approval of this CUP can be made, and are provided below.

Conditional Use Permit 325
CUP 325 would allow the development of a drive-through restaurant on the 2.2 acre CG portion of the site. The use is consistent with the Industrial District designation of the General Plan, insofar as it provides a support commercial and retail use for the businesses within the Project, as well as travelers on SR 86. The site will have high visibility to the highway, and is provided direct access from the off-ramps and Airport Boulevard. The isolated nature of the Project limits the potential impacts associated with this use, including lights from vehicles and outdoor speaker systems on the residential uses on the south side of Airport Boulevard. The drive-through has been designed to provided sufficient stacking internal to the Project site, so as not to impact City roadways or the highway. As described, the Findings for approval of this CUP can be made, and are provided below.

Conditional Use Permit 326
CUP 326 is proposed to allow the service station and convenience store on the 2.2 acre CG portion of the site. The proposed use is consistent with the General Plan land use designation of Industrial District, insofar as it provides a supporting retail use for employees within the Project and travelers on SR 86. The use is also consistent with the MS Zone, as it is allowed with approval of a CUP. As with CUP 325, this CUP will provide a service to the employees and customers of the Project, as well as the traveling public on SR 86. The site is isolated, and is located internal to the Project, with sufficient maneuvering and stacking area to prevent interference with traffic movements on Airport Boulevard. The design of the building and the canopy are consistent with the design of the Project overall, and will integrate into the Project. The Findings for approval of this CUP can be made, and are provided below.

Architectural Review 20-04

AR 20-04 addresses the entire Project site, and provides a master plan for site design, architecture and landscaping within the Project. Although no specific users for the site are known at this time, the AR will assure cohesive and high quality development within the Project. As described above, and in Attachment 2 and below, the Project is proposed to develop in phases, and may take, depending on market forces, as long as 20 years to develop. As such, a master plan for the architecture and landscaping is critical to provide direction, but the AR may require amendment when specific users are identified, or changes in building footprints are identified to meet user needs. Any such changes would require amendment of the AR, which would be reviewed consistent with City requirements for such changes. As proposed, the Phasing Plan would assure that all Project components will be built in a unified manner, including the internal roadway system and perimeter landscaping, which are proposed in Phase 1. Development plans for the site will be provided as the applicant identifies buildings and areas for development, and will be processed through the Public Works and Building Departments, with the Planning Department assuring compliance with the approved AR.



Figure 3 – Phasing Plan

Future users would be required to conform to the AR, or would be required to amend it if inconsistent, which would assure that the City would maintain control on building designs throughout the build out of the Project. All references to page numbers within this subsection can be found in Attachment 3, Architectural Plan Set.

Site Design

The Project's circulation pattern provides an internal loop road, 30 to 35 feet in paved width, that connects all parts of the Project together. The primary roadway will extend from the Project entry along the entire western edge of the property, looping east at the northern boundary, and returning southerly to connect to the westerly road near the Project entry. Although parking is provided along this roadway, it is limited to assure fewer vehicle conflicts, insofar as interior parking areas are provided for each type of development within the site. Within this circulation system, the different types of buildings are organized together, so that the progression of uses extends from most customer-centric to least on the north end of the site. A second roadway, immediately north of the Project entry, is provided for direct access to the convenience store and service station. Please see page A-010.

The buildings are distributed throughout the site, and provide sufficient separation and setbacks from structures to allow for the masses of the buildings to be relieved. The setbacks and building heights provided meet the standards of the CG and MS zones, as applicable. Parking is also distributed throughout the site. A total of 682 parking stalls are provided, which exceeds the requirement for 668 stalls. As required by the Building Code, electrical vehicle and ADA spaces are included in this total.

Architecture

The arrangement of buildings within the Project is grouped by business type, with smaller building masses located closer to Airport Boulevard, and the largest building masses at the northern end of the site, in an area that will be less visible from City streets. Building architecture has been detailed for each area of the Project, and is provided on pages A-201 through A-206 of Attachment 3. Details are shown below.



Figure 4 – Retail Architecture

The architectural style of the Project is contemporary, and incorporates substantial articulation and materials/color variations to prevent monotony and long uninterrupted façades. A significant component of the design, as shown above and in Attachment 3, is that the buildings are architecturally detailed on all sides. This is particularly important in this case, where a number of buildings will back onto either the CVSC, and development beyond, and the SR 86. The level of detail will assure that the entire Project is cohesive, and that its appearance is consistent both on and off the Project site.

Building heights for the CG zone range between 24 and 28 feet, and for buildings within the MS zone, range from 24 to 50 feet, depending on the development area. Only the large warehouses are proposed to extend to 50 feet. These building heights are consistent with each zone's development standards.

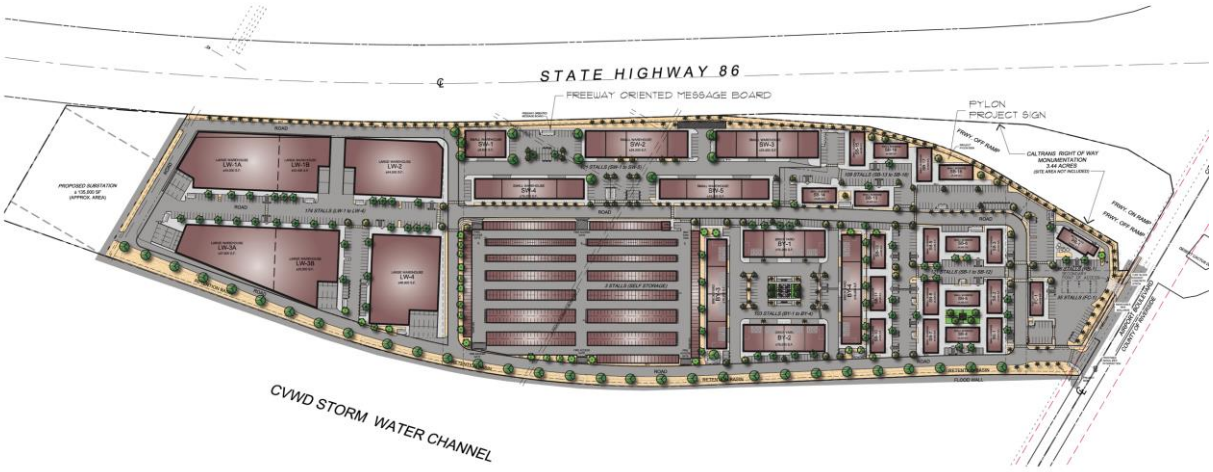


Figure 5 – Small Business and Large Warehouse Architecture

Landscaping

The overall landscaping plan is provided in Attachment 5. As shown, it provides for perimeter landscaping around the entire site, and landscaping along the internal roads and parking areas. The

species proposed include desert-adapted species, including Date and Mexican Fan Palms, Acacia, Bougainvilla, Ocotillo and Agave. A total of 12% of the site is landscaped.



Electronic Billboard

The plans for the proposed electronic sign on SR 86 are provided in Attachment. 4. The billboard is proposed for the center of the site, as shown in the site plan. The billboard is subject to the requirements of Municipal Code Section 5.48. Under that Section, the billboard is permitted by right in the MS zone, but is subject to development standards, including the following:



- Overall height no more than 40 feet above adjacent roadbed: Because of the 2 foot grade differential between the site and the SR 86 roadbed, although the sign will be 42 feet in height, it will be 40 feet above the roadbed.
- Sign face cannot exceed 700 square feet: The sign face is 14 feet by 48 feet, or a total of 672 square feet.

The sign will also be subject to Caltrans signage requirements for illuminated signs on a State highway.

Tentative Parcel Map 39721

The TPM will divide the property into 8 lots which are generally consistent with the development types proposed within the Project. It has been submitted as a condominium map, which will allow for the sale of buildings within the site, and will require a property owners' association for the maintenance of Project-wide improvements, including roads, parking areas, landscaping and

retention basins. The map has been reviewed by the City Engineer, and conforms to the City's subdivision standards. The map, as conditioned in the attached Resolution, meets City standards and provides for the logical subdivision of the property.

Development Agreement 25-02

The Development Agreement is governed by the provisions of Chapter 17.100 of the Zoning Ordinance. It allows for the City and the applicant to establish responsibilities of both parties to facilitate the build out of larger or more complex projects. In this case, the DA provides that Development Impact Fees will be frozen at current levels for 5 years; water service will be provided by CVWD's water line, until such time as the City can serve; and the City and developer will share costs for the IID substation proposed at the north end of the site. The DA has been negotiated between the City and developer, and reviewed by the City Attorney.

PROPOSED FINDINGS:

Zone Change

1. That the proposed Zone Change is consistent with applicable general and specific plans;
The Project site is designated Industrial District in the General Plan. The site is currently zoned Heavy Industrial and is proposed to be changed to Manufacturing Service and General Commercial. The Industrial District designation describes a wide range of industrial uses, including manufacturing and light industrial or business park uses, supported by commercial services in areas that are separated from residential neighborhoods. The designation is also intended to create jobs and diversify the economy for City residents. The proposed Zone Change implements the intent of the General Plan by allowing the development of a broad range of businesses, building types and services that will be consistent with the intent of the designation. The commercial zone created at the south end of the Project will allow for retail services that support the employees working within the site, the traveling public and surrounding businesses and residents. The Zone Change is consistent with the General Plan.

Conditional Use Permit 324

Pursuant to Coachella Municipal Guidelines Chapter 17.74, Conditional Uses, subject to the provisions of this chapter, the Planning Commission must make the following findings for the CUP:

1. The proposed use will not be in conflict with, but will be in harmony with and in accordance with the objectives of the general plan.

The proposed CUP will allow for the development of cannabis-related businesses within the site. The Project location is isolated from residential neighborhoods, and surrounded by the SR 86, CVSC and Airport Boulevard, providing separation and distance from residential neighborhoods, as directed in General Plan Land Use policies 7.3 and 7.4. The potential for cannabis-related businesses allows the City an additional component to its economy that provides a service to City residents. The CUP is consistent with the General Plan.

2. The proposed use will be located, designed, constructed, operated and maintained so as to be compatible with the existing or intended character of the general vicinity and shall not change the essential character of the same area.

The development of cannabis-related businesses in this part of the City is consistent with the industrial character existing to the west, along Grapefruit Boulevard, and expected within Subarea 8 of the General Plan, which envisions this part of the City for industrial and quasi-industrial development to expand the City's economic base and increase employment opportunities, while isolating industrial development from sensitive uses. All cannabis businesses would be operated within buildings, and would be required to comply with all City and State requirements, including State permitting. The use would be located in a master planned project which has established high quality design for all buildings, and any user within a Project building would be required to comply with the internal character of the Project.

3. Consideration is to be given to harmony in scale, bulk, coverage and density, to the availability of public facilities and utilities, to harmful effect, if any, upon desirable neighborhood character, to the generation of traffic and the capacity of surrounding streets, and to any other relevant impact of the development.

The CUP would allow cannabis businesses in buildings already designed and proposed within the Project. Because the design is established in AR 20-04, any user would occupy building(s) that are compatible with the Project as a whole. Further, the use is consistent and compatible with industrial and business park uses, and will not impact residential neighborhoods or sensitive receptors. Generally, cannabis cultivation and manufacturing uses are low traffic generators, and given that the traffic study for the Project has studied trip generation and impacts on City streets, and identified improvement projects required to keep traffic flows operating at acceptable levels, the CUP would not negatively impact traffic or the capacity of surrounding streets.

4. Where the proposed use may be potentially hazardous or disturbing to existing or reasonably expected neighboring uses, it must be justified by the common public interest as a benefit to the community as a whole.

The CUP will not result in hazardous uses or substances. Cannabis uses would likely use fertilizers and pesticides, which are highly regulated. Any cannabis business would require permits from and compliance with RWQCB and State licensing agencies, including the management and disposal of hazardous materials. In addition, cannabis uses would occur within a master planned industrial/business park development, and not adjacent to residents or other sensitive receptors.

5. The proposed use will include vehicular approaches to the property designed for reasonable minimal interference with traffic on surrounding public streets or roads.

The CUP will allow the cannabis use only within the MS portion of the site, and only within buildings that are planned for the site. Therefore, any cannabis business proposed under this CUP would be required to access the site from the main entry drive on Airport Boulevard, and would use the internal street system. The CUP does not interfere with traffic on surrounding streets

because the traffic study prepared for the Project as a whole analyzed traffic impacts and provided mitigation measures and improvements required to maintain acceptable levels of service on City streets.

Conditional Use Permit 325

Pursuant to Coachella Municipal Guidelines Chapter 17.74, Conditional Uses, subject to the provisions of this chapter, the Planning Commission must make the following findings for CUP 325:

1. The proposed use will not be in conflict with, but will be in harmony with and in accordance with the objectives of the general plan.

The CUP would allow a drive-through restaurant to occur within the 2.2± acres of CG land proposed at the south end of the Project site. As described in the staff report, this use will provide support for workers in the Project, the traveling public and nearby residents and businesses. This is consistent with the intent of the Industrial District, which provides for support services for employees in industrial projects in the District. The CUP is therefore consistent with the General Plan.

2. The proposed use will be located, designed, constructed, operated and maintained so as to be compatible with the existing or intended character of the general vicinity and shall not change the essential character of the same area.

The future drive-through on the Project site will be required to conform to AR 20-04, which master plans the architecture and landscaping for the entire Project site. The use is typical of a support service for an industrial or business park, or for commercial development at a freeway off-ramp. The area currently consists of a mix of businesses, vacant land and a mobile home park on the south side of Airport Boulevard, and is envisioned in Subarea 8 of the General Plan as an employment center area. Therefore, the CUP will be compatible with the character of the Project and the area, and will not change that character.

3. Consideration is to be given to harmony in scale, bulk, coverage and density, to the availability of public facilities and utilities, to harmful effect, if any, upon desirable neighborhood character, to the generation of traffic and the capacity of surrounding streets, and to any other relevant impact of the development.

The CUP would allow a drive-through in a building already designed and proposed within the Project for that purpose. Because the design is established in AR 20-04, any user would occupy a building that is compatible with the Project as a whole. Further, the use is consistent and compatible with industrial and business park uses, and will not impact residential neighborhoods or sensitive receptors. The Project EIR has studied trip generation and impacts on City streets, including a drive-through restaurant, and identified improvement projects required to keep traffic flows operating at acceptable levels. Therefore, the CUP would not negatively impact traffic or the capacity of surrounding streets.

4. Where the proposed use may be potentially hazardous or disturbing to existing or reasonably expected neighboring uses, it must be justified by the common public interest as a benefit to the community as a whole.

The development of a drive-through restaurant will not result in hazardous uses or the use of hazardous materials, insofar as a drive-through restaurant neither creates hazardous conditions, not uses hazardous materials. Therefore, the CUP will not result in impacts to neighboring uses.

5. The proposed use will include vehicular approaches to the property designed for reasonable minimal interference with traffic on surrounding public streets or roads.

The CUP will allow the drive-through use only within a building planned for that use within the Project. Therefore, any drive-through proposed under this CUP would be required to access the site from the main entry drive on Airport Boulevard, and would use the internal street system. The traffic analysis included a study of stacking at the drive-through site, which found that all traffic would be contained on the site, and would not conflict with adjacent uses. The CUP does not interfere with traffic on surrounding streets because the traffic study prepared for the Project as a whole analyzed traffic impacts and provided mitigation measures and improvements required to maintain acceptable levels of service on City streets.

Conditional Use Permit 326

Pursuant to Coachella Municipal Guidelines Chapter 17.74, Conditional Uses, subject to the provisions of this chapter, the Planning Commission must make the following findings for CUP 326:

1. The proposed use will not be in conflict with, but will be in harmony with and in accordance with the objectives of the general plan.

The CUP would allow a convenience store and gas station to occur within the 2.2± acres of CG land proposed at the south end of the Project site. As described in the staff report, this use will provide support for workers in the Project, the traveling public and nearby residents and businesses. This is consistent with the intent of the Industrial District, which provides for support services for employees in industrial projects in the District. The CUP is therefore consistent with the General Plan.

2. The proposed use will be located, designed, constructed, operated and maintained so as to be compatible with the existing or intended character of the general vicinity and shall not change the essential character of the same area.

The future convenience store and gas station on the Project site will be required to conform to AR 20-04, which master plans the architecture and landscaping for the entire Project site. The use is typical of a support service for an industrial or business park, or for commercial development at a freeway off-ramp. The area currently consists of a mix of businesses, vacant land and a mobile home park on the south side of Airport Boulevard, and is envisioned in Subarea 8 of the General

Plan as an employment center area. Therefore, the CUP will be compatible with the character of the Project and the area, and will not change that character.

3. Consideration is to be given to harmony in scale, bulk, coverage and density, to the availability of public facilities and utilities, to harmful effect, if any, upon desirable neighborhood character, to the generation of traffic and the capacity of surrounding streets, and to any other relevant impact of the development.

The CUP would allow a convenience store and gas station in a building already designed and proposed within the Project for that purpose. Because the design is established in AR 20-04, any user would occupy a building that is compatible with the Project as a whole. Further, the use is consistent and compatible with industrial and business park uses, and will not impact residential neighborhoods or sensitive receptors. The Project EIR has studied trip generation and impacts on City streets, including a convenience store and gas station, and identified improvement projects required to keep traffic flows operating at acceptable levels. Therefore, the CUP would not negatively impact traffic or the capacity of surrounding streets.

4. Where the proposed use may be potentially hazardous or disturbing to existing or reasonably expected neighboring uses, it must be justified by the common public interest as a benefit to the community as a whole.

The development of a convenience store and gas station will result in the presence of large amounts of fuel on the property. The storage and dispensing of fuel is highly regulated by County, State and federal agencies, and any operator would be subject to these regulations. Because the regulations are intended to protect the public from hazards associated with the use, the CUP will not result in impacts to neighboring uses.

5. The proposed use will include vehicular approaches to the property designed for reasonable minimal interference with traffic on surrounding public streets or roads.

The CUP will allow the convenience store and gas station only within a building planned for that use within the Project. Therefore, any such use proposed under this CUP would be required to access the site from the main entry drive on Airport Boulevard, and would use the internal street system. The traffic analysis included a study of traffic accessing the gas station, which found that all traffic would be contained on the site, and would not conflict with adjacent uses. The CUP does not interfere with traffic on surrounding streets because the traffic study prepared for the Project as a whole analyzed traffic impacts and provided mitigation measures and improvements required to maintain acceptable levels of service on City streets.

Tentative Parcel Map 39721

Pursuant to Coachella Municipal Guidelines Chapter 16.12, Tentative Map, subject to the provisions of this chapter, the Planning Commission must make the following findings for Tentative Map approval:

The Planning Commission shall deny approval of a tentative map, as required by the Subdivision Map Act, if it makes the following findings:

1. That the proposed map is not consistent with applicable general and specific plans;

The Project site is located in the Industrial District as defined by the General Plan. The TPM proposes the subdivision of the parcel consistent with the uses included in the Project, which are allowable and foreseen uses in the General Plan. The TPM will therefore be consistent with the General Plan, and this finding does not apply to the proposed TPM.

2. That the design or improvement of the proposed subdivision is not consistent with applicable general and specific plans;

The General Plan designates the Project site an Industrial District. The TPM includes improvements, including streets, retention basins, utility connections and other features that are necessary for the operation of the Project, and consistent with the City's standard requirements, including requirements for industrial, business park and commercial uses. The size and shape of the parcels are consistent with the various uses proposed within the Project, and the design includes improvements to serve all of these uses. The TPM will therefore be consistent with the requirements of the General Plan, and this finding does not apply to the proposed TPM.

3. That the site is not physically suitable for the type of development;

The Project site is generally flat, and does not contain any physical features which would prohibit or constrain development. The Project will connect to Airport Boulevard, and has integrated plans for improvements to the Airport Boulevard bridge which are consistent with the County's plans for that bridge. The distribution of buildings, streets and other facilities within the Project site allows for the safe and orderly movement of vehicles and people throughout the site. Therefore, this finding does not apply to the proposed TPM.

4. That the site is not physically suitable for the proposed density of development;

The Project is proposed in the MS and CG zones, and proposes development consistent with the development standards of both zones. The Project includes all of the ancillary facilities needed for the proper operation of a master planned industrial/commercial project, including roads, parking areas, retention basins and utility connections necessary for the safe operation of all components of the Project. The site is therefore physically suitable for the Project, and this finding does not apply to the proposed TPM.

5. That the design of the subdivision or the proposed improvements are likely to cause substantial environmental damage or substantially and unavoidably injure fish or wildlife or their habitat;

An EIR was prepared for the proposed Project which analyzes all the potential impacts of the Project, and proposed mitigation measures where necessary to reduce impacts to less than significant levels. Mitigation measures have been applied to assure that impacts to biological

resources, including birds and bats which could occur on the site, will be less than significant. The EIR also found that the Project would have significant and unavoidable impacts associated with VMT generated from the site. However, the City Council will consider, as allowed under CEQA, whether the benefits of the project outweigh the impacts associated with VMT, and make Findings and a Statement of Overriding Considerations when they consider the Project for final approval. The approval of the Project would also include a Mitigation Monitoring and Reporting Program which will assure that the required mitigation measures are implemented throughout construction and operation of the Project. Therefore, this finding does not apply to the proposed TPM.

6. That the design of the subdivision or the type of improvements is likely to cause serious public health problems;

The TPM proposes the subdivision of 43± acres of land into 8 parcels to facilitate the development of a master planned industrial/business park/commercial project. All components of the Project have been reviewed by the City Engineer, and the City's Utilities Department to assure that sufficient improvements and facilities are proposed to adequately serve the Project area, including all of the uses proposed. These requirements and conditions of approval are designed to assure that no impacts to public health will occur. Therefore, this finding will not apply to the proposed TPM.

7. That the design of the subdivision or the type of improvements will conflict with easements, acquired by the public at large, for access through or use of property within the proposed subdivision. In this connection, the governing body may approve a map if it finds that alternate easements, for access or for use, will be provided, and that these will be substantially equivalent to ones previously acquired by the public.

The proposed TPM will not conflict with any public easements acquired for access or use by the public at large within the proposed subdivision. The Riverside County Office of the Fire Marshal and Engineering Department/Public Works Department have reviewed and approved the access points to the site. The subdivision of land will not conflict with easements for access through or use of property and as such, the subdivision's design is confirmed to be in harmony with existing public easements. Therefore, this finding does not apply to the proposed TPM.

Architectural Review 20-04

Pursuant to Coachella Municipal Guidelines Chapter 17.72, Architectural Review, subject to the provisions of this chapter, the Planning Commission must make the following findings for the Architectural Review:

1. The proposed project is consistent with the general plan;

AR 20-04 will result in an industrial and commercial master planned project with uses permitted and conditionally permitted in the Industrial District of the General Plan, and the MS and CG zones of the Municipal Code. The design and distribution of the buildings is consistent with the development standards and requirements of the Industrial District as specified in the Land Use Element. The AR will also result in the generation of jobs opportunities for City residents, and provides an isolated site which does not conflict with surrounding neighborhoods.

2. The proposed project complies with zoning regulations;

The buildings, parking and ancillary structures proposed in the AR conform to the development standards of the MS and CG zones, as applicable. Setbacks and building heights are consistent with the requirements in each zone, and do not exceed these standards. The Project is consistent with Fire Department and Engineering requirements, and has been conditioned appropriately to comply with City standards.

3. The proposed project is consistent with the city's design guidelines;

The Project will provide a high quality design for an industrial, business park and commercial project, including a unified design theme for architecture and landscaping. All future users within the Project will be required to maintain the same level of development and maintenance to assure the long term quality of the Project.

4. The proposed development will not be detrimental to the public health, safety, or welfare, or materially injurious to properties and improvements in the vicinity;

The Project proposes a master planned, self-contained development that will be isolated from sensitive receptors and residential neighborhoods in the City. The uses likely to locate within the Project are not expected to propose businesses that contain or use hazardous materials, and those that could will be regulated by City, County, State and federal agencies. The improvement of the property will facilitate the development of other surrounding properties by extending utility services in this area of the City, which is still developing and expanding.

5. The proposed project is located, designed, constructed, operated and maintained so as to be compatible with the existing or intended character of the general vicinity and shall not change the essential character of the same area.

The Project is proposed in the Industrial District, and in Subarea 8, as defined in the General Plan. This area is envisioned for long term economic growth in the City, and for the development of projects similar in style, use and scope to that proposed by the Project. The Project's design consists of a unified architectural and landscaping theme that will assure a high quality of development and support future developments in the area to also develop to a high standard. The Project will include a Property Owners' Association or similar mechanism to manage the Project's facilities in total, and assure long term maintenance of the site.

PUBLIC HEARING NOTICE:

A notice of public hearing to consider the Project was published in the Desert Sun, the newspaper of record, on March 13, 2026, and a public hearing notice was mailed to property owners within a radius of 300- feet of the subject property on March 13, 2026, pursuant to Section 17.74.010G of the Coachella Municipal Code. At the time of issuance of this staff report, staff had not received public comments on this application.

ENVIRONMENTAL REVIEW:

The City determined that the Project as proposed could have a significant impact on the environment, and required the preparation of an Environmental Impact Report (EIR). The EIR analyzed all of the required environmental issue areas and found that mitigation measures could be applied to the Project to reduce impacts to less than significant levels for all issue areas except the Project's impacts from the generation of Vehicle Miles Traveled. As described in the EIR, those impacts remain significant and unavoidable. The EIR is available at: https://www.coachella.org/departments/development-services/environmental-reviews

The City circulated the Draft EIR for public comment between July 1 and September 3, 2025. During that time, the City received 17 comments from various public agencies and private parties. In response to these comments, the City prepared a Final EIR/Response to Comments, which is provided as Attachment 6. The Final EIR contains all responses to public comments, changes made to the EIR as a result of these responses, and the Mitigation Monitoring and Reporting Program for the Project.

Because the EIR identified that VMT impacts would be significant and unavoidable, the City Council will need to consider whether the benefits of the Project outweigh the impacts associated with VMT, as provided in CEQA Guidelines Section 15093. As stated in that section:

> "*CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."*"

As provided in the Resolution, the Planning Commission would recommend not only that the City Council certify the EIR, but that City Staff prepare and provide Findings and a Statement of Overriding Considerations for the City Council's consideration. In this case, it is Staff's recommendation that the impacts associated with VMT, which at 30.2 VMT per employee will exceed the County's 29.0 VMT per employee, even with the implementation of mitigation measures, are outweighed by the economic, legal, social and technological benefits associated with the Project, and that the Planning Commission recommend that the City Council adopt Findings and a Statement of Overriding Considerations for the Project.

ALTERNATIVES:

1) Approve Resolution No. 2026-09 recommending that the City Council approve Zone Change 20-01, CUP 324, CUP 325, CUP 326, Tentative Parcel Map 39721, AR 20-04 and DA 25-02 with the findings and conditions as recommended by Staff, and certify the Coachella Airport Business Park Development Environmental Impact Report (SCH No. 2023040106), including Findings and a Statement of Overriding Considerations.

2) Approve Resolution No. 2026-09 recommending that the City Council approve recommending that the City Council approve Zone Change 20-01, CUP 324, CUP 325, CUP 326, Tentative Parcel Map 39721, AR 20-04 and DA 25-02 with the findings and conditions as recommended by Staff, with modifications as proposed by the Planning Commission, and certify the Coachella Airport Business Park Development Environmental Impact Report (SCH No. 2023040106), including Findings and a Statement of Overriding Considerations.

3) Deny Resolution No. 2026-09

4) Continue this item and provide staff and the applicant with direction.

RECOMMENDED ALTERNATIVE(S):

Staff recommends Alternative #1 for recommending that the City Council approve Zone Change 20-01, CUP 324, CUP 325, CUP 326, Tentative Parcel Map 39721, AR 20-04 and DA 25-02 and certify the Coachella Airport Business Park Development Environmental Impact Report (SCH No. 2023040106), including Findings and a Statement of Overriding Considerations.

Attachments:

1. Resolution No. 2026-09
2. Tentative Parcel Map, Grading Plan and Phasing Plan
3. Architectural Plan Set
4. Pylon Sign Plans
5. Landscape Plans
6. Final EIR and MMRP
7. Development Agreement
8. Published Copy of the Notice of Public Hearing

RESOLUTION NO. PC2026-09

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF COACHELLA RECOMMENDING TO THE CITY COUNCIL OF THE CITY OF COACHELLA THE APPROVAL OF CHANGE OF ZONE CZ 20-01, AND THE CONDITIONAL APPROVAL OF CONDITIONAL USE PERMIT 324, CONDITIONAL USE PERMIT 325, CONDITIONAL USE PERMIT 326, TENTATIVE TRACT MAP NO. 39721, ARCHITECTUAL REVIEW 20-04 AND DEVELOPMENT AGREEMENT DA 25-02 FOR THE PROPOSED AIRPORT BUSINESS PARK PROJECT CONSISTING OF 43± ACRES LOCATED AT THE NORTHWEST CORNER OF AIRPORT BOULEVARD AND STATE ROUTE 86, APN 763-330-013, 763-330-018, and 763-330-029; AND RECOMMENDING THE PREPARATION OF FINDINGS AND A STATEMENT OF OVERRIDING CONSIDERATION AND CERTIFICATION OF THE COACHELLA AIRPORT BUSINESS PARK DEVELOPMENT ENVIRONMENTAL IMPACT REPORT AND ADOPTION OF A MMRP (SCH NO. 2023040106). APPLICANT: EMPIRE AIRPORT LLC.

WHEREAS, in June of 2020, Empire Airport LLC, submitted applications for a Change of Zone, three Conditional Use Permits, a Tentative Parcel Map, and an Architectural Review and associated environmental documentation for the development of a master planned industrial and business park with convenience commercial uses, and subsequently, in 2025, submitted a Development Agreement application for 43± acres at the northwest corner of Airport Boulevard and State Route 86 ("the Project"); and,

WHEREAS, the Project site is designated Industrial District in the City of Coachella General Plan; and,

WHEREAS, the Project is consistent with and intended to implement the vision of the Coachella Municipal Code and the General Plan 2035 pertaining to land use patterns, building and site design, and public right-of-way improvements; and

WHEREAS, pursuant to section 21067 of the Public Resources Code, and Section 15367 of the State CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.), the City of Coachella is the lead agency for the proposed Project; and

WHEREAS, pursuant to the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq. the City circulated an Initial Study for public comment in April of 2023, and based on the comments and concerns raised by the public, the City determined that the Project could have a significant impact on the environment, and that an Environment Impact Report (EIR) should be prepared; and,

WHEREAS, the City prepared the Coachella Airport Business Park Development Environmental Impact Report (SCH No. 2023040106) which determined that all impacts except those associated with Vehicle Miles Traveled (VMT) could be mitigated to less than significant levels; and,

WHEREAS, the City circulated the EIR for public comment between July 21 and September 3, 2025, received 17 comment letters from various agencies, private parties and Native American Tribes; and**,**

WHEREAS, the City has prepared responses to the comments received on the EIR, as well as minor changes and corrections to the EIR document, and assembled them in the Final EIR provided to the Planning Commission; and**,**

WHEREAS, on April 29, 2026 the Planning Commission held a duly noticed public hearing to review the project and the related environmental documents, at which time during the hearing members of the public were given an opportunity to testify regarding the Project; and

WHEREAS, after said public hearing, the Planning Commission recommended that the City Council approve this Project; and,

WHEREAS, all other legal prerequisites to the adoption of this Resolution have occurred.

NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF COACHELLA DOES HEREBY FIND, DETERMINE AND RESOLVE AS FOLLOWS:

SECTION 1. Recitals. The above recitals are true and correct and incorporated herein as findings of fact.

SECTION 2. Compliance with the California Environmental Quality Act. The Planning Commission has reviewed and considered the information contained in the Coachella Airport Business Park Development Environmental Impact Report (SCH No. 2023040106), the Final EIR and other documents contained in the administrative record for the Project. The Planning Commission finds adequacy in the CEQA documents and finds that the Draft and Final EIR and administrative record contain a complete and accurate reporting of the environmental impacts associated with the Project and reflects the independent judgment and analysis of the Planning Commission. The Planning Commission finds that the Draft and Final EIR, as shown in "Exhibit B" of this Resolution and made a part hereto, has been completed in compliance with CEQA, the State CEQA Guidelines, and the City of Coachella's Local CEQA Guidelines.

SECTION 4. Findings on Environmental Impacts. Having reviewed the EIR, the administrative record, and all written and oral evidence presented to the Planning Commission, the Planning Commission finds that the EIR contains a complete, objective,

and accurate reporting of the environmental impacts associated with the Project and reflects the independent judgment and analysis of the Planning Commission. The Planning Commission further finds that the significant impacts associated with VMT have been mitigated to the extent feasible, but remain significant and unavoidable, and directs City staff to prepare Findings and a Statement of Overriding Consideration for the City Council. The Planning Commission recommends that the City Council adopt a Mitigation Monitoring and Reporting program pursuant to State CEQA Guidelines Section 15097.

SECTION 6. Change of Zone 20-01. The Planning Commission hereby recommends that the City Council approve Change of Zone 20-01, to modify the Zoning Map from Heavy Industrial (MH) to Manufacturing Service (MS) for 40.8± acres and change 2.2± acres from MH to General Commercial (CG) for APNs 763-330-013, 763-330-018, and 763-330-029.

SECTION 7. Tentative Parcel Map 39721, CUP 324, CUP 325, CUP 326, AR 20-04 and DA 25-02. The Planning Commission hereby recommends that the City Council approve the Project applications, subject to the findings in the staff report, and the conditions of approval attached as Exhibit A.

SECTION 8. Custodian of Records. The documents and materials that constitute the record of proceedings on which these findings are based are located at Coachella City Hall. City Clerk is the custodian of the record of proceedings.

SECTION 9. Execution of Resolution. The Planning Commission Chair shall sign this Resolution and the Planning Commission Secretary shall attest and certify to the passage and adoption thereof.

APPROVED AND ADOPTED by the members of the City of Coachella Planning Commission on this 6th day of May, 2026.

_____
Eva Lara
Planning Commission Chair

ATTEST:

_____
Kendra Reif
Planning Commission Secretary

APPROVED AS TO FORM:

_____

City Attorney

I HEREBY CERTIFY that the foregoing Resolution was adopted by the Planning Commission at a regular meeting of the Planning Commission held on the 6th day of May, 2026, and was adopted by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

_____
Kendra Reif
Planning Commission Secretary

EXHIBIT A
RESOLUTION PC 2026-09

CONDITIONS OF APPROVAL
Architectural Review No. 20-04
Tentative Parcel Map No. 37921
Conditional Use Permit No. 324, 325 and 326
APN# 763-330-013, -018, -029
Coachella Airport Business Park

GENERAL CONDITIONS

1. The applicant shall defend, indemnify and hold harmless the City of Coachella, its officials, officers, employees, and agents from and against any claim, action, or proceeding against the City, its officials, officers, employees or agents to attack, set aside, void or annul any project approval or condition of approval of the city concerning this project, including but not limited to any approval or condition of approval or mitigation measure imposed by the City Council or Planning Commission. The City shall promptly notify the applicant of any claim, action, or proceeding concerning the project and the City shall cooperate fully in the defense of the matter. The City reserves the right, at its own option, to choose its own attorney to represent the City, its officials, officers, employees and agents in the defense of the City Attorney, within five days of the effective date of this approval.

2. The working drawings shall include within the first four pages a list of all conditions of approval included in this resolution.

3. CFD. The applicant shall be subject to further requirements that it participate in the Community Facilities District for lots within Tentative Parcel Map 39721 that the City proposed to establish under the Mello-Roos Community Facilities Act of 1982, Section 13311 of the California Government Cod, as amended, for all undeveloped property within the boundaries of the City, including the subject property subject to this development approval (Tentative Parcel Map No. 39721), to finance police and fire services for such property. The applicant shall do everything necessary for inclusion of the property subject to this development approval within such District upon its establishment. This development approval is subject to such requirement as a condition, unless such District is established prior to the effectiveness of this development approval in which case, it shall be a condition precedent. The Community Facilities District shall be established before issuance of the first certificate of occupancy.

4. LLMD. The owner shall agree to the formation of a Landscape and Lighting Maintenance District(LLMD) for the maintenance of the lighting, landscaping and irrigation. The owner shall prepare the improvement plans, Engineer's Report, Estimated Costs, and submit to the City Engineer as required for the formation of the LLMD. The funds to be deposited shall be a minimum of $1,000. Costs over

$1,000 shall be billed by the City to the owner for payment prior to the recordation of the Final Map. The LLMD shall be formed before issuance of the first certificate of occupancy.

5. CC&R's. The owner shall agree to the formation of a Property Owners' Association for maintenance of all common areas including streets, retention basins, fencing, and on-site amenities.

6. CC&R's. The Property Owners' Association shall adopt Conditions, Covenants and Restrictions (CC&R's), and act as a liaison to the City for review of the placement, type, architectural style, materials, and landscaping of all buildings and lots. The proposed CC&Rs shall be submitted for City and Riverside County Fire review prior to recordation of final map and the City shall be a third-party beneficiary to the CC&Rs.

7. Prior to the recordation of the final map the applicant shall submit detailed landscaping irrigation plans and sign plans for review, including plans for all on-site landscaping and retention basins for approval by the City Engineer and Development Services Director.

8. All street names and addressing shall be consistent with City and USPS policies.

9. The applicant shall submit, and must obtain approval from the Community Development Director, a letter from a registered landscape architect confirming that landscaping and irrigation have been installed in accordance with the approved plans prior to issuance of a certificate of occupancy. Any damaged, dead or decayed landscape areas shall be replaced per approved landscape plans upon landscape inspection by the Community Development Director and prior to issuance of a certificate of occupancy.

10. Landscaping and irrigation shall be provided in accordance with Section 17.54.010(J) of the Municipal Code and in accordance with the State Model Water Efficient Landscape Ordinance (AB 1881). Water budget calculations, including the Maximum Applied Water Allowance (MAWA) and Estimated Total Water Use (ETWU) shall be provided as part of the landscaping and irrigation plan.

11. All development on the site shall be consistent with the plans approved by the City Council for AR 20-04

12. The Mitigation Measures contained in the Coachella Airport Business Park Development Environmental Impact Report (Sch No. 2023040106), as amended in the Final EIR and included in the adopted Mitigation Monitoring and Reporting Program are incorporated in their entirety by this reference.

Building

13. All structures on the Project site shall comply with the California Building Code in effect at the time that building permits are submitted.

Engineering

PRIOR TO APPROVAL OF ENGINEERING PLANS or ISSUANCE OF ENGINEERING PERMITS:

FINAL MAP:

14. A focused Traffic Analysis has been prepared for the project by an appropriately licensed professional engineer and incorporated into the final CEQA documents. The TA includes but not limited to identification of trip generation, traffic distribution and impact on existing transportation facilities and at time of General Plan build-out, all relevant, ingress and egress movements, lines of sight, queuing analysis, and alignment studies (preliminary signing and striping plan). All Street improvement and site access plans shall conform the approved TA and Environmental documents. Applicant shall be required to obtain approval of all site access and circulation from the Fire Marshall, City engineer, Development Services and Caltrans.

15. A preliminary soils report shall be prepared for the project by an appropriately licensed professional engineer. At a minimum, the soils report shall provide specific analyses and recommendations for grading, pavement structural sections, and infiltration.

16. A comprehensive drainage report, prepared by California Registered Civil Engineer, shall be submitted for review and approval by the City Engineer prior to issuance of any permits. The report shall contain pre- and post-development hydrology maps showing on-site and off-site tributary drainage areas and shall be prepared in accordance with the requirements of the Riverside County Flood Control District. Adequate provisions shall be made to accept and conduct the existing tributary drainage flows around or through the site in a manner which will not adversely affect adjacent or downstream properties. If the design of the project includes a retention basin, it shall be sized to contain the runoff resulting from a 10-year storm event and the runoff from a 100-year storm event shall be contained within basin with shallow ponding (3.5' max.). The basin shall be designed to evacuate a 10-year storm event within 72 hours. The size of the retention basin(s) shall be determined by the hydrology report and be approved by the City Engineer. Retention basin shall be provided with a minimum of 2.00 feet sandy soil if determined to contain silt or clay materials. Maximum allowable percolation rate for design shall be 10 gal./s.f./day unless otherwise approved by the City Engineer. A percolation test for this site is required to be submitted. A combination drywell vertical drain field shall be constructed at all points where runoff enters the retention basin. Drywell & vertical drain field design shall be based on soils borings made at the proposed drywell locations after the retention basins have been rough graded. Minimum depth shall be 45-feet. A log that includes sieve analysis for each strata of the borings shall be

submitted to the City Engineer for confirmation of depth of the vertical drain fields. Underground retention under the proposed parking area will be considered as an alternative to surface retention subject to the approval of the City Engineer.

17. Prepare and record necessary drainage easements to implement the project in accordance with drainage law.

18. A storm water quality management plan shall be prepared for the project by California Registered Civil Engineer in compliance with NPDES and State Water Quality Control Board regulations. The project shall be designed to specify preferential use of Low Impact Development Best Management Practices that reduce pollutants and runoff volume.

19. Applicant shall submit for review and approval by the City Engineer all documents related to any existing and proposed on-site and off-site easements that may affect the development of the site. All easements shall be identified on the engineering plans.

20. Prior to approval of the Final Map, the applicant shall resolve potential CVWD issues related to existing tile drains or irrigation mains located within the tract boundary or along the streets adjacent to the tract. If necessary, tile drains and irrigation lines shall be relocated and easement documents prepared for the new location of any such lines. The easement shall be shown on the final map. Plans for the tile drain or irrigation relocation shall be submitted to CVWD for approval and a copy of the plans shall be submitted to the City for evaluation regarding possible conflict with City facilities. The applicant shall submit to the City approved copies of any such relocation plan.

21. Full Street Improvements plans, Engineer Estimates for Construction, Street Improvements Bonds and Monument Bonds shall be approved prior to Approval of the Final Maps

22. Prior to submittal of the final map to the City Council for approval, the applicant shall post securities (Bonds) to guarantee the installation of required improvements and a Subdivision Improvement Agreement shall be submitted to Engineering Division for City Engineer and City Attorney approval.

23. All Airport Blvd. improvements, including traffic signal installations shall be completed prior to final occupancy for the first structure at the Tract.

GENERAL:

24. Applicant shall comply with the valley wide NPDES permit requirements including but not limited to submittal of a WQMP for plan review accompanied by a $3,000 plan check deposit for approval including executed maintenance agreement. All

unused plan check fees will be refunded to the applicant upon approval of the Final WQMP.

25. The developer shall submit a Fugitive Dust Control and Erosion Control plan in accordance with Guidelines set forth by CMC and SCAQMD to maintain wind and drainage erosion and dust control for all areas disturbed by grading. Exact method(s) of such control shall be subject to review and approval by the City Engineer. No sediment is to leave the site. Additional securities, in bond form, in amount of $2,000.00 per acre of gross area, and a one-time cash deposit of $2,000.00 are required to insure compliance with this requirement. No work may be started on or off site unless the PM-10 plan has been approved, the original plans, and executed dust control agreement, are filed in the engineering department at the City of Coachella.

26. Site access improvements shall be in conformance with the requirements of Title 24 of the California Administrative Code. This shall include access ramps for off-site and on-site streets as required.

27. In the event the project obtains electrical service from IID, the applicant shall provide necessary utility easements for IID and underground overhead distribution lines within the project boundaries. Applicant shall submit to the City a letter from IID that satisfies this requirement.

28. The applicant shall pay all necessary plan check, permit and inspection fees. Fees will be determined when plans are submitted to the City Engineering Department for plan check.

29. Applicant shall obtain approval of site access and circulation from Fire Marshall.

30. Internal roads shall be complete prior to final occupancy of any adjacent structure.

ROUGH GRADING:

31. Prior to issuance of rough grading permits, applicant shall comply with any pertinent sections of the approved site CEQA report. These studies may include but are not limited to: cultural resource surveys, archeological surveys or monitoring, biological surveys, nesting bird surveys, etc. Compliance with all required environmental studies associated with ground disturbance shall be confirmed by the Development Services department prior to issuance of grading permits.

32. Prepare and submit rough grading and erosion control plans for the project.

33. The project's soils engineer shall certify to the adequacy of the grading plan.

34. All projects developing one (1) acre or more of total land area, or which are part of a larger phased development that will disturb one acre of land, are required to obtain

coverage under the State Water Resources Control Board's (SWRCB) General Permit for storm water discharges associated with construction activity. Proof of filing a Notice of Intent (NOI) with the SWRCB for coverage under this permit is required. The Waste Discharger's Identification Number (WDID), issued by the SWRCB, must be shown on the grading plans. The project's Storm Water Pollution Prevention Plan shall be submitted for the City's review and approval.

PRECISE GRADING:

35. A precise grading/improvement plan, prepared by a California Registered Civil Engineer, showing building footprints, pad elevations, finished grades, drainage routes, retaining walls, erosion control, slope easements, and all other pertinent information shall be submitted for review and approval by the City Engineer.

36. Rough grading shall be certified by the project soils engineer prior to issuance of a permit for precise grading or building construction.

37. Provide and record a reciprocal use and maintenance agreement to assure common ingress and egress and joint maintenance of all common access, parking areas and drives.

38. If applicant is planning to build a wall, separate permits shall be required for wall construction. The maximum height of any wall shall be limited to six (6) feet as measured from an average of the ground elevations on either side.

STREET IMPROVEMENTS:

39. Street improvement plans prepared by a California Registered Civil Engineer shall be submitted for review and approval by the City Engineer. All street improvements including street lights shall be designed and constructed in conformance with City Municipal Code, General Plan, and Standards and Specifications. Street flow line grade shall have a minimum slope of 0.35 %.

40. Applicant shall construct all off-site and on-site improvements including street pavement, curb, gutter, sidewalk, street trees, medians, traffic signals, perimeter walls, perimeter landscaping and irrigation, storm drain, street lights, and any other incidental works necessary to complete the improvements. Driveways shall conform to City of Coachella standards for commercial driveways with a minimum width of 24.00 feet and curbed radius entrances.

41. Applicant shall construct street improvements along the State Route 86 South Bound off Ramp to the satisfaction of Caltrans and the City Engineer. Improvements along the State Highway frontage shall be submitted to the City for review and approval as well as Caltrans District 8 for Review and Approval and shall include at a minimum:

a. An emergency access/exit driveway may be installed onto the South Bound Off Ramp. This emergency access point may be gated with a Fire marshal approved Knox box. Access would be limited to emergency vehicles only and would have a hard passable surface suitable to support emergency vehicles and is incorporated into the landscape elements. This condition may apply at phase II of the project dependent on Fire Marshal and Caltrans review and approval.

b. Landscaping along the State Highway frontage shall be installed per Caltrans and Planning requirements and all frontage landscaping shall be complete and installed prior to the completion of phase 1 improvements.

c. Intersection improvements at the State Route 86 south bound on and off ramps shall be completed in conformance with the Traffic Impact Analysis subject to approval from Caltrans. Initial traffic signal modifications and synchronization shall be required prior to occupancy of the first structure as detailed below. Additional staged improvements may be conditioned to later phases of the project subject to comments and conditions imposed by Caltrans at a later date.

42. Applicant shall construct and dedicate streets and street improvements to conform to the General Plan. All street improvements on Airport Blvd. shall be completed prior to issuance of Certificate for occupancy for any on site structures. Airport Boulevard- Public Roadway as shown on the CUP and per these comments shall include the following:

    a. Dedication of land along southbound lane within project limits is required. This street is classified as Major Arterial with Bicycle lanes with 118 feet of right-of-way as per City of Coachella General Plan

    b. Street measured at Center line to northerly curb shall have a width of 49-foot.

    c. Applicant shall widen street along Airport Blvd. frontage to the Satisfaction of the City Engineer prior to the issuance of the first COO. It is noted that ultimate widening dimensions and layouts shall be dependent on review and approval of both the County of Riverside who owns and maintains the southerly half of the street, and Caltrans who owns and maintains the signalized intersection at Desert Cactus and Airport Blvd.

    d. Applicant shall install a primary driveway to the business park with a signalized intersection at the southwest corner of the property and shall place the primary driveway access as far west as practical to achieve spacing from the existing signalized intersection at Desert Cactus and Airport Blvd.

e. Applicant shall install a second driveway access point on the Airport Blvd. frontage that is limited to right hand turn movements. A raised concrete island shall be placed to force the right hand turn movements. Note that this secondary driveway must be approved by Caltrans due to its proximity to the Caltrans jurisdictional traffic signal.

f. Applicant shall install all sidewalk and curb and gutter transitions to uniformly connect to existing adjacent improvements and coordinate installation and/or relocation of fire hydrants, water meters, storm drain, wells, street lights and all other appurtenances as required to the satisfaction of the City Engineer.

g. Applicant shall install a landscape median along the frontage of Airport Blvd. Proposed median must be approved by the County of Riverside and Caltrans with design considerations for access to the southerly properties.

h. Applicant shall construct all appurtenant roadway components within project limits such as, but not limited to: curb and gutter, sidewalk, ADA ramps, Street Lights, Landscape, Traffic control striping, legends, Traffic control signs and street name signs to the satisfaction of the City Engineer.

i. Applicant shall also provide a 1.5 inch Mill and overlay of all existing pavement along the project frontage from curb face to curb face before the final acceptance of street frontage improvements by the City.

j. Applicant shall construct three-way signalized intersection at the proposed property entrance as well as full ADA improvements at four corners of the intersection to the satisfaction of the City Engineer. Per Caltrans requirements, the Signal at Desert Cactus and Airport Blvd. must be synchronized with the traffic signal at the property entrance.

k. Applicant shall construct signal modification and ADA ramp improvement at the northwest corner of Desert Cactus and Airport Boulevard. Applicant shall include signal synchronization with the property entrance traffic signal and any other modifications necessary to accomplish pedestrian, bicycle, and vehicle movements as well as full Airport Blvd. improvements as listed herein. Note that this northwest intersection quadrant is the off ramp for State Route 86 and under the jurisdictional control of Caltrans.

l. Applicant shall provide street widening on Airport Blvd east of Desert Cactus Drive to allow for proper alignment of the east and west bound lanes, at the widened intersection. All turn lanes and thru lanes shall meet Caltrans minimum standards for lane offsets and lane tapers at an

intersection per Caltrans standard highway design guidelines. This street widening shall also include relocation of the existing traffic signal at the northeast corner of Desert Cactus and Airport Boulevard. These improvements shall NOT include any modifications to the existing bridge structure or bridge components at the Airport Blvd/State Route 86 interchange. Note that this northeast intersection quadrant is the On Ramp for State Route 86 and under the jurisdictional control of Caltrans

m. Applicant shall underground all existing dry utilities at westbound lane within project limits such as, but not limited to: power poles, telecommunication poles and all other existing dry utilities to the satisfaction of the City Engineer.

43. Per the approved Traffic Impact Analysis that is part of the projects Final CEQA, additional offsite impacts are associated with the project. All offsite improvements shall require the payment of cash in lieu contributions in accordance with the projects fair share contributions shown in Tables 8-2, 8-3, 8-4 and 8-5 of the TIA. Applicant shall pay the highest listed value for any given intersection as listed in the referenced tables. Prior to the issuance of the fist building permit, Applicant shall deposit its fair-share payment for the two offsite improvements specified below, based on an agreed estimate of the cost of full reconstruction as identified in the TIA including design, project management and construction at standard prevailing wage rates.

a. Prior to the issuance of the first building permit for Phase I, Applicant shall make a cash in lieu fair share cash payment for the following intersections or street segments:

Location:	Project Fair Share %
Intersection: Avenue 54 and Grapefruit Blvd. (Signalize Intersection)	N/A – DIF/TUMF funded intersection
Intersection: Tyler Street and Grapefruit Blvd. (Signalize Intersection)	N/A – DIF/TUMF funded intersection
Intersection: Palm Street and Grapefruit (Signal Relocation/enhancement)	7.2%
Street: Grapefruit Blvd, Palm Street to Avenue 54	7.2%

(Widen pavement to 6 lane major arterial)	
Street: Grapefruit Blvd, Avenue 54 to Tyler Street (Widen pavement to 6 lane major arterial)	N/A – DIF/TUMF funded street segment
Intersection: Airport Blvd and Fillmore Street (Signalize Intersection)	N/A – DIF funded intersection
Street: SR 86 Southbound On and Off Ramps (Add southbound exit lane)	N/A – DIF/TUMF funded intersection

SEWER and WATER IMPROVEMENTS:

44. Sewer & Water Improvement Plans prepared by a California Registered Civil Engineer shall be submitted for engineering plan check and City Engineer approval.

45. Applicant shall construct all off-site and on-site water improvements and any other incidental works necessary to complete the improvements. Size and location of sewer and water improvements shall be approved by the City Engineer.

PRIOR TO ISSUANCE OF BUILDING PERMITS:

46. A final soils report, compaction report and rough grading certificate shall be submitted and approved prior to issuance of any building permits.

47. Provide a set of proposed Covenants, Conditions and Restrictions (CC&R) for review and approval. The proposed CC&Rs shall contain the Association's/Owner's maintenance obligations with respect to various facilities including, but not limited to, right-of-way and private landscaping, private streets, sidewalks, utilities, street lights, and Water Quality Management Plan (WQMP) features. This document must be submitted to and approved by the City before it is submitted to any other governmental entity.

48. Prior to issuance of building permits, all required public improvements, including landscaping and lighting of the retention basins, and landscaped areas along the exterior streets, shall be completed or secured with appropriate sureties to the satisfaction of the City Engineer. An engineering final inspection is required. "As-built" plans shall be submitted to and approved by the City Engineer. Prior to acceptance of the improvements by the City, such plans, once approved, shall be given to the city on compact disk in AutoCad format. All off-site and on-site

improvements shall be completed to the satisfaction of the City Engineer prior to acceptance of improvements for maintenance by the City.

49. The applicant's Civil Engineer shall field verify and certify that all BMPs are designed, constructed, and functional in accordance with the approved WQMP.

PRIOR TO RELEASE OF OCCUPANCY PERMITS/ACCEPTANCE OF PUBLIC IMPROVEMENTS:

50. Prior to issuance of certificate of occupancy, all public improvements, including landscaping and lighting of the retention basins, and landscaped areas along the exterior streets, shall be completed to the satisfaction of the City Engineer. An engineering final inspection is required. "As-built" plans shall be submitted to and approved by the City Engineer. Prior to acceptance of the improvements by the City, such plans, once approved, shall be given to the city on compact disk in AutoCad format. All off-site and on-site improvements shall be completed to the satisfaction of the City Engineer prior to acceptance of improvements for maintenance by the City.

Fire

51. **Fire Protection Water Supplies/Fire Flow** - Minimum fire flow for the construction of all buildings is required per CFC Appendix B. Prior to building permit issuance for new construction, the applicant shall provide documentation to show there exists a water system capable of delivering the required fire flow. Specific design features may increase or decrease the required fire flow. Will Serve Letters from the responsible water purveyor are required prior to a map recordation.

52. **Fire Protection Water Supplies/Hydrants** - The minimum number of fire hydrants required, as well as the location and spacing of fire hydrants, shall comply with CFC Appendix C and NFPA 24. Fire hydrants shall be located no more than 400 feet from all portions of the exterior of the building along an approved route on a fire apparatus access road, unless otherwise approved by the fire department. In areas where new water mains are extended along streets and hydrants are not needed for protection of structures, standard fire hydrants shall be provided at spacing not to exceed 1,000 feet along streets for transportation hazards. Fire hydrants shall be at least 40 feet from the building it is serving. A fire hydrant shall be located within 20 to 100 feet of the fire department connection for buildings protected with a fire sprinkler system. The size and number of outlets required for the approved fire hydrants are 4" x 2 ½" x 2 ½" (super hydrant). Reference CFC as amended and NFPA 24.

53. **Fire Department Access** - Fire apparatus access roads shall be provided within 150 feet of all exterior portions of buildings, unless otherwise approved by the fire department. Fire apparatus access roads shall have an unobstructed width of no less than 24 feet. Dead-end fire apparatus access roads exceeding 150 feet in length shall provide an approved turn around. The minimum required turning radius of a fire

apparatus access road is 38 feet outside radius and 14 feet inside radius. The construction of the fire apparatus access roads shall be all weather and capable of sustaining 75,000 lbs. Unless otherwise approved, the grade of a fire apparatus access road shall not exceed 16 percent and the cross slope shall not exceed 2.5 percent. The angles of approach and departure for fire apparatus access roads shall be a maximum of 6 percent grade change for 25 feet of approach/departure. Reference CFC as amended, Coachella City Ordinance, and Riverside County Fire Department Policies and Standards.

54. **Fire Lane marking:** Identification and marking of fire lanes, including curb details and signage, shall comply with all Riverside County Fire Department Standards.

55. **Fire Department Access Turn Around** – On-parcel dead-end fire apparatus access roads exceeding 150 feet in length shall provide a bulb turnaround at the terminus measuring a minimum of 38 feet outside radius and 14 feet inside radius. Parallel parking around the perimeter of the bulb is acceptable provided the bulb outside turning radius is increased by 8 feet. In-lieu of a bulb, a hammer-head type turnaround is acceptable where the top of the "T" dimension is 120 feet with the stem in the center. Additional turnaround designs may be acceptable as approved by the Fire Department. Reference CFC as amended and Riverside County Fire Department Policies and Standards.

56. **Secondary Access** – Unless otherwise approved by the Fire Department, dead end fire apparatus access roads shall not exceed 1,320 feet. Secondary egress/access fire apparatus access roads shall provide independent egress/access from/to the area or as otherwise approved by the Fire Department. Secondary egress/access fire apparatus access roads shall be as remote as possible from the primary fire apparatus access road to reduce the possibility that both routes will be obstructed by a single emergency. Additional fire apparatus access roads based on the potential for impairment by vehicle congestion, condition of terrain, climatic conditions, anticipated magnitude of a potential incident, or other factors that could limit access may be required by the Fire Department. Reference CFC as amended and Riverside County Fire Department Policies and Standards.

57. **Fire Department Building Construction Plan Review** - Submittal of construction plans to the Fire Department will be required. Final fire and life safety conditions will be addressed when the Fire Department reviews the plans. These conditions will be based on the California Fire Code, California Building Code (CBC), and related codes/standards adopted at the time of construction plan submittal. Reference CFC as amended.

58. **Fire Sprinkler System** - All new commercial buildings and structures 3,600 square feet or larger will be required to install a fire sprinkler system. Reference CFC as amended.

59. **Fire Alarm and Detection System -** A water flow monitoring system and/or fire alarm system may be required as determined at time of building construction plan review. Reference CFC as amended.

60. **Cannabis Facilities -** Deferred submittals shall be required for Carbon Dioxide Gas

Enrichments Systems and Plant Processing/Extraction Systems. Reference CFC as amended and Riverside County Fire Department Policies and Standards.

61. **Traffic Calming Devices -** Requests for installation of traffic calming designs/devices on fire apparatus access roads shall be submitted and approved by the Fire Code Official. Reference CFC as amended.

62. **Gate Access -** All electronically operated gates shall be provided with Knox key switches and automatic sensors for access. These gates shall be provided with access to gate equipment or another method to open the gate if there is a power failure. (Manual gates shall not be locked unless a Knox padlock or Knox Box containing the key to the lock is installed in an approved location on the approach side of the gate). A pedestrian gate, if used to provide access, shall be a minimum 3 feet wide and provided with a Knox Box/Padlock if locked. Reference CFC as amended.

63. **Fire Department Access Doors –** If high piled storage will be utilized in the building, Fire Department Access Doors may be required every 150 feet along all portions of the interior of the building that are along the fire apparatus access road. Reference CFC as amended.

64. **Water Plans -** If fire hydrants are required to be installed, applicant/developer shall furnish the water system fire hydrant plans to the Fire Department for review and approval prior to building permit issuance. Plans shall be signed by a registered civil engineer, and shall confirm hydrant type, location, spacing, and minimum fire flow. Once plans are signed and approved by the local water authority, the originals shall be presented to the Fire Department for review and approval. Reference CFC as amended.

65. **Emergency Responder Communication Coverage Systems -** Projects that do not meet the exceptions set forth by the Coachella Office of the Fire Marshal shall provide plans for an emergency responder radio coverage system. Reference CFC as amended and Riverside County Fire Department Policies and Standards.

66. **Fire Planning Review:** This planning case will also be reviewed by the Riverside County Fire Department's Fire Planning Division for the cumulative impact on the Fire Department's ability to provide an acceptable level of service. Additional requirements may be conditioned by Fire Planning to mitigate these impacts. Questions for Fire Planning can be addressed to RVCPlanningSubmittals@fire.ca.gov.

PRIOR TO FINAL

67. **Emergency Responder Radio Communication Compliance** - Fire Inspection of and function testing of the site-specific impacts to the regional Emergency Responder Radio Communication System without repeater installations, is required at a time in the development that all walls, floors, roofs, and un-stocked fixtures are installed. The results of the testing shall determine if there are critical impacts to the regional radio system and the need for any mitigations within a specified timeline of the development completion.

EXHIBIT B
RESOLUTION PC 2026-09

Draft and Final EIR

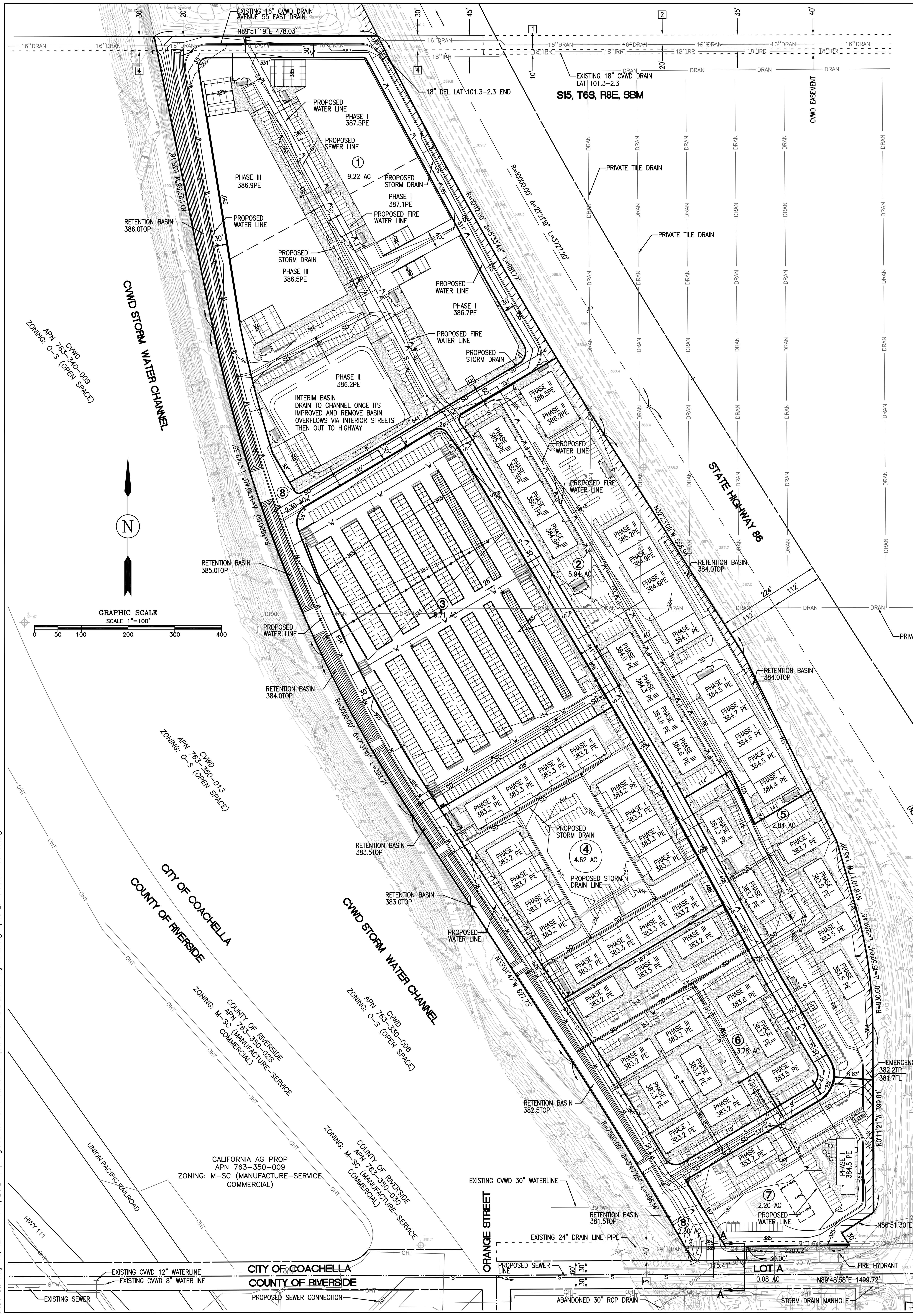
The Draft and Final EIR can be accessed at:

https://www.coachella.org/departments/development-services/environmental-reviews

IN THE CITY OF COACHELLA, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

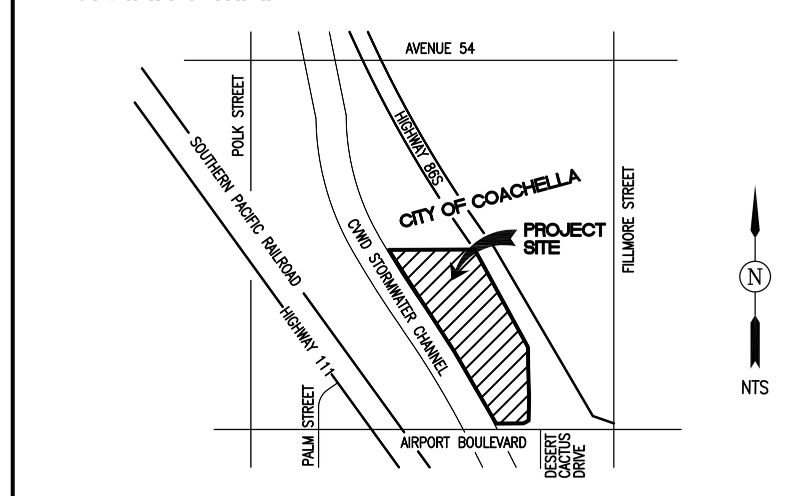
TENTATIVE PARCEL MAP NO. 39721

BEING A PORTION OF THE SOUTH HALF OF SECTION 15, T6S, R8E, SBM
PARCELS 5 AND 6 FOR CONDOMINIUM PURPOSES
DATE: MAY 2022



Plotted: May 05, 2022 - 4:47pm DWG: L:\projects\C1443 Coachella Airport Bus Park\survey\drawings\plan_sets\TPM 39721.dwg

VICINITY MAP



GENERAL NOTES

1. TOTAL AREA – 42.69 AC± ACRES, GROSS.
2. SEWAGE DISPOSAL AND WATER SUPPLY TO BE PROVIDED BY COACHELLA AVALLEY WATER DISTRICT.
3. FEMA FLOOD ZONE– FLOOD ZONE AE: AREAS OF SPECIAL FLOOD HAZARD AREAS WITH BASE FLOOD ELEVATION (BFE).
   FLOODPLAIN PER FIRM MAP NO. 06065C2270G EFFECTIVE DATE MARCH 6, 2018.
4. AIRPORT COMPATIBILITY ZONES: JACQUELINE COCHRAN, ZONE D
5. DRIVEWAY DESIGN TO AIRPORT BLVD MAY REQUIRE A SPECIALIZED CALTRANS INTERSECTION DESIGN IN ACCORDANCE WITH CALTRANS TRAFFIC OPERATIONS POLICY DIRECTIVE NO. 13-02, INTERSECTION CONTROL EVALUATION AND CONTROLS PER INDEX 401.5 AND PER CALTRANS COMPLETE STREETS INTERSECTION GUIDE.
6. TENTATIVE MAP NO. 39721 CONTAINS 8 LOTS.
7. PARCELS 5 AND 6 ARE FOR CONDOMINIUM PURPOSES.

AREA TABLE

PARCEL NUMBER	AREA	PARCEL NUMBER	AREA
1	9.22 AC	6	3.78 AC
2	5.94 AC	7	2.20 AC
3	6.71 AC	8	2.30 AC
4	4.62 AC	LOT A	0.08 AC
5	2.84 AC		

TOTAL AREA: 42.69 AC

LEGEND

PROJECT BOUNDARY
RIGHT OF WAY LINES
RESTRICTED ACCESS
LOT LINES
PROPOSED WATER LINE
W — PROPOSED WATER LINE
FW — PROPOSED FIRE WATER LINE
S — PROPOSED SEWER LINE
SD — PROPOSED STORM DRAIN
① PARCEL NUMBER

EXISTING EASEMENTS

[1] 10' WIDE PIPELINE EASEMENT IN FAVOR OF THE UNITED STATES OF AMERICA RECORDED 09/20/1948 IN BOOK 1015, PAGE 377 OF OFFICIAL RECORDS

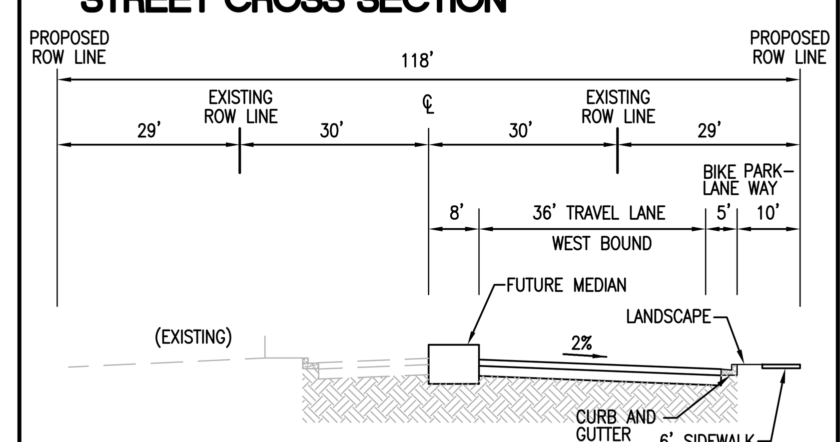
[2] 20' WIDE ROAD EASEMENT IN FAVOR OF THE SOUTHERN PACIFIC LAND COMPANY RECORDED 01/27/1954 IN BOOK 1549, PAGE 23 OF OFFICIAL RECORDS

[3] 40' WIDE PIPELINE EASEMENT IN FAVOR OF THE COACHELLA VALLEY COUNTY WATER DISTRICT RECORDED 04/11/1955 AS INST. NO. 23579 OF OFFICIAL RECORDS

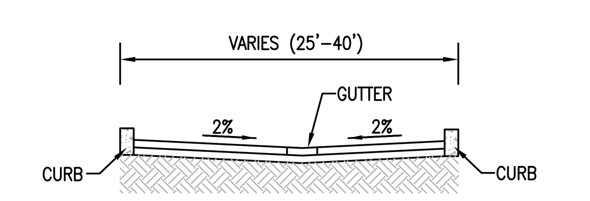
[4] 30' WIDE PIPELINE EASEMENT IN FAVOR OF THE COACHELLA VALLEY COUNTY WATER DISTRICT RECORDED 05/31/1963 AS INST. NO. 56675 OF OFFICIAL RECORDS

[5] PROPOSED NO-BUILT EASEMENT

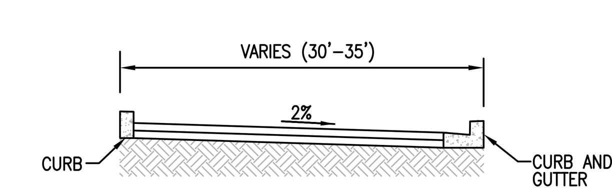
STREET CROSS SECTION



AIRPORT BOULEVARD
SECTION A-A
NOT TO SCALE



ON-SITE ACCESS ROAD
NOT TO SCALE



ON-SITE ACCESS ROAD
NOT TO SCALE

DEVELOPER

EMPIRE AIRPOT, LLC BY HAGGEN COMPANY
CONTACT: CHRIS FAHEY, PRESIDENT AND CHIEF OPERATION OFFICER
12302 EXPOSITION BOULEVARD
LOS ANGELES, CA 90064
TEL: (310) 820-1200
EMAIL: CFAHEY@HAAGENCO.COM

OWNER

EMPIRE AIRPOT, LLC BY HAGGEN COMPANY
CONTACT: CHRIS FAHEY, PRESIDENT AND CHIEF OPERATION OFFICER
12302 EXPOSITION BOULEVARD
LOS ANGELES, CA 90064
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TEM: EMAIL: CFAHEY@HAAGENCO.COM

ENGINEER

THE ALTUM GROUP
73-710 FRED WARING DR, STE 219
PALM DESERT, CA 92260
TEL: (760) 346-4750

LEGAL DESCRIPTION

BEING PORTION OF THE SOUTHWEST QUARTER AND THE SOUTHEAST QUARTER OF SECTION 15, TOWNSHIP 6, SOUTH, RANGE 8 EAST, SAN BERNARDINO BASE AND MERIDIAN, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT, THEREOF.

APN

763-330-013, 763-330-018 & 763-330-029

ZONING/GENERAL PLAN

EXISTING ZONING: M-H (HEAVY INDUSTRIAL)
PROPOSED ZONING: M-S (MANUFACTURING SERVICE) WITH A I-P (INDUSTRIAL PARK) OVERLAY
GENERAL PLAN: IL (LIGHT INDUSTRIAL)
EXISTING USE: VACANT
PROPOSED USE: LARGE & SMALL WAREHOUSE, SMALL BUSINESS, SELF STORAGE, SERVICE STATION, BRICK YARD, AND RETAIL (GS STATION AND DRIVE THROUGH)

LOT REQUIREMENTS

IP OVERLAY
MINIMUM LOT SIZE: MARIJUANA USES – 10 ACRES, ALL OTHER USES – 1 ACRE
MINIMUM LOT WIDTH: 180 FEET
MINIMUM LOT DEPTH: 220 FEET
MINIMUM LOT COVERAGE: 50%

YARD REQUIREMENTS

1. WHERE AN M-S ZONE ABUTS UPON A STREET OR HIGHWAY WHERE TWO-THIRDS OF THE PROPERTY IN THE BLOCK ON THE OPPOSITE SIDE OF THE STREET IS ZONED RESIDENTIAL, A YARD SHALL BE PROVIDED OF TEN (10) FEET IN DEPTH.
2. WHERE AN M-S ZONE ABUTS UPON A STREET OR HIGHWAY AND WHERE ONE OR BOTH ADJOINING ZONES ARE RESIDENTIAL, A YARD SHALL BE PROVIDED WHICH IS EQUAL IN DEPTH TO THE AVERAGE OF THE REQUIRED YARDS OF THE ADJOINING ZONES.
3. WHERE AN M-S ZONE ABUTS UPON A PRIMARY HIGHWAY AS DESIGNATED ON THE CIRCULATION ELEMENT OF THE GENERAL PLAN, A YARD SHALL BE PROVIDED OF TEN (10) FEET IN DEPTH.
4. WHERE AN M-S ZONE DIRECTLY ABUTS A RESIDENTIAL ZONE, THERE SHALL BE A YARD OF NOT LESS THAN THIRTY (30) FEET ADJOINING THAT ZONE. THIS SHALL BE REDUCED TO TWENTY (20) FEET WHERE THERE EXISTS A PUBLIC ALLEY SEPARATING THE TWO ZONES.

BASIS OF BEARINGS

CALIFORNIA COORDINATE SYSTEM, ZONE 6, NAD83 (2007.0 EPOCH) BETWEEN CITY OF COACHELLA BM 1014 AND BM 1016 TAKEN AS N89°46'19"E PER THE CITY OF COACHELLA BENCHMARK BOOK.

BENCH MARK

CITY OF COACHELLA BM 1016:
3-1/2" BRASS DISC SET IN THE TOP OF CURB ON THE SOUTH SIDE OF AIRPORT BOULEVARD. IT IS 22' SOUTH OF THE CENTERLINE OF AIRPOT BOULEVARD AND 2' EAST OF THE SOUTHEAST CORNER OF THE BRIDGE OVER HWY 86 S.

ELEVATION = 407.585 NAVD 88
THE ELEVATION LISTED ABOVE IS ACTUAL ELEVATION + 500' FEET TO AVOID NEGATIVE ELEVATION.

AERIAL TOPOGRAPHIC

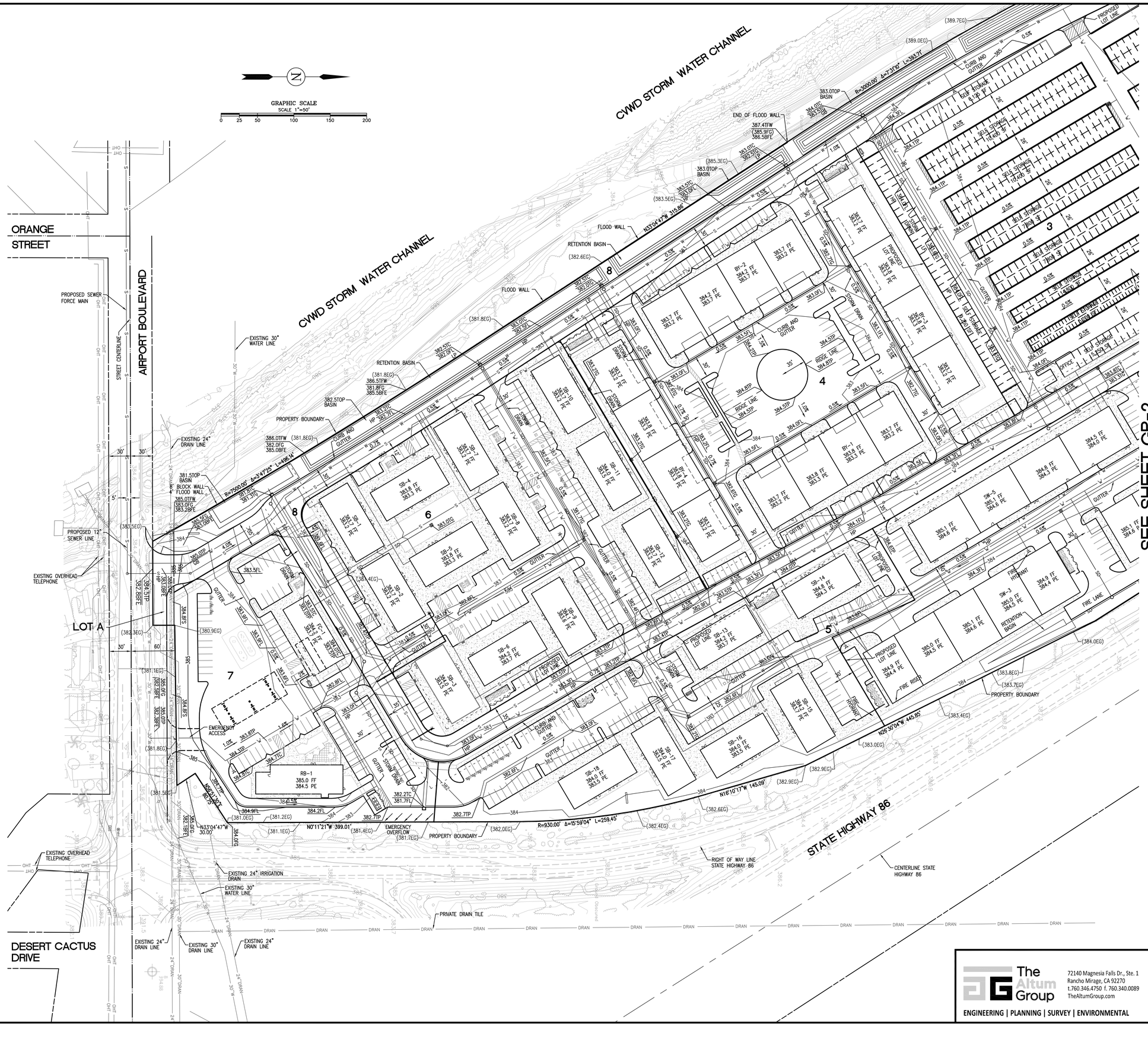
AEROTECH MAPPING, INC.
29970 TECHNOLOGY DRIVE, SUITE 220-C
MURRIETA, CA 92563 : (619) 606-5020
AERIAL PHOTOGRAPHY DATED: 1-11-2018

PREPARED BY:

The Altum Group
72140 Magnesia Falls Dr., Ste. 1
Rancho Mirage, CA 92270
t.760.346.4750 f. 760.340.0089
TheAltumGroup.com
ENGINEERING | PLANNING | SURVEY | ENVIRONMENTAL

SHEET NO. 1 OF 1

May 05, 2022 – AIRPORT BUSINESS PARK TENTATIVE PARCEL MAP NO. 39721



LEGEND

———	RIGHT OF WAY LINES
— — —	CENTERLINE
385	EXISTING CONTOURS
OHT	EXISTING OVERHEAD TELEPHONE
UGE	EXISTING UNDERGROUND ELECTRIC
DRAN	EXISTING PRIVATE DRAIN TILE LINE
12"W	EXISTING WATER LINE
18"IRR	EXISTING IRRIGATION LINE
W	PROPOSED WATER LINE
FW	PROPOSED PRIVATE FIRE WATER LINE
S	PROPOSED SEWER LINE
SD	PROPOSED STORM DRAIN
RB-1	RETAIL BUILDING
FC-1	FUEL CENTER
SB-1	SMALL BUSINESS
LW-1	LARGE WAREHOUSE
SW-1	SMALL WAREHOUSE
BY-1	BRICK YARD
FF	FINISHED FLOOR
PE	PAD ELEVATION
TP	TOP OF PAVEMENT
TC	TOP OF CURB
FS	FINISHED SURFACE
FL	FLOW LINE
TG	TOP OF GRATE
GB	GRADE BREAK
HP	HIGH POINT
LP	LOW POINT
(387.5EG)	EXISTING GRADE
	PROPOSED CONCRETE SIDEWALK
	PROPOSED AC PAVEMENT
8	LOT NUMBER
	PROPOSED FIRE HYDRANT
	PROPOSED WATER METER

PRELIMINARY EARTHWORK VOLUMES

(INCLUDES INTERIM BASIN)

	CUT	FILL
RAW	35,565 CU.YDS.	20,370 CU.YDS.
SUBSIDENCE (0.1')		6,940 CU.YDS.
SHRINKAGE (15%)		3,055 CU.YDS.
BUILDING OVEREX (15%)		13,900 CU.YDS.
PAVEMENT OVEREX (15%)		12,340 CU.YDS.
SUBTOTAL:	35,565 CU.YDS.	56,605 CU.YDS.
		21,040 CU.YDS. IMPORT

NOTE:
THE ALTUM GROUP MAKES NO REPRESENTATION CONCERNING THE EARTH VOLUME QUANTITIES LISTED ABOVE. THE ENGINEER SHALL NOT BE RESPONSIBLE FOR ANY DEVIATIONS BETWEEN THE CALCULATED QUANTITIES AND THE ACTUAL QUANTITIES AT THE TIME OF CONSTRUCTION. THE CONTRACTOR IS RESPONSIBLE TO PERFORM HIS/HER OWN TAKEOFFS TO DETERMINE THE BID QUANTITIES.

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CITY OF COACHELLA, CA

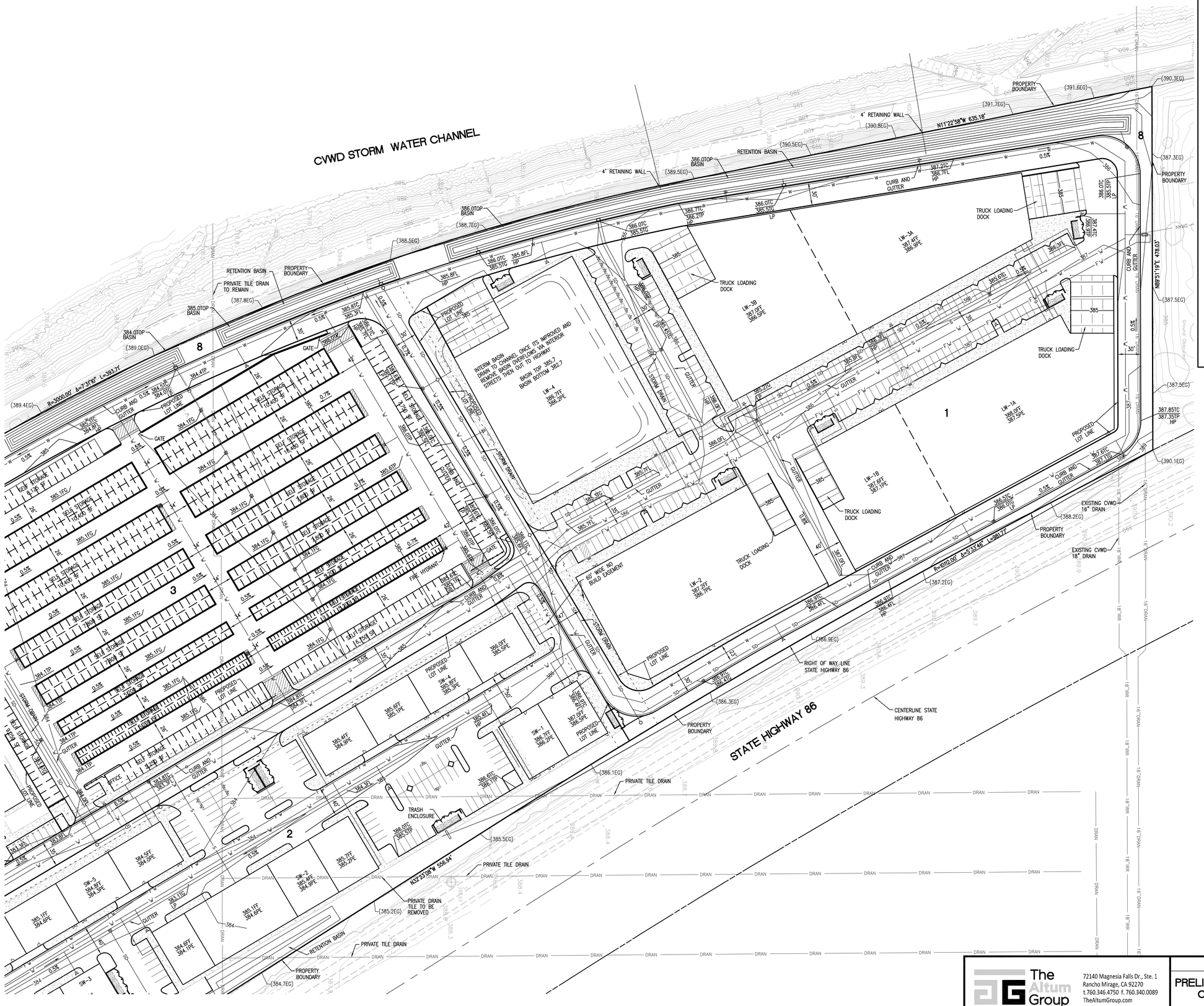
PRELIMINARY GRADING AND DRAINAGE EXHIBIT
COACHELLA AIRPORT BUSINESS PARK

BEING A PORTION OF THE SOUTH HALF OF SECTION 15, T6S, R8E, SBM

FOR: HAAGEN COMPANY, LLC

SHEET NO. GP-1 OF GP-2

Plotted: May 05, 2022 - 4:33pm By: Joshua DWG: L:\projects\C1443 Coachella Airport Bus Park\engineering\drawings\exhibits\Entitlement\EX1443-GP-1.dwg



LEGEND

———	RIGHT OF WAY LINES
— — —	CENTERLINE
385	EXISTING CONTOURS
OHT	EXISTING OVERHEAD TELEPHONE
UGE	EXISTING UNDERGROUND ELECTRIC
DRAN	EXISTING PRIVATE DRAIN TILE LINE
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GB	GRADE BREAK
HP	HIGH POINT
LP	LOW POINT
(387.5EG)	EXISTING GRADE
	PROPOSED CONCRETE SIDEWALK
	PROPOSED AC PAVEMENT
8	LOT NUMBER
	PROPOSED FIRE HYDRANT
	PROPOSED WATER METER

GRAPHIC SCALE
SCALE 1"=50'
0 25 50 100 150 200

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TheAltumGroup.com

CITY OF COACHELLA, CA

PRELIMINARY GRADING AND DRAINAGE EXHIBIT
COACHELLA AIRPORT BUSINESS PARK

BEING A PORTION OF THE SOUTH HALF OF SECTION 15, T6S, R8E, SBM

FOR: HAAGEN COMPANY, LLC

SHEET NO. GP-1 OF GP-2

Plotted: May 05, 2022 - 4:34pm By: jbotuo DWG: L:\projects\C11443 Coachella Airport Bus Park\engineering\drawings\exhibit\Entitlement\E11443-GP-2.dwg

NOT TO SCALE

CVWD STORM WATER CHANNEL

ORANGE STREET

AIRPORT BOULEVARD

STREET CENTERLINE

PHASE I SEWER LIFT STATION

PHASE I SEWER LINE

PROPERTY BOUNDARY

RETENTION BASIN

EXISTING 30" WATER LINE

PHASE I WATER LINE

PHASE I SEWER LINE

PHASE I STORM DRAIN

PHASE I FIRE WATER LINE

PHASE I INTERIM RETENTION BASIN

PROPOSED DRIVE AISLE

PROPOSED LOT LINE

GAS STATION

EMERGENCY ACCESS

EXISTING 24" IRRIGATION DRAIN

PRIVATE DRAIN TILE

LOT A

DESERT CACTUS DRIVE

STATE HIGHWAY 86

CENTERLINE STATE HIGHWAY 86

RIGHT OF WAY LINE STATE HIGHWAY 86

R=7550.00' Δ=3°47'25" L=498.14'

R=3000.00' Δ=7°31'6" L=393.77'

R=10102.00' Δ=3°33'48" L=981.77'

R=930.00' Δ=15°59'04" L=259.45'

N33°04'47"W 315.86'

N11°22'58"W 835.18'

N89°51'19"E 478.03'

N32°23'06"W 556.94'

N25°30'04"W 445.85'

N15°10'17"W 145.09'

N0°11'21"W 399.01'

N33°04'47"W 30.00'

N56°31'00"E 60.75'

LW-1A PHASE I

LW-1B PHASE II

LW-2 PHASE I

LW-3A PHASE III

LW-3B PHASE II

LW-4 PHASE II

BY-1 PHASE I

BY-2 PHASE I

BY-2 PHASE II

BY-4 PHASE II

SW-1 PHASE II

SW-2 PHASE II

SW-3 PHASE I

SW-4 PHASE III

SW-5 PHASE II

SB-1 PHASE I

SB-2 PHASE I

SB-3 PHASE I

SB-4 PHASE II

SB-5 PHASE III

SB-6 PHASE II

SB-7 PHASE III

SB-8 PHASE III

SB-9 PHASE III

SB-10 PHASE III

SB-11 PHASE III

SB-12 PHASE III

SB-13 PHASE II

SB-14 PHASE II

SB-15 PHASE I

SB-16 PHASE I

SB-17 PHASE I

SB-18 PHASE I

RB-1 PHASE I

FC-1 PHASE I

SELF STORAGE

OFFICE

LEGEND

- PHASE I
- PHASE II
- PHASE III
- W — PHASE I WATER LINE
- FW — PHASE I FIRE WATER LINE
- S — PHASE I SEWER LINE
- SD — PHASE I STORM DRAIN
- SD — PHASE III STORM DRAIN

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CITY OF COACHELLA, CA

PHASING EXHIBIT
COACHELLA AIRPORT BUSINESS PARK

BEING A PORTION OF THE SOUTH HALF OF SECTION 15, T6S, R8E, SBM

FOR: HAAGEN COMPANY, LLC

SHEET NO. PP-1 OF PP-1

Plotted: May 05, 2022 - 4:42pm By: jbazua DWG: L:\projects\C1443 Coachella Airport Bus Park\engineering\drawings\exhibits\Entitlement\EX1443-PP-1.dwg

Coachella Airport Business Park

N.W.C. State Highway 86 & Airport Boulevard
Coachella, California
April 12, 2022

CLIENT
Haagen Co, LLC
12302 Exposition Boulevard
Los Angeles, CA 90064

Contact: Chris Fahey
T: 310.820.1200

ARCHITECT
McKently Malak Architects
35 Hugus Alley, Suite 200
Pasadena, CA 91103

Contact: Herb Horowitz
T: 626.583.8348

CIVIL ENGINEER
The Altum Group
73-710 Fred Waring Drive, Suite 219
Palm Desert, CA 92260

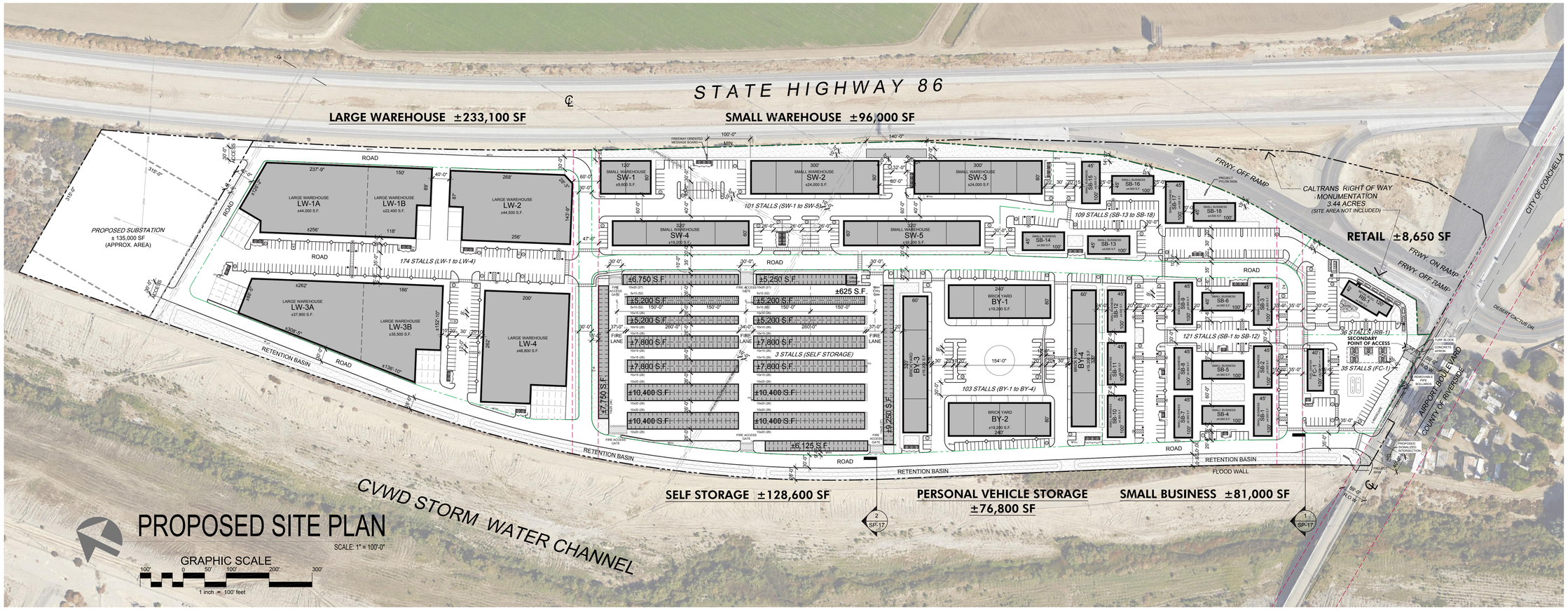
Contact: Rich Malacoff
T: 760.346.4750

LANDSCAPE ARCHITECT
Hermann Design Group
6864 Indiana Avenue, Suite 104e
Riverside, CA 92506

Contact: Jose Estrada
T: 951.782.9335

SHEET INDEX

COVER	COVER / TITLE SHEET
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A-011	COLORED SITE PLAN
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A-201	RETAIL BUILDING ELEVATIONS
A-102	SERVICE STATION FLOOR PLAN
A-202	SERVICE STATION ELEVATIONS
A-103	SMALL BUSINESS FLOOR PLAN
A-203	SMALL BUSINESS ELEVATIONS
A-104	BRICKYARD FLOOR PLAN
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SE-01	SITE ELEVATION / LINE OF SIGHT
TE-01	TRASH ENCLOSURE DETAIL
CM-01	COLOR AND MATERIALS BOARD



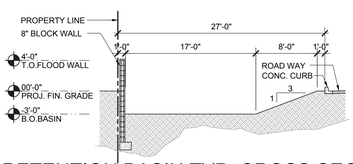
PROPOSED SITE PLAN

SCALE: 1" = 100'-0"

GRAPHIC SCALE

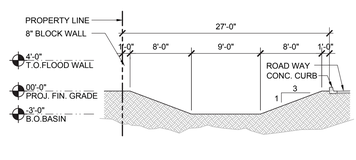
100' 0 50' 100' 200' 300'

1 inch = 100' feet



1 RETENTION BASIN TYP. CROSS SECTION

SCALE: 1/8" = 1'-0"



2 RETENTION BASIN TYP. CROSS SECTION

SCALE: 1/8" = 1'-0"

FIRE DEPARTMENT NOTES:

Fire Hydrants and Fire Flow: Prior to the issuance of building permits, plans for the water system shall be submitted to the fire department for review and approval. The water system shall be capable of delivering the required fire flow. Fire hydrant(s) location and spacing shall comply with the fire code. An approved water supply for fire protection during construction shall be made available prior to the arrival of combustible materials on site. Reference 2016 California Fire Code (cfc) 507.5.1, 3312, Appendices B and C.

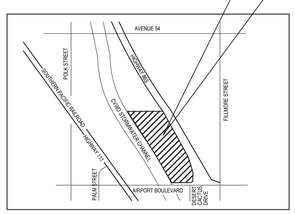
Phased Construction Access: If construction is phased, each phase shall provide approved access for fire protection prior to any construction. Ref. CFC 503.1

Knox Box and Gate Access: Buildings shall be provided with a knox box. The Knox Box shall be installed in an accessible location approved by the Office of the Fire Marshal. All electronically operated gates shall be provided with Knox key switches and automatic sensors for access. Manual gates shall also be provided with approved emergency access (Knox) equipmentRef. CFC 506.1

NOTE:

1. **FIRE HYDRANT TO BE LOCATED MAX. 300 FT. O.C. OR AS APPROVED BY RIVERSIDE COUNTY FIRE DEPARTMENT**
2. **PROPOSED FIRE HYDRANT LOCATION ON SITE ARE REPRESENTED BY FH SYMBOL**
3. **43 FT. LENGTH TEMPLATE WAS USED TO ILLUSTRATE FIRE TRUCK PATH**
4. **MINIMUM TRUCK TURNING RADIUS ±30 FT.**

N.W.C. OF STATE HWY. 86 & AIRPORT BOULEVARD COACHELLA, CALIFORNIA



VICINITY MAP

NOT TO SCALE

NORTH

PROJECT DATA

CLIENT:	HAAGEN CO., LLC
PROJECT LOCATION:	N.W.C. OF STATE HWY. 86 AND AIRPORT BOULEVARD COACHELLA, CA 92274
JURISDICTION:	CITY OF COACHELLA, CA
APN/S:	763-330-013, 018, 029
ZONING: EXISTING	M-H (HEAVY INDUSTRIAL)
ZONING: PROPOSED	M-S (MANUFACTURING SERVICE) I-P (INDUSTRIAL PARK OVERLAY DIST.)
PROPOSED USE:	LARGE & SMALL WAREHOUSE, SMALL BUSINESS, SELF STORAGE, SERVICE STATION AND DRIVE THROUGH
BOUNDARY INFORMATION:	THIS PLAN HAS BEEN PREPARED BY USING THE CONSTRAINTS EXHIBIT BY THE ALTUM GROUP, DATED FEB. 15, 2018

SITE SUMMARY

SITE AREA

APN# 763-330-013	21.56 AC
APN# 763-330-018	9.62 AC
APN# 763-330-029	11.18 AC
TOTAL SITE AREA	42.36 AC

BUILDING DATA

PROPOSED BUILDING AREA

LARGE WAREHOUSE	±233,100 SF
SMALL WAREHOUSE	±96,000 SF
SMALL BUSINESS	±81,000 SF
PERSONAL VEHICLE STORAGE	±76,800 SF
SELF STORAGE	±128,600 SF
SERVICE STATION/ MINI MART	±4,000 SF
DRIVE-THRU FAST FOOD RESTAURANT	±4,650 SF
TOTAL BUILDING AREA	±624,150 SF

PARKING REQUIRED:

Restaurant w/ Drive Through (1/45 sf of Customer Area + 1/200 sf Non Customer Area)

Customer Area (±2,000 SF - 50%)		= 44.4	Stalls
Non Customer Area (±2,000 SF - 50%)		= 10	Stalls
Service Station		= 5	Stalls
Large Warehouse (233,100 sf)	20,000 sf	= 50	Stalls
	213,100 sf	= 213.1	Stalls
Small Warehouse (96,000 sf)	20,000 sf	= 50	Stalls
	76,000 sf	= 76	Stalls
Small Business (81,000 sf)	20,000 sf	= 50	Stalls
	61,000 sf	= 61	Stalls
Personal Vehicle Storage (76,800 sf)	20,000 sf	= 50	Stalls
	56,800 sf	= 56.8	Stalls
Self Storage Office (625 sf)		= 1.5	Stalls
GRAND TOTAL REQUIRED		667.8 Stalls or 668 Stalls	

PARKING PROVIDED:

STANDARD:	583 STALLS
DISABLED:	44 STALLS
ELECTRIC / CLEAN AIR VEHICLES	55 STALLS
PER CAL GREEN TABLE 5.106.5.2 & 5.106.5.3.3	
FUTURE EV VAN ACCESSIBLE	1 STALL
FUTURE EV STANDARD ACCESSIBLE	1 STALL
FUTURE AMBULATORY	1 STALL
FUTURE EV CHARGING STATION	38 STALLS
CLEAN AIR VAN POOL / EV	14 STALLS
TOTAL PARKING PROVIDED	682 STALLS

BUILDING DATA

PROPOSED BUILDING HEIGHT

LARGE WAREHOUSE	±38' TO 50' HIGH
SMALL WAREHOUSE	±28' TO 32' HIGH
SMALL BUSINESS	±24' TO 28' HIGH
PERSONAL VEHICLE STORAGE	±24' TO 28' HIGH
SELF STORAGE	±24' TO 28' HIGH
RETAIL (GAS STATION & DRIVE THRU)	±24' TO 28' HIGH

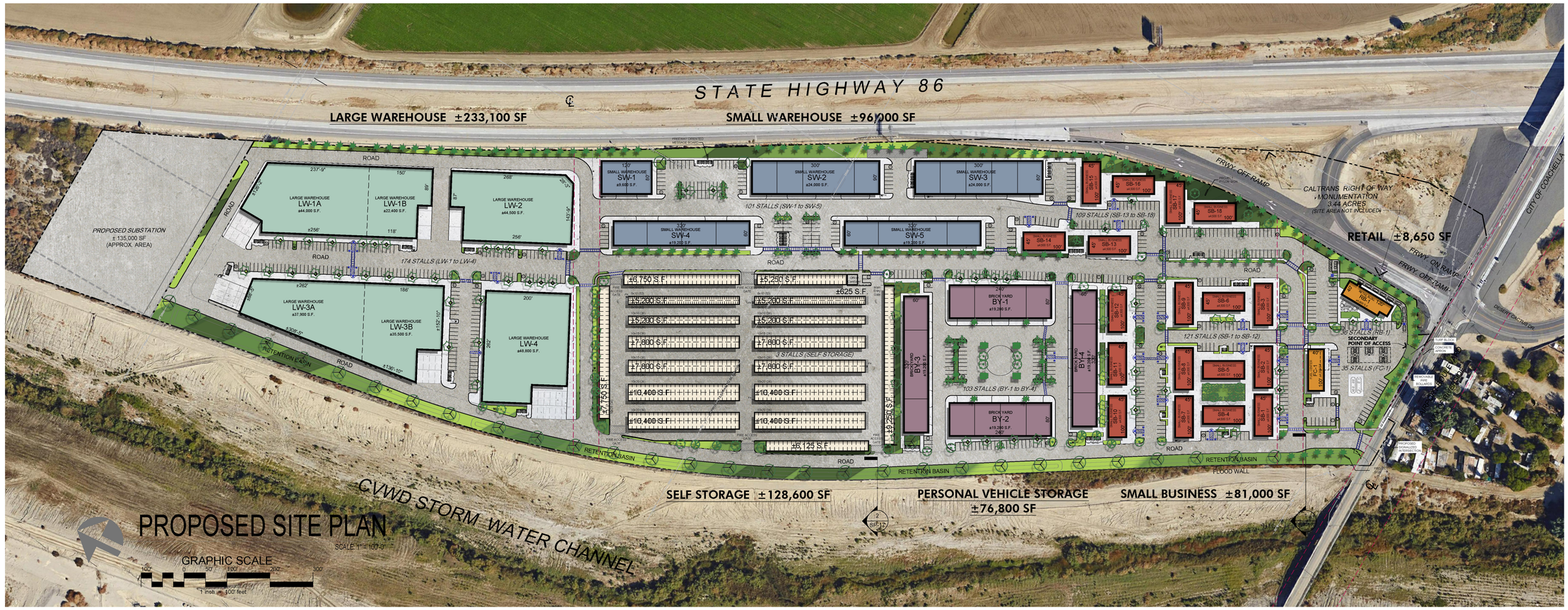
BUILDING TYPE TYPE V-B (FULLY SPRINKLERED)

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COACHELLA, CALIFORNIA

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PROPOSED SITE PLAN
04.12.2022 18028TMA
A-010



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Coachella Airport Business Park

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COLORED SITE PLAN
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A-011



RETAIL BUILDING W/ DRIVE THRU

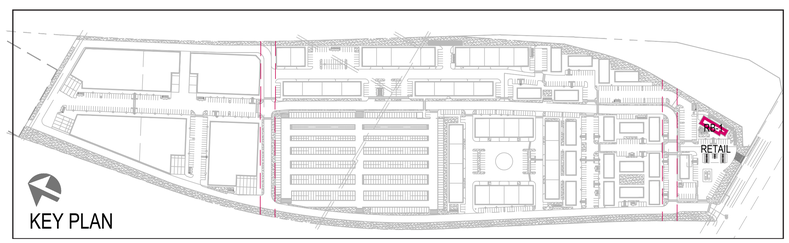
FLOOR PLAN

SCALE: 3/32" = 1'-0"

GRAPHIC SCALE

8' 0 4' 8' 16' 24'

1 inch = 11' feet



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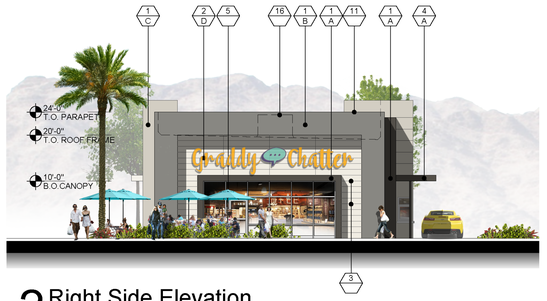
Coachella Airport Business Park
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COACHELLA, CALIFORNIA

McKently Malak ARCHITECTS
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Pasadena, California 91103
T:6265838348 F:6265838387

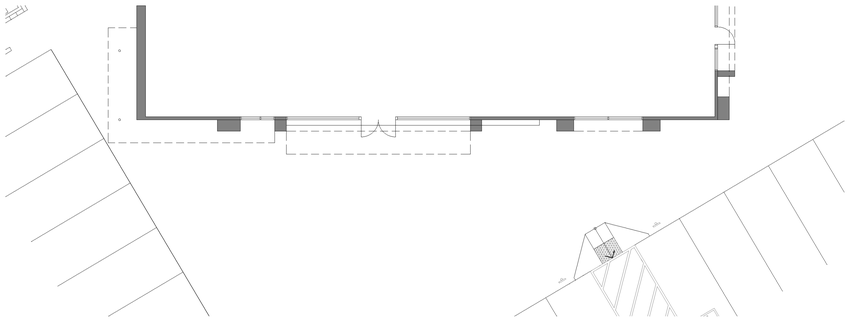
FLOOR PLAN
04.12.2022 18028TMA
A-101

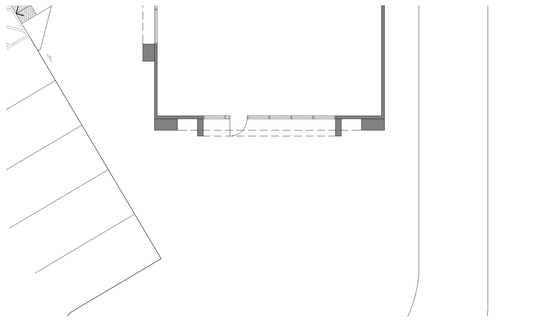


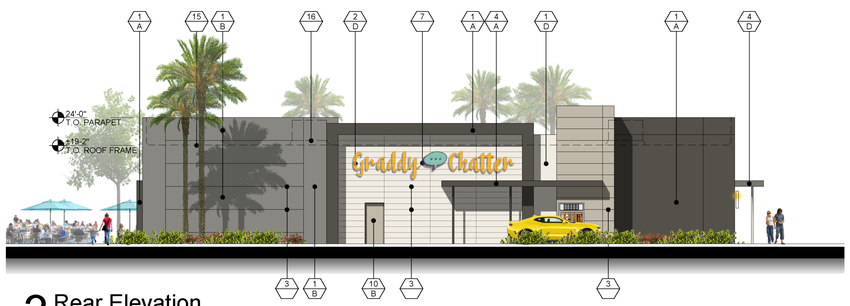
1 Front Elevation - Retail
SCALE: 3/32" = 1'-0"



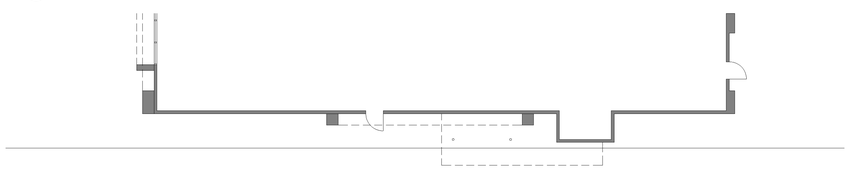
2 Right Side Elevation
SCALE: 3/32" = 1'-0"





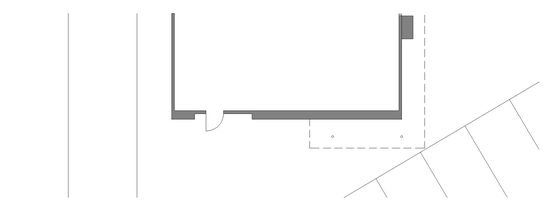


3 Rear Elevation
SCALE: 3/32" = 1'-0"





4 Left Side Elevation
SCALE: 3/32" = 1'-0"



MATERIALS AND FINISH KEYNOTES

1	EXTERIOR CEMENT PLASTER, SMOOTH FINISH
2	EXTERIOR CEMENT PLASTER, COMBED FINISH
3	PLASTER REVEAL JOINTS (TYPICAL)
4	METAL CANOPY, PAINT
5	ANODIZED ALUMINUM STOREFRONT W/ GLAZING MANUFACTURER: KAWNEER NORTH AMERICA COLOR: CLEAR ANODIZED
6	FROSTED GLASS STOREFRONT
7	SIGNAGE (NOT A PART OF THIS PERMIT)
8	SECTIONAL GARAGE DOOR W/ FROSTED GLASS PANELS MANUFACTURER: OVERHEAD DOOR COLOR: CLEAR ANODIZED; MODEL 521
9	SECTIONAL STEEL DOOR MANUFACTURER: OVERHEAD DOOR MODEL: 470
10	EXTERIOR HOLLOW METAL DOOR & FRAMES; PAINT
11	PRESTO-LOCK METAL COPING SYSTEM, PAINT
12	DECORATIVE BRACKET LIGHT
13	WALL PACK LIGHT FIXTURE
14	UNDER CANOPY LIGHT FIXTURE
15	ROOF LINE
16	ROOF EQUIPMENT
17	E.I.F.S CORNICE; PAINT
18	ANODIZED ALUMINUM CLEARSTORY WINDOW W/ GLAZING MANUFACTURER: KAWNEER NORTH AMERICA COLOR: CLEAR ANODIZED

A	Urbane Bronze SW 7048
B	Classic French Gray SW 0077
C	Jogging Path SW 7638
D	Greek Villa SW 7551
E	Light French Gray SW 0055
F	Rugged Brown SW 6062

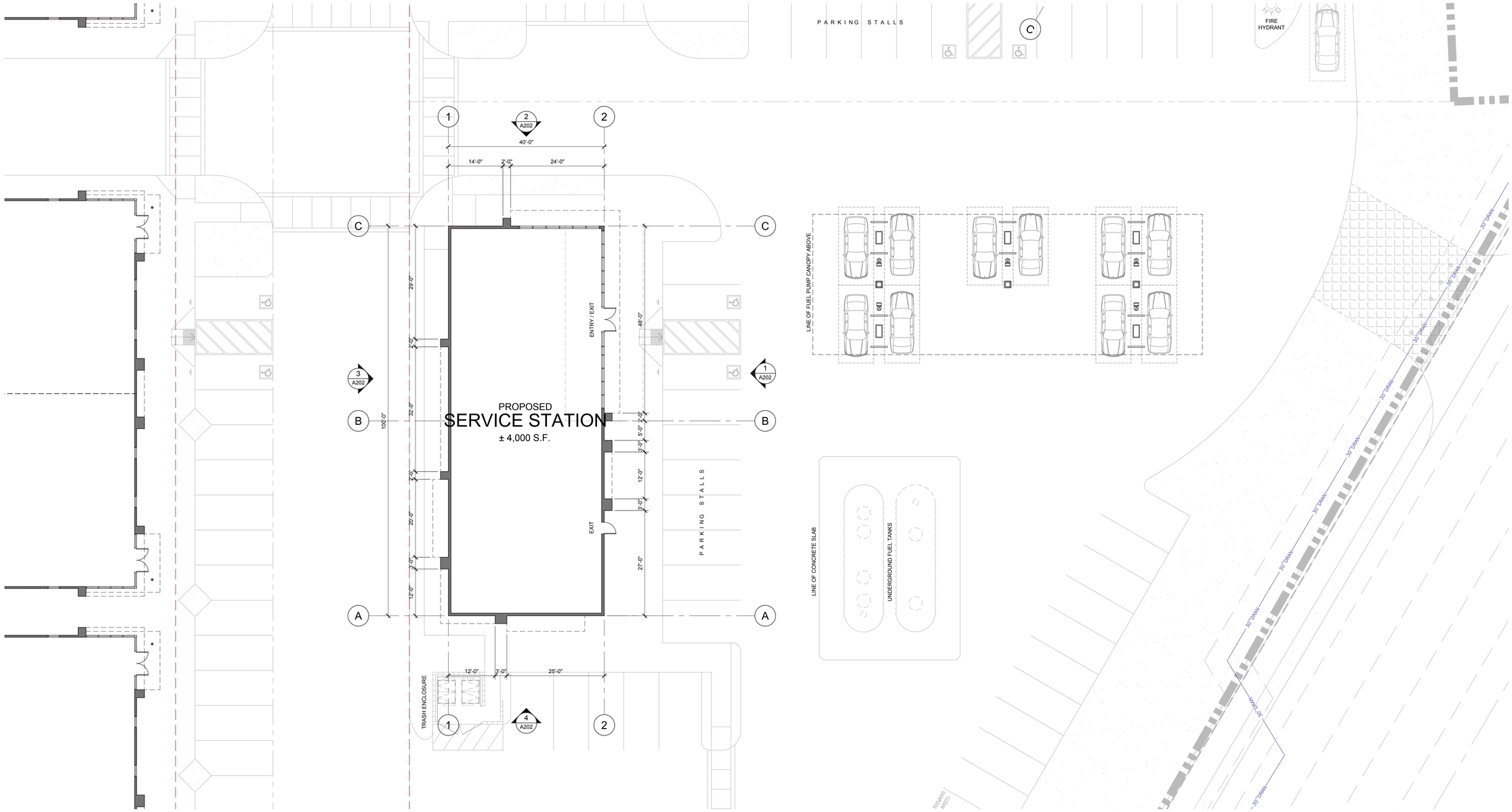
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ELEVATIONS
04.12.2022 18028TMA
A-201



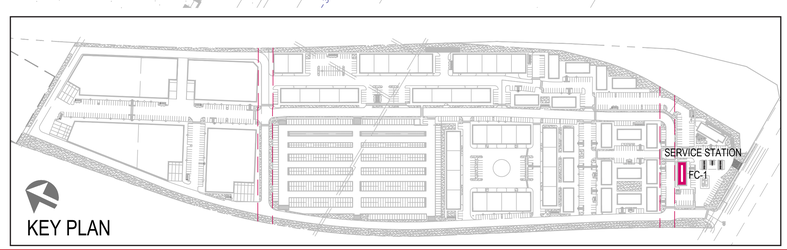
SERVICE STATION
FLOOR PLAN

SCALE: 3/32" = 1'-0"

GRAPHIC SCALE

8' 0 4' 8' 16' 24'

1 inch = 11' feet



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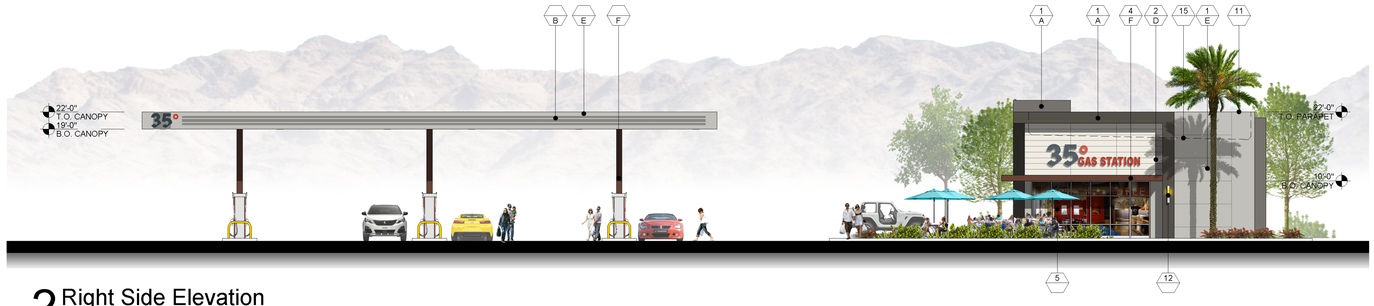
Coachella Airport Business Park
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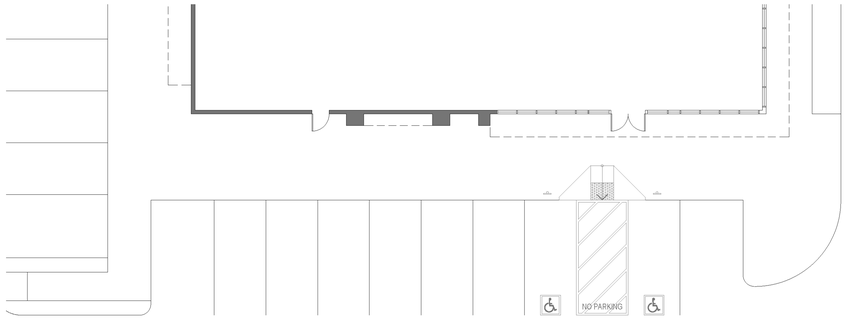
FLOOR PLAN
04.12.2022 18028TMA
A-102

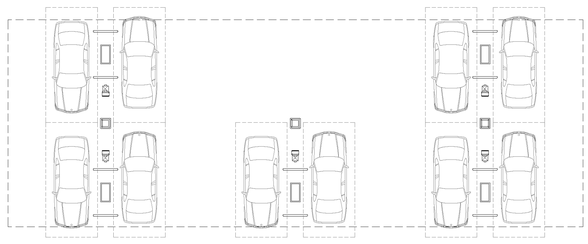


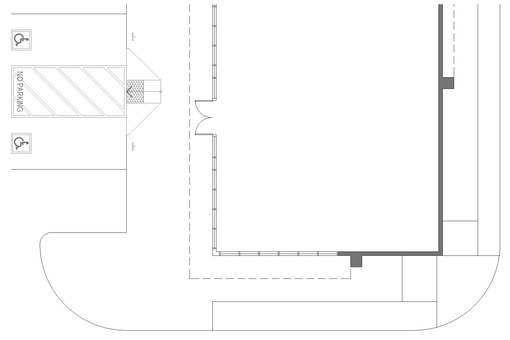
1 Front Elevation - Service Station
SCALE: 3/32" = 1'-0"

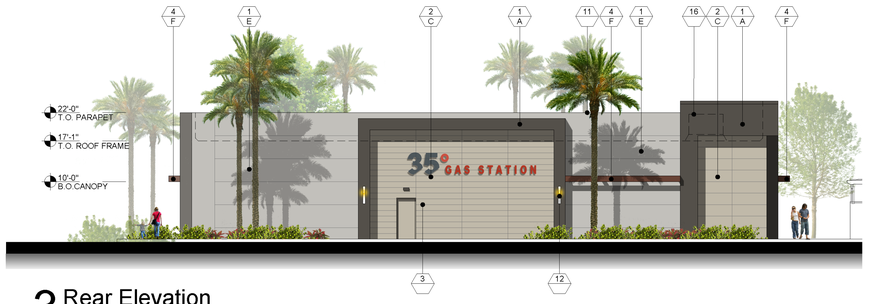


2 Right Side Elevation
SCALE: 3/32" = 1'-0"

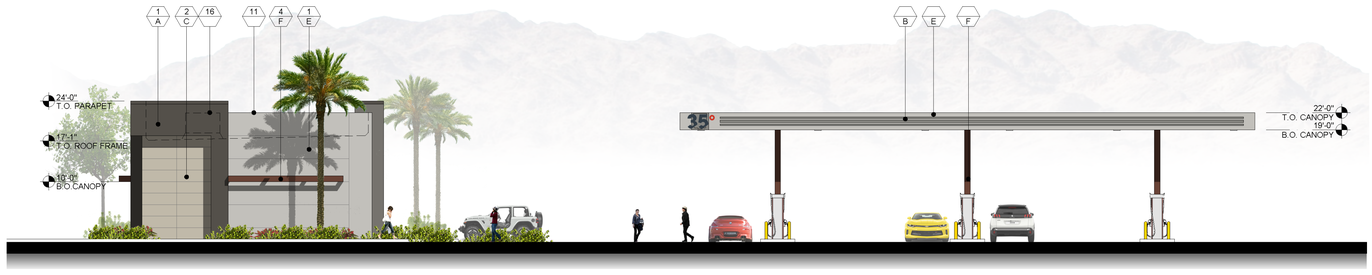




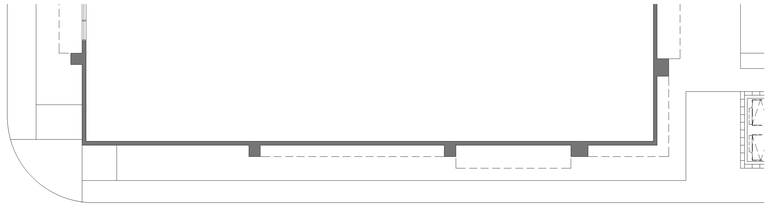


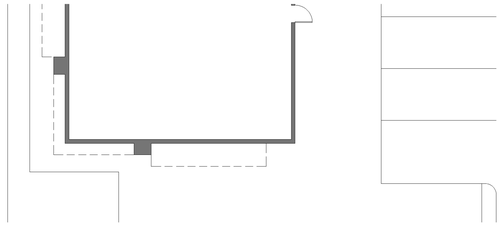


3 Rear Elevation
SCALE: 3/32" = 1'-0"



4 Left Side Elevation
SCALE: 3/32" = 1'-0"







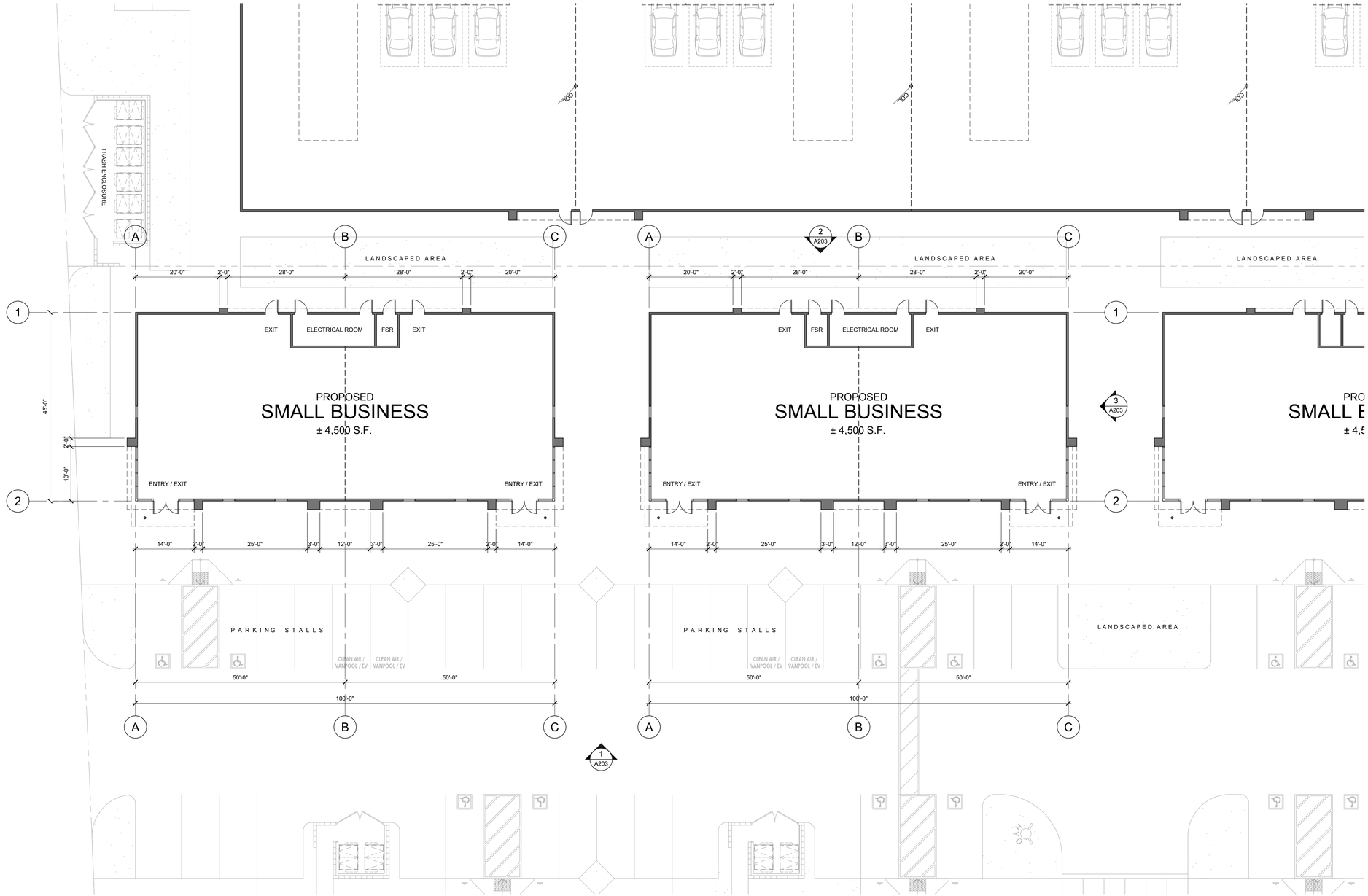
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ELEVATIONS
04.12.2022 18028TMA
A-202



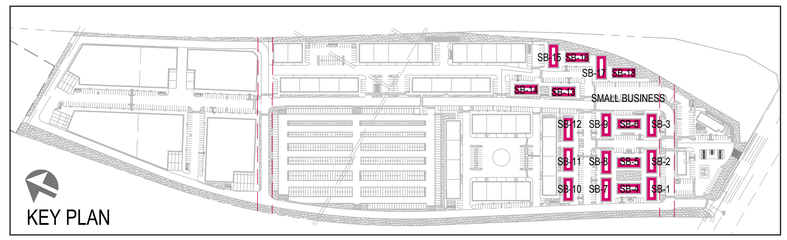
TYPICAL SMALL BUSINESS
FLOOR PLAN

SCALE: 3/32" = 1'-0"

GRAPHIC SCALE

8' 0 4' 8' 16' 24'

1 inch = 1'1" feet



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COACHELLA, CALIFORNIA

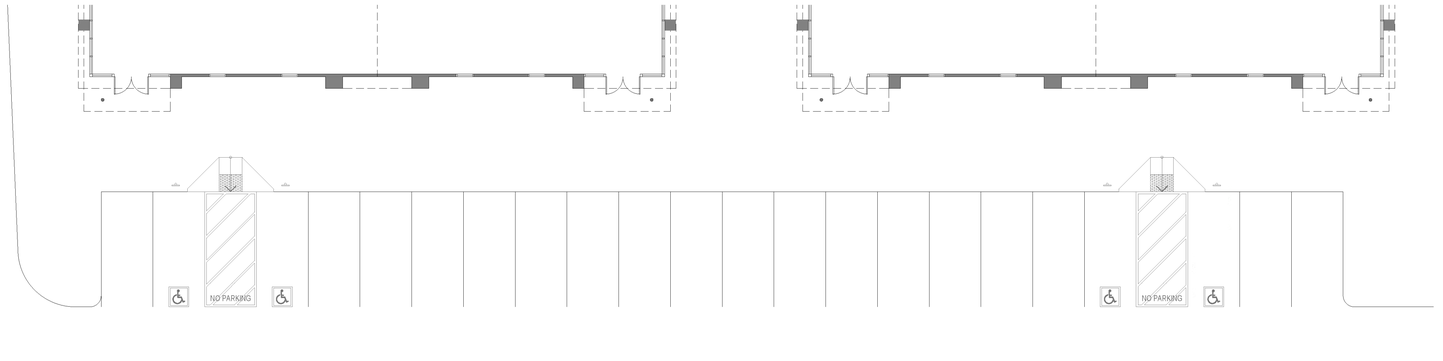
McKently Malak ARCHITECTS
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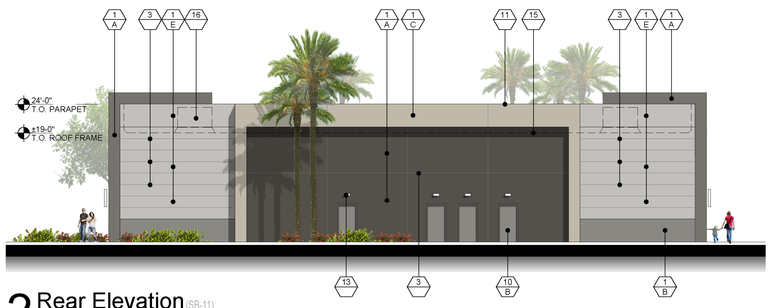
FLOOR PLAN
04.12.2022 18028TMA
A-103



1 Front Elevation - Typ. Small Business (SB-10 and SB-11)

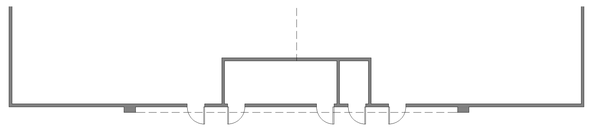
SCALE: 3/32" = 1'-0"





2 Rear Elevation (SB-11)

SCALE: 3/32" = 1'-0"





3 Side Elevation (SB-11)

SCALE: 3/32" = 1'-0"



Note: Signage shown on the elevations for graphic purpose only and does not represent the use or actual tenants

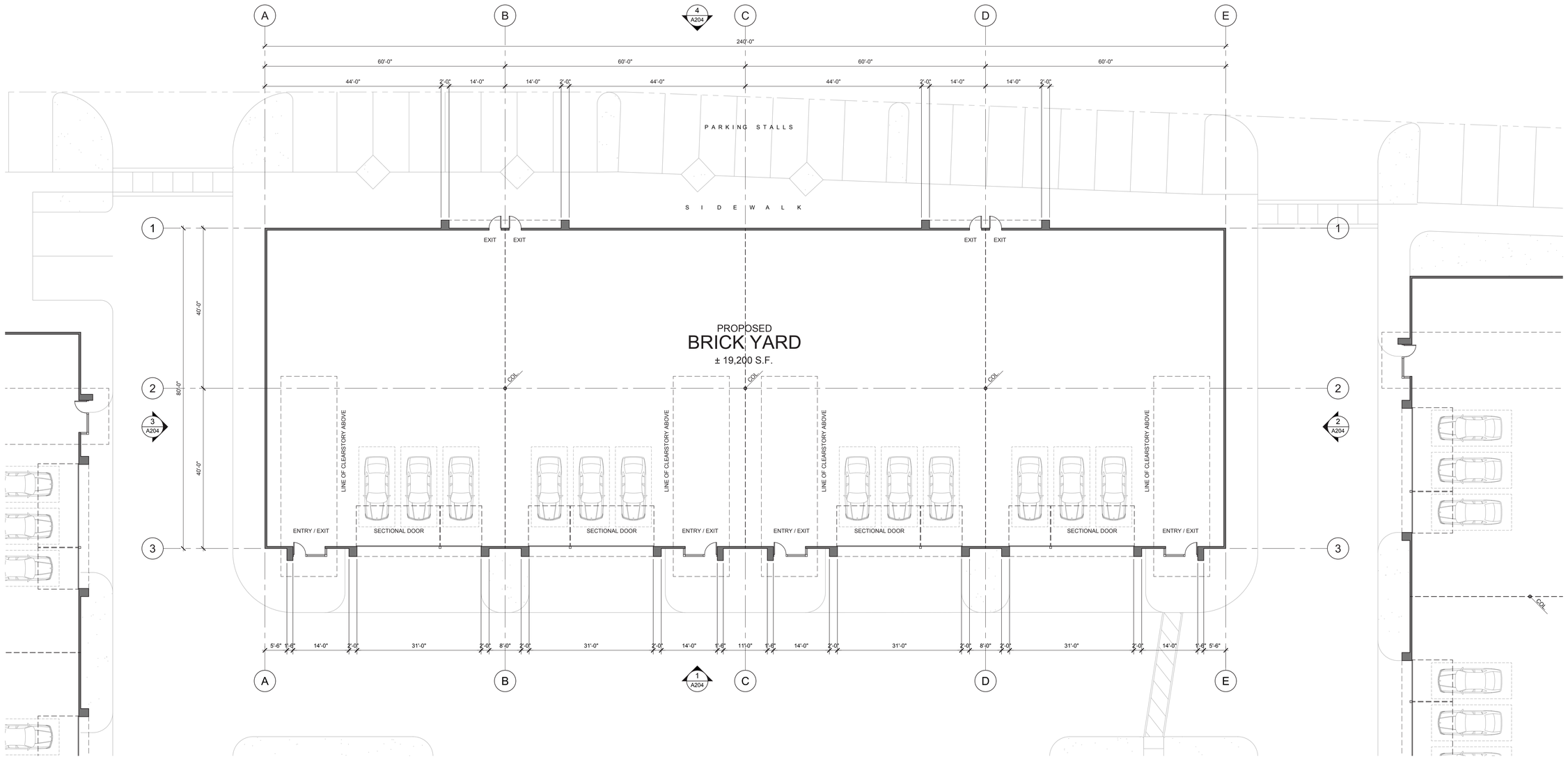
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ELEVATIONS
04.12.2022 18028TMA

A-203



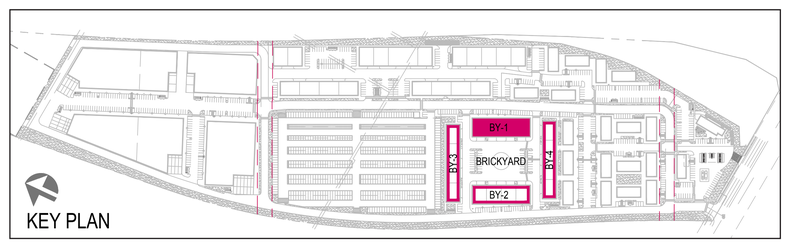
TYPICAL BRICKYARD
FLOOR PLAN

SCALE: 3/32" = 1'-0"

GRAPHIC SCALE

8' 0 4' 8' 16' 24'

1 inch = 11' feet

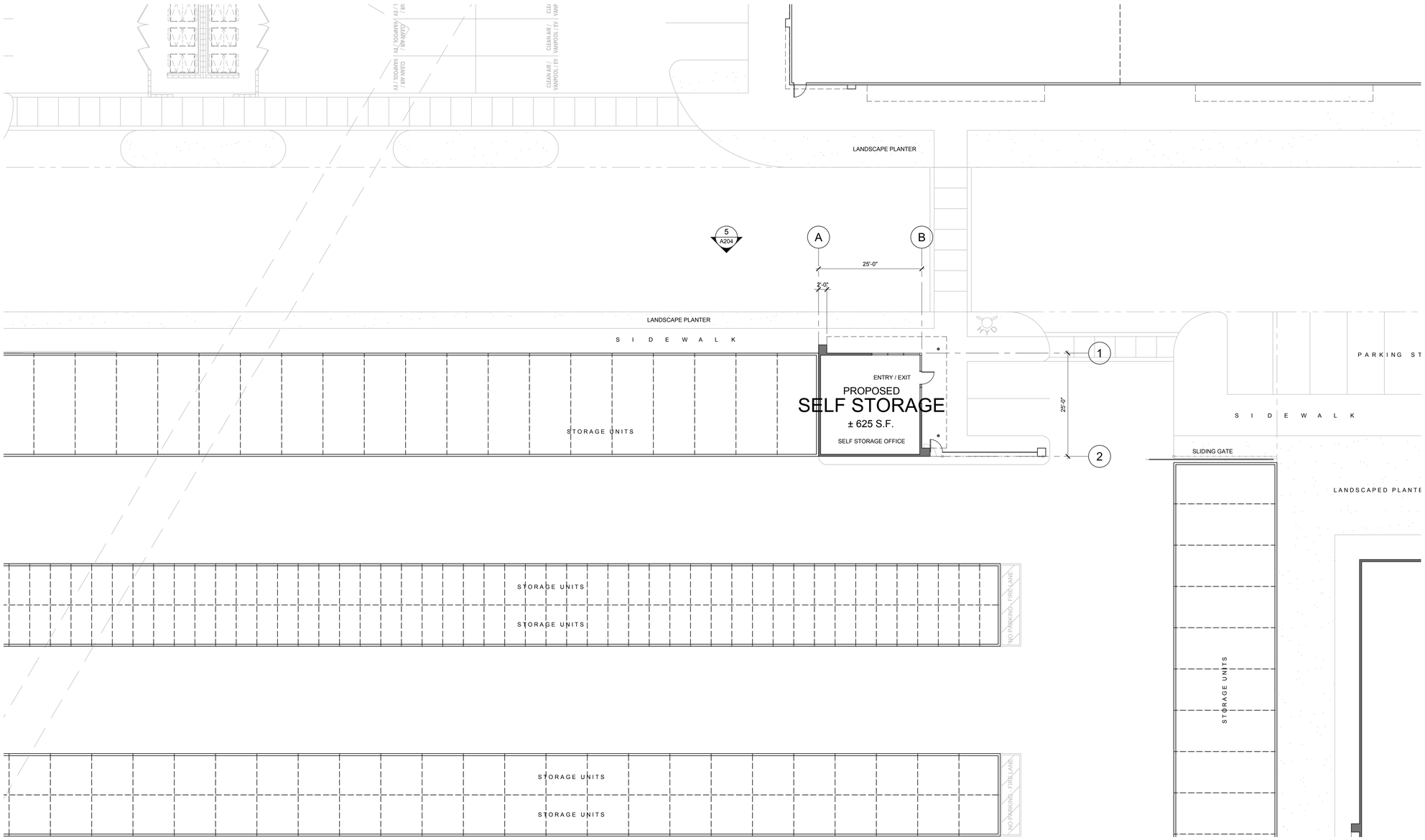


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FLOOR PLAN
04.12.2022 18028TMA
A-104



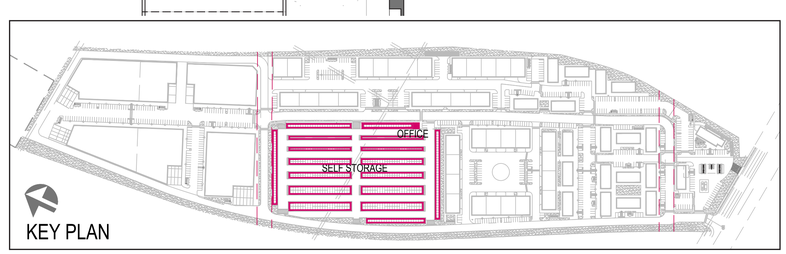
TYPICAL SELF STORAGE
FLOOR PLAN

SCALE: 3/32" = 1'-0"

GRAPHIC SCALE

8' 0 4' 8' 16' 24'

1 inch = 11' feet



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Pasadena, California 91103
T:626.583.8348 F:626.583.8387

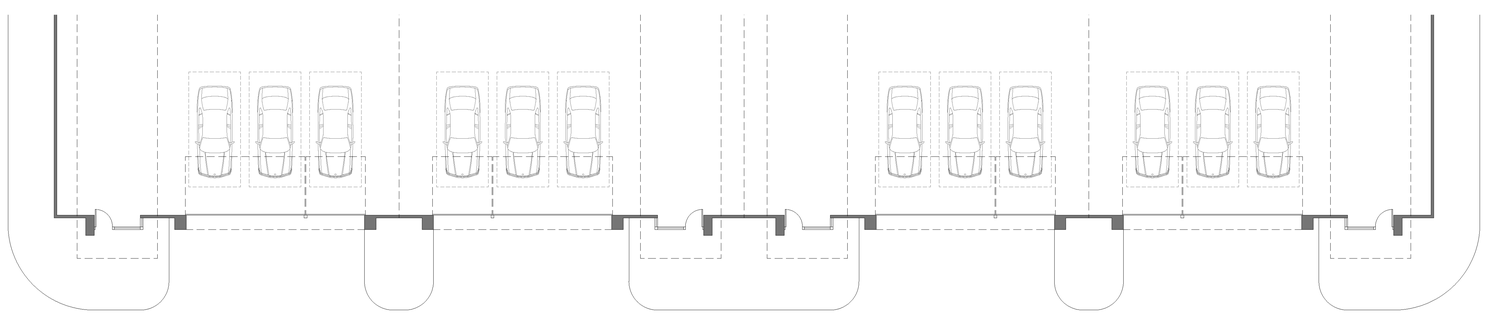
FLOOR PLAN
04.12.2022 18028TMA
A-104.1



1 Front Elevation - Typ. Brickyard
SCALE: 3/32" = 1'-0"



2 Right Side Elevation
SCALE: 3/32" = 1'-0"

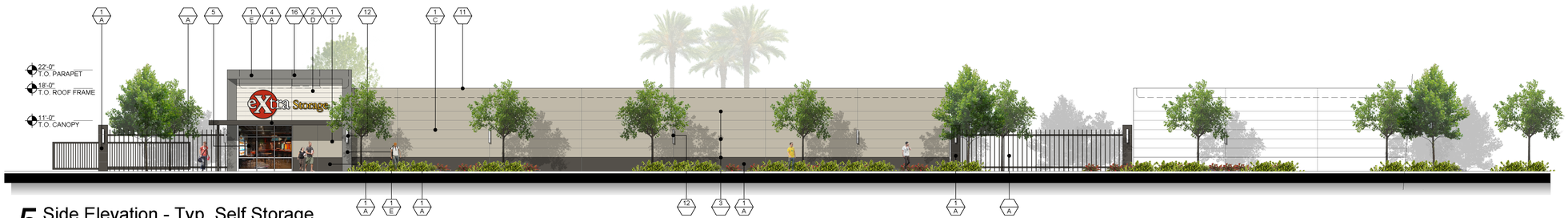




3 Left Side Elevation
SCALE: 3/32" = 1'-0"



4 Rear Elevation
SCALE: 3/32" = 1'-0"



5 Side Elevation - Typ. Self Storage
SCALE: 3/32" = 1'-0"

Note: Signage shown on the elevations for graphic purpose only and does not represent the use or actual tenants

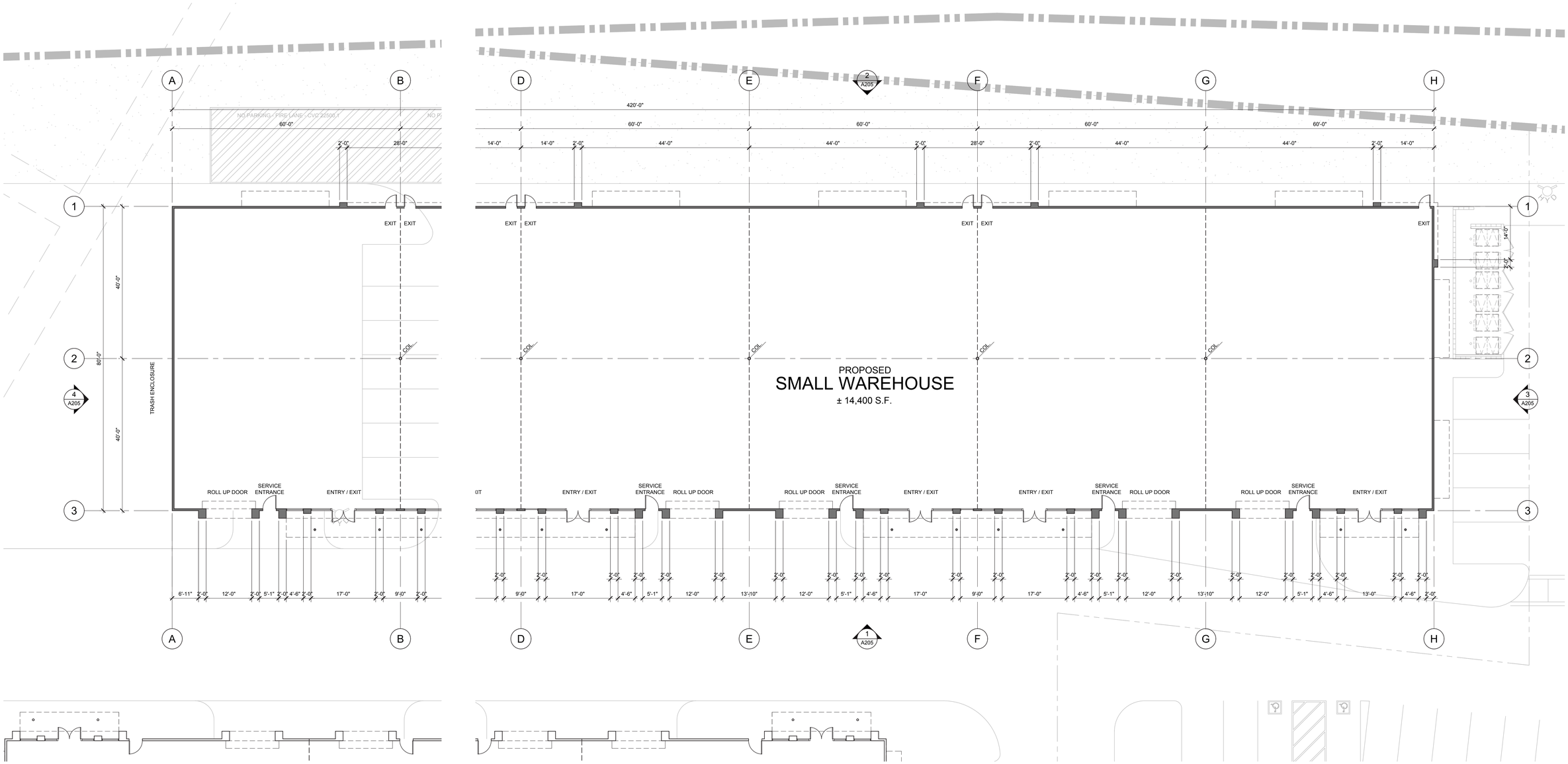
Haagen Co LLC
12302 Exposition Boulevard, Los Angeles CA 90064

Coachella Airport Business Park
NWC State Highway 86 and Airport Road
COACHELLA, CALIFORNIA

McKently Malak ARCHITECTS
35 Hugus Alley Suite 200
Pasadena, California 91103
T:626.583.8348 F:626.583.8387

ELEVATIONS
04.12.2022 18028TMA

A-204



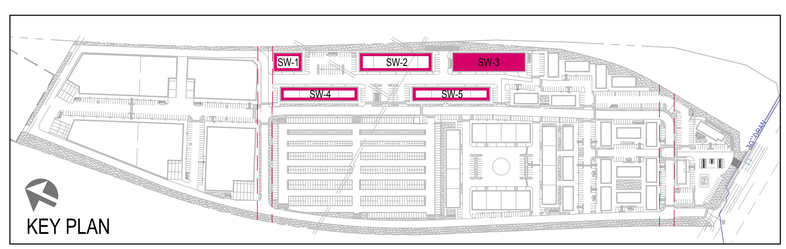
TYPICAL SMALL WAREHOUSE
FLOOR PLAN

SCALE: 3/32" = 1'-0"

GRAPHIC SCALE

8' 0 4' 8' 16' 24'

1 inch = 11' feet



Haagen Co LLC
12302 Exposition Boulevard, Los Angeles CA 90064

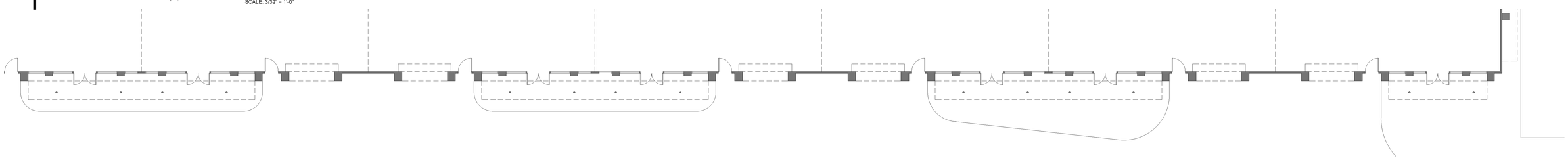
Coachella Airport Business Park
NWC State Highway 86 and Airport Road
COACHELLA, CALIFORNIA

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Pasadena, California 91103
T:626.583.8348 F:626.583.8387

FLOOR PLAN
04.12.2022 18028TMA
A-105

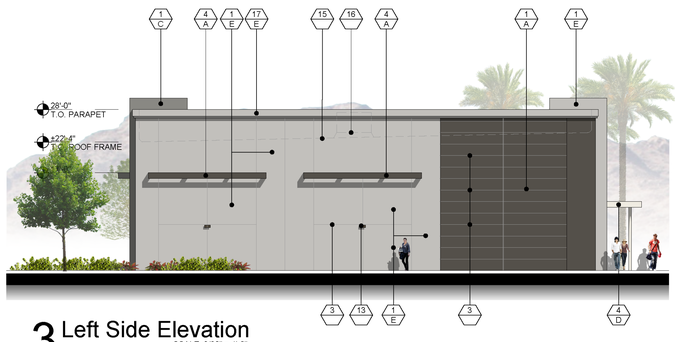


1 Front Elevation - Typ. Small Warehouse
SCALE: 3/32" = 1'-0"

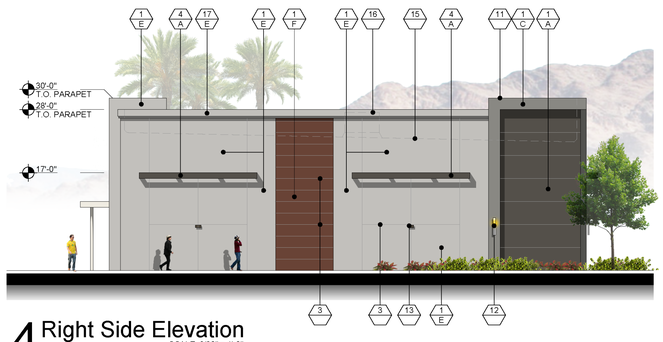




2 Rear Elevation
SCALE: 3/32" = 1'-0"



3 Left Side Elevation
SCALE: 3/32" = 1'-0"



4 Right Side Elevation
SCALE: 3/32" = 1'-0"

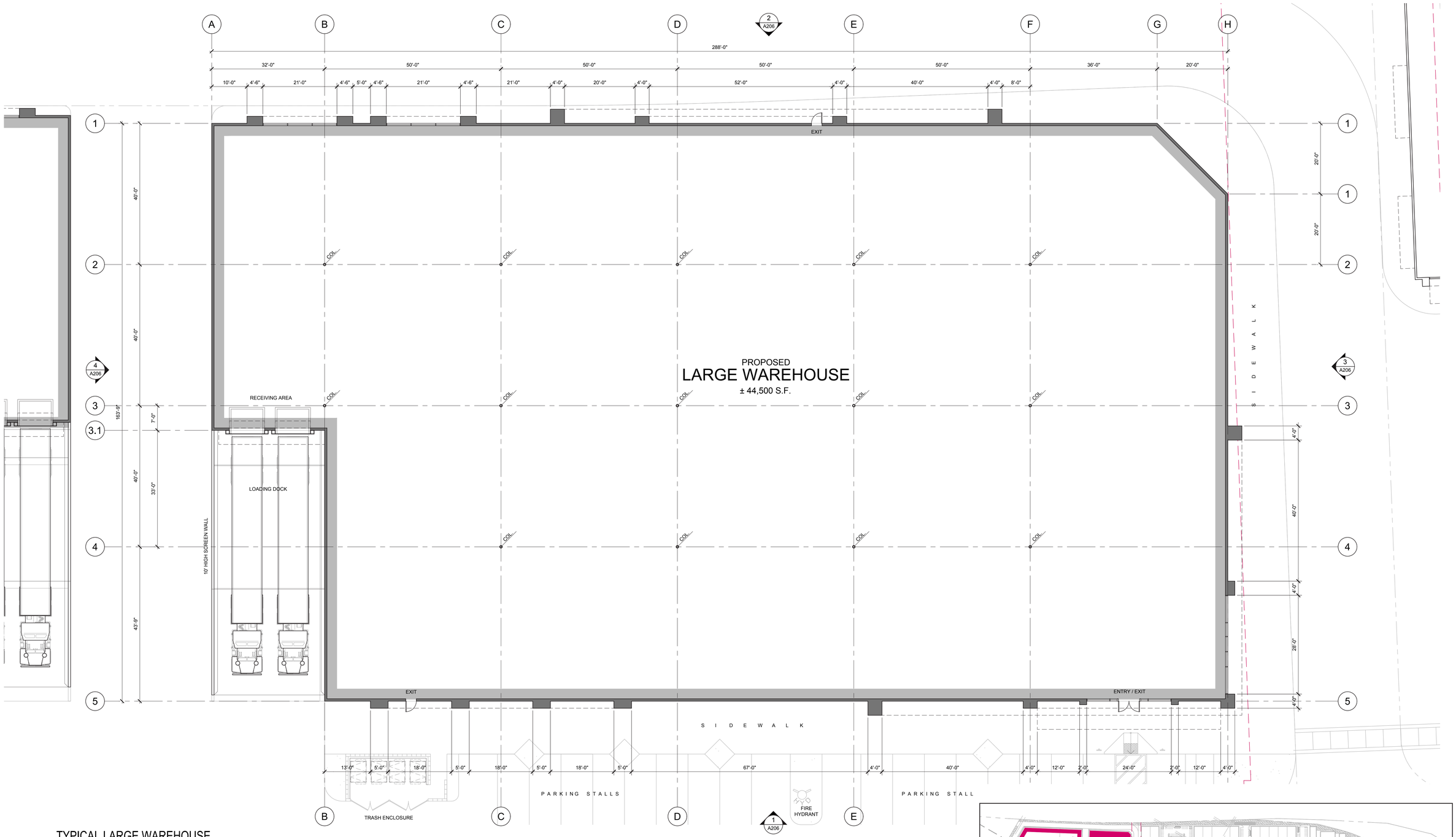
Note: Signage shown on the elevations for graphic purpose only and does not represent the use or actual tenants

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NWC State Highway 86 and Airport Road
COACHELLA, CALIFORNIA

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Pasadena, California 91103
T:626.583.8348 F:626.583.8387

ELEVATIONS
04.12.2022 18028TMA
A-205



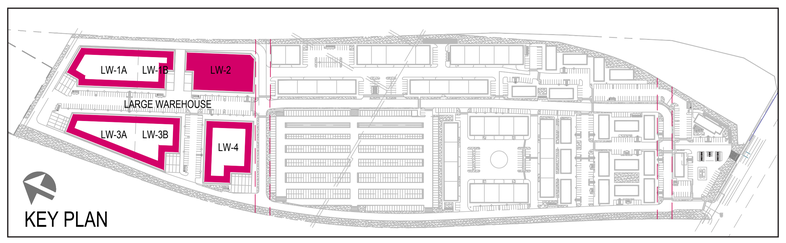
TYPICAL LARGE WAREHOUSE
FLOOR PLAN

SCALE: 3/32" = 1'-0"

GRAPHIC SCALE

8' 0 4' 8' 16' 24'

1 inch = 11' feet

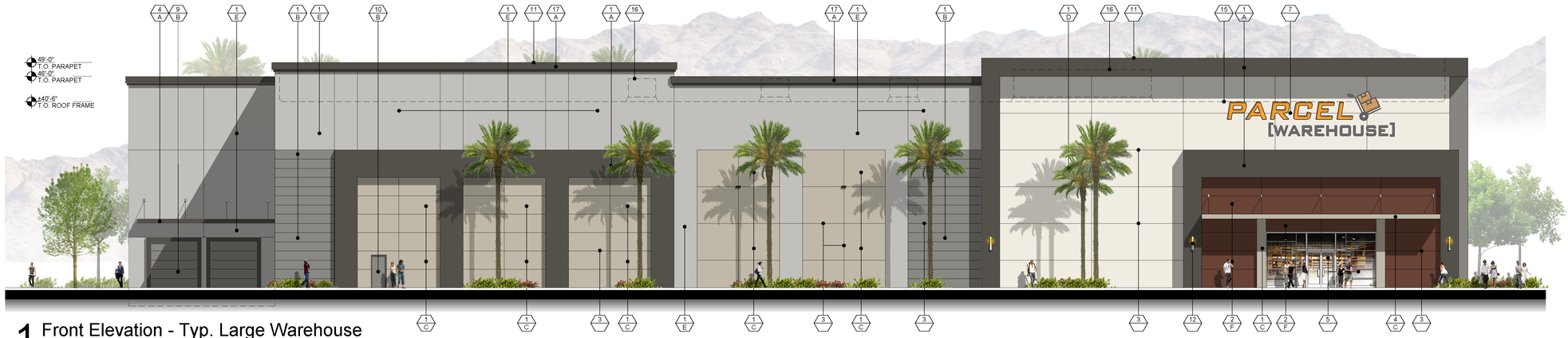


Haagen Co LLC
12302 Exposition Boulevard, Los Angeles CA 90064

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NWC State Highway 86 and Airport Road
COACHELLA, CALIFORNIA

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ARCHITECTS
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Pasadena, California 91103
T:626.583.8348 F:626.583.8387

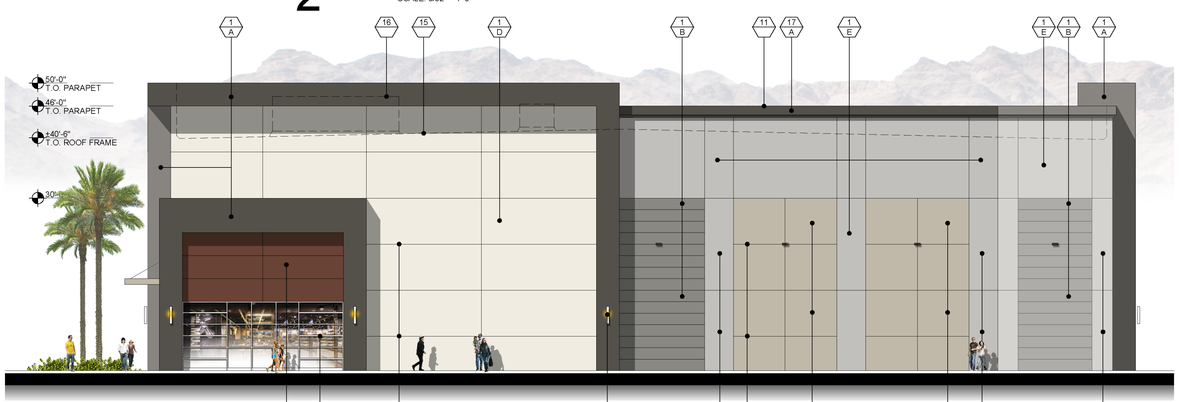
FLOOR PLAN
04.12.2022 18028TMA
A-106



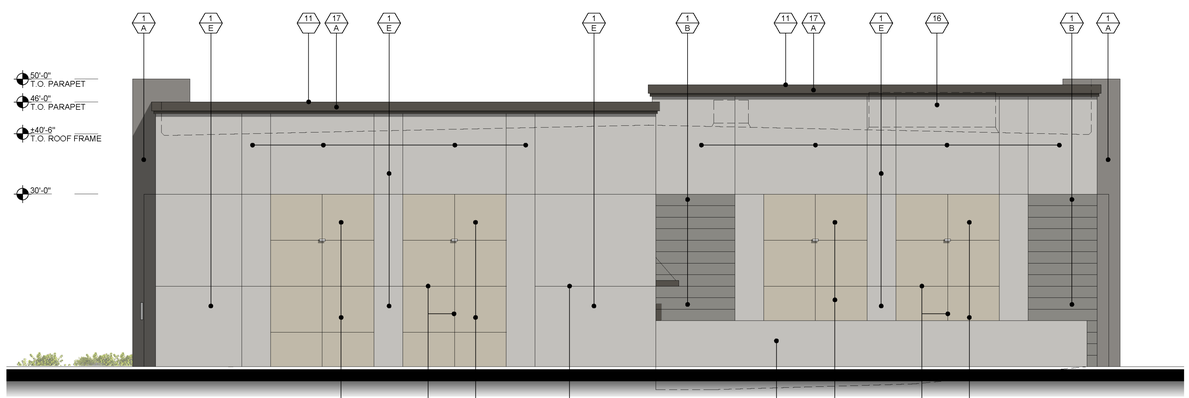
1 Front Elevation - Typ. Large Warehouse
SCALE: 3/32" = 1'-0"



2 Rear Elevation
SCALE: 3/32" = 1'-0"



3 Side Elevation
SCALE: 3/32" = 1'-0"



4 Side Elevation
SCALE: 3/32" = 1'-0"

Note: Signage shown on the elevations for graphic purpose only and does not represent the use or actual tenants

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Coachella Airport Business Park
NWC State Highway 86 and Airport Road
COACHELLA, CALIFORNIA

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35 Hugus Alley Suite 200
Pasadena, California 91103
T:626.583.8348 F:626.583.8387

ELEVATIONS
04.12.2022 18028TMA
A-206



1 Site Elevation Airport Boulevard
SCALE: 1" = 30'-0"



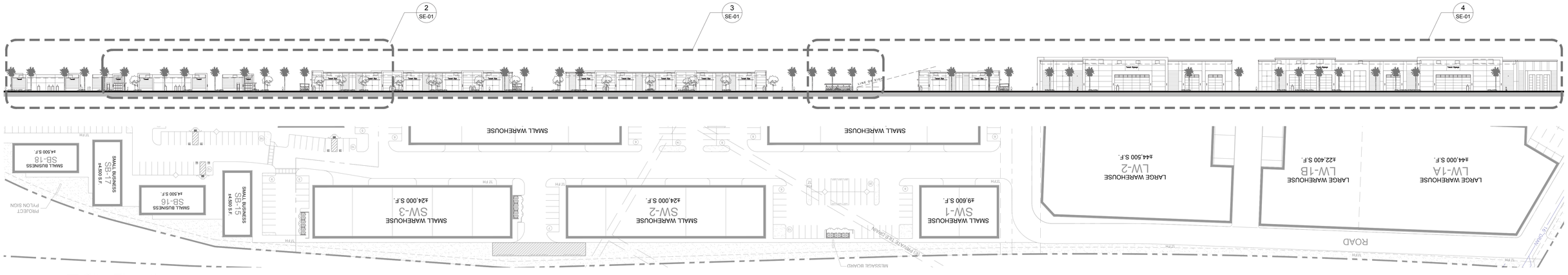
2 Site Elevation State Highway 86
SCALE: 1" = 30'-0"



3 Site Elevation State Highway 86
SCALE: 1" = 30'-0"



4 Site Elevation State Highway 86
SCALE: 1" = 30'-0"



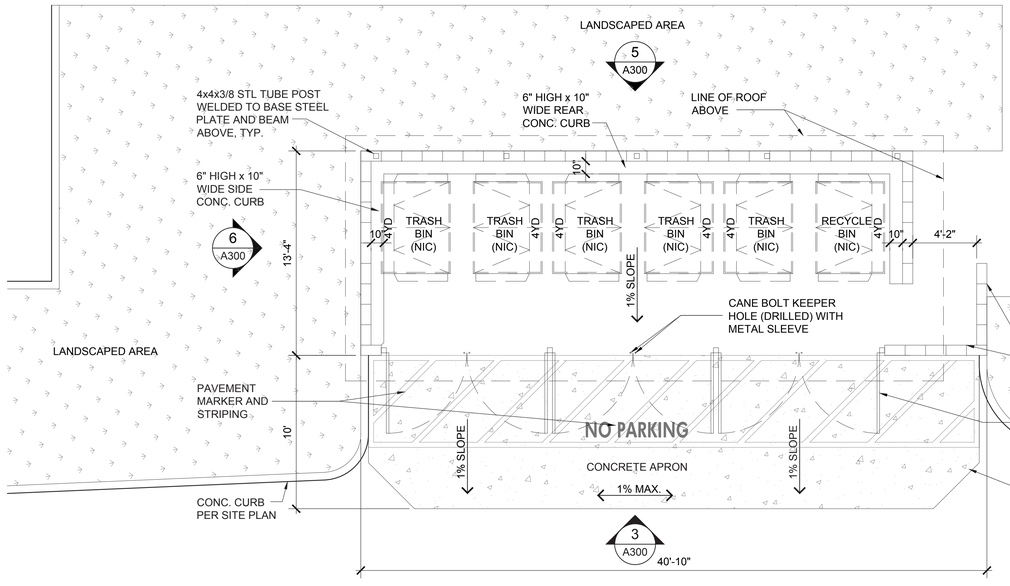
5 Site Elevation State Highway 86
SCALE: 1" = 30'-0"

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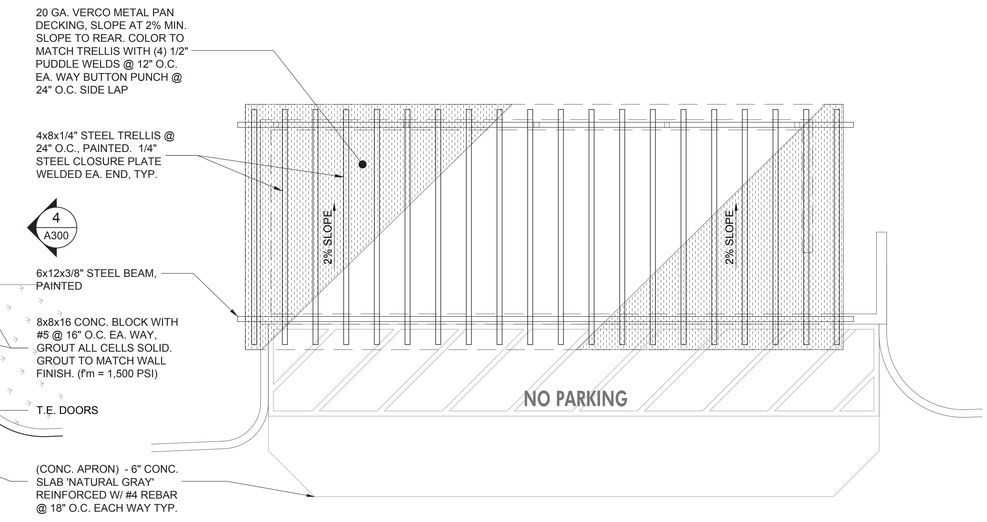
Coachella Airport Business Park
NWC State Highway 86 and Airport Road
COACHELLA, CALIFORNIA

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ARCHITECTS
35 Hugus Alley Suite 200
Pasadena, California 91103
T:626.583.8348 F:626.583.8387

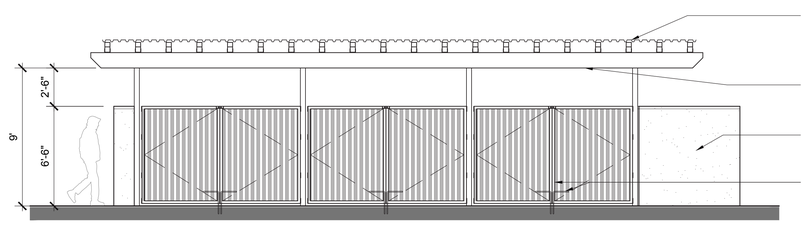
SITE ELEVATION
04.12.2022 18028TMA
SE-01



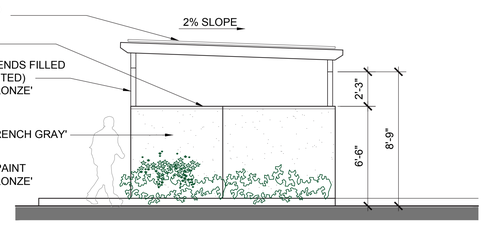
1 Trash Enclosure - Floor Plan
SCALE: 1/4" = 1'-0"



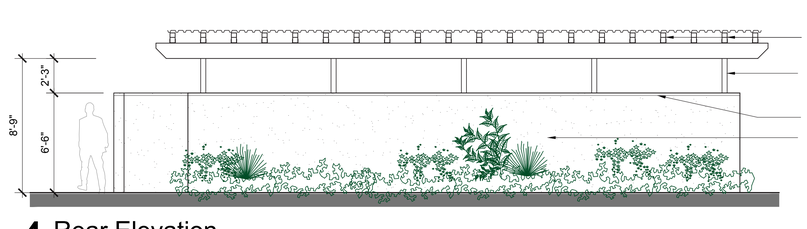
2 Trash Enclosure - Roof Plan
SCALE: 1/4" = 1'-0"



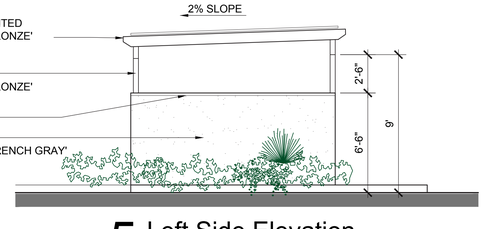
3 Front Elevation
SCALE: 1/4" = 1'-0"



3 Right Side Elevation
SCALE: 1/4" = 1'-0"



4 Rear Elevation
SCALE: 1/4" = 1'-0"



5 Left Side Elevation
SCALE: 1/4" = 1'-0"

Haagen Co LLC
12302 Exposition Boulevard, Los Angeles CA 90064

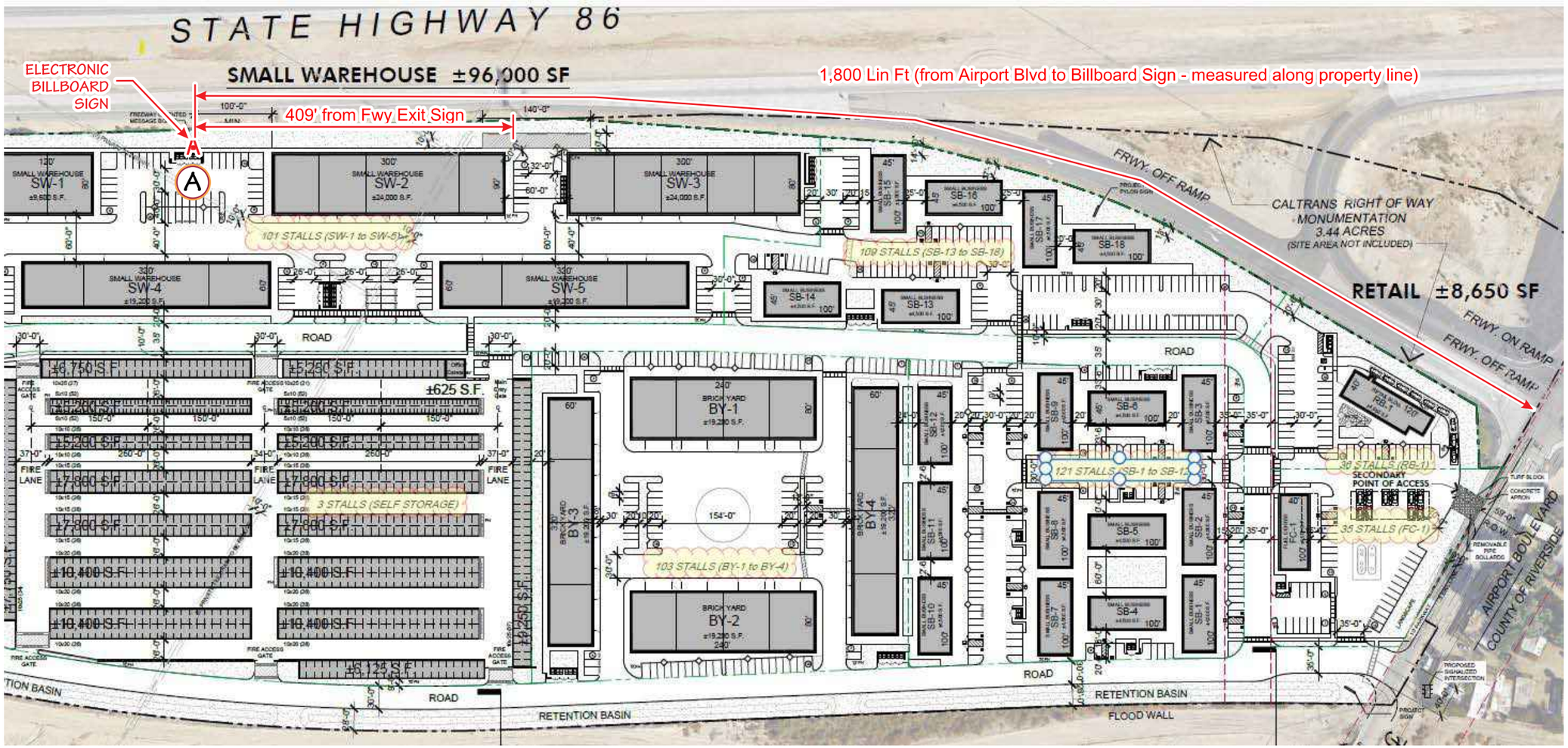
Coachella Airport Business Park
NWC State Highway 86 and Airport Road
COACHELLA, CALIFORNIA

McKently Malak ARCHITECTS
35 Hugus Alley Suite 200
Pasadena, California 91103
T:626.583.8348 F:626.583.8387

TRASH ENCLOSURE
04.12.2022 18028TMA
TE-01

SIGN	SCOPE OF WORK / DESCRIPTION
A	MANUFACTURE AND INSTALL (1) DOUBLE SIDED V-SHAPED FREEWAY PYLON MESSAGE BOARD WITH 16MM DIGITAL DISPLAYS

POSE MILE: I-86-R 16.931



N

SCALE: NTS

PROJECT TITLE

COACHELLA AIRPORT BUSINESS

COACHELLA, CA

JOB NUMBER 50641

SALES	CLAUDE ELLENA
DRAWN BY	CARLOS
DATE	5-20-20
SCALE	AS NOTED
FOLDER	S/COACHELLA AIRPORT BUSINESS PARK/50641
FILE	50641R3 LOCATION 2.CDR
DESIGN#	001

REVISIONS

DATE	BY	DATE	BY
4-16-21	CM		

APPROVAL

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- The customer shall provide accessibility to remote transformers and/or ballasts for installation, final inspection and service.
- Dedicated 120 Volt sign circuits with a ground wire to be provided within 6' of the display(s) by the customer.
- Sketch may vary from specified colors. Photos are for visual reference only, size and placement of signs may vary.

SIGNATURE | DATE

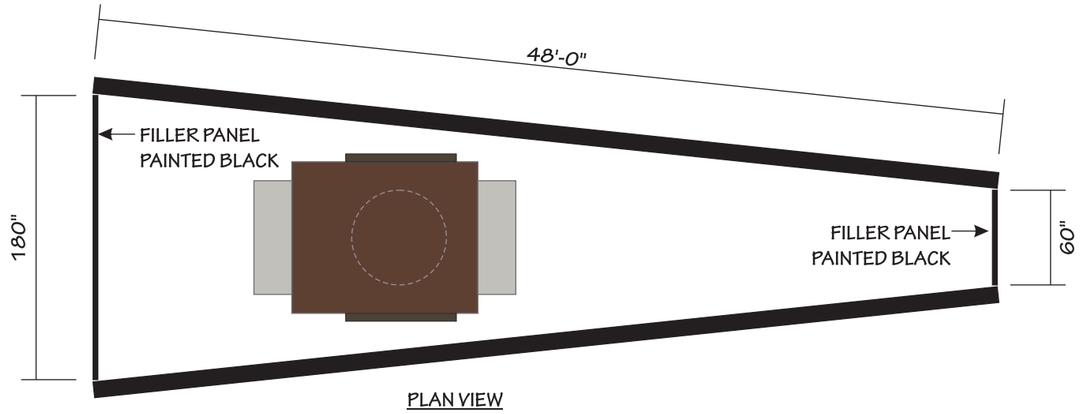
PRINTED NAME | TITLE

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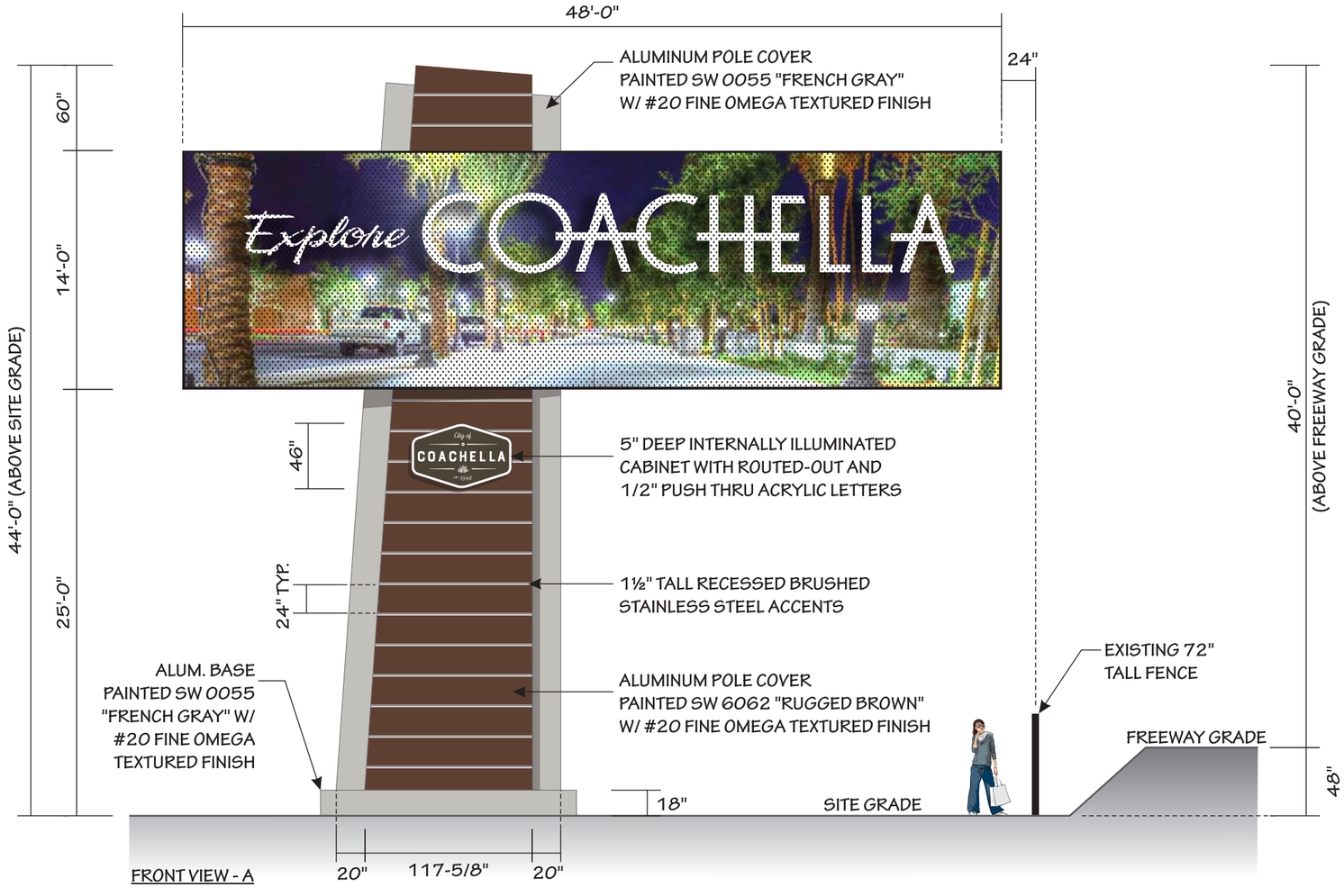
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PLAN VIEW

A SCALE: 1/8" = 1'-0"



FRONT VIEW - A



END VIEW - A

A MANUFACTURE AND INSTALL (1) ONE DOUBLE SIDED V-SHAPED FREEWAY PYLON MESSAGE BOARD

SCALE: 1/8" = 1'-0"

COLOR SCHEDULE

- SW 6062 "RUGGED BROWN #20 OMEGA FINE TEXTURE
- SW 6062 "RUGGED BROWN #20 OMEGA FINE TEXTURE
- SW 7048 "URBANE BRONZE" SATIN FINISH

Item 4.

PROJECT TITLE

COACHELLA AIRPORT BUSINESS

COACHELLA, CA

JOB NUMBER 50641

SALES	CLAUDE ELLENA
DRAWN BY	CARLOS
DATE	5-20-20
SCALE	AS NOTED
FOLDER	S/COACHELLA AIRPORT BUSINESS PARK/50641
FILE	50641R3 LOCATION 2.CDR
DESIGN#	002

REVISIONS

DATE	BY	DATE	BY
3-9-21	CM		

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SIGNATURE DATE

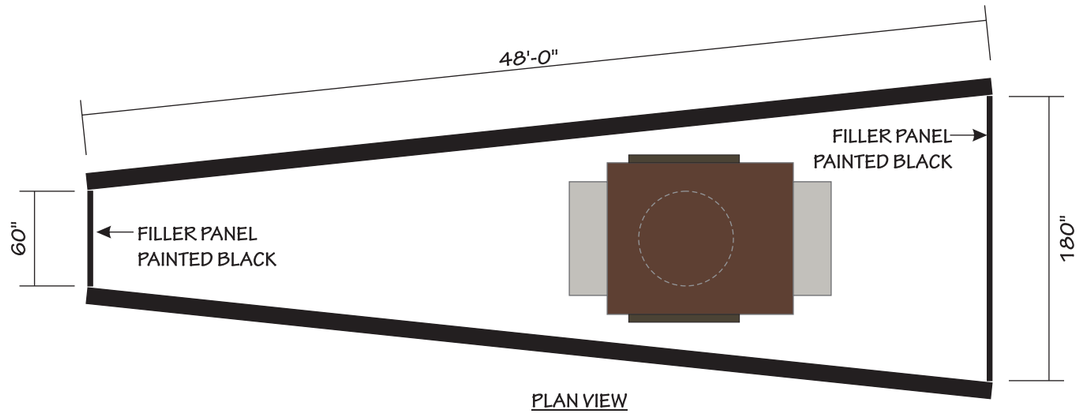
PRINTED NAME TITLE

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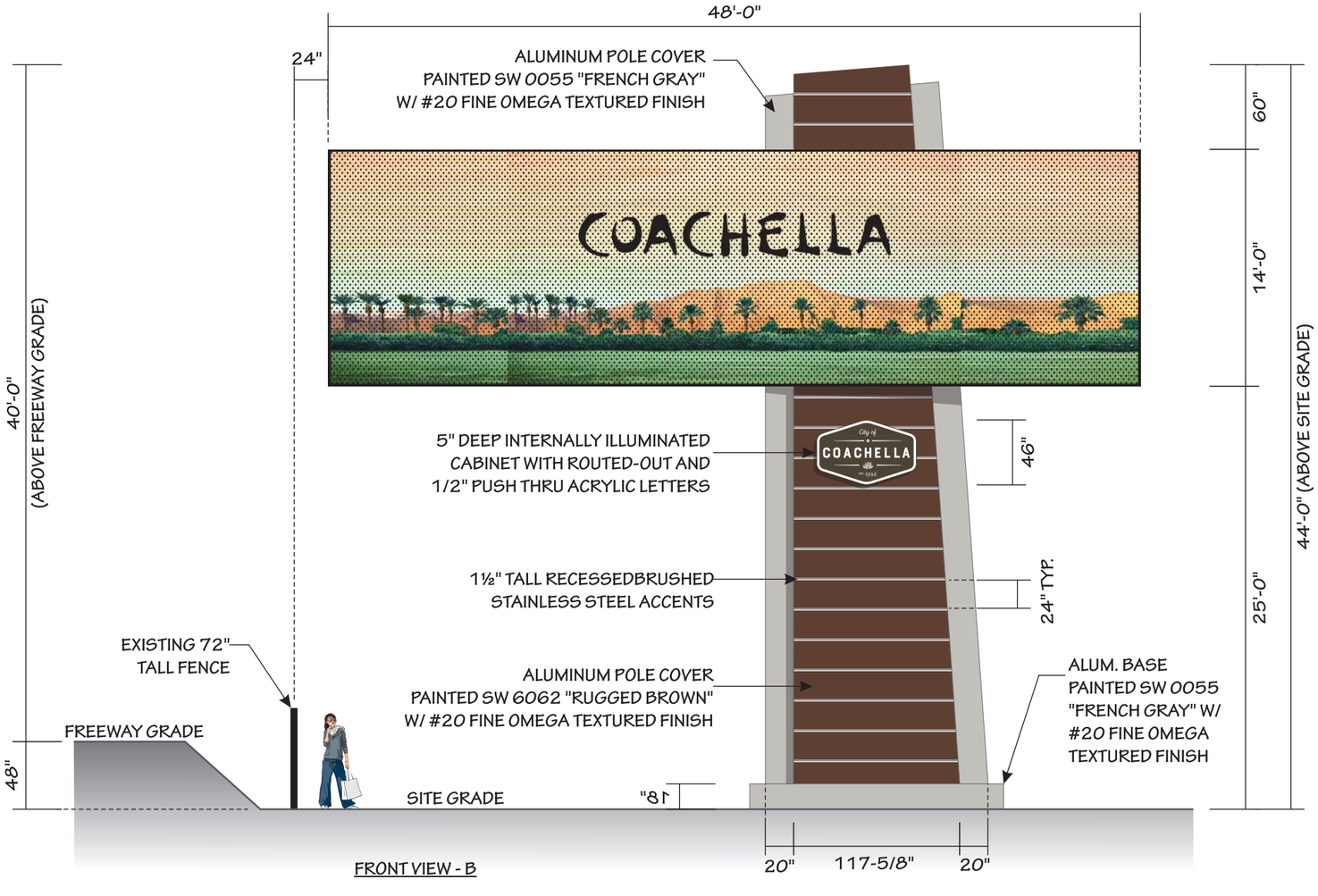
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PLAN VIEW

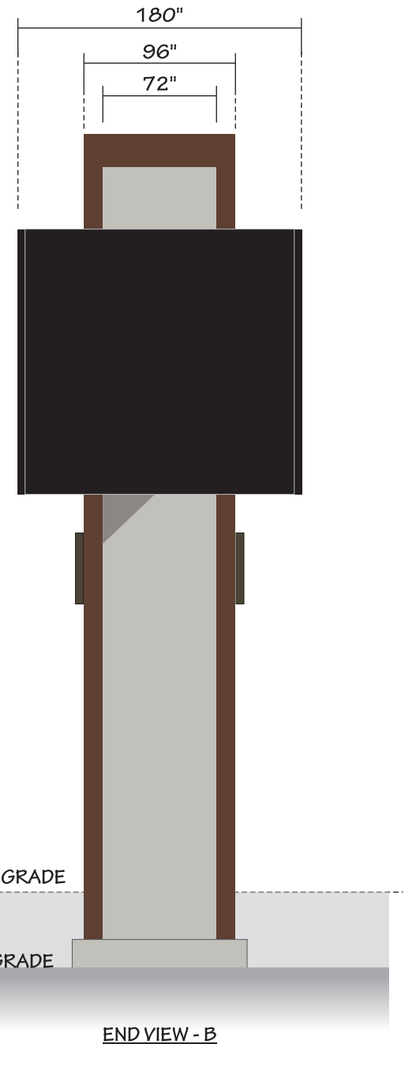
SCALE: 1/8" = 1'-0"



FRONT VIEW - B

COLOR SCHEDULE

- SW 6062 "RUGGED BROWN #20 OMEGA FINE TEXTURE
- SW 6062 "RUGGED BROWN #20 OMEGA FINE TEXTURE
- SW 7048 "URBANE BRONZE" SATIN FINISH



END VIEW - B

A MANUFACTURE AND INSTALL (1) ONE DOUBLE SIDED V-SHAPED FREEWAY PYLON MESSAGE BOARD

SCALE: 1/8" = 1'-0"

PROJECT TITLE

COACHELLA AIRPORT BUSINESS

COACHELLA, CA

Item 4.

JOB NUMBER 50641

SALES	CLAUDE ELLENA
DRAWN BY	CARLOS DATE 5-20-20
SCALE	AS NOTED
FOLDER	S/COACHELLA AIRPORT BUSINESS PARK/50641
FILE	50641R3 LOCATION 2.CDR
DESIGN#	003

REVISIONS

DATE	BY	DATE	BY
3-9-21	CM		

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SIGNATURE DATE

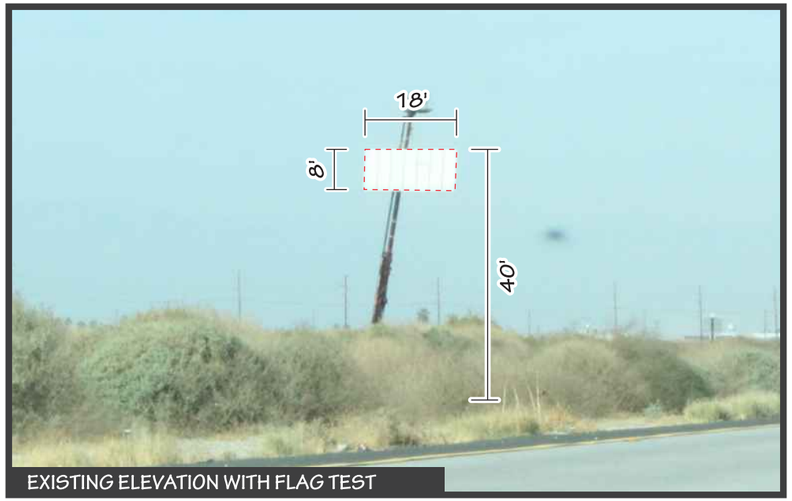
PRINTED NAME TITLE

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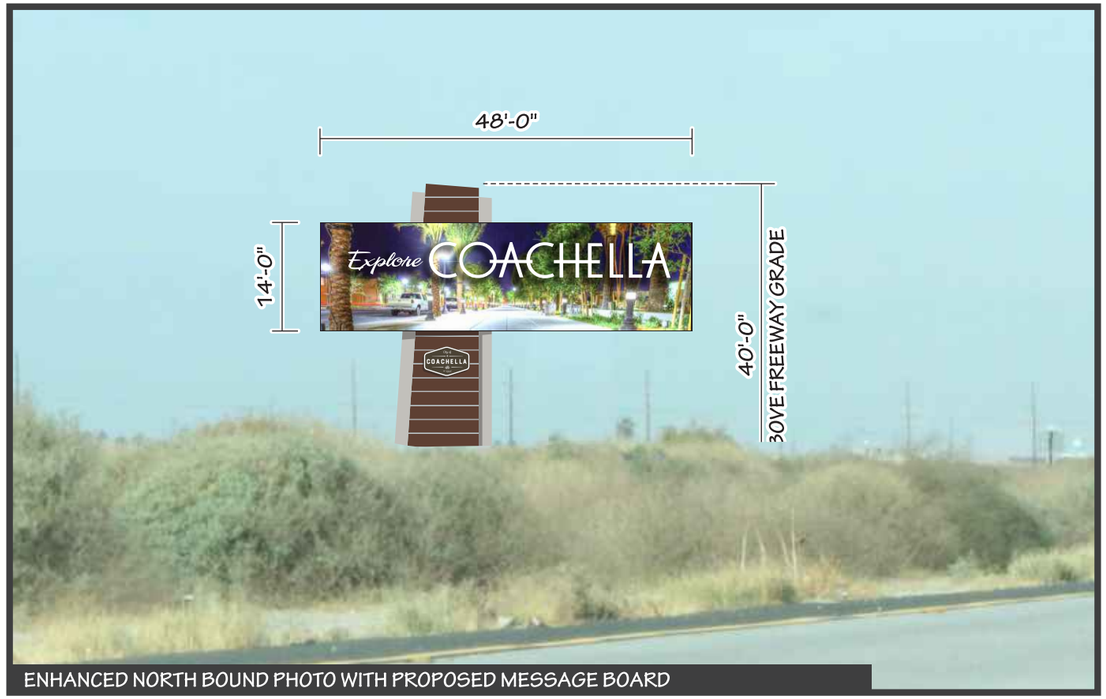
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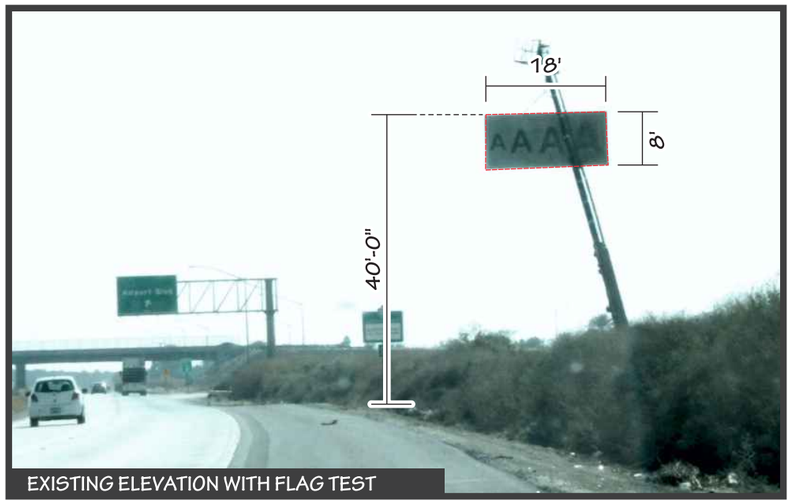
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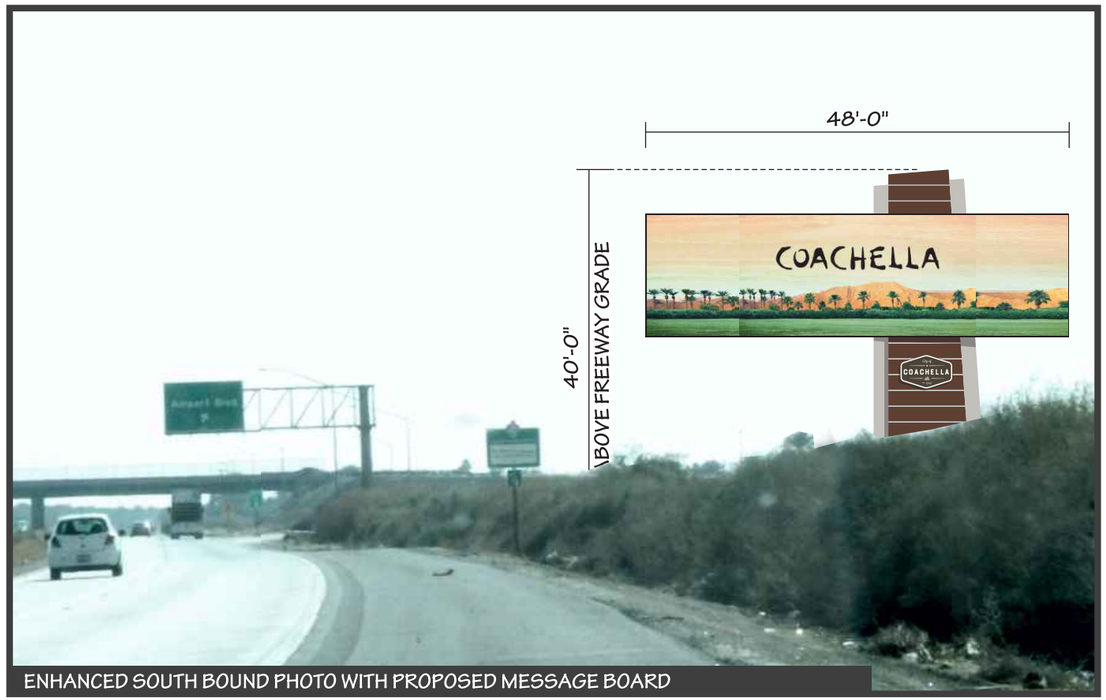
EXISTING ELEVATION WITH FLAG TEST



ENHANCED NORTH BOUND PHOTO WITH PROPOSED MESSAGE BOARD



EXISTING ELEVATION WITH FLAG TEST



ENHANCED SOUTH BOUND PHOTO WITH PROPOSED MESSAGE BOARD

A

SCALE: NTS

PROJECT TITLE

COACHELLA AIRPORT BUSINESS

COACHELLA, CA

JOB NUMBER 50641

SALES	CLAUDE ELLENA
DRAWN BY	CARLOS
DATE	5-20-20
SCALE	AS NOTED
FOLDER	S/COACHELLA AIRPORT BUSINESS PARK/50641
FILE	50641R3 LOCATION 2.CDR
DESIGN#	004

REVISIONS

DATE	BY	DATE	BY

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SIGNATURE | DATE

PRINTED NAME | TITLE

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A DAY ILLUMINATION

SCALE: 1/8" = 1'-0"

PROJECT TITLE

COACHELLA AIRPORT BUSINESS

COACHELLA, CA

JOB NUMBER 50641

SALES	CLAUDE ELLENA
DRAWN BY	CARLOS
DATE	5-20-20
SCALE	AS NOTED
FOLDER	S/COACHELLA AIRPORT BUSINESS PARK/50641
FILE	50641R3 LOCATION 2.CDR
DESIGN#	005

REVISIONS

DATE	BY	DATE	BY

APPROVAL

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SIGNATURE | DATE

PRINTED NAME | TITLE

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A NIGHT ILLUMINATION

SCALE: 1/8" = 1'-0"

PROJECT TITLE

COACHELLA AIRPORT BUSINESS

COACHELLA, CA

JOB NUMBER 50641

SALES	CLAUDE ELLENA
DRAWN BY	CARLOS
DATE	5-20-20
SCALE	AS NOTED
FOLDER	S/COACHELLA AIRPORT BUSINESS PARK/50641
FILE	50641R3 LOCATION 2.CDR
DESIGN#	006

REVISIONS

DATE	BY	DATE	BY

APPROVAL

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- The customer shall provide accessibility to remote transformers and/or ballasts for installation, final inspection and service.
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SIGNATURE | DATE

PRINTED NAME | TITLE

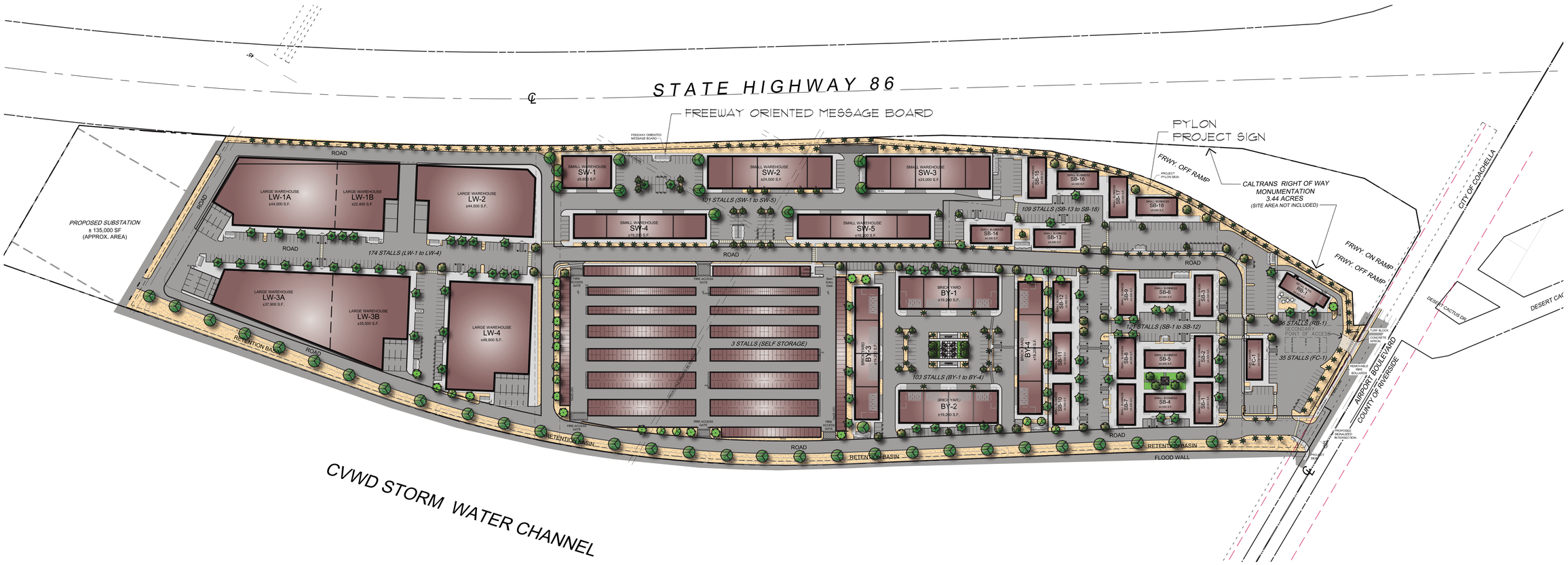
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CONCEPTUAL LANDSCAPE PLAN



PROPOSED PLANT LIST

SYMBOL	QTY.	BOTANICAL NAME / COMMON NAME	SIZE / NOTES	WATER USE
TREES & PALMS				
		PROSOPIS GLANDULOSA 'MAVERICK'	24" BOX SINGLE TRK. STND.	0.2 LOW
		PARKINSONIA X 'DESERT MUSEUM'	24" BOX SINGLE TRK. STND.	0.2 LOW
		PARKINSONIA PRAECOX 'PALO BREA'	24" BOX SINGLE TRK. STND.	0.2 LOW
		ACACIA SALIGINA 'WILLOW ACACIA'	24" BOX SINGLE TRK. STND.	0.2 LOW
		QUERCUS VIRGINIANA 'SOUTHERN LIVE OAK'	24" BOX SINGLE TRK. STND.	0.5 MOD
		PHOENIX DACTYLIFERA 'DATE PALM'	18' BTH DIAMOND CUT PACIFIC DATE WD YOUNG NURSERY DAVID SMITH "160,250,1028 or eq.	0.5 MOD
		ACACIA ANEURA 'MULGA'	24" BOX SINGLE TRK. STND.	0.2 LOW
		CAESALPINIA CACALACO 'SMOOTHY'	24" BOX MULTI-TRK.	0.2 LOW
		CORDIA BOISSIERI 'TEXAS OLIVE'	24" BOX SINGLE TRK. STND.	0.2 LOW
		CHAMAEROPS HUMILIS 'MEDITERRANEAN FAN PALM'	24" BOX MULTI-TRK.	0.5 MOD
SHRUBS				
		SENNA ARTEMISIOIDES 'FEATHER CASSIA'	5 GAL.	0.2 LOW
		LEUCOPHYLLUM LANGMANIAE 'LYNN'S LEGACY'	5 GAL.	0.2 LOW
		LEUCOPHYLLUM CANDIDUM 'THUNDER CLOUD'	5 GAL.	0.2 LOW
		LEUCOPHYLLUM ZYGOPHYLLUM 'CIMARRON'	5 GAL.	0.2 LOW
		TECOMA 'LYDIA'	5 GAL.	0.5 MOD
		BOUGAINVILLEA 'TORCH GLOW'	5 GAL.	0.5 MOD
		BOUGAINVILLEA 'PINK PIXIE'	5 GAL.	0.5 MOD
		BOUGAINVILLEA 'ROSENKA'	5 GAL.	0.5 MOD
		EREMOPHILA MASCULATA 'VALENTINE'	5 GAL.	0.2 LOW
		CALLISTEMON VIMINALIS 'LITTLE JOHN'	5 GAL.	0.5 MOD
		CARISSA 'BOXWOOD BEAUTY'	5 GAL.	0.5 MOD
		RUSSELIA EQUISETIFORMIS 'CORAL FOUNTAIN'	5 GAL.	0.5 MOD
GROUNDCOVER & VINES				
		EREMOPHILA GLABRA 'MINGENEW GOLD'	5 GAL.	0.2 LOW
		LANTANA 'NEW GOLD'	5 GAL.	0.5 MOD
		CARISSA 'GREEN CARPET'	5 GAL.	0.5 MOD
ACCENTS				
		DASYLIRION LONGISSIMA 'MEXICAN GRASS TREE'	15 GAL.	0.2 LOW
		DASYLIRION WHEELERI 'DESERT SPOON'	15 GAL.	0.2 LOW
		FOUQUIERIA SPLENDENS 'OCOTILLO'	15 GAL. 6-8 CANES MIN.	0.2 LOW
		AGAVE WEBERI 'WEBER'S AGAVE'	5 GAL.	0.1 VERY LOW
		AGAVE ANGUSTIFOLIA 'MARGINATA'	5 GAL.	0.1 VERY LOW
		HESPERALOE PARVIFLORA 'RED TIPPED YUCCA'	5 GAL.	0.2 LOW
		ECHINOCACTUS GRUSONII 'GOLDEN BARREL CACTUS'	12" DIA.	0.2 LOW

PAVING, STONE, & GRAVEL MATERIALS

4"-8" DIA. 'BAJA CRESTA RUBBLE' PROVIDE COMPLETE COVERAGE IN DESIGNATED AREAS

3/8" MINUS 'MOJAVE GOLD' DECOMPOSED GRANITE LAID 3" THICK

'RUSTIC BROWN' BOULDER "A" - 2' 6" x 2' 6"

'RUSTIC BROWN' BOULDER "B" - 2' x 2'

'RUSTIC BROWN' BOULDER "C" - 1' 6" x 1' 6"

COACHELLA AIRPORT BUSINESS PARK

COACHELLA, CA

HAAGEN COMPANY, LLC

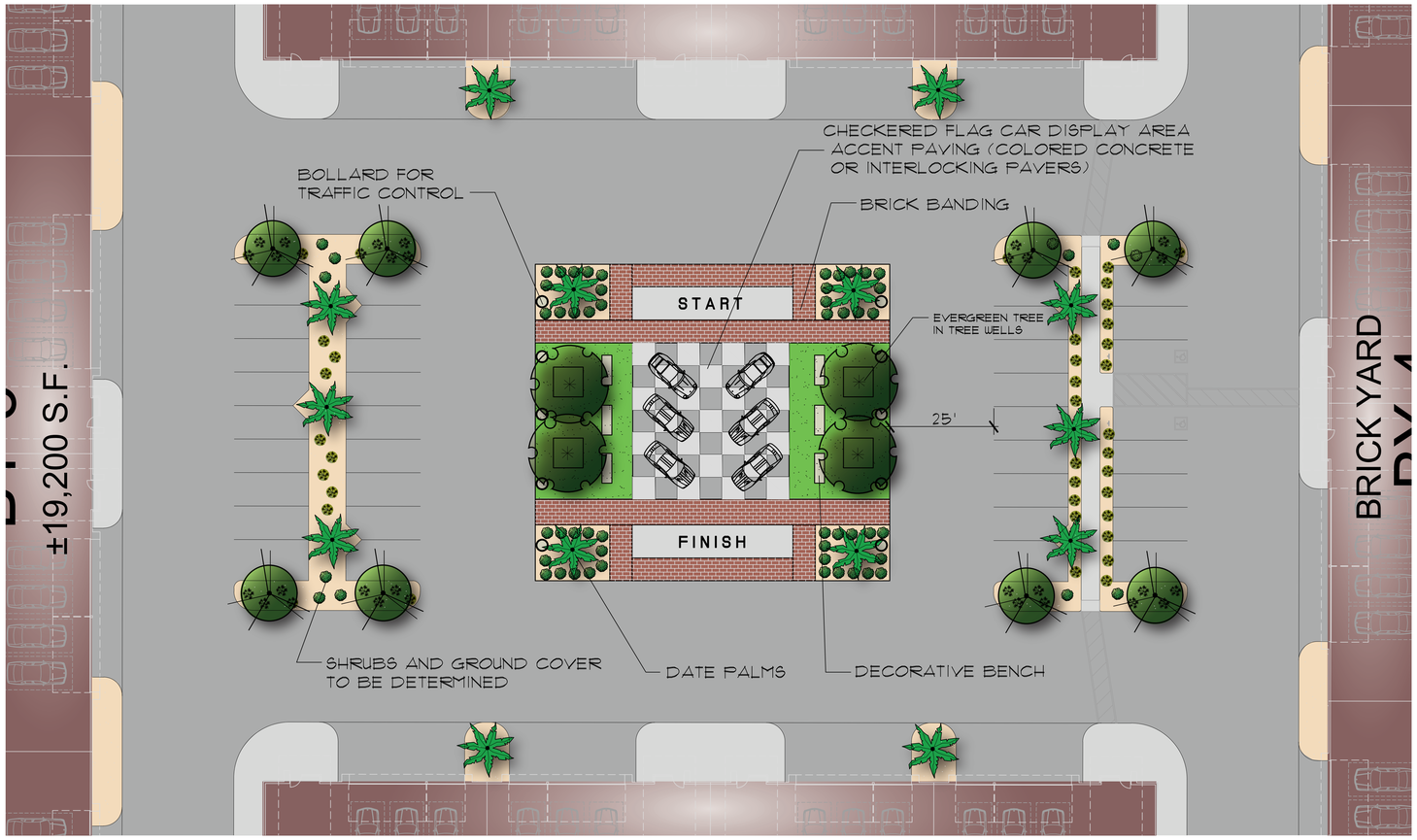
LP-1

SCALE: 1" = 100'-0" (0' 100' 200' 300')

HERMANN DESIGN GROUP
77-899 WOLF RD.
SUITE 102
PALM DESERT, CA
92211
LIC# 2754, EXP 04/30/22
PH. (760) 777-9131
FAX (760) 777-9132

DATE 6-09-20

CONCEPTUAL LANDSCAPE PLAN



BRICK YARD AREA

COACHELLA AIRPORT BUSINESS PARK

COACHELLA, CA

HAAGEN COMPANY, LLC

LP-2

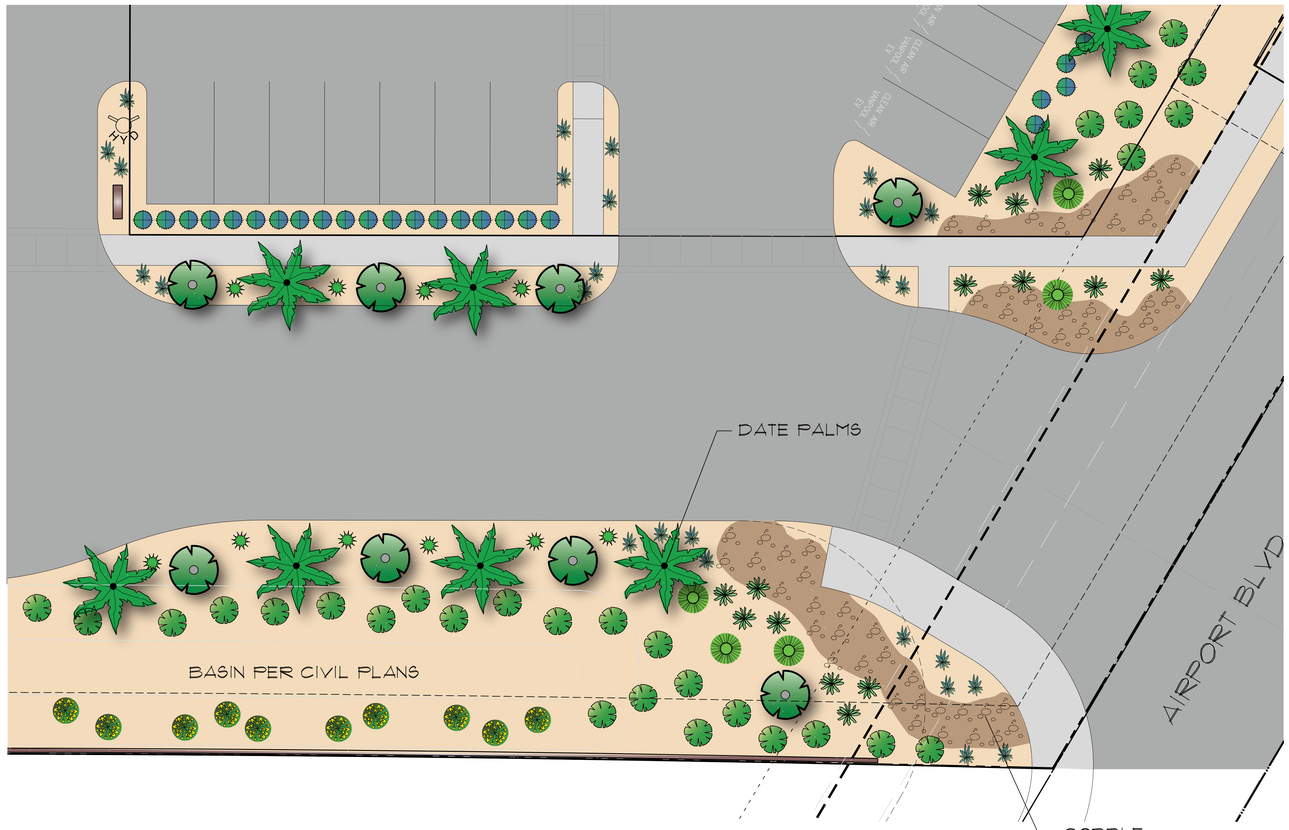
0' 16' 32' 48'

SCALE: 1/16"=1'-0"

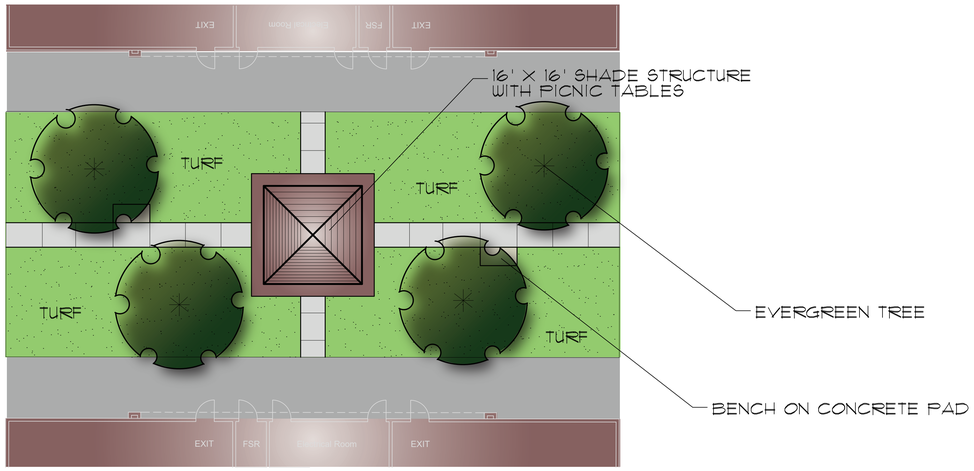
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SUITE 102
PALM DESERT, CA
92211
LIC# 2754, EXP 04/30/22
PH. (760) 777-9131
FAX (760) 777-9132

DATE 6-09-20

CONCEPTUAL LANDSCAPE PLAN



ENTRY LANDSCAPE AT AIRPORT BLVD



SMALL BUSINESS PICNIC AREA

COACHELLA AIRPORT BUSINESS PARK

COACHELLA, CA

HAAGEN COMPANY, LLC

LP-3

0' 10' 20' 30'

SCALE: 1"=10'

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SUITE 102
PALM DESERT, CA
92211
LIC# 2754, EXP 04/30/22
PH. (760) 777-9131
FAX (760) 777-9132

DATE 6-09-20

Final Environmental Impact Report

Coachella Airport Business Park Development
SCH No. 2023040106

March 2026

Prepared for:
City of Coachella
53990 Enterprise Way
Coachella, CA 92236



Prepared by:
Alum Group
44-600 Village Court, Suite 100
Palm Desert, CA 92260

MNS Engineers, Inc.
3850 Vine Street, Suite 110
Riverside, CA 92507

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Attachment C2: Biological Resources Responses to Comments Technical Memorandum (Rincon Consultants, November 3, 2025)

Attachment D2: Cultural Resources Responses to Comments Technical Memorandum (Chronicle Heritage, October 2, 2025)

Attachment H2: Noise Responses to Comments Technical Memorandum (AMBIENT Air Quality and Noise Consulting, October 21, 2025)

Attachment I2: Transportation Responses to Comments Technical Memorandum (Integrated Engineering Group, October 14, 2025)

Attachment I3: Supplemental Transportation Exhibits (Replacement of the Airport Boulevard Bridge Over Whitewater River Project, Preliminary Project Overview Interim Striping) (Dokken Engineering, September 2024)

1.0 Introduction

In accordance with the California Environmental Quality Act Guidelines ("CEQA Guidelines") Section 15088, the City of Coachella, as the lead agency, has evaluated the comments received on the Coachella Airport Business Park EIR (Draft EIR) (State Clearinghouse No. 2023040106).

The Draft EIR for the proposed Coachella Airport Business Park (the "Project" or "Proposed Project") was distributed to responsible and trustee agencies, interested groups, and organizations. The Draft EIR was made available for public review and comment for a period of 45 days. The public review period for the Draft EIR established by the CEQA Guidelines commenced on July 21, 2025, and concluded on September 3, 2025.

The Final EIR consists of the following components:

- Section 1.0 – Introduction
- Section 2.0 – Response to Comments
- Section 3.0 – Errata
- Section 4.0 – Mitigation Monitoring and Reporting Program

Due to its length, the text of the Draft EIR is not included with this document; however, it is included by reference in this Final EIR. None of the corrections or clarifications to the Draft EIR identified in this document constitutes "significant new information" pursuant to CEQA Guidelines Section 15088.5. As a result, a recirculation of the Draft EIR is not required.

2.0 Responses to Comments

In accordance with the CEQA Guidelines Section 15088, the City of Coachella, as the lead agency, evaluated the written comments received on the Draft Environmental Impact Report (EIR) (State Clearinghouse No. 2023040106) for the Project and has prepared the following responses to the comments received. This Response to Comments document becomes part of the Final EIR for the Project in accordance with CEQA Guidelines Section 15132.

A list of public agencies, organizations, and individuals that provided comments on the Draft EIR is presented below in Table 1, *List of Public Agencies, Tribes, and Organizations Commenting on the Draft EIR*. Individual comments within each communication have been numbered so comments can be crossed-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

Table 1: List of Public Agencies, Tribes, and Organizations Commenting on the Draft EIR

Comment Letter No.	Agency, Tribe, or Organization	Letter Dated
Agencies		
1	Desert Sands Unified School District	July 30, 2025
2	City of La Quinta	August 7, 2025
3	County of Riverside Transportation and Land Management Agency	September 2, 2025
4	U.S. Fish and Wildlife Service	September 2, 2025
5	South Coast Air Quality Management District	September 3, 2025
Tribes		
6	Torres Martinez Desert Cahuilla Indians	July 21, 2025
7	Agua Caliente Band of Cahuilla Indians	July 23, 2025
Organizations		
8	Southern California Gas Company	July 21, 2025
9	Californians Allied for a Responsible Economy via Adams Broadwell Joseph & Cardozo, Attorneys at Law	August 6, 2025
10	Californians Allied for a Responsible Economy via Adams Broadwell Joseph & Cardozo, Attorneys at Law	August 6, 2025
11	Californians Allied for a Responsible Economy via Adams Broadwell Joseph & Cardozo, Attorneys at Law	August 6, 2025
12	Supporters Alliance for Environmental Responsibility via Lozeau Drury, LLP	August 6, 2025
13	Advocates for the Environment	September 3, 2025
Comment Letters Received After the Close of the Comment Period		
14	California Department of Fish and Wildlife	September 4, 2025
15	California Department of Transportation	September 10, 2025
16	Californians Allied for a Responsible Economy via Adams Broadwell Joseph & Cardozo, Attorneys at Law	September 11, 2025
17	Californians Allied for a Responsible Economy via Adams Broadwell Joseph & Cardozo, Attorneys at Law	August 21, 2025

Comment Letter 1 (page 1 of 1)

Comment Letter No.1

Thursday, July 31, 2025 at 7:29:20 AM Pacific Daylight Time

Subject: FW: Coachella Airport Business Park
Date: Wednesday, July 30, 2025 at 5:17:33 PM Pacific Daylight Time
From: Kendra Reif
To: Nicole Criste
Attachments: ~WRD0814.jpg, DIR- Coachella Airport Business Park.pdf

From: Castillo, Yaneli <yaneli.castillo@desertsands.us>
Sent: July 30 25 10:03 AM
To: Kendra Reif <kreif@coachella.org>
Subject: Coachella Airport Business Park

Good morning Kendra,

The project below is not within Desert Sands Unified School District boundaries:

Project Name: Coachella Airport Business Park
Project Location: Northwest corner of the intersection of State Route 86 (SR 86) and Airport Boulevard in the city of Coachella (City) County of Riverside.

1-1

Thank you,

1 of 1

Response to Comment Letter 1

Yaneli Castillo
Desert Sands Unified School District
July 30, 2025

1-1 This comment states that the Project is not within Desert Sands Unified School District boundaries. Comment noted. The comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines.

Comment Letter 2 (page 1 of 1)

Comment Letter No. 2

La Quinta CALIFORNIA

August 7, 2025 Sent via Email

Kendra Reif, Community Development Director
City of Coachella Development Services, Planning Division
53990 Enterprise Way
Coachella, CA 92236

SUBJECT: Notice of Availability and Completion of the Draft EIR - Coachella Airport Business Park

Dear Kendra Reif,

Thank you for the opportunity to review and comment on the above-mentioned project. The City of La Quinta has no comments at this time. Please keep us on your distribution list for any future public notices pertaining to this project. You may email notices to Scott Nespor, Senior Planner, at snespor@laquintaca.org. 2-1

Sincerely,

Scott Nespor
Senior Planner

Cc: Cheri Flores, Interim Director of Design Development Department

78495 Calle Tampico | La Quinta, California 92253 | 760.777.7000 | www.laquintaca.gov

Response to Comment Letter 2

Scott Nespor, Senior Planner
City of La Quinta
August 7, 2025

2-1 The commenter states that the City of La Quinta has no comments at this time. Comment noted. The comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines.

Comment Letter 3 (page 1 of 3)

Comment Letter No. 3

COUNTY OF RIVERSIDE
TRANSPORTATION AND
LAND MANAGEMENT AGENCY

Dennis Acuna, P. E., T. E.
Director of Transportation

Hector D. Davila, P.E.
Deputy for Transportation/Capital Projects

Russell Williams
Deputy for Transportation/Planning and Development

Transportation Department

September 2, 2025
Sent via e-mail

Kendra Reif
Community Development Director
City of Coachella Development Services, Planning Division
53990 Enterprise Way,
Coachella, CA 92236

RE: Coachella Airport Business Park Project Notice of Preparation of a Draft EIR

Dear Ms. Kendra Reif:

The County of Riverside Transportation Department (County) has reviewed the Environmental Impact Report (EIR) from the City of Coachella for the Coachella Airport Business Park Project pursuant to the California Environmental Quality Act (CEQA).

The County, in coordination with the City of Coachella, is proposing the Airport Boulevard Bridge Replacement Project, adjacent to the Coachella Airport Business Park Project. The Airport Boulevard Bridge Replacement Project is proposing to replace the existing two--lane bridge with a new wider two-lane bridge. The replacement bridge will be constructed at a width of 71 feet and includes 6-foot-wide sidewalks on both sides of the bridge, 8-foot-wide shoulders, a 14-foot-wide eastbound and westbound lane, and a 12-foot-wide striped median/turn lane. 3-1

The County previously provided comments regarding the Coachella Airport Business Park on the Notice of Preparation (NOP) in 2023. These comments pertained to Parking and Circulation, Noise, Transportation, Tribal Cultural Resources, and Mandatory Findings of Significance.

Please find the County's comments on the EIR for the Coachella Airport Business Park Project below.

COMMENT #1 – Section 2.5.6 | Project Site Circulation and Parking

Please provide information regarding the necessary improvements and geometrics of the proposed intersection signalization and proposed main access point on Airport Boulevard for the Coachella Airport Business Park Project in the Project Site Circulation and Parking section. 3-2

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Comment Letter 3 (page 2 of 3)

COMMENT #2 – Section 2.5.8 | Required Approvals

An Encroachment Permit from the County of Riverside will be required for any work within County right-of-way along Airport Boulevard. Please include an Encroachment Permit from the County of Riverside in Table 2.5. 3-3

COMMENT #3 – Section 3.3 | Cumulative Development

Tables 3-1 and 3-2 only include development projects and should also include the Airport Boulevard Bridge Replacement Project, the Coachella Valley Water District's Stormwater Channel Improvement Project, and other known future infrastructure projects in the vicinity. The bridge replacement project was approved by the County of Riverside Board of Supervisors on 6/13/23 and should be included within the cumulative analysis. 3-4

COMMENT #4 – Section 4.15 | Public Services

Within the Public Services section of the EIR, please include additional details regarding any emergency services access conflicts with the Desert View Mobile Home Park. Exhibit 2.4 Site Plan shows a proposed signalized intersection at the eastern bridge abutment; however, a driveway entrance into the Desert View Mobile Home Park is located just to the east of this intersection. Please include additional details regarding any proposed changes to access that would affect emergency services for this community as a result of the proposed signalized intersection. 3-5

COMMENT #5 – Section 4.17 | Transportation

Within the Transportation section of the EIR, please include additional details regarding any access conflicts with the Desert View Mobile Home Park. Exhibit 2.4 Site Plan shows a proposed signalized intersection at the eastern bridge abutment; however, a driveway entrance into the Desert View Mobile Home Park is located just to the east of this intersection. Please include additional details regarding any proposed changes to access for this community as a result of the proposed signalized intersection.

Additionally, although the City of Coachella's General Plan identifies Airport Boulevard as a 6-lane urban arterial in the buildout classifications for purposes of traffic analysis, there are no known programmed projects or environmental documentation to widen Airport Boulevard from two-lanes to four- or six-lanes in the future. Please include a discussion of any necessary future improvements anticipated with the widening of Airport Boulevard to six-lanes. Currently, the existing bridges over Union Pacific Railroad, Coachella Valley Storm Drain, and State Route 86 can only accommodate up to four lanes and future improvements likely would be needed in order to construct a 6-lane urban arterial at this location. 3-6

COMMENT #6 – Appendix I - Traffic Impact Analysis

The County has also reviewed the Traffic Impact Analysis and provides the following comments:

- Counts were collected on January 18, 2024. January 15 was a Holiday. Per the County's Transportation Analysis Guidelines traffic data should not be collected on weeks that include a holiday and non-school session time period unless approved by the Transportation Department. 3-7
- Figure 1-2 (Trip Distributions) is difficult to follow. Provide directional distributions by movement at all intersections.
- Provide a separate pass-by distribution figure.

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Comment Letter 3 (page 3 of 3)

- Figure 1-3 to 1-5: trip assignment doesn't include pass-by trips. What happened to the pass-by volumes?
- Intersection 7 is split maintenance. Per the County's Guidelines, the project has a direct impact and is required to mitigate (construct improvements) due to LOS degrading from acceptable during the Existing scenario to unacceptable during EAP scenario.
- Intersection 1 is split maintenance. Per the County's Guidelines, the project has a direct impact and is required to mitigate (construct improvements) due to LOS degrading from acceptable during the Existing scenario to unacceptable during EAP scenario.
- Intersection 6: the County has concerns with queuing at this intersection. SimTraffic output sheets (Page 441 of 492) shows that the queues may be longer than 333'. Additional concerns in the southbound direction: the southbound through queues extend past the right turn storage. The project is required to mitigate. Provide Synchro files to the County for review.
- Clarify the recommended lane configurations at the new signalized driveway. A dedicated left turn lane is required. Is a dedicated right turn lane provided? Is the project proposing the widening of the bridge? Provide the site plan and truck turning template to the County for review.

3-7 Cont.

Conclusion

The County appreciates the opportunity to provide comments on the Coachella Airport Business Park Project's EIR. Continued coordination between the County of Riverside Transportation Department, City of Coachella, Haagen Co., LLC, and Terra Nova Planning & Research, Inc. is requested to ensure these Projects are not in conflict.

3-8

Thank you very much,

Umer Ahmed
Engineering Project Manager

4080 Lemon Street, 8th Floor · Riverside, CA 92501 · (951) 955-6740
P.O. Box 1090 · Riverside, CA 92502-1090 · FAX (951) 955-3198

Response to Comment Letter 3

Umer Ahmed, Engineering Project Manager
County of Riverside Transportation and Land Management Agency (TLMA)
September 2, 2025

3-1 This comment provides a general summary of the proposed Project. The comment also notes that the County previously provided comments regarding the Coachella Airport Business Park on the Notice of Preparation (NOP) in 2023 pertaining to Parking and Circulation, Noise, Transportation, Tribal Cultural Resources, and Mandatory Findings of Significance. Those comments were previously addressed in the DEIR which was circulated on July 21, 2025. Responses to specific comments newly enumerated in this comment are provided below. As it pertains to the Airport Boulevard Bridge Replacement Project, this project is an independent project being undertaken by Riverside County that was subject to its own environmental review, as noted in this comment. To clarify the analysis in the Draft EIR, the Airport Boulevard Bridge Replacement Project has been added to the list of cumulative projects at the commenter's request (see Response 3-4 below, and revised Tables 3-1 and 3-2 in the Draft EIR provided in Section 3.0 of this FEIR). In addition, exhibits depicting the proposed bridge improvements have been added to DEIR Section 4.17, Transportation as Exhibits 4.17-1 and 4.17-2 (see Section 3.0 of this FEIR). These clarifications and enhancements to the Draft EIR do not provide significant new information to the DEIR that would require recirculation because the additions do not change the DEIR in a way that deprives the public of a meaningful opportunity to comment on a significant adverse effect of the Project or a feasible way to mitigate or avoid such an impact.

3-2 This comment requests information regarding the necessary improvements and geometrics of the proposed intersection signalization and proposed main access point on Airport Boulevard for the Coachella Airport Business Park Project in the Project Site Circulation and Parking section in the DEIR. Please refer to Attachment I3, *Supplemental Transportation Exhibits (Replacement of the Airport Boulevard Bridge Over Whitewater River Project, Preliminary Project Overview Interim Striping) (Dokken Engineering, September 2024*), of this FEIR, which provides the information requested by the commenter. It should be noted that this attachment does not constitute significant new information requiring recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5. Rather, it serves only to clarify or amplify information already presented in the DEIR and/or the respective technical studies.

These exhibits will be added to Section 4.17, *Transportation,* of the DEIR (see Section 3.0, Errata). This comment does not assert any issue that must be addressed further pursuant to CEQA Guidelines.

3-3 The commenter requests that an Encroachment Permit from TLMA be added to Table 2.5, *Required Permits and Approvals,* in Section 2.0, Project Description, of the DEIR for any work within County right-of-way along Airport Boulevard. This change has been made to page 2.0-9 of the DEIR (Table 2.5) and is reflected in Section 3.0, Errata, of the Final EIR.

3-4 This comment requests that the Airport Boulevard Bridge Replacement Project (approved by the County of Riverside Board of Supervisors on 6/13/23), the Coachella Valley Water District's Stormwater Channel Improvement Project, and other known future infrastructure projects in the vicinity, be added to the Cumulative Projects lists in Tables 3-1 and 3-2 in the DEIR.

Section 15130(a) of the CEQA Guidelines provides that "[A]n EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable..." Cumulatively considerable, as defined in Section 15065(a)(3), "means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." An adequate discussion of significant cumulative impacts requires either: (1) "a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or (2) "a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact."

The Airport Boulevard Bridge Replacement Project (SCH No. 2023030456) adopted a Negative Declaration on May 16, 2023, and filed a Notice of Determination on June 30, 2023. Those documents analyzed hydrology, traffic, and noise issues, finding only incremental construction noise and short-term emissions relevant. Although that project was found not to have significant individual impacts, its temporary construction emissions and traffic detours fall within the same geographic area as the proposed project and were therefore considered in the cumulative impact assessment in the DEIR. Refer to Section 3.0, Errata, of this FEIR, which shows the addition of the Airport Boulevard Bridge Replacement Project to the cumulative projects list as well as the addition of exhibits depicting the proposed bridge improvements in DEIR Section 4.17, Transportation. Construction noise and short-term emissions generated by the Airport Boulevard Bridge Replacement Project, when added to the cumulative baselines, would not exceed any applicable thresholds, so the combined effect of these projects would not be cumulatively considerable. Cumulative construction noise and short-term emissions impacts are therefore less than significant.

The CVWD's Stormwater Channel Improvement Project (SCH. No. 2015111067) adopted a FEIR on November 12, 2019. That document analyzed hydrology and flood-control impacts and found that the proposed project's incremental contribution to flood conveyance was minimal when considered in combination with the referenced channel improvement project and other projects in the watershed because it: 1) reduced flood risk and increased conveyance capacity, thereby improving baseline conditions for the drainage area; 2) did not alter the fundamental flood-conveyance function or increase upstream runoff beyond previously mitigated conditions; and 3) other planned or approved drainage/flood control projects were of the same subsurface/overland flow system. Hydrology and flood-control impacts, when added to the cumulative baselines, would not exceed any applicable thresholds, so the combined effect of these projects would not be cumulatively considerable. Cumulative hydrology and flood-control impacts are therefore less than significant. At the commenter's request, these projects have been added to Tables 3-1 and 3-2 of the DEIR and

are reflected in Section 3.0, Errata, of this FEIR, but this addition does not change any of the impact analysis or conclusions in the DEIR.

3-5 This comment requests that, within the Public Services section of the DEIR, additional details be included regarding any emergency services access conflicts with the Desert View Mobile Home Park. Exhibit 2.4, Site Plan, of the DEIR shows a proposed signalized intersection at the eastern bridge abutment; however, a driveway entrance into the Desert View Mobile Home Park is located just to the east of this intersection. Please also refer to Attachment I3, *Supplemental Transportation Exhibits (Replacement of the Airport Boulevard Bridge Over Whitewater River Project, Preliminary Project Overview Interim Striping) (Dokken Engineering, September 2024*), of this FEIR, which provides the clarifying information requested by the commenter. It should be noted that this attachment does not constitute significant new information requiring recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5. Rather, it serves only to clarify or amplify information already presented in the DEIR and/or the respective technical studies.

These exhibits will be added to Section 4.17, *Transportation,* of the DEIR, as shown in Section 3.0, Errata, of this FEIR. This comment does not assert any issue that must be addressed further pursuant to CEQA Guidelines.

3-6 This comment repeats the requested revisions noted in Response 3-5 for the Transportation section of the DEIR. In addition, the commenter notes that, although the City of Coachella's General Plan identifies Airport Boulevard as a 6-lane urban arterial in the buildout classifications for purposes of traffic analysis, there are no known programmed projects or environmental documentation to widen Airport Boulevard from two-lanes to four- or six-lanes in the future. The commenter further requests that a discussion of any necessary future improvements anticipated with the widening of Airport Boulevard to six-lanes also be included. Currently, the existing bridges over Union Pacific Railroad, Coachella Valley Stormwater Channel, and State Route 86 (SR-86) can only accommodate up to four lanes and future improvements likely would be needed in order to construct a 6-lane urban arterial at this location.

The TLMA's comment letter was also reviewed, and further clarifying responses were provided by Integrated Engineering Group in the *Coachella Airport Business Park Supplemental Transportation Analysis* (Transportation Responses to Comments Technical Memorandum), dated October 14, 2025 (provided as Attachment I2 of this FEIR). It should be noted that this attachment addresses the specific comments raised in the TLMA comment letter but does not constitute significant new information requiring recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5. Rather, it serves only to clarify or amplify information already presented in the DEIR and/or the Traffic Impact Analysis contained in the DEIR Appendices. Based on this Technical Memorandum, appropriate ROW has been dedicated along the property frontage to accommodate potential widening of Airport Boulevard to 6 lanes in accordance with the General Plan buildout cross section, and as such, the Project would not conflict with the General Plan Circulation Element. However, based on future buildout of the area, a 4-lane roadway will accommodate the future growth forecasted by the regional

transportation model. As such, no revisions to the Project's Transportation Analysis or the DEIR are warranted.

3-7 The commenter provides the following comments and requested revisions for the Project's Traffic Impact Analysis document:

- Counts were collected on January 18, 2024. January 15 was a Holiday. Per the County's Transportation Analysis Guidelines traffic data should not be collected on weeks that include a holiday and non-school session time period unless approved by the Transportation Department.

  Based on additional information from Integrated Engineering Group, scheduling of the traffic data collection was coordinated and approved by the City of Coachella to be conducted on the Thursday after the Monday holiday, with two days in between for traffic to normalize. Schools were in session. Accordingly, January 18, 2024, was an appropriate day to conduct traffic counts. As such, no revisions to the Project's Transportation Analysis or DEIR are warranted.

- Figure 1-2 (Trip Distributions) is difficult to follow; provide directional distributions by movement at all intersections.

  Integrated Engineering Group has revised Figure 1-2 accordingly. Please refer to Attachment I2 of this FEIR for the updated figure. The revised Attachment will be attached to the EIR. It should be noted that this attachment does not constitute significant new information requiring recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5. Rather, it serves only to clarify or amplify information already presented in the DEIR and/or the respective technical studies.

- Provide a separate pass-by distribution figure.

  Integrated Engineering Group has provided a separate pass-by distribution figure. Please refer to Attachment I2 of this FEIR for this information. The updated document includes updated intersection volume figures including new Figure 1-2b to show pass-by trip distribution and assignment. Attachment I2 also includes updated intersection operation analysis for the Project driveway under all scenarios that include a Project phase. The revised Attachment will be attached to the EIR. It should be noted that this attachment does not constitute significant new information requiring recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5. Rather, it serves only to clarify or amplify information already presented in the DEIR and/or the respective technical studies.

- Figure 1-3 to 1-5: trip assignment doesn't include pass-by trips. What happened to the pass-by volumes?

Integrated Engineering Group has provided the pass-by trips in the trip assignment. Please refer to Attachment I2 of this FEIR for this information. The revised Attachment will be attached to the EIR.

- Intersection 7 is split maintenance. Per the County's Guidelines, the Project has a direct impact and is required to mitigate (construct improvements) due to LOS degrading from acceptable during the Existing scenario to unacceptable during EAP scenario.

  As discussed in Section 4.17, Transportation, of the DEIR (page 4.17-3), in 2018, the State CEQA Guidelines were amended to state that automobile delay, as measured by LOS and other similar measures of vehicle capacity or traffic congestion cannot be considered a significant impact on the environment (PRC Section 21099(b)(3)); State CEQA Guidelines section 15064.3). Information provided related to LOS is provided for informational purposes only and to ensure consistency with the General Plan and is not provided to analyze potentially significant CEQA impacts of the proposed Project. In addition, as discussed in Section 4.17, Transportation, of the DEIR, this location (Intersection 7, Avenue 54 and Grapefruit Boulevard) is deficient in all Opening Year Baseline scenarios prior to addition of the Project. Therefore, this is a cumulative deficiency. Per the County guidelines, where improvements identified in the TUMF or other funding mechanism that can provide the target LOS, payment of the applicable TUMF or DIF will be considered as the Project's cumulative contribution towards the identified improvements and will be implemented through conditions of approval. It should be noted that this improvement is identified in the TUMF. Therefore, the DEIR, at pages 4.17-16, 4.17-17, 4.17-20, 4.17-21, 4.17-24, 4.17-25, 4.17-28 and 4.17-29, appropriately identifies that the Project will contribute toward this improvement via fee payment to City of Coachella DIF and CVAG TUMF programs for Projects B-349 (Grapefruit Boulevard from Avenue 52 to Avenue 54) and B-350 (Grapefruit Boulevard from Avenue 54 to Avenue 56).

- Intersection 1 is split maintenance. Per the County's Guidelines, the Project has a direct impact and is required to mitigate (construct improvements) due to LOS degrading from acceptable during the Existing scenario to unacceptable during EAP scenario.

  As discussed above and explained in DEIR Section 4.17, Transportation, this location is deficient in Opening Year 2033 Baseline scenario prior to addition of the Project. Therefore, this should be considered a cumulative deficiency. Additionally, per the County Guidelines, improvements may be provided through the TUMF network or other funding mechanisms, which is how the Project is satisfying its fair share contribution obligation here.

- Intersection 6: the County has concerns with queuing at this intersection. SimTraffic output sheets (Page 441 of 492) shows that the queues may be longer than 333'. Additional concerns in the southbound direction: the southbound through queues

extend past the right turn storage. The Project is required to mitigate. Provide Synchro files to the County for review.

As discussed in Attachment I2 of this FEIR , the queue was analyzed using Synchro queue output, not SimTraffic. Additionally, the southbound and northbound through movement deficiency will be addressed by TUMF Project B-350. This Project is a roadway segment improvement to Grapefruit Boulevard, which is the original alignment of California State Route 111 (SR 111) and is locally maintained, and runs in a northwesterly direction from Avenue 56th at the south to Avenue 54th at the north. The existing condition of Grapefruit Blvd varies between a 2-lane and 4-lane arterial roadway, and Project improvements are described in Table 4-3 of Appendix I of the DEIR, which include upgrading this segment of Grapefruit Blvd to a 6-lane arterial roadway.

The Project is within the TUMF network and prioritized for funding, along with other transportation improvement projects within the Coachella Valley[1]. The Project will be responsible for paying into the TUMF program. Per the County guidelines, improvements identified in the TUMF or other funding mechanism that address deficiencies will be considered to adequately mitigate the Project's cumulative contribution towards the identified deficiency and will be implemented through conditions of approval. Since the City will include a condition of approval requiring the payment of TUMF fees, this standard requirement is equivalent to the County's standard, and no additional analysis or Mitigation Measures are warranted.

- Clarify the recommended lane configurations at the new signalized driveway. A dedicated left turn lane is required. Is a dedicated right-turn lane provided? Is the Project proposing the widening of the bridge? Provide the site plan and truck turning template to the County for review.

  A dedicated left-turn lane and a dedicated right-turn lane will be provided at the driveway per the intersection improvement plan. For further clarification, a detailed depiction of the intersection design is shown in Exhibits 4.17-1 and 4.17-2, which are provided in Section 3.0, Errata, of this FEIR and will be included in Section 4.17, Transportation, of the DEIR. The Project will not widen the bridge. It should be noted that these attachments do not constitute significant new information requiring recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5. Rather, it serves only to clarify or amplify information already presented in the DEIR and/or the respective technical studies. This comment does not assert any issue that must be addressed further pursuant to CEQA Guidelines.

3-8 The commenter concludes by requesting continued coordination between the County of Riverside Transportation Department, City of Coachella, Haagen Co., LLC, and Terra Nova Planning & Research, Inc. is requested to ensure these Projects are not in conflict. Continued

[1] Coachella Valley Association of Governments Transportation Uniform Mitigation Fee program.

coordination will occur as requested. This comment does not assert any issue that must be addressed further pursuant to CEQA Guidelines.

Comment Letter 4 (page 1 of 4)

Comment Letter No. 4

United States Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
Ecological Services
Palm Springs Fish and Wildlife Office
777 East Tahquitz Canyon Way, Suite 208
Palm Springs, California 92262

In Reply Refer to:
2025-0143081-CEQA-TA-ERIV

September 2, 2025
Sent Electronically

Kendra Reif
Community Development Director
City of Coachella Development Services, Planning Division
53990 Enterprise Way
Coachella, California 92236

Subject: Notice of Availability and Completion of the Draft Environmental Impact Report or the Coachella Airport Business Park Project, City of Coachella, Riverside County, California

Dear Kendra Reif:

This letter is in response to the notice dated July 21, 2025, soliciting comments on the draft Environmental Impact Report (DEIR) for the Coachella Airport Business Park Project (Project) located in the City of Coachella, Riverside County, California. The Project Applicant proposes development of a business park, with approximately 42.36 acres (ac) of industrial uses and 5.6 ac for the construction of an Imperial Irrigation District (IID) electrical substation facility at the northern end of the Project site. Utility connections to Coachella Water Authority (CWA) waterlines and Coachella Valley Water District (CVWD) sewer lines are also proposed as part of the Project implementation. 4-1

We offer the following comments on the DEIR as they relate to potential impacts on public trust resources. The primary concern and mandate of the U.S. Fish and Wildlife Service (Service) is the conservation, protection, and enhancement of fish and wildlife resources and their habitats for the continuing benefit of the American people. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened or endangered animals and plants listed under the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*). The comments provided herein are based on the information provided in the draft DEIR and our knowledge of sensitive and declining fish and wildlife resources.

PROJECT DESCRIPTION

The proposed Project site is located at the northwest corner of the intersection of State Route 86 (SR-86) and Airport Boulevard in the City of Coachella (City). The Project is within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) Area, and the City is a Local Permittee to the CVMSHCP. Additionally, the Project site overlaps with CVMSHCP-modeled habitat for Coachella Valley round-tailed ground squirrel (*Spermophilus tereticaudus chlorus*) and Palm Springs pocket mouse (*Perognathus longimembris bangsi*). The proposed Project is for the 4-2

Comment Letter 4 (page 2 of 4)

development of a 47.96-ac business park, comprised of a fuel station with a convenience store, small business use spaces, a small retail and restaurant development, small and large warehouse structures, personal vehicle storage and self-storage units, and a billboard sign. A new 315-foot by 315-foot IID electrical substation will be constructed and require at least one transformer bank to provide adequate power for the Project. The construction of the substation will be determined in coordination with IID and may include additional facilities. Additionally, utility connections to CWA waterlines and CVWD sewer lines are proposed. 4-2 Cont.

NESTING BIRDS

The Biological Resources Assessment (BRA) associated with the DEIR states that a reconnaissance-level field survey was conducted on July 7, 2023, covering the 48-ac Project area as well as a 300-foot (ft) buffer (Study Area). During the field survey, the black-tailed gnatcatcher (*Polioptila melanura*) was observed within the northern portion of the Study Area, but no other nesting birds were observed. Please note that the DEIR states that the black-tailed gnatcatcher is a Covered Species by the CVMSHCP; however, the species is not currently covered under the CVMSHCP. The BRA also states that western burrowing owl (*Athene cunicularia hypugaea*; burrowing owl), a CVMSHCP-Covered Species, Service Bird of Conservation Concern, and candidate species under the California Endangered Species Act; crissal thrasher (*Toxostoma crissale*), a CVMSHCP-Covered Species; and loggerhead shrike (*Lanius ludovicianus*) have moderate potential to occur within the Study Area but were not observed during the field survey. Due to the presence of desert riparian habitat throughout the middle and northern portions of the Study Area and desert scrub habitat throughout the southern portion of the Study Area, we agree that these species have the potential to occur within the Study Area. Furthermore, the BRA states that the Study Area includes disturbed land throughout the Project site and adjacent to the SR-86, with sparse vegetative coverage and observations of previous vegetation clearance. The presence of sparse vegetation, particularly cover of shrubs, is suitable habitat for ground-nesting birds. Moreover, bare ground or sparse vegetation cover also constitutes suitable nesting habitat for some ground-nesting birds. Therefore, the proposed ground disturbance has the potential to impact nesting birds. However, the DEIR does not indicate that focused nesting bird surveys were completed, likely contributing to the lack of nesting bird observations during the field survey. Focused nesting bird surveys, both within and outside of nesting season, are necessary to accurately confirm nesting bird presence or absence. A complete assessment of the biological resources within the Project area is required to assess the Project's potential impacts to nesting birds. Please revise the DEIR to include a complete assessment of the Project's potential impacts to nesting bird habitat, including completion of nesting bird surveys during the appropriate time of year, to determine the extent of nesting birds on the Project site. 4-3

Additionally, Mitigation Measure (MM) BIO-1 states that Project-related activities shall not occur during the bird breeding season, from January 15 through August 31, unless pre-construction surveys are conducted within seven days prior to ground disturbance. The Service generally considers peak nesting season to be February 1 through September 15. Additionally, due to the potential of variation in timing of the nesting bird season, we recommend MM BIO-1 be revised to require nesting bird surveys throughout construction, both within and outside of nesting season, to avoid any potential adverse effects to nesting.

Comment Letter 4 (page 3 of 4)

BURROWING OWL

The BRA states that no signs of burrowing owls or burrows were observed during the field survey, although the California Natural Diversity Database indicates that the species has previously been observed within five miles of the Project site. The BRA also states that the Project site contains open arid habitat previously disturbed by heavy equipment and that burrowing owl are known to nest in disturbed areas. Additionally, as previously mentioned, the Project site overlaps with CVMSHCP-modeled habitat for the Coachella Valley round-tailed ground squirrel. Due to the presence of disturbed habitat within the Project site, the proximity of the Whitewater River channel and berms, and the potential for Coachella Valley round-tailed ground squirrels to occur and create burrows within the Project area, the Service determines that the Project site is likely suitable habitat for burrowing owl, and burrowing owls have the potential to inhabit the site. However, the DEIR does not indicate completion of focused burrowing owl surveys. Focused burrowing owl surveys during the breeding season and nonbreeding season are necessary to accurately confirm burrowing owl presence or absence. Pursuant to the California Department of Fish and Wildlife's (CDFW) Staff Report on Burrowing Owl Mitigation (2012 or most recent version), for both breeding and non-breeding season surveys, a minimum of four survey visits are required to assess a site for burrowing owl presence. Given the lack of multiple, focused burrowing owl surveys, the total number of burrowing owl individuals or suitable and occupied burrows within the Project area and a 500-foot buffer is unknown. Please revise the DEIR to include an accurate assessment of the Project's potential impacts to burrowing owl, including focused survey results following the protocols outlined in the 2012 Staff Report on Burrowing Owl Mitigation. 4-4

MM BIO-2 requires burrowing owl pre-construction surveys within 500 ft of the Project disturbance footprint. Further details regarding the burrowing owl survey methods are not provided. Please revise MM BIO-2 to specify that burrowing owl pre-construction surveys shall be conducted by a qualified biologist in accordance with the protocols described in the Staff Report on Burrowing Owl Mitigation. Additionally, due to the potential for burrowing owl to occur throughout the construction period, surveys for burrowing owls should be continued throughout construction to avoid any potential impacts to burrowing owl. MM BIO-2 also states that should the surveys determine burrowing owl presence, "the burrowing owl shall be relocated pursuant to accepted CDFW protocols". Please revise MM BIO-2 to require that, if the pre-construction surveys confirm burrowing owl presence, the Project applicant shall submit a Burrowing Owl Plan that includes avoidance, minimization, and mitigation measures to the Service and CDFW (collectively, Wildlife Agencies) for review and approval prior to beginning Project activities. The Project proponent shall coordinate with the Wildlife Agencies on the appropriate avoidance, minimization, and mitigation measures to be included in the Burrowing Owl Plan. Per Section 4.4 and Section 8.5.2 of the CVMSHCP, relocation of burrowing owls must follow protocols accepted by the Wildlife Agencies, and active relocation and eviction/passive relocation must be determined through coordination with the Wildlife Agencies for all Covered Activities. As such, please revise MM BIO-2 to state that if avoidance of burrowing owl is not possible, the Project applicant shall coordinate with the Wildlife Agencies on a burrowing owl relocation plan. Additionally, please submit the relocation plan to the Wildlife Agencies for review and approval. These measures are consistent with the City in fulfilling its obligations as a CVMSHCP Permittee.

Comment Letter 4 (page 4 of 4)

BATS

The draft BRA states that the Study Area contains habitat for several bat species, including the western yellow bat (*Lasiurus xanthinus*), a CVMSHCP-Covered Species, though no bat species were observed during the field survey. Due to the presence of the California fan palm oasis north of the Project site and the riparian woodland and scrub habitats within the northern portion of the Study Area, we agree with the BRA's conclusion that there is moderate potential for western yellow bat to occur on the Project site. However, the DEIR does not indicate completion of focused bat surveys. Focused bat surveys are necessary to accurately confirm the presence or absence of special-status bat species. Additionally, the DEIR does not include an assessment of bat roosting habitat in the bridge on Airport Boulevard, adjacent to the southern portion of the Project site and within the Study Area. Other bridges crossing the Whitewater River channel are known to support bat roosts, and the proximity of the bridge to the Project site has the potential to impact bats that may be roosting in the bridge throughout Project construction. An assessment of the Airport Boulevard bridge is needed to determine the Project's potential impacts to special-status bat species. Please revise the DEIR to include a complete assessment of the Project's potential impacts to bat habitat, including completion of focused bat surveys following accepted survey methods on the Project site and the Airport Boulevard bridge, to accurately determine the extent of bats on and adjacent to the Project site. 4-5

The DEIR includes MM BIO-3, which requires a special-status bat species emergence survey should construction activities occur within 300 ft of the California fan palm oasis during the bat maternity season. Further details regarding the bat emergence survey protocols are not provided. Please revise MM BIO-3 to include detailed information regarding the survey methods, including the number of days of acoustic monitoring, emergence roost counts, and number of roost count observers. Additionally, multiple surveys are required during the maternity season to accurately document roost activity. Please revise MM BIO-3 to require a minimum of two surveys during the maternity season, one during spring and one during summer. In addition to bat maternity season surveys, a winter survey and migration period survey should also be required to identify presence of bats in the Project site throughout the year. MM BIO-3 also requires avoidance and establishment of a buffer should any special-status bat species be observed during the maternity roosting season prior to construction. We recommend revising MM BIO-3 to require that, if bats are determined to be present at the Project site, avoidance and buffers are established at all times of year, regardless of maternity roosting season.

We appreciate the opportunity to provide comments on the DEIR. If you have any questions regarding these comments, please contact Lory Salazar-Velasquez.[1] 4-6

Sincerely,

MARY WOULFE Digitally signed by MARY WOULFE Date: 2025.09.02 15:12:25 -07'00'

for Brian Croft
Field Supervisor

[1] lory_salazar-velasquez@fws.gov.

Response to Comment Letter 4

Mary Woulfe for Brian Croft, Field Supervisor
U.S. Fish and Wildlife Service
September 2, 2025

4-1 This comment provides a general introduction. Responses to specific comments are provided below.

4-2 This comment includes a general summary of the proposed Project and does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

4-3 The commenter notes that black-tailed gnatcatcher (*Polioptila melanura*) was observed within the northern portion of the Study Area. The commenter notes that the DEIR states the black-tailed gnatcatcher is listed as a Covered Species under the Coachella Valley Multiple Species Habitat Conservation Plan ("CVMSHCP"); however, this species is not currently covered under the CVMSHCP.

This change has been made to Section 4.4, *Biological Resources,* pages 4.4-12, 4.4-24 and 4.4-31 of the DEIR and is reflected in Section 3.0, Errata, of the Final EIR. It should be noted that the discussion regarding black-tailed gnatcatcher will remain in DEIR Section 4.4, Biological Resources, p. 4.4-24 under the discussion of "Avian Species," since potential impacts to nesting birds and common passerine species protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC), including black-tailed gnatcatcher, could occur if nests are located on the Project Area and/or in the immediate vicinity during construction activities. Mitigation Measure BIO-1 (DEIR, page 4.4-30) requires the preparation of preconstruction surveys in compliance with MBTA, thereby protecting the black tailed gnatcatcher and reducing project impacts on the species to less than significant levels.

The commenter agrees that burrowing owl (*Athene cunicularia*, CVMSHCP-Covered Species, CDFW Species of Special Concern ("SSC"], and California Endangered Species Act ("CESA" Candidate Endangered), crissal thrasher (*Toxostoma crissale*, CVMSHCP-Covered Species), and loggerhead shrike (*Lanius ludovicianus*) have potential to occur within the Study Area. The commenter further states that the presence of sparse vegetation, particularly cover of shrubs, is suitable habitat for ground-nesting birds. Moreover, bare ground or sparse vegetation cover also constitutes suitable nesting habitat for some ground-nesting birds. Therefore, the proposed ground disturbance has the potential to impact nesting birds. The commenter states that the DEIR does not indicate that focused nesting bird surveys were completed, likely contributing to the lack of nesting bird observations during the field survey. The commenter recommends focused nesting bird surveys, both within and outside of nesting season, to accurately confirm nesting birds' presence or absence. The commenter claims that a complete assessment of the biological resources within the Project area is required to assess the Project's potential impacts to nesting birds, and requests that the DEIR be revised to include a complete assessment of the Project's potential impacts to nesting bird habitat, including

completion of nesting bird surveys during the appropriate time of year, to determine the extent of nesting birds on the Project site.

Pages 23 and 28 of the Project's Biological Resources Assessment ("BRA") and page 4.4-24 of the DEIR state that multiple nesting birds and raptors have the potential to nest in shrubs and trees and/or burrow on bare ground throughout and near the Study Area, and that numerous avian nests including verdins (*Auriparus flaviceps*) nesting in the mesquite (*Prosopis glandulosa*) and arrow weed (*Pluchea sericea*) thickets were observed within the Substation development area. The DEIR further states that no special status birds or raptors were observed, with the exception of black-tailed gnatcatcher, but suitable open habitats, trees, shrubs, and other vegetation provide the micro-habitats for these species to occur throughout the Project area. These observations further demonstrate that the Study Area is used by nesting birds.

The DEIR also states (page 4.4-24) that vegetation and open areas within and surrounding the Project area have the potential to provide refuge cover from predators, perching sites, and favorable conditions for avian nesting that could be affected by the proposed Project. The DEIR further states (page 4.4-24) that potential impacts to nesting birds could occur if nests are located on the Project area and/or in the immediate vicinity during construction activities. Direct impacts could occur to avian special-status species if active nests are disturbed during vegetation removal or ground disturbing activities. Direct impacts may also occur if active nests are located within close proximity to the Project area and are abandoned due to visual and/or acoustic Project-related actions such as construction noise, lighting, and fugitive dust. These impacts could lead to individual mortality and/or harassment that might reduce nesting success. Therefore, as stated in the DEIR, impacts to special-status birds and raptors would be potentially significant without mitigation.

The USFWS's comment letter was reviewed, and further responses were provided by Rincon Consultants in the *Responses to Draft Environmental Impact Report Comments for the Coachella Airport Business Park in Coachella, Riverside County, California* (Biological Resources Responses to Comments Technical Memorandum), dated November 3, 2025 (provided as Attachment C2 of this FEIR). This attachment does not constitute significant new information requiring recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5. Rather, it serves only to clarify or amplify information already presented in the DEIR and/or the respective technical studies. Based on this Technical Memorandum, the assessment of potential Project impacts to nesting birds within the Study Area included in both the BRA and DEIR is adequate because no federally listed threatened or endangered birds were detected within the Study Area; and as prescribed in Mitigation Measure (MM) BIO-1, implementation of a pre-construction nesting bird survey prior to commencement of any vegetation removal or ground disturbance, and establishment of appropriate avoidance buffers if any active nests are detected during the survey until a qualified biologist has determined that nestlings have fledged or the nest is no longer active, are sufficient in order to avoid/minimize impacts to nesting birds.

Additionally, the commenter notes that MM BIO-1 in the DEIR states that Project-related activities shall not occur during the bird breeding season, from January 15 through August 31,

unless pre-construction surveys are conducted within seven days prior to ground disturbance. USFWS generally considers peak nesting season to be February 1 through September 15. The commenter also recommends that MM BIO-1 be revised to require nesting bird surveys throughout construction, both within and outside of nesting season, to account for variation in the timing of the nesting bird season and avoid any potential adverse effects to nesting.

As noted in Attachment C2 of this FEIR, it is typically not necessary to conduct nesting bird surveys outside of the bird nesting season, as birds are not typically nesting during that time of year. Due to the location of the Project site, it is not appropriate to extend the bird breeding season date into September as USFWS suggests because nesting at and around the Project site would occur at the earlier end of the specified nesting season due to the desert heat and other extreme weather conditions. Rincon suggests keeping the start of the breeding season as January 15 because raptors are known to nest as early as January. Rincon recommends modifying and adding language to MM BIO-1 with some of CDFW's suggested revisions to MM BIO-1, as described below in Response 14.11, in order to clarify and amplify this MM and facilitate its adequacy in protecting nesting birds. The recommended updated MM BIO-1 Nesting Bird Avoidance/Pre-construction Surveys is as follows:

"Prior to issuance of the Project's grading permit, the following measures shall be implemented:

To avoid disturbance of nesting and special-status bird species protected by the MBTA and CFGC, activities related to the Project, including but not limited to, vegetation removal, ground disturbance, and construction shall not occur during the bird breeding season (January 15 through August 31) unless a pre-construction nesting bird survey is conducted within three ~~seven~~ days prior to vegetation removal or ground disturbance.

A qualified biologist, who is familiar with the identification of avian species in the Coachella Valley, will conduct the preconstruction nesting bird survey within three ~~seven~~ days prior to vegetation removal or ground disturbance to evaluate the presence/absence, location, and status of any active nests on or adjacent to the Project Area. The extent of the survey area surrounding the Project Area shall be determined by the qualified biologist to help ensure that direct and indirect effects to nesting birds are avoided. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist will make every effort to avoid potential nest predation as a result of survey efforts. If an active nest(s) is discovered, a suitable buffer shall be established around the active nests, as determined by the biologist, and construction activity will not occur within the buffer until the biologist has determined that the nest is no longer active. Buffer size shall consider the species involved and relevant level of tolerance to adjacent activity, the location of the nest relative to proposed activities, and site conditions that naturally buffer the location, such as vegetation screening, topography, etc. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged, the nest is no longer active, or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If construction activities are delayed or paused for more than 14 days during the nesting season, the nest survey will be re-initiated for areas that still

contain potential nesting habitat. No parking, storage of materials, or construction activities shall occur within this buffer until the qualified biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into this buffer shall occur only at the discretion of the qualified biologist, if it is determined that encroachment will not adversely impact the nesting birds."

This change has been made to Section 4.4, *Biological Resources,* page 4.4-26 (MM BIO-1) of the DEIR and is reflected in Section 3.0, Errata, of the Final EIR.

4-4 The commenter notes that the BRA states that burrowing owls or burrows were not observed during the field survey, although the California Natural Diversity Database (CNDDB) indicates that the species has previously been observed within five miles of the Project site. The USFWS states that due to the presence of disturbed habitat within the Project site, the proximity of the Whitewater River channel and berms, and the potential for Coachella Valley round-tailed ground squirrels to occur and create burrows within the Project area, the Project site is likely suitable habitat for burrowing owl, and burrowing owls have the potential to inhabit the site. The commenter notes that the DEIR does not indicate completion of focused burrowing owl surveys. The commenter recommends that the DEIR include an accurate assessment of the Project's potential impacts to burrowing owl, including results from focused surveys during the breeding season and non-breeding season following the protocols outlines in CDFW's 2012 Staff Report on Burrowing Owl Mitigation.

Additionally, the commenter recommends that MM BIO-2 be revised to require burrowing owl pre-construction surveys by a qualified biologist in accordance with the protocols described in the Staff Report on Burrowing Owl Mitigation. The commenter also recommends that MM BIO-2 be revised to include burrowing owl surveys throughout the construction period. The commenter also recommends that MM BIO-2 be revised to require that, if the pre-construction surveys confirm burrowing owl presence, the Project applicant shall submit a Burrowing Owl Plan that includes avoidance, minimization, and mitigation measures to the USFWS and CDFW (collectively, Wildlife Agencies) for review and approval prior to beginning Project activities. The commenter notes that the Project proponent should coordinate with the Wildlife Agencies on the appropriate avoidance, minimization, and mitigation measures to be included in the Burrowing Owl Plan. The commenter further notes that per Section 4.4 and Section 8.5.2 of the CVMSHCP, relocation of burrowing owls must follow protocols accepted by the Wildlife Agencies, and active relocation and eviction/passive relocation must be determined through coordination with the Wildlife Agencies for all Covered Species. The commenter further requests that MM BIO-2 be revised to state that if avoidance of burrowing owl is not possible, the Project applicant shall coordinate with the Wildlife Agencies on a burrowing owl relocation plan, and requests that the relocation plan be submitted to the Wildlife Agencies for review and approval.

Based on the Biological Resources Responses to Comments Technical Memorandum (provided as Attachment C2 of this FEIR), Section 4.4 of the CVMSHCP requires burrowing owl surveys in CVMSHCP Conservation Areas. The Project site is outside of a Conservation Area; therefore, focused burrowing owl surveys are not required by the CVMSHCP for the Project. The biological resources field survey found no burrowing owl or their sign, and no burrows on the

Project site. The commenter provides no evidence that the species occupies the site. The site is not located in a CVMSHCP Conservation Area. MM BIO-2 requires pre-construction surveys for the species. If the species were to locate on the site, the required pre-construction surveys would identify them, and preclude Project activities, including grubbing prior to grading until such time as a mitigation program, including relocation if needed, was reviewed and implemented by the project biologist and CDFW, thereby eliminating the potential for Take of the species on the Project site. The City is complying with the requirements of both the CVMSHP and CESA by requiring MM BIO-2, and no change is required to assure protection of the species on the site. In order to provide clarity and direction, MM BIO-2 has been modified to explicitly cite the CDFW Staff Report as the correct protocol, and to prohibit Project activities until mitigation or avoidance measures are implemented, should the species be identified on site.

Therefore, MM BIO-2 will be revised as follows:

BIO-2 Burrowing Owl Pre-construction Survey

In accordance with Section 4.4 Required Avoidance, Minimization, and Mitigation Measures of the CVMSHCP, pre-construction burrowing owl surveys shall be conducted by a qualified biologist no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the Staff Report on Burrowing Owl Mitigation (CDFW, 2012 or most recent version). Pre-construction surveys shall be conducted within 500 feet of the Project disturbance footprint to identify burrows that could be utilized by burrowing owl. Potentially suitable burrows shall be checked by a qualified biologist to see if they are occupied or not prior to the start of Project disturbance activities. If the burrow is unoccupied, the burrow shall be made inaccessible to burrowing owl, and the Project may proceed. If either a nesting or escape burrow is occupied, Project activities shall be immediately halted within 500 feet of the burrow. The qualified biologist shall coordinate with CDFW and USFWS and prepare a Burrowing Owl Avoidance and Monitoring Plan that shall be submitted to the Wildlife Agencies for approval prior to re-commencing Project activities within the restricted area ~~the burrowing owl shall be relocated pursuant to accepted CDFW protocols~~. A burrow is assumed occupied if records indicate that at least one burrowing owl has been observed occupying a burrow on site during the past three years. For ground-disturbing activities, pre-construction surveys should be repeated when there is a pause in construction of more than 30 days. ~~If there are no records for the site, surveys must be conducted to determine, prior to construction, if burrowing owl are present. Active burrows shall be avoided during the burrowing owl breeding season (January 15 to August 31) with an appropriate buffer zone as determined by a qualified biologist. If occupied burrows cannot be avoided, determination of the appropriate method of relocation, such as eviction/passive relocation or active relocation, shall be based on the specific site conditions (e.g., distance to nearest suitable habitat and presence of burrow) in coordination with CDFW and the City. Passive relocation may only occur in the non-breeding season (September to January)~~.

This change has been made to Section 4.4, *Biological Resources,* page 4.4-26 of the DEIR and is reflected in Section 3.0, Errata, of the Final EIR. It should be noted that this change, including the identification of the burrowing owl as a candidate species, does not constitute significant

new information requiring recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5. Rather, it serves only to clarify or amplify information already presented in the DEIR and/or the respective technical studies.

4-5 The commenter notes that bat species were not observed during the field survey, but agrees with the BRA's conclusion that there is moderate potential for western yellow bat (*Lasiurus xanthinus*, CVMSHCP-Covered Species) to occur on the Project site due to the presence of the California fan palm oasis north of the Project site and the riparian woodland and scrub habitats within the northern portion of the Study Area. The commenter notes that the DEIR does not indicate completion of focused bat surveys. Additionally, the commenter states that the DEIR does not include an assessment of bat roosting habitat in the bridge on Airport Boulevard, adjacent to the southern portion of the Project site and within the Study Area. The commenter recommends that the DEIR be revised to include a complete assessment of the Project's potential impacts to bat habitat, including completion of focused bat surveys following accepted survey methods on the Project site and the Airport Boulevard bridge crossing over the Whitewater River channel.

Based on the Biological Resources Responses to Comments Technical Memorandum (provided as Attachment C2 of this FEIR), the CVMSHCP does not require focused bat surveys. MM BIO-3 requires a special-status bat species emergence survey if construction activities are to occur within 300 feet of the California fan palm oasis during the bat maternity season (April 1 through August 31). The emergence survey will be conducted in areas of suitable roosting habitat, which includes the Airport Boulevard bridge, during the maternity season to document the presence of special-status bat species maternal roosting habitat. MM BIO-3 also requires that any special-status bat species observed during the maternity roosting season within or adjacent to the Project area should be avoided and provided a minimum buffer as determined by the qualified biologist (a 100-foot to 300-foot buffer is recommended) prior to the commencement of Project construction.

Additionally, the commenter recommends that MM BIO-3 is revised to include detailed information regarding survey methods, including the number of days of acoustic monitoring, emergence roost counts, and number of roost count observers.

The commenter also recommends that MM BIO-3 be revised to require a minimum of two surveys during the maternity season, one during spring and one during summer. Further, the commenter recommends that MM BIO-3 also be revised to require a winter survey and migration period survey, and to require that, if bats are determined to be present at the Project site, avoidance and buffers are established at all times of year, regardless of maternity roosting season.

The commenter recommends that MM BIO-3 be revised to require that, if bats are determined to be present at the Project site, avoidance and buffers are established at all times of year, regardless of maternity roosting season.

As noted in Attachment C2 of this FEIR, due to the fact that the CVMSHCP does not require focused bat surveys, a special-status bat species emergence survey is sufficient. Performance

standards are included in the MM as written, and further detail is not required. MM BIO-3 as written would ensure avoidance of special-status bat species during the maternity roosting season with establishment of a 100-foot to 300-foot buffer should any special-status bat species be detected. However, MM BIO-3 will be slightly revised to include the express mention of the Airport Boulevard bridge since it is included as an area of suitable roosting habitat, as follows:

BIO-3 Emergence Bat Survey

A special-status bat species emergence survey shall be conducted if construction activities are to occur within 300 feet of the California fan palm oasis during the bat maternity season (April 1 through August 31). The emergence survey will be conducted in areas of suitable roosting habitat, including the Airport Boulevard bridge, during the maternity season to document the presence of special-status bat species maternal roosting habitat. The emergence survey will be conducted 30 minutes before sunset and last for up to two hours after sunset. Any special-status bat species observed during the maternity roosting season within or adjacent to the Project Area should be avoided and provided a minimum buffer as determined by the qualified biologist (a 100-foot to 300-foot buffer is recommended) prior to the commencement of construction.

4-6 The commenter concludes by providing a contact name for any questions associated with the above comments. Comment noted.

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Comment Letter No. 5

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September 3, 2025

Draft Environmental Impact Report (DEIR) for the Coachella Airport Business Park Project (Proposed Project) (SCH No: 2023040106)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Coachella is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

5-1

Summary of Proposed Project Information in the DEIR

Based on the DEIR, the Proposed Project would include the development of a currently vacant and undeveloped approximate 47.96 acres in the southeastern portion of the city of Coachella.[1] The overall Proposed Project site would be developed for approximately 42.36 acres of industrial uses while an Imperial Irrigation District (IID) substation would be located at the northern 5.6 acres of the Project site. The key components of the Project are summarized below:[2]

- **Fuel Station and Retail:** Ten fueling position gas station with an associated convenience store, located at the site's entrance along Airport Boulevard. The gas station is anticipated to have a maximum throughput of 2.0 million gallons of gasoline per year.[3]
- **Small Business Buildings:** Eighteen buildings, each approximately 4,500 square feet (totaling about 81,000 square feet).[4]
- **Personal Vehicle Storage:** Four structures averaging 19,200 square feet each (totaling approximately 76,800 square feet).[5]
- **Self-Storage Buildings:** Seventeen buildings ranging from 5,200 to 10,400 square feet (totaling approximately 128,600 square feet).[6]
- **Warehouses:** Five small warehouses ranging from 9,600 to 24,000 square feet (approximately 96,000 square feet total). Six large warehouses ranging from 22,400 to

5-2

[1] DEIR, page ES-1.
[2] *Ibid.*
[3] DEIR, page 4.3-26.
[4] DEIR, page 2.0-4.
[5] *Ibid.*
[6] *Ibid.*

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48,800 square feet (approximately 233,100 square feet total) would be developed along the northern portion of the site near the proposed substation.[7]

- **IID Electrical Substation:** A 315-foot by 315-foot IID substation which would require at least one 1–25 mega volt ampere, 92/13.2 kilovolt (kV) transformer bank to meet the Project's electrical demands. The substation would also include new 92 kV transmission line extensions, associated distribution feeders/backbones, and distribution line extensions.[8]

The construction of the Coachella Airport Business Park Development is planned to occur in multiple phases, spanning a significant period, and is anticipated to overlap with operational activities. The project is scheduled for three phases[9];

- Phase I construction is estimated to take approximately one to five years following Project approvals, with a projected start in Fall 2027.
- Phase II is anticipated to occur over approximately five to 10 years.
- Phase III is projected to occur over approximately 20 years.

5-2 Cont.

This phased approach indicates that the overall construction, from initial groundbreaking to the completion of all three phases, will extend well beyond 2035. For the purpose of air quality and greenhouse gas (GHG) emission analyses, the aggregate total construction time for all three phases was analyzed as 3.2 years, to represent a worst-case scenario.[10]

Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located 50 feet to the south of the project site, across Airport Blvd.

South Coast AQMD Comments

Use of EMFAC2021 Instead of EMFAC2025

According to the DEIR and Appendix B – Air Quality, Energy, Greenhouse Gas emissions and Health Risk Assessment Impact Analysis, the Lead Agency utilizes EMFAC 2021 emission factors as the methodology for the Proposed Project's analysis. According to CARB, the EMFAC 2025[11] was officially released in May 2025. Since the Proposed Project's DEIR was prepared in July 2025, South Coast AQMD staff recommends that the Lead Agency revise the emissions calculations utilizing the EMFAC 2025 emissions factors and include them in the Final EIR.

5-3

Outdated AERMET and Meteorological Data Used in AERMOD Modeling

Appendix B of the DEIR indicates that meteorological data processed by AERMET version 16216 (version 9) were used for the modeling. However, South Coast AQMD released a newer, approved

5-4

[7] *Ibid*
[8] *Ibid.*
[9] DEIR, page 2.0-8
[10] DEIR, page 4.3-16.
[11] CARB EMFAC 2021. Access at: https://arb.ca.gov/emfac

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version of AERMOD-ready MET data files (Version 11) in October 2023.[12] The updated dataset was developed using the U.S. EPA's AERMET processor Version 22112, along with pre-processors AERMINUTE Version 15272 and AERSURFACE Version 20060.[13] The U.S. EPA's current preferred and recommended meteorological data preprocessor for the AERMOD , as of the latest release, is AERMET version 24142, released in November 2024.[14]

Use of outdated meteorological data and model versions is inconsistent with the U.S. EPA's Guideline on Air Quality Models (40 CFR Part 51, Appendix W)[15] and may result in inaccurate or non-conservative health risk estimates. To ensure accuracy and consistency with federal modeling guidelines, the Lead Agency should re-run the dispersion modeling using the more recent meteorological data processed by the most recent U.S. EPA-recommended versions of AERMET (version 24142), revise the health risk results accordingly, and include the updated results in the Final EIR.

5-4 Cont.

Incorrect Pollutant Averaging Time

South Coast AQMD staff's review of the dispersion modeling files noted that the PM2.5 pollutant type and averaging time of 24-Hour and annual[16] keywords were selected for the pollutant averaging time in the control pathway in the AERMOD model. However, according to the South Coast AQMD Risk Assessment Procedures v9.0 and South Coast AQMD Modeling Guidance for AERMOD,[17] a detailed HRA utilizing AERMOD should be run using the "OTHER" type and pollutant averaging time 1-hour and PERIOD.

In addition, South Coast AQMD staff's review of the modeling files noted that industrial buildings were not included in the building downwash option in the AERMOD dispersion model during operation which resulted in an underestimation of the ground-level pollutant concentrations near the buildings.

5-5

Thus, the Lead Agency is recommended to: 1) re-run the construction and operational HRAs to utilize 1-hour and PERIOD averaging time to determine the health risk impacts to the sensitive receptors and off-site workers and include the industrial buildings in the building downwash to analyze more accurate ground-level concentrations; and 2) include the results in the Final EIR.

Health Risk Assessment (HRA) during Project Operation

CEQA Guidelines Sections 15126.2 and 15126.4 require a DEIR to include a description of the significant environmental effects of a Proposed Project, significant environmental effects which

5-6

[12] South Coast AQMD AERMOD-Ready MET Data Files available at https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html
[13] South Coast AQMD Data for AERMOD available at https://www.aqmd.gov/home/air-quality/meteorological-data/data-for-aermod
[14] U.S. EPA Air Quality Dispersion Modeling - Preferred and Recommended Models available at https://www.epa.gov/scram/meteorological-processors-and-accessory-programs
[15] Code of Federal Regulations Title 40, Part 51, Appendix W available at https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-51/appendix-Appendix%20W%20to%20Part%2051
[16] South Coast AQMD Risk Assessment Procedures v9.0. Access at: https://www.aqmd.gov/docs/default-source/permitting/hra-procedures/hraprocedures9-0_103124.pdf
[17] South Coast AQMD Modeling Guidance for AERMOD. Access at: South Coast AQMD Modeling Guidance for AERMOD

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cannot be avoided, significant irreversible environmental changes, growth-inducing impacts, and mitigation measures proposed to minimize the significant adverse impacts. An impact is considered significant under CEQA if it leads to a "substantial, or potentially substantial, adverse change in the environment." In addition to the air quality impacts from the criteria air pollutants and greenhouse gases, the adverse air quality health risk impacts associated with increased emissions of toxic air contaminants (TACs) from all sources (including but not limited to expected future permitted stationary and portable sources, mobile sources, and other emission sources) during the operation phases need to be appropriately evaluated using qualitative and/or quantitative approaches to justify whether there will be potentially substantial adverse impacts.

The Appendix B of the DEIR indicate that the operational risks from the proposed gas station was prepared using the South Coast AQMD's Risk Tool (V1.103). However, this tool is only applicable to CEQA permitting projects and is not applicable to Proposed Project.

5-6 Cont.

As mentioned earlier in this letter, the aerial maps indicate that the nearest sensitive receptor, a residential area, is located adjacent to or within 50 feet south of the Proposed Project site. As such, the Lead Agency is recommended to conduct an operational phase HRA, which should include evaluating truck emissions (including the truck routes to and from the site, truck loading/unloading docks, and their proximity to the sensitive receptors) and the impact of diesel-powered stationary and portable sources under the foreseeable probable future conditions. An HRA assessment is essential for determining the potential cancer risk impacts associated with the operation of the Proposed Project to the offsite sensitive receptors and workers so that they can be compared to the South Coast AQMD Air Quality Significance Thresholds for TACs[18] to determine whether there will be a potentially significant air quality impact. The analysis should also disclose the potential health risks for chronic and acute impacts of the Proposed Project's operation on residents living and/or workers working outside the Proposed Project's boundary in the Revised DEIR or Final EIR.

Hauling Mileage Information During Construction

The Proposed Project's construction activities include site preparation, grading, building construction, paving, and architectural coating.[19] Appendix B of the DEIR indicates that the Proposed Project would require approximately 21,040 cubic yards of soil import which would generate a total of 2,630 haul truck trips.[20] According to the DEIR, the Proposed Project site would be serviced by the Badlands Landfill and Burrtec landfill facilities which are located 69 miles and 31 miles from the project site, respectively.[21] However, the haul truck length trip in CalEEMod analysis shows 20 miles. Thus, the air quality analysis during construction is potentially underestimated in the DEIR. It is essential to include all the emission sources in the air quality analysis to determine the significance level during construction and propose all the feasible mitigation measures to reduce or minimize the impacts. In addition, the information and assumptions should be consistent throughout the CEQA document and its appendices. The Lead Agency is recommended to revise CalEEMod and the DEIR to update the haul truck distances to reflect the maximum potential haul trip distances to 69 miles.

5-7

[18] South Coast AQMD Air Quality Significance Thresholds available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf
[19] DEIR, Table 4.6-2, page 4.6-8.
[20] Appendix B – Air Quality, Energy, Greenhouse Gas emissions and Health Risk Assessment Impact Analysis, page 43.
[21] *Ibid.* CalEEMod, page 183.

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Use of South Coast AQMD's Mass Rate Localized Significance Threshold (LST) Look-Up Table to Analyze the Proposed Project's Localized Air Quality Impact appears Inconsistent with Guidance for the LST Methodology

The localized significance threshold (LST) analysis in the DEIR appears to incorrectly rely on the LST screening tables to determine the significance of localized air quality impacts. As indicated in Table 3-2 of the LST methodology,[22] these screening tables are not applicable for projects larger than five acres. Since the Proposed Project site size is 47.96 acres and is located in close proximity to sensitive receptors, including residential uses as noted earlier in this letter, reliance on the LST screening tables may underestimate localized air quality impacts. Therefore, it is recommended that the Lead Agency conduct project-specific dispersion modeling to accurately assess the localized air quality impacts from both construction and operational phases of the Proposed Project and compare the results to the Ambient Air Quality Standards for Criteria Pollutants on the South Coast AQMD Air Quality Significance Thresholds[23] and include the results in the Final EIR. 5-8

Potential Underestimation of Emissions Due to Imprecise Assumptions for Truck Trip Lengths and Trip Rates in Emissions Analysis

Appendix B of the DEIR explains that air quality impact analysis was based on the assumption that the average truck trip length is 20 miles. However, the project site is located approximately 150 miles away from the Ports of Los Angeles and Long Beach which means that the air quality analysis underestimated the emissions from trucks traveling from the Ports to the project site. For this reason, the Lead Agency is recommended to revise the Final EIR using project-specific assumptions for vehicle trip lengths and rates, including applying more conservative trip lengths such as designating specific mileage distance for local trips and 150 miles for Port-related trips. Tailoring these parameters and assumptions to be based on project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project. 5-9

Railroad Adjacent to The Project Site

Based on the review of an aerial photograph and the DEIR, the Proposed Project site is located adjacent to a railroad.[24] The DEIR should explain whether transportation by railroad will be utilized for this project. If so, locomotive emissions should be included in the air quality analysis and Health Risk Assessment (HRA) in the revised CEQA document. 5-10

AB 617 ECV CERP Alignment

The Proposed Project area includes the Assembly Bill 617 (AB 617) designated Eastern Coachella Valley (ECV) community and is heavily impacted by air pollution generated from sources such as the Salton Sea, pesticides, fugitive road dust, open burning and illegal dumping, diesel mobile 5-11

[22] South Coast AQMD Final Localized Significance Threshold Methodology available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf

[23] South Coast AQMD Air Quality Significance Thresholds available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf

[24] DEIR, page 4.6-1.

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sources, Greenleaf Desert View Power Plant, and land use issues. As part of the AB 617 process, South Coast AQMD is required to work with a Community Steering Committee (CSC) to develop a Community Emission Reductions Plan (CERP) that identifies air quality priorities and related actions to address those air quality priorities and reduce air pollution in the community. The South Coast AQMD Governing Board adopted the ECV CERP on June 4, 2021. South Coast AQMD staff recommends that the Lead Agency review the actions to reduce air pollution in the ECV community included in Chapter 5 of the ECV CERP, which can be found here: https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/final-cerp/final-cerp-july-2021.pdf?sfvrsn=9#page=101. South Coast AQMD staff also recommends the Lead Agency continue working with South Coast AQMD to explore whether additional measures to further reduce emissions can be identified and implemented at the Proposed Project to support actions in the ECV CERP.

5-11 Cont.

Air Quality Mitigation Measures for NOx and PM Emissions from Construction

According to the CARB Strategies for Reducing Emissions from Off-Road Construction Equipment, the implementation of off-road Tier 5 starting in 2027 or 2028 and the Governor's Executive Order in September 2020 requires CARB to develop and propose a full transition to Zero Emissions (ZE) by 2035.[25] Considering the scope of the project, it is crucial to ensure that the levels of construction emissions, specifically NOx and PM_{10}, remain below significant thresholds during the construction period for each proposed individual project. Moving towards achieving this goal, where feasible, involves opting for electric emission-free engines instead of diesel-fueled engines for the construction equipment. This proactive choice not only aligns with environmental concerns but also demonstrates a commitment to minimizing the project's environmental footprints. The abatement of NOx can also be pursued by enforcing greener constructions, such as, limiting the usage of older engines in favor of adopting the latest available technologies, or even incorporating exhaust retrofits such as cutting-edge exhaust aftertreatment techniques. Additionally, several other resources to assist the Lead Agency with identifying additional potential mitigation measures for the Proposed Project are included in the South Coast AQMD's CEQA Air Quality Handbook[26] for both operational and construction emissions.

5-12

Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NOx) and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based

5-13

[25] Presentation can be found at: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/combined-construction-carb-amp-aqmp-presentations-01-27-21.pdf

[26] South Coast AQMD's CEQA Air Quality Handbook, Available at: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook

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on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt to earn Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of the development of a total of 329,100 square feet warehouses, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation[27]. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or waire-program@aqmd.gov. For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.[28]

5-13 Cont.

Additional Recommended Air Quality and Greenhouse Gases Mitigation Measures and Project Design Considerations

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

Mitigation Measures for Operational Air Quality Impacts

Mobile Sources

5-14

1. Require zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

   Note: Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

[27] South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf.
[28] South Coast AQMD WAIRE Program. Accessed at: http://www.aqmd.gov/waire.

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Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.

Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials.
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

5-14 Cont.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporating additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[29]
2. South Coast AQMD 2022 Air Quality Management Plan,[30] specifically:

[29] State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf
[30] South Coast AQMD, 2022 Air Quality Management Plan (AQMP). Available at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan

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a) Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures

b) Appendix IV-B – CARB's Strategy for South Coast

c) Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measure

3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.[31]

5-14 Cont.

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. The final CEQA document, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,[32] Rule 203 – Permit to Operate,[33] Rule 401 – Visible Emissions,[34] Rule 402 – Nuisance,[35] Rule 403 – Fugitive Dust,[36] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[37] Rule 1113 – Architectural Coating,[38] Regulation XIII – New Source Review,[39] Rule 1401 – New Source Review of Toxic Air Contaminants,[40] Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities,[41] Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,[42] Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[43] etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

5-15

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast

[31] United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: https://www.epa.gov/mobile-source-pollution.
[32] South Coast AQMD. Rule 201 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[33] South Coast AQMD. Rule 203 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[34] South Coast AQMD. Rule 401 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[35] South Coast AQMD. Rule 402 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[36] South Coast AQMD. Rule 403 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[37] South Coast AQMD. Rule 1110.2 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[38] South Coast AQMD. Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[39] South Coast AQMD. Regulation XIII available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[40] South Coast AQMD. Rule 1401 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[41] South Coast AQMD. Rule 1403 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf
[42] South Coast AQMD. Rule 1466 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf
[43] South Coast AQMD. Rule 1470 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

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AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at https://www.aqmd.gov/home/permits. 5-15 Cont.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. 5-16

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jivar Afshar, Air Quality Specialist, at jafshar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:JA

RVC250722-01
Control Number

Response to Comment Letter 5

Sam Wang, Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation
South Coast Air Quality Management District
September 3, 2025

5-1 This comment provides a general introduction. Responses to specific comments are provided below.

5-2 This comment includes a general summary of the proposed Project and does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

5-3 This comment relates to the use of EMFAC2021 instead of EMFAC2025 in the Project's air quality analysis. The commenter recommends that the emissions calculations for the air quality analysis in the DEIR be revised utilizing the EMFAC 2025 emissions factors rather than the current EMFAC2021, since the Proposed Project's DEIR was prepared in July 2025. As noted in Attachment B2 of this Final EIR, the EMFAC2025 model has not yet been approved by the USEPA. Approval of the EMFAC 2025 model by the USEPA is required before a new EMFAC version can be used. As such, no changes in regard to this comment have been made to the modeling, as the most current approved EMFAC model has been utilized in the DEIR.

5-4 This comment relates to the use of outdated AERMET, and meteorological data used in the AERMOD modeling in the Project's air quality analysis. The commenter notes that Appendix B1 of the DEIR indicates that meteorological data processed by AERMET version 16216 (version 9) were used for the modeling. However, SCAQMD released a newer, approved version of AERMOD-ready MET data files (Version 11) in October 2023. The commenter further states that the use of outdated meteorological data and model versions is inconsistent with the U.S. EPA's Guideline on Air Quality Models (40 CFR Part 51, Appendix W) and may result in inaccurate or non-conservative health risk estimates. To ensure accuracy and consistency with federal modeling guidelines, the commenter requests that the air quality modeling be re-run using the more recent meteorological data processed by the most recent USEPA-recommended versions of AERMET (version 24142), revise the health risk results accordingly, and include the updated results in the Final EIR.

As discussed in the Attachment B2 of this FEIR, the AERMOD model runs were re-run with the following changes: 1) the most current versions of AERMOD, AERMET, AERMINUTE and AERSURFACE were utilized; 2) the averaging times of 1 hour and Period were selected; 3) the most current meteorological data for Jacqueline Cochran Regional Airport was utilized; and 4) for the operational model runs, the proposed buildings' heights were entered into AERMOD and pre-processed with BPIP. The revised AERMOD model run results and associated cancer risks are provided for informational purposes in Attachment B2 of this Final EIR.

As shown in Attachment B2, the cancer risk from the proposed Project's DPM emissions would be as high as 1.6 per million persons at the mobile homes located south of the Project site

(Sensitive Receptors 2 and 3). When combined with the gas station TAC emissions, this would result in a cancer risk as high as 3.0 per million persons at the mobile homes located south of the Project site. The combined Project-related cancer risk from DPM and gas station TAC emissions would remain well below the SCAQMD's threshold of 10 per million persons based on the updated analysis. Therefore, operation of the proposed Project would result in a less than significant impact due to the cancer risk from TAC emissions. This change has been made to page 4.3-28 of the DEIR (Table 4.3-9, *Project-Related Diesel Particulate Matter (DPM) Cancer Risks at Nearby Sensitive Receptors*) and is reflected in Section 3.0, Errata, of the Final EIR. As shown in the Table, all of the cancer risk impacts calculated with the current information are lower than those originally included in the DEIR. Therefore, the DEIR identified a more conservative cancer risk assessment, and these recalculations do not warrant recirculation of the DEIR.

5-5 This comment remarked on pollutant averaging time utilized in the Project's air quality analysis. The commenter's review of the dispersion modeling files noted that the $PM_{2.5}$ pollutant type and averaging time of 24-Hour and annual keywords were selected for the pollutant averaging time in the control pathway in the AERMOD model, however, a detailed HRA utilizing AERMOD should be run using the "OTHER" type and pollutant averaging time 1-hour and PERIOD. In addition, the commenter's review of the modeling files noted that industrial buildings were not included in the building downwash option in the AERMOD dispersion model during operation which resulted in an underestimation of the ground-level pollutant concentrations near the buildings. As such, the commenter recommends that the Project's air quality analysis and DEIR be revised accordingly.

Refer to Response 5-4, above. The 1-hour and Period averaging times and the building downwash were analyzed in the revised AERMOD model runs, provided in Attachment B2 of this FEIR, which did not change the analysis or conclusions set forth in the DEIR and does not constitute significant new information requiring recirculation of the DEIR.

5-6 This comment relates to the HRA analysis for Project operation in the Project's air quality analysis. The commenter notes that the Project's air quality analysis indicates that the operational risks from the proposed gas station were prepared using the SCAQMD's Risk Tool (V1.103). However, this tool is only applicable to CEQA permitting projects and is not applicable to Proposed Project. As such, the commenter recommends that the Project's air quality analysis and DEIR be revised to conduct an operational phase HRA, which should include evaluating truck emissions (including the truck routes to and from the site, truck loading/unloading docks, and their proximity to the sensitive receptors) and the impact of diesel-powered stationary and portable sources under the foreseeable probable future conditions. The commenter adds that the air quality analysis and DEIR should also disclose the potential health risks for chronic and acute impacts of the Proposed Project's operation on residents living and/or workers working outside the Proposed Project's boundary.

As discussed in Attachment B2 of this FEIR, the cancer and non-cancer risks from diesel emissions created from construction and operation of the proposed Project were analyzed using AERMOD. Specifically, Section 8.3 of Appendix B1 of the DEIR describes the modeling inputs and Section 10.4 of Appendix B1 of the DEIR shows the modeling results. The RiskTool

has been utilized in hundreds of CEQA documents and is a published analysis method that is utilized for gas stations and other site-specific sources. Section 10.4 of Appendix B1 of the DEIR utilized a very conservative method of adding the cancer risk calculated by AERMOD to the cancer risk calculated by the RiskTool, in order to provide the total cancer risk from the proposed Project at the nearby sensitive receptors. Pages 4.3-26 to 4.3-29 of the DEIR summarize these calculations and clearly show the results of the analysis. As such, no changes in regard to this comment have been made to the DEIR.

5-7 This comment relates to the hauling mileage information during construction in the Project's air quality analysis. The commenter states that, according to the DEIR, the Proposed Project site would be serviced by the Badlands Landfill and Burrtec landfill facilities which are located 69 miles and 31 miles from the Project site, respectively. However, the haul truck length trip in CalEEMod analysis shows 20 miles. Thus, the air quality analysis during construction is potentially underestimated in the DEIR.

As discussed in Attachment B2 of this FEIR, the import of 21,040 cubic yards of dirt to the Project site during the grading phase was analyzed in CalEEMod. Landfills are not a source of fill dirt for construction projects in the Coachella Valley. It should be noted that there are typically several construction projects with excess dirt and only a few projects that need dirt, so it can be reasonably assumed that the imported dirt will come from a nearby project that is located closer than 20 miles away. As such, the 20-mile assumption for trip length in CalEEMod is considered conservative. Accordingly, no changes in regard to this comment have been made to the DEIR.

5-8 The commenter asserts that the localized significance threshold (LST) analysis in the Project's air quality analysis appears to incorrectly rely on the LST screening tables to determine the significance of localized air quality impacts. As indicated in Table 3-2 of the LST methodology, these screening tables are not applicable for projects larger than five acres. Since the Proposed Project site size is 47.96 acres reliance on the LST screening tables may underestimate localized air quality impacts. Therefore, the commenter recommends that the Project's air quality analysis and DEIR be revised to conduct project-specific dispersion modeling and compare the results to the Ambient Air Quality Standards for Criteria Pollutants on the SCAQMD Air Quality Significance Thresholds.

As discussed in Attachment B2 of this FEIR, the SCAQMD provides a Fact Sheet for Applying CalEEMod to Localized Significance Threshold that details how to analyze the projects that are greater than 5 acres in size by using calculations based on the active construction equipment. The Draft EIR utilized the methodology provided in the Fact Sheet to analyze the localized air impacts from construction and operation of the proposed Project.

However, in order to expand on localized air impacts during construction and operations, the AERMOD PM2.5 DPM construction run that is detailed in Section 8.3 Appendix B1 of the DEIR, and summarized in Table 4.3-10, *Project-Related Diesel Particulate Matter (DPM) Cancer Risks at Nearby Sensitive Receptors,* of the DEIR, was re-run based on the site preparation phase of construction, and is provided in Attachment B2 of this FEIR. The off-road equipment source was set to match the 4.17 pounds per day of PM2.5 emissions as calculated from CalEEMod.

The AERMOD model run files are provided in Attachment B2 of this Final EIR, which found that site preparation activities would create PM2.5 concentrations as high as 0.192 µg/m3, which is well below SCAQMD's PM2.5 construction threshold of 10.4 µg/m3.

For operations, the AERMOD model was based on the year 2028 PM2.5 emissions rates from the EMFAC2021 model output files provided in Appendix B of the Air Report and included emissions from exhaust (RUNEX), brake wear (PMBW) and tire wear (PMTW). The AERMOD model run files are provided in Attachment B2 of this FEIR, which found that operational activities would create PM2.5 concentrations as high as 0.024 µg/m^3, which is well below SCAQMD's PM2.5 operational threshold of 2.5 µg/m^3.

This information expands upon the information provided in the DEIR but does not represent a change in the analysis or the level of impact significance as discussed in the DEIR. As such, no changes in regard to this comment have been made to the DEIR.

5-9 This comment relates to a potential underestimation of emissions in the Project's air quality analysis due to assumptions for truck trip lengths and trip rates in the emissions analysis. The commenter notes that the Project's air quality analysis explains that the analysis was based on the assumption that the average truck trip length is 20 miles. However, the Project site is located approximately 150 miles away from the Ports of Los Angeles and Long Beach which means that the air quality analysis underestimated the emissions from trucks traveling from the Ports to the Project site. As such, the commenter recommends that the Project's air quality analysis and DEIR be revised using project-specific assumptions for vehicle trip lengths and rates, including applying more conservative trip lengths such as designating specific mileage distance for local trips and 150 miles for Port-related trips.

As discussed in the Attachment B2 of this FEIR, the distance utilized the default trip distances that ranged between 4.79 and 9.65 miles in the CalEEMod model. The trip distances in the CalEEMod model vary for each region of the State and are based on empirical evidence provided in the CalEEMod User Guide and the use of the default trip distances in CalEEMod meets the CEQA requirement of providing substantial evidence of the analysis. The largest proposed warehouse under the Project would be 48,800 square feet, which would be considered a small warehouse in Southern California, and no warehouses would be designed to be high-cube warehouses, which are the warehouses specifically designed to receive cargo containers. For these reasons, truck trips directly from the Ports to the Project site are not anticipated and the default truck trip distances in the CalEEMod provide a reasonable estimate of the truck trip distances that would occur during operation of the proposed Project. As such, no changes in regard to this comment have been made to the DEIR.

5-10 The commenter notes that, based on the review of an aerial photograph and the DEIR, the Proposed Project site is located adjacent to a railroad. The Project's air quality analysis and DEIR should explain whether transportation by railroad will be utilized for this Project.

No railroad connections or loading areas will be provided on the Project site as part of the proposed Project. This is further discussed in Attachment B2 of this FEIR. As such, no changes in regard to this comment have been made to the DEIR.

5-11 The commenter notes that the Proposed Project area includes the AB 617 designated Eastern Coachella Valley ("ECV") community that is heavily impacted by air pollution. As part of the AB 617 process, SCAQMD is required to work with a Community Steering Committee ("CSC") to develop a Community Emission Reductions Plan ("CERP") that identifies air quality priorities and related actions to address those air quality priorities and reduce air pollution in the community. The commenter recommends that the Lead Agency review the actions to reduce air pollution in the ECV community included in Chapter 5 of the ECV CERP. SCAQMD staff also recommends the Lead Agency continue working with SCAQMD to explore whether additional measures to further reduce emissions can be identified and implemented at the Proposed Project to support actions in the ECV CERP.

As part of the environmental analysis in the DEIR, air quality impacts associated with construction and operation of the proposed project were evaluated in accordance with the CEQA Guidelines, South Coast AQMD significance thresholds, and applicable regulatory requirements. The CERP for the ECV community, adopted by the South Coast AQMD Governing Board on June 4, 2021, was reviewed for consistency with the proposed project. Construction and operation of the proposed Project would comply with all applicable AB 617 requirements for the Eastern Coachella Valley community, as well as all applicable South Coast AQMD rules and regulations (Refer to DEIR page 4.3-11). The proposed project incorporates mitigation measures (Mitigation Measure GHG-1) designed to minimize emissions of criteria pollutants and toxic air contaminants during construction and operation, as described on pages 4.3-23 of the DEIR. These measures are consistent with the air quality improvement strategies identified in the ECV CERP and would not conflict with or impede implementation of the CERP.

As demonstrated in the Project's air quality analysis and Section 4.3, Air Quality, of the DEIR, the proposed project's emissions would not result in significant air quality impacts after implementation of required mitigation measures and would not contribute substantially to existing air quality burdens within the ECV community. Coordination with South Coast AQMD would continue, as required, to ensure compliance with applicable air quality regulations. This comment does not identify new information that would alter the conclusions of the air quality analysis, and no additional mitigation measures are required.

5-12 The commenter recommends that additional air quality mitigation measures for NOx and PM emissions from Project construction be included in the Project's air quality analysis and DEIR. Specifically, the commenter notes that, according to the CARB Strategies for Reducing Emissions from Off-Road Construction Equipment, the implementation of off-road Tier 5 starting in 2027 or 2028 and the Governor's EO in September 2020 requires CARB to develop and propose a full transition to Zero Emissions ("ZE") by 2035. Further, the commenter adds that several other resources to assist the Lead Agency with identifying additional potential mitigation measures for the Proposed Project are included in the SCAQMD's CEQA Air Quality Handbook for both operational and construction emissions.

As shown in DEIR Table 4.3-5, the Project will not exceed SCAQMD thresholds for NOx and PM emissions during construction. The Project therefore complies with SCAQMD thresholds

under CEQA. The Project Applicant has committed to implementing Mitigation Measure GHG-1 (DEIR page 4.3-22 and 4.3-23) that restricts the use of diesel-powered off-road equipment during operation of the proposed Project and requires temporary power poles to be installed during construction of the proposed Project that will allow for the charging of the ZE vehicles. As such, no changes in regard to this comment have been made to the DEIR.

5-13 This comment relates to Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions ("WAIRE") Program. The commenter notes that, since the Proposed Project consists of the development of a total of 329,100 square feet of warehouses, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, the commenter recommends that the Project's air quality analysis and DEIR review SCAQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the proposed Project that may help future warehouse operators meet their compliance obligation.

As described in Section 4.3, Air Quality, of the DEIR, the Project will be required to comply with all applicable SCAQMD rules and regulations. As allowed under CEQA, compliance with standard requirements and responsible agency regulations is sufficient to reduce impacts, and is not required as mitigation for projects. However, it should be noted that the largest warehouse space on the proposed plans is 48,800 square feet. Therefore, unless a tenant were to take leases on multiple warehouse spaces, this Rule will likely not apply to the proposed Project. As such, no changes in regard to this comment have been made to the DEIR.

5-14 The commenter recommends incorporating several air quality mitigation measures and project design considerations into the Final EIR. The commenter further suggests that the Lead Agency conduct a review of a number of publications from SCAQMD, the State of California, and the United States Environmental Protection Agency.

As discussed in Attachment B2 of this FEIR, and as shown in the DEIR, Tables 4.3-5 and 4.3-6, the proposed Project has provided adequate mitigation to reduce all air quality-related impacts to less than significant levels. It should be noted that most of the commenter's proposed mitigation has already or will likely become State Regulations that the Project Applicant will be required to implement. As such, no changes in regard to this comment have been made to the DEIR.

5-15 This comment relates to SCAQMD air permits and role as a Responsible Agency. The commenter recommends that the Project's air quality analysis and DEIR should be revised to include a discussion about any and all new stationary and portable equipment requiring SCAQMD air permits (including but not limited to emergency generators, fire water pumps, boilers, etc.), provide the evaluation of their air quality and greenhouse gas impacts, and identify SCAQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s).

As discussed in the Attachment B2 of this FEIR, all of the regulations noted by the commenter have all been discussed in Section 4.3, *Air Quality,* of the DEIR, as part of the SCAQMD subsection of Section 4.3.2, Regulatory Framework. In addition, DEIR Section 4.3.4, Impact Analysis (under "Methodology"), includes a discussion regarding the CalEEMod assumptions used for modeling, based on the CalEEMod default equipment mix using the building types, sizes and uses proposed for the Project. As such, no changes in regard to this comment have been made to the DEIR.

5-16 The commenter concludes by iterating the DEIR comment and response processes set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b). This comment is noted.

Comment Letter 6 (page 1 of 5)

Comment Letter No. 6

Monday, July 21, 2025 at 1:29:45 PM Pacific Daylight Time

Subject: Re: Notice of Availability and Completion of the Draft EIR - Coachella Airport Business Park
Date: Monday, July 21, 2025 at 12:54:48 PM Pacific Daylight Time
From: GW Res <grestmtm@gmail.com>
To: Terra Nova Planning & Research <admin@terranovaplanning.com>
CC: kreif@coachella.org <kreif@coachella.org>, Nicole Criste <ncriste@terranovaplanning.com>, Torres-Matinez Cultural Committee <cultural-committee@torresmartinez-nsn.gov>, Mary Belardo <belardom@gmail.com>, Richie_Lopez <renegades55r@gmail.com>, Sara Morreo <smorreo9@gmail.com>, maria bermudez <elkaseis1@gmail.com>, Alesia Reed <lisareed990@gmail.com>, thomas tortez <ttortez@yahoo.com>
Attachments: image001[98].png, image001[98].png

Good afternoon

I am responding on behalf of The Torres Martinez Cultural Committee regarding our Tribes concerns for the Coachella Airport Business Park

6-1

Our Tribes has 3 areas of concerns for this project area

•Tribes Prehistoric settlement pattern

Our Tribes Prehistoric settlement pattern begins around Airport Boulevard/ 86 HWY. This is a continuous settlement pattern running south starting with Prehistoric village La Mesa site, then Roadrunner house , Martinez , Alamo , Auga Dulce and Túva with a many smaller extended village sites that runs throught the communities of Thermal ,Mecca and Oasis

6-2

•A main Indian trail
Running from the main village sites La Mesa to Túva with smaller branches of the trail breaking off and connecting other village sites runs throught the communities of Thermal, Mecca and Oasis

•Desert Cahuilla Cultural landuse area
There are several main village sites located in this Desert with each village site having its own landuse area that can be speard out over several square miles. With these village site being so close together there over many lapping areas depending on there relationships.

1 of 5

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This project area is located right between the Village sites of

West
Temal Wakhish (earth dry- La Mesa) Témalwáxiš – name of La Mesa near Augustine Reservation
Ekwawinet/ Kelewutkwīkwinut (wood hanging down)
East
Awelpitcava (dog lying by the trail)
Wála•tún•e/Wál•tún – To Spread Out Roots To Bear Fruit. Original village name for Present-day Mecca.

6-2 Cont.

NORTH
Palaiyil (Water turtle)
Pál•sétax^{w}et – Salt Water. Original village name of present-day Cabazon Reservation

South
Pūichekiva (Roadrunner house)

our Tribes concerns is as followed:

Our Tribes concern regarding the project area of impact would be the subsurface content.

Understanding this area is heavy disturbed due to a date Palm Grove, our Tribes has found deep intacted Archaeologcal features related to our Tribes Mortuary practicing underneath these deep plow zone before

So the question is:

Is there any subsurface Cultural content underneath the disturbed soil (intacted Cultural/Archaeologcal features) ?

Therefore based off the location our this project our Tribe's recommendation is for Phase 1 extension (Phase 2 Testing) to assist in determining if any Cultural content remains underneath the un@disturbed soil and to assist in proper mitigation of impacts to any potential Tribal Cultural Resources. (intacted Cultural/Archaeologcal features)

6-3

If this project is going to require ground disturbance during construction our Tribes requires Phase 3 data recovery Plan (Monitoring plan/ Tribal Monitoring) this is a plan on

2 of 5

Comment Letter 6 (page 3 of 5)

how to address any finding during construction.

Over the years we have learned it's more efficient when it comes to a project that requires ground disturbance (Monitoring) it is easier to have a plan in place before finding rather than trying to develop a plan after any finding this will minimizes any long term stoppage

6-3 Cont.

We appreciate your time and effort in helping us protect our Tribes Traditional Cultural Resource

Any questions comments or concerns please feel free to contact us

6-4

We appreciate your time and effort in helping us protect our Tribes Traditional Cultural Resource

Any questions comments or concerns please feel free to contact us.

Respectfully
Gary Wayne Resvaloso Jr
Torres Martinez Desert Cahuilla Indians MLD
70-555 Pierce St
Thermal Ca, 92274
(442) 256-2964
grestmtm@gmail.com

Our lives begin to end the day we become silent about things that matter.
Martin Luther King Jr.

On Mon, Jul 21, 2025, 8:00 AM Terra Nova Planning & Research <admin@terranovaplanning.com> wrote:

> On behalf of the City of Coachella, attached please find the Notice of Availability for the above referenced project for your review.
>
> **Document Availability:** Copies of project documents, the Draft Environmental Impact Report, and appendices are available at the City of Coachella Development Services, Planning Division, 53990 Enterprise Way, Coachella, CA 92236, and on the City's website https://www.coachella.org/departments/development-services/environmental-reviews.
>
> The City of Coachella is currently open Monday through Thursday between 7:00 a.m. and 6:00 p.m. and closed every Friday. Additionally, the Draft EIR and Technical Appendices will be

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Comment Letter 6 (page 4 of 5)

provided to the following library for public review:

Coachella Library, 1500 Sixth Street, Coachella, CA 92236

Hours: Sunday: Closed. Monday: Closed. Tuesday: 10:00 am-6:00 pm.

Wednesday: 11:00 am-7:00 pm. Thursday: 11:00 am-7:00 pm. Friday: 10:00 am-6:00 pm. Saturday: 10:00 am-6:00 pm.

Public Review Period: As mandated by State law, the minimum public review period for this document is 45 days. The Draft EIR is available for public review and comment beginning on July 21, 2025, and ending September 3, 2025. All comments on the Draft EIR must be submitted in writing to the email address or physical address provided below and received no later than 6:00 PM September 3, 2025.

All comments should be emailed to Kendra Reif, Community Development Director at Kreif@coachella.org , or mailed to:

City of Coachella Development Services, Planning Division

Attn: Kendra Reif, Community Development Director

53990 Enterprise Way, Coachella, CA 92236

Public Hearings: Notification of the date, timing, and place of future public hearings will be provided in compliance with City and California Environmental Quality Act (CEQA) requirements.

Kindest Regards,

TERRA NOVA PLANNING & RESEARCH, INC.®

42635 Melanie Place, Ste 101

Palm Desert, CA 92211

Phone: (760) 341-4800

4 of 5

Comment Letter 6 (page 5 of 5)

Fax: 760-341-4455

www.terranovaplanning.com

5 of 5

Response to Comment Letter 6

Gary Wayne Resvaloso Jr.
Torres Martinez Desert Cahuilla Indians
July 21, 2025

6-1 This comment provides a general introduction. Responses to specific comments are provided below.

6-2 The commenter describes the three identified areas of Tribal concern in relation to the Project site. The commenter further states that the Tribe has previously discovered deep intact archaeological features related to the Tribe's mortuary practices underneath these deep plow zones.

A general acknowledgment of the three areas of concern (village sites) described by the commenter is provided in DEIR Section 4.18, *Tribal Cultural Resources*, and the *Cultural Resource Investigation* that was prepared for the Project. This comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis under CEQA. Therefore, no further response is warranted.

6-3 The commenter reiterates the concern regarding potential subsurface cultural content and requests that Phase 1 extension (Phase 2 Testing) be conducted. The commenter further states that the Tribe requires the preparation of a Phase 3 Data Recovery Plan (Monitoring Plan/Tribal Monitoring).

For context, it should be noted that the initial tribal outreach letters were sent to 12 recommended tribal groups based on a list provided by the Native American Heritage Commission (NAHC) on April 3, 2020, which included the Torrez Martinez Desert Cahuilla Indians. A follow-up phone call was also placed to the Tribe on April 30, 2020. Five responses were received from the list of tribal groups from the NAHC in 2020. The Quechan Tribe of the Fort Yuma Reservation and Santa Rosa Band of Cahuilla Indians stated the tribes do not have any comments for the Project. The Agua Caliente Band of Cahuilla Indians stated that the Project area is within their Traditional Use Area and made some requests for information as well as monitoring during ground disturbance. The Soboba Band of Luiseno Indians deferred to the Torres Martinez Desert Cahuilla Indians. The Torres Martinez Desert Cahuilla Indians responded on April 28, 2020, and indicated that the area is sensitive for cultural resources and, as such, they stated they would provide information regarding the sensitivity of the area during the official AB 52 consultation process. Tribal consultation with the Torres Martinez Desert Cahuilla Indians was conducted from April 12, 2022, through July 12th, 2022. The Torres Martinez Desert Cahuilla Indians did not respond. In response to the commenter's email of July 21, 2025, the City indicated that consultation had been completed, but the City provided the commenter a copy of the *Cultural Resource Investigation* (Appendix D1 of the DEIR) and indicated that City staff was available if the commenter wished to have further discussions. No response was received.

A *Cultural Resources Memorandum in support of the Final EIR Coachella Airport Business Park Project, Riverside, California* (Cultural Resources Responses to Comments Technical Memorandum), was prepared by Chronicle Heritage dated October 2, 2025 (provided as Attachment D2 of this FEIR). It should be noted that this attachment does not constitute significant new information requiring recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5. Rather, it serves only to clarify or amplify information already presented in the DEIR and/or the respective technical studies. As noted in Attachment D2 of this FEIR, the previously-conducted 2023 records search, intensive Phase 1 survey, and consultation of the 2021 Archaeological Sensitivity Model all found no documented or visible surface cultural resources in the Project area. The sensitivity model concluded that the potential for surface resources remains low. Additionally, the intensive archaeological survey noted the Project area is relatively disturbed and is located within an active alluvial plain. Therefore, the likelihood of identifying archaeological resources in original context is considered low. As such, further cultural resource management, including Phase 2 testing, is not warranted for the Project, as surficial resource potential has been thoroughly evaluated. In addition, MM CUL-1 already provides for the establishment of all necessary protocols and procedures for the treatment of resources prior to the initiation of earth moving activities. As such, a formal Tribal Cultural Resources Monitoring Plan is not recommended.

The DEIR correctly identified the potential presence of buried resources. In order to assure that impacts to these resources would be less than significant, the DEIR includes MM CUL-1, which requires a qualified archaeologist and Tribal monitor(s) to be present during any ground disturbing activities during the Project construction phase and requires that all work shall be halted in the vicinity in the event of a discovery during the Project's ground disturbing activities in the construction phase. However, to clarify, the language pertaining to tribal monitoring during Project construction in MM CUL-1 has been slightly revised to include a reference specifically to the Torres Martinez Desert Cahuilla Indians, as well as the ABCBI per Comment Letter 7, below. This change has been made to both Section 4.5, Cultural Resources, pages 4.5-9 and 4.5-10, and Section 4.18, Tribal Cultural Resources, page 4.18-7, of the DEIR and is reflected in Section 3.0, Errata, of the Final EIR. It should be noted that this revision does not constitute significant new information requiring recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5. Rather, it serves only to clarify or amplify information already presented in the DEIR and/or the respective technical studies.

6-4 The commenter concludes by providing a contact name for any questions associated with the above comments. Comment noted.

Comment Letter 7 (1 of 3)

Comment Letter No. 7

Wednesday, July 23, 2025 at 1:56:16 PM Pacific Daylight Time

Subject: RE: Notice of Availability and Completion of the Draft EIR - Coachella Airport Business Park
Date: Wednesday, July 23, 2025 at 1:51:44 PM Pacific Daylight Time
From: THPO Consulting <ACBCI-THPO@aguacaliente.net>
To: Terra Nova Planning & Research <admin@terranovaplanning.com>
CC: kreif@coachella.org <kreif@coachella.org>, Nicole Criste <ncriste@terranovaplanning.com>
Attachments: image001.png, image002.png, DEIR THPO comments.pdf

Hello, Kendra,

Attached is my comment on the DEIR. 7-1

Thank you,

Xitlaly Madrigal
Cultural Resources Analyst
xmadrigal@aguacaliente.net
(760) 423-3485
5401 Dinah Shore Drive, Palm Springs, CA 92264

From: Terra Nova Planning & Research <admin@terranovaplanning.com>
Sent: Monday, July 21, 2025 8:00 AM
Cc: kreif@coachella.org; Nicole Criste <ncriste@terranovaplanning.com>
Subject: Notice of Availability and Completion of the Draft EIR - Coachella Airport Business Park

This email was sent by a person from outside your organization. Please verify the authenticity of this email before taking further action.

On behalf of the City of Coachella, attached please find the Notice of Availability for the above referenced project for your review.

Document Availability: Copies of project documents, the Draft Environmental Impact Report, and appendices are available at the City of Coachella Development Services, Planning Division, 53990 Enterprise Way, Coachella, CA 92236, and on the City's website https://www.coachella.org/departments/development-services/environmental-reviews.

The City of Coachella is currently open Monday through Thursday between 7:00 a.m. and 6:00 p.m. and closed every Friday. Additionally, the Draft EIR and Technical Appendices will be provided to the following library for public review:

Coachella Library, 1500 Sixth Street, Coachella, CA 92236
Hours: Sunday: Closed. Monday: Closed. Tuesday: 10:00 am-6:00 pm.

1 of 2

Comment Letter 7 (2 of 3)

Wednesday: 11:00 am-7:00 pm. Thursday: 11:00 am-7:00 pm. Friday: 10:00 am-6:00 pm. Saturday: 10:00 am-6:00 pm.

Public Review Period: As mandated by State law, the minimum public review period for this document is 45 days. The Draft EIR is available for public review and comment beginning on July 21, 2025, and ending September 3, 2025. All comments on the Draft EIR must be submitted in writing to the email address or physical address provided below and received no later than 6:00 PM September 3, 2025.

All comments should be emailed to Kendra Reif, Community Development Director at Kreif@coachella.org, or mailed to:

City of Coachella Development Services, Planning Division
Attn: Kendra Reif, Community Development Director
53990 Enterprise Way, Coachella, CA 92236

Public Hearings: Notification of the date, timing, and place of future public hearings will be provided in compliance with City and California Environmental Quality Act (CEQA) requirements.

Kindest Regards,

TERRA NOVA PLANNING & RESEARCH, INC.®
42635 Melanie Place, Ste 101
Palm Desert, CA 92211
Phone: (760) 341-4800
Fax: 760-341-4455

https://protect.checkpoint.com/v2/r01/___www.terranovaplanning.com___YzJ1OmEncWFjYWxpZW5oZWdvdnO6YzpvOmIxMWRmZTM2NzU3MTEiNDIwYjZhODA1YmRhMjZjNWOyOjc6YmI2ZjoxMjg5YTMwNmRiOTI5YjdjMzNiZmNlNWZjNzgxYTkyZWFkZjA3YzNhODExYjA2ODk2ZjM2MWU2ODNiN2U3MWI3OnO6VDpG

2 of 2

Comment Letter 7 (3 of 3)

historic resources to be preserved during renovations and remodels of historic resources on and around a site. With adherence to General Plan policies and implementation of Mitigation Measure CUL-1, the proposed Project would have less than significant impacts on archaeological resources.

Mitigation Measures

CUL-1 A qualified archaeologist and ıt during any ground disturbing activities during the Project c hat archaeological materials are encountered during ground d be halted in the vicinity of the discovery until a qualified arch overy and assess the significance of the archaeological resource Tribal monitor shall establish all necessary protocols and proce es prior to the initiation of earth moving activities. 7-1 Cont.

Xitlaly Madrigal
Can you please alter the language here to specify an ACBCI Tribal Monitor?
Reply

Impact 4.5.3 Implementation of the proposed Project would not disturb any human remains, including those interred outside of dedicated cemeteries (Less than Significant Impact with Mitigation Incorporated)

The proposed Project site does not contain any cemeteries and no human remains were found on the site during the pedestrian surveys conducted on March 30, 2020, and again on December 7, 2023. It is not anticipated that proposed Project operations would unearth any human remains at the site. However, there is always the possibility that human remains could be uncovered during ground disturbing activities.

Through the implementation of Mitigation Measure CUL-2, all pre-construction and construction work taking place within the vicinity of the discovered remains must cease and the necessary steps to ensure the integrity of the immediate area must be taken. The State of California Health and Safety Code 7050.5 and the California Public Resources Code (PRC) Section 5097.98 both require that the County Coroner must be notified within 24 hours of the discovered human remains. If the remains discovered are determined by the Coroner to be of Native American descent, the Coroner is required to contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC would, in turn, contact the Most Likely Descendant (MLD) who would determine further action(s) to be taken. The MLD would have 48 hours to access the site and make a recommendation regarding disposition of the remains. Therefore, with incorporation of Mitigation Measure CUL-2, impacts would reduced to less than significant levels.

Mitigation Measures

CUL-2 In the event that human remains are uncovered during ground disturbing activities on the Project site, no further disturbance shall occur and all work shall cease within 100 feet of the discovery until the County Coroner has made a determination of the origin and disposition of the remains. Ground disturbing activities and excavations shall not resume until the following has been addressed:

1. The County Coroner has been contacted and determined that no investigation to the cause of death is required; and,

2. If the County Coroner determines that the remains are of Native American descent, the Coroner shall notify Native American Heritage Commission (NAHC), which will then determine the Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend means of treating or disposing of, with

Response to Comment Letter 7

Xitlaly Madrigal
Agua Caliente Band of Cahuilla Indians
July 23, 2025

7-1 The commenter requests that the language for Mitigation Measure CUL-1 in DEIR Section 4.18, *Tribal Cultural Resources,* on p. 4.18-7, to revised to specify that an Agua Caliente Band of Cahuilla Indians (ACBCI) Tribal Monitor be present during any ground disturbing activities during the Project construction phase.

Refer to Response 6-3, above. The language pertaining to tribal monitoring during Project construction in MM CUL-1 has been slightly revised to include a reference specifically to the ACBCI, as well as the Torres Martinez Desert Cahuilla Indians, per Comment Letter 6, above. This change is reflected in both Section 4.5, *Cultural Resources,* (page 4.5-10) and Section 4.18, *Tribal Cultural Resources,* (page 4.18-7) of the DEIR and in Section 3.0, Errata, of the Final EIR. It should be noted that this revision does not constitute significant new information requiring recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5. Rather, it serves only to clarify or amplify information already presented in the DEIR and/or the respective technical studies.

Comment Letter 8 (page 1 of 5)

Comment Letter No. 8

Monday, July 21, 2025 at 9:36:47 AM Pacific Daylight Time

Subject: FW: 7/21/25-RE: Notice of Availability and Completion of the Draft EIR - Coachella Airport Business Park
Date: Monday, July 21, 2025 at 9:21:38 AM Pacific Daylight Time
From: Nicole Criste <ncriste@terranovaplanning.com>
To: Kimberly Cuza <kcuza@terranovaplanning.com>
Attachments: image003.png, Coachella Airport Business Park Notice of Availability.pdf

Nicole Sauviat Criste
Principal

TERRA NOVA PLANNING & RESEARCH, INC.®
42635 Melanie Place, Ste 101
PALM DESERT, CA. 92211
(760) 341-4800
FAX#: 760-341-4455
E-Mail: ncriste@terranovaplanning.com

From: SCG SE Region Redlands Utility Request <SCGSERegionRedlandsUtilityRequest@semprautilities.com>
Date: Monday, July 21, 2025 at 8:32 AM
To: kreif@coachella.org <kreif@coachella.org>
Cc: Nicole Criste <ncriste@terranovaplanning.com>, McGarrey, Deborah <DMcgarrey@socalgas.com>, Terra Nova Planning & Research <admin@terranovaplanning.com>
Subject: 7/21/25-RE: Notice of Availability and Completion of the Draft EIR - Coachella Airport Business Park

Hello,
Regarding: **Notice of Availability and Completion of the Draft EIR - Coachella Airport Business Park**
SoCalGas Distribution does not appear to have a conflict with this project. Please include a note to have the developer contact 811 / USA at DigAlert | Utility Locating California | Underground Wire & Cable Locator prior to any excavation / demolition activities so we can Locate & Mark out our facilities.
If the Developer needs new gas service, please have them contact our Builder Services group to begin the application process as soon as practicable, at https://www.socalgas.com/for-your-business/builder-services.
To avoid delays in processing requests and notifications, please have all Franchise correspondence sent to our Utility Request inbox, at SCGSERegionRedlandsUtilityRequest@semprautilities.com

8-1

1 of 5

Comment Letter 8 (page 2 of 5)

I cover the **Southeast Region – Redlands**
SCGSERegionRedlandsUtilityRequest@semprautilities.com would be your contact for requests in the southeastern ends of LA County, Riverside County, San Bernardino & Imperial Counties.

Southeast Region - Anaheim office which is all of Orange County and the southern ends of Los Angeles County; therefore, any Map and/or Will Serve Letter requests you have in these areas please send them to AtlasRequests/WillServeAnaheim@semprautilities.com

8-2

Northwest Region – Compton HQ For West and Central LA County, your Map Request and Will Serve Letters, will go to SCG-ComptonUtilityRequest@semprautilities.com

Northwest Region - Chatsworth
For any requests from the northern most parts of LA County all the way up to Visalia, San Luis Obispo, Fresno and Tulare you would
contact NorthwestDistributionUtilityRequest@semprautilities.com

Transmission
For Transmission requests, please contact SoCalGas Transmission,
at SoCalGasTransmissionUtilityRequest@semprautilities.com

READ MORE .....

MINOR STREET IMPROVEMENT PROJECTS: (CHIP SEAL, SLURRY SEAL, GRIND & OVERLAY)
Please notify Southern California Gas Company 4 months prior to start of pavement
projects for the gas company to complete leak survey & repair leaks if found.

MAJOR STREET IMPROVEMENT PROJECTS: (PROJECTS REQUIRING EXCAVATIONS GREATER THAN 9 INCHES, WIDENING OF EXISTING STREETS, INSTALLING NEW CURBS &
GUTTERS, BUS PADS, TRAFFIC SIGNALS, REALIGNMENT, GRADE SEPARATION, ETC.)
&
PIPELINE PROJECTS: (STORM DRAIN, WATERLINE, WATER, SEWER, ELECTRICAL, TELECOMUNICATIONS, ETC.)
Please provide Southern California Gas Company with your signed designed plans
with *gas company facilities posted* on your designs plans, 4-6 months prior to start of construction for possible relocation of SCG medium pressure facilities and 9-12 months
for possible relocation of SCG high pressure facilities.

8-3

2 of 5

Comment Letter 8 (page 3 of 5)

This time is needed to analyze plans and to design required alterations to any conflicting SCG gas facilities. Please keep us informed of any and all pre-construction meetings, construction schedules, etc., so that our work can be scheduled accordingly.

8-3 Cont.

Potholing may be required to determine if a conflict exists between the proposed development and our facilities. If, for any reason, there are SCG facilities in conflict, and a request to be relocated is needed, it is important to send the request in writing. Please include all required information below:

- **A Signed "Notice to Owner" request on Official Letterhead from the City, County,**

and/or company.

- **Name, Title and Project Number.**
- **Address, Location, Start Date, Parameters & Scope of Entire Job/Project.**
- **Copy of Thomas Guide Page and/or Google Map Screenshot Highlighting Project Area.**
- **Requestor Company's Contact Name, Title, Phone Number, Email, and other pertinent information.**

8-4

Thank you,
Josh Rubal
Lead Planning Associate
Distribution Planning & Project Management
Redlands HQ - Southeast Region
(213) 231-7978 Office
SCGSERegionRedlandsUtilityRequest@semprautilities.com

From: McGarrey, Deborah <DMcgarrey@socalgas.com>
Sent: Monday, July 21, 2025 8:14 AM
To: Terra Nova Planning & Research <admin@terranovaplanning.com>
Cc: kreif@coachella.org; Nicole Criste <ncriste@terranovaplanning.com>; SCG SE Region Redlands Utility Request <SCGSERegionRedlandsUtilityRequest@semprautilities.com>
Subject: Re: Notice of Availability and Completion of the Draft EIR - Coachella Airport Business Park

Good morning
I have forwarded the information to the SCG Utility Request department.

Get Outlook for iOS

From: Terra Nova Planning & Research <admin@terranovaplanning.com>
Sent: Monday, July 21, 2025 8:00:00 AM
Cc: kreif@coachella.org <kreif@coachella.org>; Nicole Criste <ncriste@terranovaplanning.com>
Subject: [EXTERNAL] Notice of Availability and Completion of the Draft EIR - Coachella Airport Business

3 of 5

Comment Letter 8 (page 4 of 5)

Park

On behalf of the City of Coachella, attached please find the Notice of Availability for the above referenced project for your review.

Document Availability: Copies of project documents, the Draft Environmental Impact Report, and appendices are available at the City of Coachella Development Services, Planning Division, 53990 Enterprise Way, Coachella, CA 92236, and on the City's website https://www.coachella.org/departments/development-services/environmental-reviews [coachella.org].

The City of Coachella is currently open Monday through Thursday between 7:00 a.m. and 6:00 p.m. and closed every Friday. Additionally, the Draft EIR and Technical Appendices will be provided to the following library for public review:

Coachella Library, 1500 Sixth Street, Coachella, CA 92236
Hours: Sunday: Closed. Monday: Closed. Tuesday: 10:00 am-6:00 pm. Wednesday: 11:00 am-7:00 pm. Thursday: 11:00 am-7:00 pm. Friday: 10:00 am-6:00 pm. Saturday: 10:00 am-6:00 pm.

Public Review Period: As mandated by State law, the minimum public review period for this document is 45 days. The Draft EIR is available for public review and comment beginning on July 21, 2025, and ending September 3, 2025. All comments on the Draft EIR must be submitted in writing to the email address or physical address provided below and received no later than 6:00 PM September 3, 2025.

All comments should be emailed to Kendra Reif, Community Development Director at Kreif@coachella.org , or mailed to:

City of Coachella Development Services, Planning Division
Attn: Kendra Reif, Community Development Director
53990 Enterprise Way, Coachella, CA 92236

Public Hearings: Notification of the date, timing, and place of future public hearings will be provided in compliance with City and California Environmental Quality Act (CEQA) requirements.

Kindest Regards,



TERRA NOVA PLANNING & RESEARCH, INC.®
42635 Melanie Place, Ste 101
Palm Desert, CA 92211
Phone: (760) 341-4800
Fax: 760-341-4455

4 of 5

Comment Letter 8 (page 5 of 5)

www.terranovaplanning.com [terranovaplanning.com]

5 of 5

Response to Comment Letter 8

Josh Rubal, Lead Planning Associate
Distribution Planning & Project Management
Redlands HQ - Southeast Region
Southern California Gas Company
July 23, 2025

8-1 The commenter states that SoCalGas does not have a conflict with the Project and provides contact information for the Project developer for pre-construction utility coordination. Comment noted. The comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines.

8-2 This comment provides contact information for the various SoCalGas regions. Comment noted. The comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines.

8-3 This comment provides notification timelines for various project types including minor and major street improvement projects and pipeline projects. The Project Applicant is coordinating with all utility purveyors including SoCalGas within the required timeframes. Comment noted. The comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines.

8-4 This comment states that potholing may be required to determine if a conflict exists between the proposed Project and SoCalGas facilities and provides instructions for sending a request in writing. The Project Applicant is coordinating with all utility purveyors including SoCalGas and will advise SoCalGas if potholing is required. Comment noted. The comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines.

Comment Letter 9 (page 1 of 3)

Comment Letter No. 9

ADAMS BROADWELL JOSEPH & CARDOZO
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080-7037

TEL (650) 589-1660
FAX (650) 589-5062
ssannadan@adamsbroadwell.com

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520 CAPITOL MALL, SUITE 350
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KELILAH D. FEDERMAN
RICHARD M. FRANCO
ANDREW J. GRAF
TANYA A. GULESSERIAN
DARION N. JOHNSTON
RACHAEL E. KOSS
AIDAN P. MARSHALL
PLAURA P. MCGUIRE
ISABEL TAHIR

Of Counsel
MARC D. JOSEPH
DANIEL L. CARDOZO

August 6, 2025

Via U.S. Mail and Email

Luis Lopez, Development Services Director
City of Coachella
53990 Enterprise Way
Coachella, CA 92236
Email: llopez@coachella.org

Angela M. Zepeda, City Clerk
City of Coachella
53990 Enterprise Way
Coachella, CA 92236
Email: cityclerk@coachella.org

Via Email Only

Kendra Reif, Principal Planner
Email: kreif@coachella.org

Via Online Submission:

https://coachella.seamlessdocs.com/f/PUBLICREQUESTFORM

Re: Request for Immediate Access to Documents Referenced in the Draft Environmental Impact Report– Coachella Airport Business Park Project (SCH No. 2023040106)

Dear Mr. Lopez, Ms. Zepeda, and Ms. Reif:

We are writing on behalf of Californians Allied for a Responsible Economy ("CARE CA") to request ***immediate access*** to any and all documents referenced, incorporated by reference, and relied upon in the Draft Environmental Impact Report ("DEIR") prepared for the Coachella Airport Business Park Project (SCH No. 2023040106) ("Project") proposed by Haagen Co., LLC (dba Empire Airport Co., LLC) ("Applicant"). *This request excludes a copy of the DEIR. This request also excludes any documents that are currently available on the City of Coachella website, as of today's date*.[1] 9-1

[1] Accessed https://www.coachella.org/departments/development-services/environmental-reviews on August 6, 2025.

7982-003j

printed on recycled paper

Comment Letter 9 (page 2 of 3)

The proposed Project site would be developed for industrial uses comprised of the following uses: large and small warehouse; personal vehicle storage and self-storage units; small business use spaces; a small retail and restaurant development; a 44-foot-tall electronic billboard sign located along the Project's small business frontage along SR 86; a fuel station with a convenience store; and associated landscaping, parking, lighting, and signage. An Imperial Irrigation District electrical substation facility would also be constructed as part of the project, at the northern end of the overall Project site. The new 315 foot x 315 foot electrical substation will require at least one 1-25 mega volt ampere 92/13.2 kilovolt transformer bank in order to provide adequate power for the proposed Project. The project would be located on northwest corner of SR 86 and Airport Blvd (APNs 763-330-013, -018, -029). 9-2

Our request for ***immediate access*** to all documents referenced in the DEIR is made pursuant to the California Environmental Quality Act ("CEQA"), which requires that all documents referenced, incorporated by reference, and relied upon in an environmental review document be made available to the public for the entire comment period.[2]

Please use the following contact information for all correspondence: 9-3

U.S. Mail
Sheila M. Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email
ssannadan@adamsbroadwell.com

[2] *See* Public Resources Code § 21092(b)(1) (stating that "all documents referenced in the draft environmental impact report or negative declaration" shall be made "available for review"); 14 Cal. Code Reg. § 15072(g)(4) (stating that all documents incorporated by reference in the MND . . . "shall be readily accessible to the public").
7982-003j

Comment Letter 9 (page 3 of 3)

If you have any questions, please call me at (650) 589-1660 or email me at ssannadan@adamsbroadwell.com. Thank you for your assistance with this matter.

9-3
Cont.

Sincerely,

Sheila M. Sannadan
Legal Assistant

SMS:ljl

7982-003j

Response to Comment Letter 9

Sheila M. Sannadan, Legal Assistant
Californians Allied for a Responsible Economy via Adams Broadwell Joseph & Cardozo, Attorneys at Law
August 6, 2025

9-1 This comment requests copies of all documents referenced, incorporated by reference, and relied upon in the DEIR.

CEQA requires that the public notice specify the address where copies of the draft EIR and all documents referenced in the draft EIR are available for review. (PRC § 21092(b)(1)). CEQA also requires that the lead agency must post the draft EIR on its internet website, if any. (PRC § 21082.1(d)). Although CEQA requires that notice must be given in sufficient time so that the public is able to use the full review period, courts apply the principle that "statutory requirements for public notice are fulfilled if the public agency makes a good faith effort to follow the procedures prescribed by law" when reviewing a lead agency's compliance with the notice requirements of PRC § 21092. (*Gilroy Citizens for Responsible Planning v. City of Gilroy (2006) 140 Cal.App.4th 911, 922*-924). CEQA does not require the draft EIR to be provided in a manner beyond what is required by law, and courts shall not interpret the CEQA statutes or the state guidelines in a manner which imposes procedural or substantive requirements beyond those explicitly stated in the statutes or state guidelines. (PRC § 21083.1).

On August 11, 2025, the City made a good faith effort to provide the reference documents requested by CARE CA in its August 6, 2025, letter. Of note, CEQA does not require that functional hyperlinks or physical copies of requested documents must be provided in response to public requests or as part of the statutory public comment process. Instead, CEQA requires that the notice must provide the address where documents referenced in the draft EIR are available for review. (PRC § 21092(b)(1)). In accordance with *Gilroy*, these efforts by the City, and its CEQA consultant, plainly constitute a good faith effort to follow statutory requirements for public notice and Draft EIR availability. Although the City allowed comments to be submitted until September 11, 2025, this was only an extension for filing comments, not an extension of the legally required public review period.

CEQA does not require recirculation of the EIR where new information merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. (PRC § 21092.1, *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal. 4th 1112.). Fulfilling the request to provide reference information for the documents requested by CARE CA in its August 6, 2025 letter amplifies the information already contained in an adequate EIR; therefore, recirculation is not required. Furthermore, this comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

9-2 This comment summarizes the project description. This comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

9-3 See Response 9-1.

Comment Letter 10 (page 1 of 2)

Comment Letter No. 10

ADAMS BROADWELL JOSEPH & CARDOZO
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (650) 589-1660
FAX: (650) 589-5062
ssannadan@adamsbroadwell.com

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August 6, 2025

Via U.S. Mail and Email

Luis Lopez, Development Services Director
City of Coachella
53990 Enterprise Way
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Email: llopez@coachella.org

Angela M. Zepeda, City Clerk
City of Coachella
53990 Enterprise Way
Coachella, CA 92236
Email: cityclerk@coachella.org

Via Email Only

Kendra Reif, Principal Planner
Email: kreif@coachella.org

Re: Request for Mailed Notice of Actions and Hearings – Coachella Airport Business Park Project (SCH No. 2023040106)

Dear Mr. Lopez, Ms. Zepeda, and Ms. Reif:

We are writing on behalf of Californians Allied for a Responsible Economy ("CARE CA") to request mailed notice of the availability of any environmental review document, prepared pursuant to the California Environmental Quality Act, related to the Coachella Airport Business Park Project (SCH No. 2023040106) ("Project") proposed by Haagen Co., LLC (dba Empire Airport Co., LLC) ("Applicant"). 10-1

The proposed Project site would be developed for industrial uses comprised of the following uses: large and small warehouse; personal vehicle storage and self-storage units; small business use spaces; a small retail and restaurant development; a 44-foot-tall electronic billboard sign located along the Project's small business frontage along SR 86; a fuel station with a convenience store; and associated landscaping, parking, lighting, and signage. An Imperial Irrigation District (IID) electrical substation facility would also be constructed as part of the project, at the northern end of the overall Project site. The new 315 foot x 315 foot electrical substation will require at least one 1-25 mega volt ampere (MVA) 92/13.2 kilovolt (kV) transformer bank in order to provide adequate power for the proposed Project. 10-2

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Comment Letter 10 (page 2 of 2)

10-2 Cont.

The project would be located on northwest corner of SR 86 and Airport Blvd (APNs 763-330-013, -018, -029).

We also request mailed notice of any and all hearings and/or actions related to the Project. These requests are made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108, 21152 and 21167(f) and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

Please send the above requested items by email and U.S. Mail to our San Francisco office as follows:

10-3

Please use the following contact information for all correspondence:

U.S. Mail
Sheila M. Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email
ssannadan@adamsbroadwell.com

If you have any questions, please call me at (650) 589-1660 or email me at ssannadan@adamsbroadwell.com. Thank you for your assistance with this matter.

Sincerely,

Sheila M. Sannadan
Legal Assistant

SMS:ljl

7982-001j

Response to Comment Letter 10

Sheila M. Sannadan, Legal Assistant
Californians Allied for a Responsible Economy via Adams Broadwell Joseph & Cardozo, Attorneys at Law
August 6, 2025

10-1 CEQA requires the lead agency to provide public notice of the availability of the draft EIR at the same time [the lead agency] sends a notice of completion to the OPR. This comment requests mailed notice of the availability of any environmental review document prepared under CEQA for the proposed Project. The commenter has been added to the City's list of interested parties and has been, and will continue to be provided Project notices. This comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

10-2 This comment summarizes the project description. This comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

10-3 See Response 10-1.

Comment Letter 11 (page 2 of 3)

a 44-foot-tall electronic billboard sign located along the Project's small business frontage along SR 86; a fuel station with a convenience store; and associated landscaping, parking, lighting, and signage. An Imperial Irrigation District (IID) electrical substation facility would also be constructed as part of the project, at the northern end of the overall Project site. The new 315 foot x 315 foot electrical substation will require at least one 1-25 mega volt ampere (MVA) 92/13.2 kilovolt (kV) transformer bank in order to provide adequate power for the proposed Project. The project would be located on northwest corner of SR 86 and Airport Blvd (APNs 763-330-013, -018, -029). 11-2 Cont.

This request is made pursuant to the **California Public Records Act** (Government Code §§ 7920.000, *et seq.*). This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a Constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We request *immediate access* to review the above documents pursuant to section 7922.525 of the Public Records Act, which requires public records to be "open to inspection at all times during the office hours of a state or local agency" and provides that "every person has a right to inspect any public record."[1] Therefore, the 10-day response period applicable to a "request for a copy of records" under Section 7922.535(a) does not apply to this request. 11-3

We request access to the above records in their original form, as maintained by the agency.[2] Pursuant to Government Code Section 7922.570, if the requested documents are in electronic format, please upload them to a file hosting program such as Dropbox, NextRequest or a similar program. Alternatively, if the electronic documents are 10 MB or less (or can be easily broken into sections of 10 MB or less), they may be emailed to me as attachments.

[1] Gov. Code §7922.525(a).
[2] Gov. Code § 7922.570; *Sierra Club v. Super. Ct.* (2013) 57 Cal. 4th 157, 161-62.
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Comment Letter 11 (page 3 of 3)

We will pay for any direct costs of duplication associated with filling this request up to $200.[8] However, please contact me at (650) 589-1660 with a cost estimate before copying/scanning the materials.

Please use the following contact information for all correspondence:

U.S. Mail
Sheila M. Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email
ssannadan@adamsbroadwell.com

11-4

If you have any questions, please call me at (650) 589-1660 or email me at ssannadan@adamsbroadwell.com. Thank you for your assistance with this matter.

Sincerely,

Sheila M. Sannadan
Legal Assistant

SMS:ljl

[8] Gov. Code §§ 7922.530, 7922.575; *North County Parents v. Dept. of Education* (1994) 23 Cal.App.4th 144; *County of Los Angeles v. Super. Ct.* (2000) 82 Cal.App.4th 819, 826.

7982-002j

Comment Letter 11 (page 1 of 3)

Comment Letter No. 11

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Via Email Only

Kendra Reif, Principal Planner
Email: kreif@coachella.org

Via Online Submission:

https://coachella.seamlessdocs.com/f/PUBLICREQUESTFORM

Re: Public Records Act Request – Coachella Airport Business Park Project (SCH No. 2023040106)

Dear Mr. Lopez, Ms. Zepeda, and Ms. Reif:

We are writing on behalf of Californians Allied for a Responsible Economy ("CARE CA") to request *immediate access to* any and all public records referring or related to the Coachella Airport Business Park Project (SCH No. 2023040106) ("Project") proposed by Haagen Co., LLC (dba Empire Airport Co., LLC) ("Applicant"). This request includes, but is not limited to, any and all file materials, applications, correspondence, resolutions, memos, notes, analysis, email messages, files, maps, charts, and any other documents related to the Project. *This request does not include the Draft Environmental Impact Report ("DEIR") or documents referenced or relied upon in the DEIR, which we have requested in a separate letter pursuant to the California Environmental Quality Act.* 11-1

The proposed Project site would be developed for industrial uses comprised of the following uses: large and small warehouse; personal vehicle storage and self-storage units; small business use spaces; a small retail and restaurant development; 11-2

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Response to Comment Letter 11

Sheila M. Sannadan, Legal Assistant
Californians Allied for a Responsible Economy via Adams Broadwell Joseph & Cardozo, Attorneys at Law
August 6, 2025

11-1 This comment consists of a Public Records Act (PRA) request for any and all Project-related public records including but not limited to file materials, applications, correspondence, resolutions, memos, notes, analysis, email messages, files, maps, charts, and any other files related to the Project. The City Clerk responded to the commenter, and provided all responsive records. This comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

11-2 This comment summarizes the project description. This comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

11-3 This comment cites provisions relative to the California PRA, under which this request has been made. This comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

11-4 This comment states that direct duplication costs will be paid by the commenter upon request and provides contact information. This comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

Comment Letter 12 (page 1 of 1)

Comment Letter No. 12



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Via Email

August 6, 2025

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Nicole Sauviat Criste, Consulting Planner
Terra Nova Planning & Research, Inc.
42635 Melanie Place, Ste 101
ncriste@terranovaplanning.com

Re: Comment on Draft Environmental Impact Report, Coachella Airport Business Park (SCH No. 2023040106)

Dear Ms. Reif and Ms. Criste:

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Coachella Airport Business Park Project (SCH No. 2023040106), which proposes the development of a mixed-use business park with 624,500 square feet for industrial uses located at the northwest corner of the intersection of State Route 86 and Airport Boulevard (APNs 763-330-013, -018, and -029) in the City of Coachella ("Project"). 12-1

SAFER is concerned that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER requests that the Development Services Department address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project. 12-2

SAFER reserves the right to supplement these comments during the administrative process. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997). 12-3

Sincerely,

Brian Flynn
Lozeau Drury LLP

Response to Comment Letter 12

Brian Flynn
Supporters Alliance for Environmental Responsibility via Lozeau Drury, LLP
August 6, 2025

12-1 This comment provides a general introduction and includes a general summary of the proposed Project. Responses to specific comments are provided below.

12-2 The commenter expresses concern that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. The commenter requests that the City recirculate the Draft EIR. The comment does not provide substantial evidence of a significant environmental impact or the need to recirculate the Draft EIR. As discussed in *Browning-Ferris Indus. v. City Council* (1986) 181 Cal.App.3d 852, 862, a general response to a general comment is sufficient.

The Draft EIR provides an accurate and thorough analysis of all of the project's potential environmental impacts pursuant to CEQA. As discussed throughout the Draft EIR, mitigation measures would be required for impacts related to Aesthetics, Biology, Cultural Resources, Geology, Greenhouse Gases, and Soils, Hazards and Hazardous Materials, Noise, and Transportation as these impact areas are potentially significant after the imposition of existing regulations and standard conditions. For other impact areas, the Draft EIR details that there is no nexus requiring mitigation pursuant to State CEQA Guidelines section 15126.4, subd. (a)(4)(A)-(B), as impacts would be less than significant. No conditions exist that would require recirculation of the Draft EIR pursuant to State CEQA Guidelines section 15088.5 and the Draft EIR is not fundamentally inadequate or conclusory in nature.

.

12-3 The commenter concludes that they reserve the right to supplement these comments. Comment noted.

Comment Letter 13 (page 1 of 9)

Comment Letter No. 13

September 3, 2025

Advocates for the Environment

A non-profit public-interest law firm
and environmental advocacy organization



Nicole Sauviat Criste
Consulting Planner
Terra Nova Planning & Research, Inc.
42635 Melanie Place, Suite 101
Palm Desert, CA 92211

Via U.S. Mail and email to ncriste@terranovaplanning.com and Kreif@coachella.org

Re: Comments on Draft Environmental Impact Report for the Coachella Airport Business Park Project, SCH No. 2023040106

Dear Ms. Criste:

Advocates for the Environment submits the comments in this letter regarding the Draft Environmental Impact Report (**DEIR**) for the Coachella Airport Business Park Project (**Project**). The Project Site is 47.96 acres located on the northwest corner of State Route 86 (**SR 86**) and Airport Boulevard in the City of Coachella (**City**), County of Riverside, California. The Project proposes to develop an industrial business park totaling 624,500 square feet, including 233,100 square feet of large warehouse structures, 96,000 square feet of small warehouse structures, 81,000 square feet of small business buildings, 19,200 square feet of personal vehicle storage structures, 128,600 square feet of self-storage buildings, and a 4,000 square-foot fuel station with convenience store, among other developments on the site. We have reviewed the DEIR and submit comments regarding the sufficiency of the DEIR's Greenhouse-Gas (**GHG**) analysis under the California Environmental Quality Act (**CEQA**). 13-1

The City should require the Project to be net-zero

Given the current regulatory context and technological advancements, a net-zero significance threshold is feasible and extensively supportable. GHG emissions from buildings, including indirect emissions from offsite generation of electricity, direct emissions produced onsite, and from construction with cement and steel, amounted to 21% of global GHG emissions in 2019. (IPCC Sixth Assessment Report, Climate Change 2022, WGIII, Mitigation of Climate Change, p. 9-4.) This is a considerable portion of global GHG emissions. It is much more affordable to construct new building projects to be net-zero than to obtain the same level of GHG reductions by expensively retrofitting older buildings to comply with climate change regulations. Climate damages will keep increasing until we reach net zero GHG emissions, and there is a California state policy requiring the state to be net-zero by 2045. It therefore is economically unsound to construct new buildings that are not net-zero. 13-2

Environmental groups have achieved incredible outcomes by litigation under CEQA. Two of the largest mixed-use development projects in the history of California, Newhall Ranch

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Comment Letter 13 (page 2 of 9)

(now FivePoint Valencia), and Centennial (part of Tejon Ranch) decided to move forward as net-zero communities after losing CEQA lawsuits to environmental groups. The ability for these large projects to become net-zero indicates that it is achievable, even for large-scale developments. The Applicant for this Project should do the same.

We urge the City to adopt net-zero as the GHG significance threshold for this project. This threshold is well-supported by plans for the reduction of GHG emissions in California, and particularly the CARB Climate Change Scoping Plans. The CARB 2017 Scoping Plan states that "achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development." (CARB 2017 Scoping Plan, p. 101.)

13-2 Cont.

Additionally, the CARB 2022 Scoping Plan reaffirms the necessity of a net zero target by expressing: "it is clear that California must transition away from fossil fuels to zero-emission technologies with all possible speed ... in order to meet our GHG and air quality targets." (CARB 2022 Scoping Plan, p. 184.) CARB further encourages a net-zero threshold in its strategies for local actions in Appendix D to the 2022 Scoping Plan. (CARB 2022 Scoping Plan, Appendix D p. 24-26.) Moving this Project forward as a net-zero project would not only be the right thing for the City to do, but also would help protect the City and the Applicant from CEQA GHG litigation.

GHG Analysis

The City adopted two GHG significance thresholds based on CEQA Guidelines, Appendix G: (1) whether the project would "[g]enerate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or (2) whether the project would "[c]onflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases." (DEIR, p. 4.8-9.) The DEIR states that the Project's GHG emissions would be less than significant after mitigation because the Project would comply with the City of Coachella Climate Action Plan (**CAP**)[1] by implementing "all applicable development standards presented in the CAP Development Review Checklist." (DEIR, p. 4.8-9.)

13-3

However, the DEIR ignored the fact that the Project before mitigation would conflict with the CAP on the whole and failed to clearly determine and analyze the potential significance of the Project's GHG impact before mitigation, as required by CEQA. The DEIR did not reference the CAP's reduction target of 49% below 2010 GHG emissions levels per service population by 2035 or demonstrate how the Project would be consistent with this goal. While

[1] City of Coachella, Climate Action Plan, Public Draft, April 2015, available at: https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/climate_action_plan.pdf

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Comment Letter 13 (page 3 of 9)

the DEIR identifies certain measures and project features intended to reduce emissions, it does not explain how these measures will be achieved, enforced, or measured to reach the CAP target reduction. There is no project-specific evidence or quantitative analysis to demonstrate the Project's GHG emissions will be reduced to a less-than-significant level. Thus, the mitigation is vague and deferred.

13-3 Cont.

Moreover, the DEIR concludes that the Project's cumulative GHG impact would be less than significant after mitigation because of its purported consistency with the CAP. (DEIR, p. 4.8-21.) However, it did not demonstrate that the mitigation measure requiring such consistency, MM GHG-1, would achieve compliance with the CAP. The City did not provide substantial evidence that adherence to the Coachella CAP would be sufficient to reduce the Project's cumulative impact to the less-than-significant level, and even if the Project were to adhere to the CAP, it would still conflict with California's GHG reduction goals.

The CAP is not a qualified streamlining instrument under CEQA Guidelines 15183.5(b)(1)

The CAP was designed to help the City to conduct a streamlined review of project-level GHG emissions under CEQA. The DEIR asserts that the CAP qualifies as a "Plan for the Reduction of Greenhouse Gas Emissions" under CEQA Guidelines § 15183.5(b). But, as described in the following paragraphs, the CAP does not meet the requirements of § 15183.5(b).

Section 15183.5(b)(1)(A) requires that a qualifying plan must "quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area." The CAP was adopted in April 2015. The Guidelines' requirement requires that a qualifying plan must quantify the existing GHG emissions in the area. But the CAP relies exclusively on a 2010 GHG inventory. (CAP, pp. 22-23.) This inventory was already five years outdated upon adoption of the CAP, and 15 years outdated when being relied upon for decision-making for this project. The City made no showing that the CAP complies with this requirement to quantify existing and projected emissions.

13-4

Section 15183.5(b)(1)(B) requires that a qualifying plan must "establish a level, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable." The CAP sets city-wide emissions reductions targets for 2020 and 2035 (CAP, p. 28), but does not connect them to any established GHG level for when a project's impacts become cumulatively considerable, or a level at which covered activities would be less than cumulatively considerable. Further, these targets are not compliant with SB 32 or aligned with any of the more recent climate goals.

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Comment Letter 13 (page 4 of 9)

Section 15183.5(b)(1)(D) requires that a qualifying plan must "specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level." The CAP contains measures for reducing emissions (CAP, pp. 31-35), but contains no analysis or substantial evidence showing that adoption of these measures will reduce the City's GHG emissions to a particular level on a city-wide or project level basis. 13-4 Cont.

The Coachella CAP does not meet the criteria in the CEQA Guidelines to be a document from which the City can streamline a project's analysis. It is erroneous to streamline under CEQA Guidelines § 15183.5(b) because the CAP is not a qualified reductions plan under the CEQA Guidelines.

The Project would have a significant cumulative impact that would not be resolved by CAP compliance

The City did not demonstrate that adherence to the CAP would ensure a less-than-significant GHG impact. The DEIR concludes that the Project would have a less-than-significant cumulative GHG impact, relying on its analysis of consistency with the CAP through several design measures included in MM GHG-1. (DEIR, p. 4.8-21.) The City's determination that MM GHG-1 would reduce the Project's GHG impact to a less-than-significant level was erroneous and not supported by substantial evidence. 13-5

Use of the CAP as a significance threshold is not supported by substantial evidence

Because the CAP is not a qualified streamlining document under CEQA Guidelines 15183.5(b)(1), the City should have provided substantial evidence to support its use of the CAP as its sole determinant of the Project's GHG significance. Consistency with the CAP is not a valid GHG significance threshold because the City did not demonstrate, with substantial evidence, that consistency with the CAP would conform to California's GHG reduction goals. 13-6

In particular, the City does not provide analysis to connect the citywide 2035 goal of 4.2 MTCO2e per service population to the 2017 Scoping Plan target of 2 MTCO2e/capita by 2050, or any other relevant state climate goals.

The City did not demonstrate that the mitigation would achieve CAP Compliance

The DEIR's analysis is based on the premise that MM GHG-1 would bring the Project into conformance with the CAP. Yet, the City did not provide substantial evidence for this determination. The Project's annual per-service population GHG emissions would be 10.84 13-7

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Comment Letter 13 (page 5 of 9)

MTCO2e.[2] The CAP aims to reduce GHG emissions per service population (**sp**) to 7 MTCO2e /sp by 2020 and 4.2 MTCO2e/sp by 2035. The Project would exceed both targets, and the DEIR makes no showing that the per- service-population metric would be reduced through the implementation of MM GHG-1. Thus, the mitigation would be insufficient for the Project to achieve CAP compliance and does not demonstrate that the Project would have a less-than-significant impact after mitigation. 13-7 Cont.

The DEIR asserts that MM GHG-1 would allow the Project to achieve a 10 percent reduction in construction GHG emissions. However, this claim is not supported by substantial evidence and rely on unsubstantiated assumptions. The DEIR states, without explanation, that the off-road equipment, required by MM GHG-1 to be powered by alternative fuels, would result in an 8.4% reduction in construction GHG emissions because it would amount to an 8.4% reduction in fuel usage. (DEIR, p. 4.8-13.) 13-8

Requiring alternative fuels is not the same as requiring zero emission equipment, so the reduction in fuel use is likely to be below 8.4%. Further, the City provided no connecting evidence to support its assumption that fuel usage is equivalent to construction GHG emissions reductions. There are other factors such as waste generation that influence the breakdown of GHG construction impact, which the City did not consider when it treated these two metrics as interchangeable.

Similarly, the 1.6% reduction through a traffic demand plan (**TDM**) lacks detailed analysis or enforcements mechanisms to ensure the TDM is effective. (See CEQA Guidelines Section 15126.4(a)(1)(B).) Overall, the DEIR did not provide sufficient information to demonstrate that the Project, even with MM GHG-1, would achieve the CAP's goals. 13-9

Consistency with Applicable Plans

The DEIR discusses the 2022 Scoping Plan, Southern California Association of Governments Connect SoCal, and the City of Coachella CAP to indicate that the Project would not conflict with the second significance threshold, consistency with an applicable plan, policy, or regulation for GHG emissions reductions. However, this significance analysis violates CEQA because it ignores the Project's conflicts with the 2022 Scoping Plan and ignores other applicable plans, including the 2017 Scoping Plan and EO B-55-18. 13-10

The Project is inconsistent with the 2022 CARB Scoping Plan's key targets for electrification and decarbonization, yet the DEIR fails to address the inconsistencies. First, the 2022 Scoping Plan sets a goal for 50% of all industrial energy demand to be electrified by 2045 (2022 CARB Scoping Plan, p. 77).[3] The DEIR does not show that the Project is consistent

[2] 8,030 MTCO2e per year ÷ 741 employees = 10.84 MTCO2e per capita
[3] 2022 Scoping Plan located at: https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf

Comment Letter 13 (page 6 of 9)

with this goal. The 2022 CARB Scoping Plan also places particular emphasis on decarbonizing industrial facilities by "displacing fossil fuel use with a mix of electrification, solar thermal heat, biomethane, low- or zero-carbon hydrogen, and other low-carbon fuels to provide energy for heat and reduce combustion emissions." (2022 CARB Scoping Plan, p. 208). The Project does not appear to be consistent with this goal, and there was insufficient analysis provided in the DEIR to demonstrate otherwise. 13-10 Cont.

Next, the Project claims it is in compliance with transportation sector policies when it is actually relying on vehicle manufacturer compliance to indirectly satisfy the 2022 Scoping Plan requirements, rather than applying project-specific measures. (DEIR, p. 4.8-20.) The finding of less-than-significant impacts after mitigation improperly relies on the assumption that the State will update and enforce applicable mitigation measures, and it is these assumptions that make the Project less-than-significant. This shifts responsibility away from the Project itself, and the measures identified are neither project-specific nor sufficiently detailed, effectively deferring mitigation in violation of CEQA. 13-11

Additionally, the Project is likely to rely on diesel fuel in its operations, potentially conflicting with the 2022 Scoping Plan's objectives. Although the DEIR mentions several measures and regulations aimed at reducing GHG emissions from mobile sources, such as the Advanced Clean Truck Regulation and Clean Off-Road Fleet Recognition Program, it does not specifically address how the Project will contribute to or comply with the goal of electrifying 50% of industrial energy demand by 2045. Therefore, the Project conflicts with the goals of the 2022 Scoping Plan by not adequately reducing its reliance on fossil fuels and failing to incorporate sufficient low- or zero-carbon energy sources. 13-12

The EIR should have analyzed all applicable plans

The DEIR's second threshold for GHG emissions is whether the Project would "conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases." (DEIR, p. 4.8-20.) For the Project's emissions to be considered insignificant under this threshold, the Project must be consistent with all applicable plans, but it is not. 13-13

The DEIR fails to analyze the 2017 Scoping Plan, which is still relevant. It established the foundational framework and strategies for achieving the 2030 GHG target, which has yet to be accomplished. While the 2022 Scoping Plan builds upon previous plans, it does not supersede or replace the 2017 initiatives. Relevant portions of the 2017 Scoping Plan should have been analyzed because it is still an "applicable plan" that was adopted by the State to reduce GHG emissions.

Comment Letter 13 (page 7 of 9)

The CARB 2017 Scoping Plan sets out statewide goals for total GHG emissions targets of 6 MTCO2e/capita by 2030, and 2 MTCO2e/capita by 2050 (2017 CARB Scoping Plan, p. 99). The Project's GHG emissions would be 8,030 MTCO2e per year with 741 employees. (DEIR, p. 2.0-6.) The Project's annual per-capita GHG emissions will therefore be 10.84 MTCO2e[4]. The Project will exceed both the 2030 and 2050 targets. This metric is also inconsistent with the CAP, which aims to reduce GHG emissions per service population (**sp**) to 7 MTCO2e /sp by 2020 and 4.2 MTCO2e/sp by 2035. The Project far exceeds both targets, thus, the Project's GHG emissions will be significant by conflicting with applicable plans for the reduction of GHG emissions under the second threshold. The DEIR's conclusion to the contrary violates CEQA.

13-13 Cont.

Additionally, the Project neither discusses, nor demonstrates consistency with, Executive Order B-55-18, which establishes the statewide goal of achieving carbon-neutrality by 2045.[5] As discussed above, the Project conflicts with the 2022 Scoping Plan, which serves as the roadmap to reach carbon neutrality by 2045. The Project's failure to adhere to the Scoping Plan and implement all mitigation strategies indicates that the Project will conflict with EO B-55-18 and undermine the State's climate goals. The DEIR's insufficient discussion and exclusion of the 2017 Scoping Plan and EO B-55-18 demonstrate that the Project cannot be considered consistent with applicable plans, policies, or regulations, as required by CEQA.

13-14

Inappropriate Deferral of Significance Conclusion

An EIR must determine significance on the project and its inherent design features alone before incorporating mitigation measures, and it is not permissible to "compress[] the analysis of impacts and mitigation measures into a single issue" (*Lotus v. Dep't of Transportation* (2014) 223 Cal.App.4th 645, 656.) Here, the DEIR impermissibly incorporated mitigation before determining significance to conclude that the Project would not have significant GHG impact. The DEIR stated that GHG-1 would be incorporated "in order to comply with the CAP," but this is not the same as a clear finding of significant impact before mitigation.

13-15

Without the extra measures provided in MM GHG-1, the Project would exceed the significance threshold of consistency with the CAP. Thus, the DEIR should have concluded that the Project's GHG impact would be significant before analyzing impact with mitigation included.

[4] 8,030 MTCO2e per year ÷ 741 Employees = 10.84 MTCO2e per capita
[5] Exec. Order No. B-55-18, Cal. Gov't located at: https://archive.gov.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf

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More mitigation would be required to sufficiently reduce the Project's potentially significant impact

Due to the conflict with the CAP and other evidence demonstrating significant impact, the City should have found that the Project would have a potentially significant GHG impact before mitigation, requiring a thorough discussion of mitigation measures. However, the DEIR only included one GHG mitigation measure and did not consider any other mitigation to reduce the Project's potentially significant impact, based on the erroneous determination that MM GHG-1 would be sufficient to reduce the Project's significant GHG impact.

By stating that GHG-1 would be necessary to comply with the CAP, the chosen significance threshold, the City implies that the Project's GHG impact would be significant before mitigation. (DEIR, p. 4.8-9.) GHG impacts are inherently cumulative because climate change results from contributions from all past present and future projects that emit GHGs. Once a lead agency finds a potentially significant cumulative impact, CEQA requires that the Project incorporate fair-share mitigation. *Napa Citizens for Honest Gov't v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 364.) Here, this means reducing the full extent of the Project's contribution to the cumulatively significant GHG impact. 13-16

However, complying with the CAP does not demonstrate GHG emission reductions would be reduced to a fair-share level because the Coachella CAP does not require the Project to fully reduce its emissions. MM GHG-1 only requires the Project to implement the minimum changes necessary to comply with the CAP, rather than committing to the maximum feasible mitigation required.

Without mitigation, the Project will likely contribute to well over 200,000 MTCO2e over its projected 30-year lifespan.[5] This is a good starting point from which to subtract the effect of additional non-offset mitigation measures before implementing offset purchases. After requiring operational emission reductions to the maximum feasible extent through energy reducing measures, solar electricity generation, and electric vehicle charging stations and fleets, the City could require the Applicant to purchase offsets for the Project's remaining GHG emissions. Ultimately, there are many GHG mitigation measures that the City failed to consider because it erroneously determined that a single measure MM GHG-1 would be sufficient to reduce the Project's GHG impact. 13-17

Conclusion

Although the City identified the Project's GHG impact as less-than-significant after mitigation, the chosen threshold was not supported by substantial evidence and the proposed 13-18

[5] 8,030 MTCO2e per year × 30 years = 240,900 MTCO2e

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mitigation would not be sufficient to reduce the Project's impact to a less-than-significant level. The City's failure to analyze significance before mitigation and potential mitigation measures amounted to prejudicial error that hinders the public and decision-makers from understanding the potential GHG impact of this Project.

13-18 Cont.

Please put me on the interest list to receive updates about the progress of this Project. We make this request under Public Resources Code, § 21092.2.

Sincerely,



Dean Wallraff, Attorney at Law
Executive Director, Advocates for the Environment

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Response to Comment Letter 13

Dean Wallraff, Attorney at Law
Executive Director
Advocates for the Environment
September 3, 2025

13-1 This comment provides a general introduction and includes a general summary of the proposed Project. Responses to specific comments are provided below.

13-2 The commenter opines that the City should require the Project to be net zero. The commenter's opinion is noted. This comment does not raise a significant environmental concern regarding the DEIR's analysis of GHG impacts; instead, it suggests that the City should adopt a different GHG significance threshold for the Project.

CEQA allows the lead agency to use its informed judgment in determining the standards of significance on which to rely. (*See East Oakland Stadium Alliance v City of Oakland* (2023) 89 Cal.App.5th 1226, 1258). Section 4.8 of the DEIR addresses GHG emissions in accordance with CEQA requirements (*see* 14 CCR 15064.4). CEQA does not require the City to adopt net-zero as a significance threshold for GHG emissions. Instead, a lead agency may determine that a project has a less than significant cumulative impact related to GHG emissions if the project complies with the requirements of a previously approved plan for the reduction of GHG emissions. (14 CCR 15064(h)(3)). The applicable emissions reduction plan for the Project is the Coachella Climate Action Plan ("CAP") that was developed to be utilized as a tiering document for the streamlined review of project-level GHG emissions under CEQA for development projects in the City. As noted on page ES-14 of the DEIR it is determined, by a showing of substantial evidence, that the Project is consistent with the CAP with Mitigation Measure GHG-1 incorporated. The City included the CAP in the Coachella General Plan Update 2035 Project. The City Council approved the General Plan Update 2035 document along with the Program EIR and the CAP on April 22, 2015. The CAP builds on the 2013 General Plan Update by quantifying emissions from buildout of the City of Coachella General Plan and includes additional policies and implementation actions to help the City further reduce emissions. The CAP establishes emissions reduction targets to meet the statewide emissions targets provided in Executive Order S-03-5 that require GHG emissions to be reduced to 1990 levels by 2020 and reduced to 80 percent below 1990 levels by 2050. The CAP was developed to be utilized as a tiering document for the streamlined review of project-level GHG emissions under CEQA for development projects within the City. The CAP meets CEQA requirements for qualified GHG emissions reduction plans under 14 CCR 15183.5(b).[2]

The 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan), adopted by the California Air Resources Board on November 16, 2022, does not require local agencies to adopt net-zero GHG significance thresholds. Instead, the 2022 Scoping Plan identifies a technologically feasible and cost-effective path to achieve carbon neutrality by 2045. (2022 Scoping Plan, p. 1). The Scoping Plan encourages local jurisdictions to develop a CAP to plan

[2] City of Coachella - Planning Division, Climate Action Plan § (2015), pages 68-70. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/climate_action_plan.pdf.

for the reduction of GHG emissions and allow individual projects to streamline project-specific GHG analysis. (2022 Scoping Plan p. 268).

The commenter quotes language from the Transportation Sustainability section of the 2022 Scoping Plan to suggest that the 2022 Scoping Plan reaffirms a necessity for a local agency to adopt a net-zero GHG significance threshold. However, the quoted language actually refers to the transition from fossil fuels to zero-emission vehicle technologies within the transportation sector: "While CARB's programs, along with local action, have made substantial progress over the past few decades, it is clear that California must transition away from fossil fuels to zero-emission technologies with all possible speed and pursue policies that result in less driving, in order to meet our GHG and air quality targets . . . Technology refers to the vehicles themselves, as well as the associated refueling infrastructure for those vehicles." (2022 Scoping Plan, p. 184). Of note, the DEIR addresses the transition away from fossil fuel vehicle technologies in Mitigation Measure GHG-1: "To the maximum extent feasible, all off-road equipment (non-street legal), such as forklifts and street sweepers, used onsite for warehouse operations shall be powered by alternative fuels, electrical batteries or other alternative/non-diesel fuels (e.g., propane or compressed natural gas (CNG)) that do not emit diesel particulate matter, and that are low or zero emissions." (DEIR p. 4.8-20).

Finally, the commenter states that Appendix D to the 2022 Scoping Plan further encourages a net-zero threshold. Appendix D is not a regulatory requirement; instead, it provides recommendations intended to help local governments develop local GHG reduction strategies through the development of CAPs. (2022 Scoping Plan, Appendix D, p. 4). Regarding the adoption of a net-zero threshold of significance, Appendix D states: "Absent consistency with an adequate, geographically specific GHG reduction plan . . . lead agencies can make a significance determination . . . based on whether the project would result in net-zero GHG emissions. (Note that lead agencies can also use other valid significance thresholds, as described in subsection 3.2.3 below.) Although achieving net-zero GHG emissions may be an appropriate overall objective, it should be noted this approach may not be feasible or appropriate for every project." (2022 Scoping Plan, Appendix D, p. 24).

In addition, as noted in the DEIR Project description (Section 2, pages 2.0-3 through 2.0-5) and in Attachment B2 (AQ/GHG/HRA Responses to Comments Technical Memorandum) of this FEIR, the proposed Project consists of a business park with a mixture of commercial and industrial uses. The commenter references net zero communities that are primarily residential communities, where Title 24 regulations require that new homes built in California are net zero through the installation of solar systems on each home. When developing the Title 24 regulations, the State recognized the importance of commercial and industrial projects to the State economy, as well as the ability of commercial uses to provide local services to the community, and Title 24 provides different standards for non-residential buildings, which allow for these buildings to consume more energy, which cannot currently be met with onsite solar PV systems. However, it should be noted that the Project Applicant has committed to implementing Mitigation Measure GHG-1, which requires a minimum of 50% of the total Project electrical consumption to be provided from onsite renewable sources. As such, no changes in regard to this comment have been made to the DEIR.

13-3 This comment relates to the sufficiency of the GHG analysis conducted for the proposed Project, stating that the DEIR ignored the fact that the Project before mitigation would conflict with the CAP on the whole and failed to clearly determine and analyze the potential significance of the Project's GHG impact before mitigation. The commenter explains that the DEIR did not reference the CAP's reduction target of 49% below 2010 GHG emissions levels per service population by 2035 or demonstrate how the Project would be consistent with this goal. While the DEIR identifies certain measures and project features intended to reduce emissions, the commenter asserts that it does not explain how these measures will be achieved, enforced, or measured to reach the CAP target reduction and that it did not demonstrate that the mitigation measure requiring such consistency, MM GHG-1, would achieve compliance with the CAP.

CEQA allows a lead agency to streamline GHG analysis for projects that are consistent with a qualified GHG emissions reduction plan. (14 CCR 15183.5(a)). The City's CAP, adopted on April 22, 2015, meets CEQA requirements for qualified GHG emissions reduction plans under 14 CCR 15183.5(b).[3] A lead agency may determine that a project has a less than significant cumulative impact related to GHG emissions if the project complies with the requirements of a previously approved plan for the reduction of GHG emissions. (14 CCR 15064(h)(3)). According to CEQA, an environmental document that relies on a greenhouse gas reduction plan for a cumulative impacts analysis must identify the requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project. (14 CCR 15183.5(b)(2)). Under the streamlined analysis approach, the relevant question is not whether a project's unmitigated GHG emissions would be significant, but whether the project is consistent with the CAP's GHG reduction strategy after applying CAP requirements. In other words, the CAP itself is the analytical basis for determining significance. The DEIR correctly identifies the CAP requirements applicable to the Project and evaluates the Project's GHG impacts by determining its consistency with those CAP requirements in DEIR Table 4.8-4.

Regarding CAP emission reduction targets, the DEIR references the CAP's emissions reduction target on p. 4.8-8, stating: "The CAP establishes emissions reduction targets in order to meet the statewide emissions targets provided in Executive Order S-03-5 that require GHG emissions to be reduced to 1990 levels by 2020 and reduced to 80 percent below 1990 levels by 2050." The CAP states that the 2035 emissions target is "Extrapolated based on a linear projection from 2020 target (15% below 2010 levels) to 2050 target (80% below 1990 levels)." (Coachella CAP, footnote 44). Therefore, the DEIR's acknowledgement of the 2050 target accounts for the interim 2035 GHG emissions target.

Regarding consistency with CAP emission reduction goals, a project is consistent with a plan's GHG emissions reduction targets if the project complies with all requirements specified in the plan that apply to the project. (14 CCR 15183.5(b)). DEIR Table 4.8-4, *Project Consistency with the City of Coachella CAP Development Review Checklist*, identifies the CAP requirements applicable to the Project and demonstrates how the Project will be consistent with each

[3]City of Coachella - Planning Division, Climate Action Plan § (2015), pages 68-70. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/climate_action_plan.pdf.

identified requirement. Therefore, because the DEIR demonstrates compliance with applicable CAP requirements, the lead agency has determined that the Project is consistent with the CAP's GHG emissions reduction targets.

In regard to the commenter's concerns related to the GHG Mitigation Measures, CEQA specifies that formulation of mitigation measures shall not be deferred until some future time. (14 CCR 15126.4(a)(1)(B)). The DEIR specifies that the Project will adopt Mitigation Measure GHG-1 to ensure compliance with the CAP's Construction Emissions Reduction requirements. Mitigation Measure GHG-1 identifies that the Project would, to the maximum extent feasible, utilize alternative fuels, electric batteries, or other alternatives / non-diesel fuels (e.g., propane or compressed natural gas (CNG)) that do not emit diesel particulate matter; the Mitigation Measure also requires that a maximum of 50 percent of the total Project electrical consumption be provided by onsite solar photovoltaic (PV) panels or other onsite renewable sources. Through adoption of Mitigation Measure GHG-1, the City is ensuring compliance with the City's CAP and current best practices in construction operations that will realize a 10 percent reduction in GHG emissions. (DEIR p. 4.8-13). Mitigation Measure GHG-1 specifies detailed measures the Project will implement to achieve compliance with the CAP GHG emissions reduction requirements. Mitigation Measure GHG-1 addresses enforceability by stating that the Applicant shall demonstrate compliance with the mitigation measures prior to the issuance of Building Permits. (DEIR p. 4.8-20). Therefore, mitigation is not vague, deferred, or unenforceable.

As to the commenter's assertion that the DEIR provides no project-specific evidence of quantitative analysis to demonstrate how Project GHG emissions will be less than significant, the CEQA guidelines specify that a lead agency shall have the discretion to determine, in the context of a particular project, whether to quantify GHG emissions or rely on a qualitative analysis, such as a plan for the reduction of GHG emissions. (14 CCR 15064.4(a)). CEQA also specifies that a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with a qualified plan or mitigation program. (14 CCR 15183.5(b)). Section 4.8 of the DEIR provides substantial quantitative evidence of the Project's compliance with applicable CAP requirements. (DEIR p. 4.8-11). Specifically, Table 4.8-3 addresses Project-related GHG annual emissions and Table 4.8-4 details the measures that the Project will implement to demonstrate consistency with CAP GHG emissions reduction requirements. (DEIR p. 4.8-12 – 4.8-13).

In relation to the commenter's assertion that the DEIR does not demonstrate compliance with the CAP, the DEIR establishes mitigation measures that demonstrate compliance with CAP GHG emission reduction requirements. Regarding construction emissions, the CAP requires the Applicant to "prepare a construction emissions reduction plan that demonstrates the utilization of current best practices in construction operations that will realize a 10 percent reduction in GHG emissions." (CAP p. A-11). To satisfy this requirement, the DEIR implements Mitigation Measure GHG-1, which includes many of the best practices recommended in the CAP, including alternative fuel and electric power requirements for construction equipment and transportation management strategies for construction workers. (DEIR p. 4.8-20). The DEIR concludes that the mitigation measures implemented would reduce fossil fuel

consumption requirements, leading to a corresponding reduction in GHG emissions of at least 10%. (DEIR p. 4.8-13).

In addition, as discussed in the Attachment B2 of the FEIR and the GHG analysis in Section 10.8 of Appendix B1, *Air Quality, Energy, Greenhouse Gas Emissions and Health Risk Assessment*, the Draft EIR was prepared pursuant to the City's CAP and clearly states that the proposed Project's GHG emissions were quantified for informational purposes only and determination of significance has been based on a determination of whether the Project has implemented all applicable development standards presented in the CAP Development Review Checklist. It should be noted that the CAP provides four compliance paths that either include implementation of all applicable development standards provided in the CAP Development Review Checklist or meet the City's performance targets. Therefore, meeting the City's performance targets that are set for new residential projects, is not applicable to the proposed Project. As such, no changes regarding this comment have been made to the Project's AQ/GHG/HRA Report or the DEIR.

13-4 The commenter opines that the CAP is not a qualified streamlining instrument under CEQA Guidelines 15183.5(b)(1). The commenter cites and summarizes Section 15183.5(b)(1)(A), Section 15183.5(b)(1)(B), and Section 15183.5(b)(1)(D) and states that, since in their opinion the Coachella CAP does not meet the criteria in the CEQA Guidelines requirement to allow it to be a document from which the City can streamline a project's analysis, that it is erroneous to streamline under CEQA Guidelines § 15183.5(b) because the CAP is not a qualified reduction plan under the CEQA Guidelines.

The commenter's assertion that the CAP is not a qualified plan for the reduction of GHG emissions is not supported by substantial evidence or legal authorities. As the City specifically developed the CAP to be consistent with the criteria set forth in 14 CCR 15183.5(b)(1). The commenter states that CEQA Guidelines § 15183.5(b) "requires" that a qualifying plan "must" meet the criteria listed in 14 CCR 15183.5(b)(1). This is not accurate, as the CEQA Guidelines state that a plan for the reduction of greenhouse gas emissions "should" meet the listed criteria. (14 CCR 15183.5(b)(1)). Therefore, CEQA allows some flexibility regarding the extent to which public agencies implement plan requirements.

The commenter's first assertion, that the CAP is not a qualifying plan because the CAP relies on a 2010 GHG inventory and thus does not adequately quantify GHG emissions as stated in 14 CCR 15183.5(b)(1)(A), is not supported by substantial evidence. The CAP states that 2010 was utilized as the baseline year because it was the year of the most reasonably complete data set available for the analysis. (CAP p. 21, footnote 37). The CAP also states that the City experienced very little growth between 2010 and 2013 and the inventory data utilized in the CAP is a proximate estimate of 2013 activity data. (*Id.*). Therefore, the CAP utilizes a GHG inventory estimated to be accurate as of the year before the CAP was drafted. As to the commenter's note that the inventory was 15 years outdated when being relied upon for decision making for the Project, 14 CCR 15183.5(b)(1) does not require that a CAP be approved or updated within a certain period of time prior to project review. Section 3 of the CAP quantifies GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area, in accordance with 14 CCR 15183.5(b)(1)(A).

(*see* CAP p. 27: the CAP quantifies community GHG emissions for 2005, 2010, 2020, and 2035). Therefore, the CAP satisfies the criteria in 14 CCR 15183.5(b)(1)(A).

The commenter's second assertion that CAP is insufficient under 14 CCR 15183.5(b)(1)(B) because the CAP does not connect emissions reduction targets to an established GHG level for when a project's impacts become cumulatively considerable, is not supported by substantial evidence or legal authorities. CEQA does not require an EIR evaluation under 14 CCR 15183.5(b) streamlining provisions to connect project-specific GHG emissions to CAP emissions reduction targets. 14 CCR 15183.5(b)(1)(B) specifies that the emission reduction plan should establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable. The commenter correctly notes that the CAP sets GHG emission reductions targets for 2020 and 2035. (CAP p. 28-29). In accordance with 14 CCR 15183.5(b)(1)(B), these are the levels below which the contribution to GHG emissions from activities covered by the CAP would not be cumulatively considerable. CEQA does not require projects evaluated under 14 CCR 15183.5(b) to "connect" project-specific GHG emissions to CAP targets. Instead, a determination that a project is compliant with the applicable CAP requirements, as specified in the Climate Ready Development Review Checklist, is sufficient to satisfy the project's cumulative impact analysis. (*See* 14 CCR 15183.5(b) and CAP p. 70). The California Supreme Court has supported this methodology: "evaluating the significance of a residential or mixed-use project's greenhouse gas emissions by their effect on the state's efforts to meet it long-term goals makes at least as much sense as measuring them against an absolute numerical threshold." (*Center for Biological Diversity v. Department of Fish and Wildlife* (2016) 62 Cal.4th 204, 220-221).

The commenter's assertion that the CAP does not meet the criteria specified in 14 CCR 15183.5(b)(1)(B) because the CAP's GHG emissions reduction targets "are not compliant with SB 32 or aligned with any of the more recent climate goals," is not supported by substantial evidence. CEQA does not automatically invalidate a previously adopted GHG reduction plan any time a subsequent state climate goal is established. Instead, CEQA requires that an agency's analysis must reasonably reflect evolving scientific knowledge and state regulatory schemes. (14 CCR 15064.4(b)). To that end, in determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable. (14 CCR 15064.4(b)(3)). SB 32, which was signed into law on September 8, 2016, requires CARB to ensure that statewide GHG emissions are reduced to 40% below the 1990 level by 2030. The CAP sets an aggressive emissions reduction target of 49% below 2010 per service population emissions by 2035, which was established to meet a target of 80% below 1990 levels by 2050. (CAP p. 28-29). The commenter presents no evidence to suggest why the CAP target, which aligns with a reduction of 80% below 1990 levels by 2050, is not consistent with the SB 32 goal of 40% below 1990 levels by 2030 or, more broadly, with a strategy to address incremental contribution to climate change. To the contrary, the reductions analyzed in the DEIR substantially exceed the SB 32 goal. Furthermore, the CEQA guidelines state that, when determining the significance of impacts from GHG emissions, a lead agency should consider

the "extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (see, e.g., section 15183.5(b))." (14 CCR 15064.4(b)(3)). SB 32 and other "more recent climate goals" are not regulations or requirements adopted to implement a plan. Instead, such goals are statements of policies and objectives. (*See Center for Biological Diversity v. Department of Fish and Wildlife* (2016) 62 Cal.4th 204, 222-223). Neither SB 32 nor the 2022 Scoping Plan establish regulations implementing the Legislature's statewide goals for reducing GHG emissions for specific projects within the meaning of 14 CCR 15064.4(b)(3). (*Id*.). Therefore, the CAP is not invalid for streamlining purposes simply because it predates the existence of certain non-regulatory policies or goals.

Finally, the commenter's assertion that the CAP is not a qualified plan for the reduction of GHG emissions and streamlining *and* should therefore not be used because the CAP contains no analysis or substantial evidence showing that the adoption of specified measures will reduce the City's GHG emissions to a particular level on a city-wide or project level basis, is not supported by the substantial evidence contained in the EIR. The CEQA guidelines allow a lead agency the discretion to determine, in the context of a particular project, whether to rely on a project-specific quantitative analysis of GHG emissions or to rely on emissions reduction plan-based standards. (14 CCR 15064.4(a)). Although the CEQA Guidelines state that a lead agency should consider the extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting, section 15064.4 does not mandate the use of any specific method or numerical threshold to measure the significance of GHG emissions. (*See Center for Biological Diversity v. Department of Fish and Wildlife* (2016) 62 Cal.4th 204, 221). Here, the CAP adopts specific Climate-Ready Development Standards that were chosen because they directly implement the policies of the City's GHG reduction plan. (CAP p. 70). As referenced in Appendix B of the DEIR and the City's CAP, the Climate-Ready Development Standards describe project design features and intent as well as the development standard required to meet that intent.[4] Chapter 4 of the CAP discusses emission reduction strategies and provides extensive analysis and substantial evidence to support the GHG emissions reduction benefits of the specified Climate-Ready Development Standards. (CAP p. 31-56). Therefore, the CAP is consistent with the criteria set forth in 14 CCR 15183.5(b)(1)(D).

In addition as discussed in Attachment B2 of this FEIR, the City's CAP meets the requirements of Section 15183.5(b), since the CAP has (A) quantified GHG emissions for both existing and projected targets for years 2020 and 2035; (B) established a level, based on substantial evidence, below which the contribution to GHG would not be cumulatively considerable; (C) identified and analyzed the GHG emissions, segmented by Sector and Source within the City; (D) specifies a group of measures in the CAP Development Review Checklist that is to be implemented on a project basis that would collectively achieve the specified emissions levels; (E) establishes mechanisms to monitor the Plan's progress toward achieving the levels; (F) the CAP was adopted by the City Council in June 2014, after a public review process.

[4] Planning Division, and Vista Environmental, Coachella Airport Business Park Project Air Quality, Energy, Greenhouse Gas Emissions, and Health Risk Assessment Impact Analysis § (n.d.); Planning Division, Climate Action Plan § (2015), pages 68-70. https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/climate_action_plan.pdf.

Although the CAP was prepared before the 2017 and 2022 Scoping Plans, both of these Plans and the CAP were prepared based on the ultimate goals provided in AB 32 of an 80% reduction in GHG emissions below 1990 levels by 2050. Furthermore, the Service Population targets are for residential developments and are not applicable to a business park. The DEIR includes adoption of Mitigation Measure GHG-1, which would result in a 10 percent reduction in GHG emissions. Furthermore, as cited in DEIR Section 4.8, pages 4.8-82 through 4.8.92, the Project would be consistent with the City's CAP, which includes several quantifiable reductions in GHG emissions through incorporating elements such as Passive Solar Design, the use of Alternative Fuels for construction equipment, and implementation of a traffic demand program for construction contractors with 20 or more employees, resulting in a 1.6 percent reduction in GHG emissions. As such, no changes in regard to this comment have been made to the DEIR.

13-5 The commenter states that the Project would have a significant cumulative impact that would not be resolved by CAP compliance, and that the City's determination that MM GHG-1 would reduce the Project's GHG impact to a less-than-significant level was erroneous and not supported by substantial evidence. Refer to Responses 13-3 and 13-4, above.

13-6 The commenter repeats their assertion that the CAP is not a qualified streamlining instrument under CEQA Guidelines 15183.5(b)(1). Refer to Response 13-4, above.

13-7 The commenter repeats similar comments made above regarding MM GHG-1. The commenter states that the Project's annual per-service population GHG emissions would be 10.84, and that the CAP aims to reduce GHG emissions per service population (sp) to 7 MTCO2e /sp by 2020 and 4.2 MTCO2e/sp by 2035. The commenter asserts that the Project would exceed both targets, and the DEIR makes no showing that the per- service-population metric would be reduced through the implementation of MM GHG-1.

As detailed above in Responses 13-3 and 13-4, the CAP provides four compliance paths and the DEIR is based on implementation of all applicable development standards provided in the CAP Development Review Checklist. As such, the Service Population metric is not applicable to the proposed Project.

13-8 The commenter opines that the DEIR's claim that MM GHG-1 would allow the Project to achieve a 10% reduction in construction GHG emissions, is not supported by substantial evidence and relies on unsubstantiated assumptions, and that the off-road equipment required by MM GHG-1 would not result in an 8.4% reduction in construction GHG emissions because alternative fuels is not the same as requiring zero emission equipment.

The commenter misinterprets the DEIR's consistency analysis for MM GHG-1. MM GHG-1 requires more than the use of alternative fuels for construction equipment. As the DEIR states, MM GHG-1 requires the Project Applicant to prepare a Construction Emissions Reduction plan that demonstrates the use of multiple best practices to realize a 10% reduction in GHG emissions from construction equipment and transportation demand management strategies. (DEIR p. 4.8-13). In addition to the use of alternative fuels for construction equipment, these best practices include the use of electric or hybrid construction equipment and construction equipment idling limits. (DEIR p. 4.8-13). The DEIR states that the Project shall install

temporary power poles to enable the restriction of gas-powered construction equipment and other construction best practices to reduce GHG emissions. (DEIR p. 4.8-13). The consistency analysis for MM GHG-1 states that the combination of these measures, and not the use of alternative fuels alone, will result in a reduction in construction related GHG emissions of 10% (DEIR p. 4.8-13).

As discussed in Attachment B2 of the FEIR, and as shown in the Energy Use Calculations in Table L of Appendix B1 of the DEIR – the fuel used by the generators, welders, and air compressors, all of which are stationary equipment that would be required to be electrified and run off of the temporary power poles, represent 8.4% of the total off-road equipment fuel used during construction of the proposed Project. The remaining 1.6% reduction would be achieved through implementation of the Transportation Demand Management Program. Although, the commenter is correct that there are several other sources of GHG emissions during construction, they are negligible when compared to GHG emissions from petroleum fuel use and the Development Standards for this measure are limited to use of alternative powered equipment as well as implementation of TDM plan for construction workers. As such, the Project construction activities were correctly determined to be consistent with the City's CAP and no changes in regard to this comment have been made to the DEIR.

13-9 The commenter states that the 1.6% reduction through a traffic demand plan (TDM) lacks detailed analysis or enforcement mechanisms to ensure the TDM is effective and that, overall, the DEIR did not provide sufficient information to demonstrate that the Project, even with MM GHG-1, would achieve the CAP's goals.

DEIR Table 4.8-4 outlines the Project's consistency with the CAP Development Review Checklist, including Transportation Demand Management (TDM) strategies, which are addressed on p. 4.8-13 and p. 4.8-17. The stated 1.6% reduction in emissions is derived from the Project's adoption of TDM program elements related to the use of public or employer-provided transit, vanpools, or other similar demand management programs, which will reduce emissions associated with automobile trip generation related to employment. Reductions in Project-related operational emissions were calculated by the VMT Project Analysis on page 57 of the Coachella Airport Business Park Final TIA and VMT Analysis (Appendix I of the DEIR) and Section 4.1.2 (on page 46) of the Coachella Airport Business Park Detailed CalEEMod report (Appendix B of the DEIR). As stated in Response 13-3, Mitigation Measure GHG-1 addresses enforceability by stating that the Applicant shall demonstrate compliance with the mitigation measures, including TDM programs, prior to the issuance of Building Permits. (DEIR p. 4.8-20). Regarding the commenter's assertion that the DEIR did not provide sufficient information to demonstrate that the Project would achieve the CAP's goals, refer to Response 13-3.

The CAP has provided substantial evidence that shows implementation of TDM deployment Citywide would reduce GHG emissions by approximately 5%.[5] The DEIR includes a Project-specific analysis that analyzes the operational emissions based upon a very conservative

[5] Planning Division, Climate Action Plan § (2015). Page 55.
https://cityofcoachellageneralplanupdate.weebly.com/uploads/1/2/1/2/12129446/climate_action_plan.pdf.

analysis, which includes a VMT analysis based upon the ITE category for a Business Park land use. In addition, the DEIR incorporates information showing the Project will result in a lesser reduction in operational emissions than previously described in the City's General Plan Programmatic EIR and CAP. This analysis is consistent with Public Resources Code §21083.3, resulting in a more conservative reduction of 1.6% for implementing a TDM plan. As such, no changes regarding this comment have been made to the DEIR.

13-10 The commenter states that the DEIR's analysis of consistency with applicable GHG reduction plans ignores the Project's conflicts with the 2022 Scoping Plan and other applicable plans. The commenter states the Project is inconsistent with the 2022 CARB Scoping Plan's key targets for electrification and decarbonization.

The DEIR addresses the 2022 Scoping Plan in detail on p. 4.8-6. In that discussion, the DEIR addresses the State's goals of decarbonization and reducing fossil fuel dependency by focusing on clean energy options, both of which necessarily involve electrification. For example, the DEIR states the following:

> "CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality on November 16, 2022. The 2022 Scoping Plan lays out the sector-by-sector roadmap for California, the world's fifth largest economy, to achieve carbon neutrality by 2045 or earlier, outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target. The Plan addresses recent legislation and direction from Governor Newsom and extends and expands upon earlier plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. The Plan also takes the unprecedented step of adding carbon neutrality as a science-based guide and touchstone for California's climate work. Specifically, this plan:
>
> - Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
> - Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.
> - Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
> - Integrates equity and protecting California's most impacted communities as driving principles throughout the document.
> - Incorporates the contribution of natural and working lands (NWL) to the state's GHG emissions, as well as their role in achieving carbon neutrality.
> - Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
> - Evaluates the substantial health and economic benefits of taking action.
> - Identifies key implementation actions to ensure success."

The DEIR adopts mitigation measure MM GHG-1, which specifies requirements to electrify and decarbonize construction equipment operation and reduce diesel fuel usage as discussed in Response 13-8. Of note, the 2022 Scoping Plan provides a statewide roadmap for California to achieve carbon neutrality by 2045 or earlier, but it does not create any new project-level laws or regulations with which the Project might conflict. (See 2022 Scoping Plan p. 1). Although new regulations may be forthcoming, CARB has not yet adopted any statewide regulations to implement the 2022 Scoping Plan's electrifying industrial manufacturing energy demand goal of 50% by 2045.

As regards Executive Order B-55-18, the applicable significance threshold is whether the Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. EO B-55-18 is not a plan, policy, or regulation with which the Project must comply; instead, it is an order to establish a statewide goal to achieve carbon neutrality no later than 2045. (*see Center for Biological Diversity v. Department of Fish and Wildlife* (2016) 62 Cal.4th 204, 222). The 2022 Scoping Plan is a plan for reducing GHG emissions that adopts a roadmap for California to achieve EO B-55-18's carbon neutrality goal. The DEIR addresses the 2022 Scoping Plan on p. 4.8-6. However, as discussed above, the 2022 Scoping Plan has not yet created any new project-level laws or regulations with which the Project would conflict. Regarding commenter's assertion that the DEIR ignores the 2017 Scoping Plan, refer to Response 13-3.

The 2017 and 2022 Scoping Plans are discussed in several places throughout the AQ/GHG/HRA Report, including Sections 3.2, 6.3, and 6.4. Also, as detailed above in Response 13-4, the CAP was prepared to meet the overall GHG reduction goals provided in the 2017 and 2022 Scoping Plans. As such, no changes in regard to this comment have been made to the DEIR.

13-11 The commenter asserts that the Project claims it is in compliance with transportation sector policies when it is actually relying on vehicle manufacturer compliance to indirectly satisfy the 2022 Scoping Plan requirements. The commenter further asserts that the finding of less-than-significant impacts after mitigation improperly relies on the State.

The DEIR states that the proposed Project would be required to comply with applicable current and future transportation sector policies through vehicle manufacturer compliance, including Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, and other regulations. (DEIR p. 4.8-20). Many of these regulations, such as Advanced Clean Cars II and Advanced Clean Trucks, are vehicle manufacturer-specific regulations with no applicable project-level requirements. Others, such as Advanced Clean Fleets, have requirements applicable to both vehicle manufacturers and private fleets. However, CARB is currently in the process of repealing the parts of the Advanced Clean Fleets regulation that apply to private fleets.[6] To the extent CARB adopts and enforces transportation sector policies that specify project-level requirements, the Project will comply with all applicable requirements. Finally,

[6] California Air Resources Board (CARB) – Rulemaking Division. The Proposed Amendments to the Advanced Clean Fleets and Low Carbon Fuel Standards Regulation § (2025). https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2025/acf_lcfs/atta1.pdf.

the CEQA guidelines define mitigation as avoiding, minimizing, rectifying, reducing or eliminating impacts, or compensating for impacts. (14 CCR 15370). Consistency with applicable transportation sector policies does not constitute mitigation or deferred mitigation.

In addition, as discussed in Attachment B2 of this FEIR, CEQA allows for taking credit for emissions reductions provided by State Regulations. As such, no changes in regard to this comment have been made to the DEIR.

13-12 The commenter notes that the Project is likely to rely on diesel fuel in its operations, and therefore potentially conflicts with the 2022 Scoping Plan's objectives. The commenter restates that the DEIR does not specifically address how the Project will comply with the goal of electrifying 50% of industrial energy demand by 2045.

Refer to Response 13-10. In addition, as discussed on page 4.6-3 of the DEIR and in Attachment B2 of the FEIR, the proposed Project will be required to meet the current Title 24 requirements, for each phase of construction, which will likely require any buildings constructed around the year 2045 to be net zero energy. More specifically, the Project, to the maximum extent feasible, shall utilize alternative or non-diesel fuels (e.g., propane or compressed natural gas (CNG), or electrical batteries for all off-road equipment (i.e., non-street legal), such as forklifts and street sweepers used onsite for warehouse operations. The CARB 2022 Scoping Plan, Table 2-1: Actions for the Scoping Plan Scenario: AB 32 GHG Inventory sectors refers to "Other Industrial Manufacturing" without providing additional specifics as to the type and scale of these uses. As the Project would develop a Business Park on the Project Site, the end user tenants have not been identified and assuming the entire Project would include manufacturing uses is not consistent with the Project Goals and Objectives. As such, the Project would utilize these design measures to reduce the level of emissions for the end-user tenants. Therefore, no changes in regard to this comment have been made to the DEIR.

13-13 The commenter repeats their assertion that the DEIR's significance analysis lacks discussion of applicable GHG reduction plans, including the 2017 Scoping Plan. The commenter reiterates that the Project will exceed both the 2030 and 2050 targets.

The 2017 Scoping Plan provides goals and guidance applicable at the statewide level. Regarding the 2017 Scoping Plan's statewide goals for total GHG emissions of 6 MTCO2e/capita by 2030 and 2 MTCO2e/capita by 2050, as cited in the comment, the 2017 Scoping Plan specifically states: "These goals are appropriate for the plan level (city, county, subregional, or regional level, as appropriate), but not for specific individual projects because they include all emissions sectors in the State." (2017 Scoping Plan, p. 99, footnote 241). As stated in the responses above, the DEIR relies on compliance with the CAP to establish consistency with CEQA requirements related to GHG emissions analysis and provides a discussion of quantified GHG emissions for informational purposes only. (DEIR p. 4.8-11).

Please refer to response 13-2. Furthermore, as detailed in Response 13-4 above, the Service Population targets are for residential developments and are not applicable to the proposed Project. As such, no changes in regard to this comment have been made to the DEIR.

13-14 The commenter repeats that the Project neither discusses, nor demonstrates consistency with, Executive Order B-55-18. Executive Order B-55-18 is discussed in Section 6.3 of Appendix B1 of the DEIR. Refer to Response 13-10, above.

13-15 The commenter states that the DEIR impermissibly incorporated mitigation before determining significance. The commenter further states that the DEIR should have concluded that the Project's GHG impact would be significant before analyzing impact with mitigation included.

As detailed above in Response 13-3, the quantification of GHG emissions was provided but not used for determination of significance. Furthermore, Mitigation Measure GHG-1 was prepared to show compliance with the CAP. This is not compression of the analysis, since the unmitigated condition is self-evident, as it consists of not implementing Mitigation Measure GHG-1, which would result in non-compliance with the CAP.

13-16 The commenter asserts that more mitigation would be required to sufficiently reduce the Project's potentially significant impact, requiring a thorough discussion of mitigation measures. The DEIR did not consider any other mitigation to reduce the Project's potentially significant impact, based on the erroneous determination that MM GHG-1 would be sufficient to reduce the Project's significant GHG impact.

The CEQA guidelines specify that a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements of a previously adopted plan in accordance with the criteria specified in 14 CCR 15183.5(b)(1). As discussed in Response 13-4, the CAP is such a plan. The CEQA guidelines specify that an environmental document that relies on a greenhouse gas reduction plan for a cumulative impacts analysis must identify those requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project. (14 CCR 15183.5(b)(2)). No additional mitigation is required. The CAP confirms this, stating that compliance with the CAP shall be determined based on compliance with the applicable development standards presented in Climate-Ready Development Review Checklist: "A "No" response to an applicable Project Design Feature will require a project be adjusted to comply . . ." (CAP p. A-10). Here, the City has determined that the Project will be compliant with the CAP with the implementation of mitigation measure MM GHG-1.

In addition, as discussed in the DEIR (page 4.8-20 and in Attachment B2 of the FEIR, Mitigation Measure GHG-1 was prepared per the direction of the CAP and utilized the Development Standards provided in the CAP Development Review Checklist to develop the measures included in Mitigation Measure GHG-1. As such, no changes in regard to this comment have been made to the DEIR.

13-17 The commenter repeats previous comments regarding the sufficiency of the Project's proposed mitigation, stating that after requiring operational emission reductions to the maximum feasible extent, the City could require the Applicant to purchase offsets for the

Project's remaining GHG emissions. The commenter continues that there are many GHG mitigation measures that the City failed to consider.

CEQA does not require maximum feasible mitigation, even for a finding of significant cumulative impacts, where the lead agency determines that the adopted mitigation is effective to reduce the impact to a less-than-significant level. As a general rule, CEQA does not specify the types of mitigation that should be adopted for a project, leaving that decision to the lead agency. (See *Goleta Union Sch. Dist. v Regents of Univ. of Cal.* (1995) 37 Cal.App.4th 1025, 1030).

In addition, as discussed in Attachment B2 of this FEIR, the commenter is not correct as the DEIR found a significant GHG impact and provided Mitigation Measure GHG-1 to reduce the GHG impact to less than significant levels. As detailed above in Response 13-16, the reduction measures included in Mitigation Measure GHG-1 were developed from the CAP Checklist. As such, no changes in regard to this comment have been made to the DEIR.

13-18 The commenter concludes by restating the assertions discussed above and requesting to be put on the interest list to receive updates about the progress of this Project. Comment noted.

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Comment Letter No. 14

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

September 4, 2025
Sent via email

Kendra Reif
Community Development Director
City of Coachella
53990 Enterprise Way
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Coachella Airport Business Park (PROJECT)
Draft Environmental Impact Report (DEIR)
SCH# 2023040106

Dear Kendra Reif:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DEIR from the City of Coachella (City) for the Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1] 14-1

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on Projects and related activities that have the potential to adversely affect fish and wildlife resources. 14-2

[1]CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Conserving California's Wildlife Since 1870

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CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code. 14-2 Cont.

PROJECT DESCRIPTION SUMMARY

Proponent: Empire Airport Co. LLC

Objective: The Project proposes the development of a 48-acre business park and a substation (electricity transmission). The business park includes large and small warehouses, small businesses, restaurants, self-storage buildings, among other commercial and retail uses. The Project proposes commercial cannabis operations, including cannabis cultivation and processing, within large warehouses with cooling towers. The Project would include the development of associated driveways, landscaping, access roads, and four retention basins aligned adjacent to the Whitewater River. 14-3

Landscaping would include the use of native plants and other drought-tolerant plants. The Project proposes new artificial nighttime lighting for security, walkways and streets, signage, and a freeway-oriented electronic billboard.

Location: The Project site is located on the northwest corner of State Highway 86 and Airport Boulevard and east of the Whitewater River in the City of Coachella, in the County of Riverside. The Project site includes two separate development areas, including the Coachella Airport Business Park development area in the southern portion and a substation development area in the northern portion of the Project site. The Project Area is within Assessor's Parcel Numbers 763-330-013, 763-330-018, and 763-330-029. The Project area is within the boundaries of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) area, outside of a CVMSHCP Conservation Area.

Timeframe: Project anticipates starting construction of the Project in 2025.

COMMENTS AND RECOMMENDATIONS

CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (i.e., biological resources). CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the 14-4

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Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. The DEIR has not adequately identified and disclosed the Project's impacts (i.e., direct, indirect, and cumulative) on biological resources and whether those impacts are reduced to less than significant.

CDFW's comments and recommendations on the DEIR are explained in greater detail below and summarized here. CDFW is concerned that the DEIR does not adequately identify or mitigate the Project's significant, or potentially significant, impacts to biological resources. CDFW also concludes that the DEIR lacks sufficient information to facilitate a meaningful review by CDFW, including a complete and accurate assessment of biological resources on the Project site. CDFW requests that additional information and analyses be added to a revised DEIR, along with avoidance, minimization, and mitigation measures that avoid or reduce impacts to less than significant. 14-4 Cont.

Existing Environmental Setting

Compliance with CEQA is predicated on a complete and accurate description of the environmental setting that may be affected by the proposed Project. CDFW is concerned that the assessment of the existing environmental setting has not been adequately analyzed in the DEIR. CDFW is concerned that without a complete and accurate description of the existing environmental setting, the DEIR may provide an incomplete analysis of Project-related environmental impacts. 14-5

The DEIR lacks a complete assessment of biological resources associated with nesting birds, burrowing owls, and bats within the Project site and surrounding area. A complete and accurate assessment of the environmental setting and Project-related impacts to biological resources is needed to both identify appropriate avoidance, minimization, and mitigation measures and demonstrate that these measures reduce Project impacts to less than significant.

Mitigation Measures

CEQA requires that a DEIR include mitigation measures to avoid or reduce significant impacts. CDFW is concerned that the mitigation measures proposed in the DEIR are not adequate to avoid or reduce impacts to biological resources to below a level of significance. To support the City in ensuring that Project impacts to biological resources are reduced to less than significant, CDFW recommends adding mitigation measures for an assessment of biological resources, artificial nighttime lighting, construction noise, and pesticides associated with cannabis cultivation, as well as revising the mitigation measures for nesting birds, burrowing owl, and bats. 14-6

1) Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts, that special 14-7

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emphasis should be placed on environmental resources that are rare or unique to the region, and that significant environmental impacts of the proposed project are adequately investigated and discussed.

The DEIR and its supporting documents lack an adequate assessment of biological resources that may occupy the adjacent Whitewater River and the Airport Boulevard bridge. While the Project's Biological Resources Assessment (Biological Assessment), dated February 2024, describes some of the vegetation and land cover types supported within the Whitewater River (pages 17 and 18) and its ability to support local wildlife movement (pages 24 and 29), the DEIR and it supporting documents lack an analysis of the potential for the Airport Boulevard bridge to support nesting birds (see Nesting Birds section) and bats (see Bats section). The DEIR and its supporting documents also lack the results of focused surveys for burrowing owl within the Project site and adjacent Whitewater River (see Burrowing Owl section). Further, the DEIR lacks adequate analyses of the potential direct and indirect impacts of the Project associated with lighting (see Artificial Nighttime Lighting section) and noise (see Construction Noise section) on wildlife using the Whitewater River, including the Airport Boulevard bridge, and the vacant, vegetated parcel to the north. Compliance with CEQA is predicated on a complete and accurate description of the environmental setting that may be affected by the proposed Project. CDFW is concerned that without a complete and accurate description of the existing environmental setting, the DEIR likely provides an incomplete or inaccurate analysis of Project-related environmental impacts and whether those impacts have been mitigated to a level that is less than significant. Also, the single reconnaissance-level field survey on which much of the Biological Assessment was based was conducted on July 7, 2023. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period. 14-7 Cont.

CDFW recommends that the DEIR is revised to include the findings of a complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511). To be complete, the biological inventory needs to include a buffer area surrounding the Project site including the Whitewater River including the Airport Boulevard bridge. Based on findings from a recent biological inventory, CDFW recommends that the DEIR is revised to include an analysis of direct, indirect, and cumulative impacts to biological resources, including, but not limited to lighting and noise, and identification of appropriate avoidance, minimization, and mitigation measures. Recent and complete information on biological resources and analysis of a Project's direct, indirect, and cumulative impacts support the Lead Agency in developing appropriate avoidance, minimization, and mitigation measures to demonstrate that Project impacts to biological resources are avoided or reduced to below a level of significance.

CDFW recommends that the City of Coachella include in a revised DEIR the following mitigation measure: 14-8

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Mitigation Measure BIO-[A]: Assessment of Biological Resources

Prior to Project construction activities, a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas, including the Whitewater River, Airport Boulevard bridge, and the vacant, vegetated area to the north, with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511), will be completed. Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.

14-8 Cont.

Pursuant to the CEQA Guidelines, section 15097(f), CDFW has prepared a draft mitigation monitoring and reporting program (MMRP) in Attachment 1 for revised MM BIO-1, MM BIO-2, and MM BIO-3, as well as CDFW-recommended MM BIO-[A], MM BIO-[B], MM BIO-[C], and MM BIO-[D].

2) Nesting Birds

It is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.).

14-9

With regard to the CVMSHCP, per its associated Implementing Agreement (IA) and Permits from CDFW and the U.S. Fish and Wildlife Service (the Wildlife Agencies),

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Take associated with Covered Activities will not be in violation of the Migratory Bird Treaty Act and will be consistent with Fish and Game Code sections 3503 and 3503.5; therefore, all Covered Activities within and outside Conservation Areas must undertake measures to avoid the take of individuals, nests, and eggs of nesting birds. The CVMSHCP includes a general conservation measure that applies to all bird species to avoid impacts to habitat for nesting birds during the nesting season (CVMSHCP Section 9.7). Per IA Section 13.2, the City is obligated to ensure the projects to which it confers Take Authorization under the CVMSHCP comply with all terms and requirements of the CVMSHCP, the Wildlife Agencies' Permits that create the CVMSHCP, and the IA, including compliance with laws that protect nesting birds.

Page 4.4.24 of the DEIR indicates that "nesting birds and raptors have the potential to nest in shrubs and trees and/or burrow on bare ground throughout and near the Study Area." CDFW concurs that the Project site and surrounding areas, including the Whitewater River, contain suitable habitat for birds that nest on the ground and in shrubs and trees. The DEIR includes a Mitigation Measure BIO-1 for nesting birds, indicating that "to avoid disturbance of nesting and special-status bird species protected by the MBTA and CFGC, activities related to the Project, including but not limited to, vegetation removal, ground disturbance, and construction shall not occur during the bird breeding season (January 15 through August 31) unless a pre-construction nesting bird survey is conducted within seven days prior to ground disturbance." CDFW considers the mitigation measure for nesting birds in the DEIR to be inadequate in scope and timing to reduce impacts to nesting birds to a level less than significant. In alignment with the CVMSHCP's general conservation measure for nesting birds (CVMSHCP Section 9.7), CDFW recommends Project construction activities are conducted outside of the peak nesting bird season. CDFW also recommends the completion of nesting bird surveys *regardless* of the time of year to ensure that impacts to nesting birds and their nests and eggs are avoided. The timing of the nesting season varies greatly depending on several factors, such as bird species, weather conditions in any given year, and long-term climate changes (e.g., drought, warming, etc.). In response to warming, birds have been reported to breed earlier, thereby reducing temperatures that nests are exposed to during breeding and tracking shifts in availability of resources (Socolar et al., 2017[2]). CDFW staff have observed that climate change conditions may result in the nesting bird season occurring earlier and later in the year than historical nesting season dates. CDFW recommends that disturbance of occupied nests of migratory birds and raptors within the Project site and surrounding area be avoided any time birds are nesting on-site. CDFW therefore recommends the completion of nesting bird surveys *regardless of*

14-9 Cont.

[2] Socolar JB, Epanchin PN, Beissinger SR and Tingley MW (2017). Phenological shifts conserve thermal niches. Proceedings of the National Academy of Sciences 114(49): 12976-12981.

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the time of year to ensure compliance with all applicable laws pertaining to nesting and migratory birds. 14-9 Cont.

Additionally, the DEIR lacks an adequate discussion of the Project's potential direct, indirect, and cumulative impacts to nesting birds located within the Project site and within the adjacent Whitewater River including the Airport Boulevard bridge, which may provide suitable habitat for cliff swallows (*Petrochelidon pyrrhonota*). Cliff swallows can build nests within a week, and eggs can be laid before nests are completely finished. To avoid or reduce impacts to a level less than significant, CDFW recommends the DEIR is revised to include an analysis of impacts to nesting birds in the Whitewater River, including the Airport Boulevard bridge, and appropriate avoidance, minimization, and mitigation measures. For example, the Project may result in direct and indirect impacts to nesting birds occupying the bed, bank, and channel of the Whitewater River and the Airport Boulevard bridge through the introduction of artificial nighttime lighting during Project construction and/or long-term operations (see Artificial Nighttime Lighting section below), as well as noise associated with Project construction (see Construction Noise section below). 14-10

CDFW recommends that disturbance of occupied nests of migratory birds and raptors within the Project site and surrounding area be avoided **any time birds are nesting on-site.** CDFW recommends the City include a revised Mitigation Measure BIO-1 in a revised DEIR as follows, with additions in **bold** and removals in ~~strikethrough~~:

Mitigation Measure BIO-1: Nesting Birds

To the greatest extent feasible, the Project will avoid construction activities during the peak nesting season (February 1 through September 15). Regardless of the time of year, nesting bird surveys shall be performed by a qualified avian biologist no more than 3 days prior to vegetation removal or ground-disturbing activities. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Construction activities may not occur inside the established buffers, which shall remain on-site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. ~~Prior to issuance of the project's grading~~ 14-11

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~~permit, the following measures shall be implemented: To avoid disturbance of nesting and special-status bird species protected by the MBTA and CFGC, activities related to the project, including but not limited to, vegetation removal, ground disturbance, and construction shall not occur during the bird breeding season (January 15 through August 31) unless a preconstruction nesting bird survey is conducted within seven days prior to ground disturbance. A qualified biologist, who is familiar with the identification of avian species in the Coachella Valley, will conduct the preconstruction nesting bird survey within seven days prior to ground disturbance to evaluate the presence/absence, location, and status of any active nests on or adjacent to the Project Area. The extent of the survey area surrounding the Project Area shall be determined by the qualified biologist to ensure that direct and indirect effects to nesting birds are avoided. If an active nest(s) is discovered, a suitable buffer shall be established around the active nests, as determined by the biologist, and construction activity will not occur within the buffer until the biologist has determined that the nest is no longer active. Buffer size shall consider the species involved and relevant level of tolerance to adjacent activity, the location of the nest relative to proposed activities, and site conditions that naturally buffer the location, such as vegetation screening, topography, etc. If construction activities are delayed or paused for more than 14 days during the nesting season, the nest survey will be re-initiated for areas that still contain potential nesting habitat. No parking, storage of materials, or construction activities shall occur within this buffer until the qualified biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into this buffer shall occur only at the discretion of the qualified biologist, if it is determined that encroachment will not adversely impact the nesting birds.~~

14-11 Cont.

3) Burrowing Owl

On October 10, 2024, the Fish and Game Commission determined that western burrowing owl warrants protection as a candidate species under the California Endangered Species Act (Fish & G. Code, § 2050 et seq.). During the candidacy period, western burrowing owl will be afforded the same protection as threatened and endangered species under CESA. If Project activities, including relocation, could result in take, appropriate CESA authorization (i.e., Incidental Take Permit under Fish and Game Code section 2081) should be obtained prior to commencement of Project activities.

14-12

Take of individual burrowing owls and their nests or eggs is defined by Fish and Game Code section 86, and prohibited by sections 3503, 3503.5, and 3513. Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill." Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in

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the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.).

With regard to the CVMSHCP, the CDFW Natural Community Conservation Plan (NCCP) Permit #2835-2008-001-06 does not provide Take Authorization for burrowing owl individuals, nests, or eggs. To the contrary, section 3.5.6 of the NCCP Permit states burrowing owl "pairs or individuals will not be Taken" and reiterates that the "HCP/NCCP does not authorize Take of [burrowing owl] nests [or] eggs[.]" Therefore, throughout the CVMSHCP area—both within and without Conservation Areas—Permittees must ensure that activities occurring within their jurisdictions do not result in the take, possession, or destruction of burrowing owl individuals, nests, or eggs. Any activity occurring within the CVMSHCP area that results in the take of burrowing owl individuals, nests, or eggs would be unlawful and would not be a Covered Activity under the CVMSHCP. Per IA Section 13.2, the City is obligated to ensure the projects to which it confers Take Authorization under the CVMSHCP comply with all terms and requirements of the CVMSHCP, the Wildlife Agencies' Permits that create the CVMSHCP, and the IA, including compliance with laws that protect burrowing owls.

14-12 Cont.

Page 21 of the Project's Biological Assessment indicates that "no burrows or sign of burrowing owl was observed during the site reconnaissance. The soils and berms in the Study Area are relatively compacted and there is frequent human activity along the berms via work vehicles, however this species is known to nest in disturbed habitats. If ground squirrels were to colonize and create potential burrows there is a high likelihood that burrowing owls could inhabit the site. Burrowing owls are common along agricultural canals and drains in the Imperial and Coachella valleys. Several observations are documented in the vicinity of the site in similar habitats. Thus, this species has a moderate potential to occur within the scrub habitat throughout the Study Area and particularly the berms along the river." CDFW concurs that the Project site and surrounding area including the Whitewater River contain suitable nesting and foraging habitat for burrowing owl. However, the DEIR and Biological Assessment lack information on the protocols used to conduct the single field survey for burrowing owl and lack survey reports, including, for example, the qualifications of the surveyors, survey methods, a map of suitable burrows or burrow surrogates, etc. The Project's Biological Assessment only indicates that a reconnaissance-level field survey was conducted on July 7, 2023. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period. Given the DEIR's lack of findings from recent focused surveys for burrowing owl following the guidelines in the

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Staff Report on Burrowing Owl Mitigation,[3] the number and locations of suitable and occupied burrows within the Project site and surrounding areas including the Whitewater River are unknown. Given the lack of results from focused surveys for burrowing owl following recommended protocols and the lack of survey reports, CDFW is limited in its ability to provide biological expertise to support the City in reducing impacts to burrowing owl to a level less than significant. CDFW recommends that the DEIR is revised to include the results of four focused surveys for burrowing owl within the Project site and surrounding area, including survey reports[4], following the guidelines outlined in Appendix D of the *Staff Report on Burrowing Owl Mitigation* and to incorporate appropriate avoidance, minimization, and mitigation measures for burrowing owl. Given the presence of suitable habitat for burrowing owl within the Project site and surrounding areas including the Whitewater River, recent, focused surveys are needed to inform appropriate avoidance, minimization, and mitigation measures and support the City in avoiding or reducing impacts to burrowing owl to a level less than significant.

14-12 Cont.

The DEIR includes Mitigation Measure BIO-2, which generally aligns with Required Avoidance, Minimization, and Mitigation measures for burrowing owl under the CVMSHCP (Section 4.4). However, these measures are outdated and do not ensure that impacts to burrowing owl individuals and their nests and eggs will be avoided. To support the City in avoiding or reducing impacts to burrowing owl to a level less than significant, CDFW recommends that Mitigation Measure BIO-2 is revised with the following additions in **bold** and removals in ~~strikethrough~~:

Mitigation Measure BIO-2: Burrowing Owl Focused and Pre-Construction Surveys

14-13

Suitable burrowing owl habitat has been confirmed on the site; therefore, focused burrowing owl surveys shall be conducted by a CVMSHCP-approved Acceptable Biologist in accordance with the *Staff Report on Burrowing Owl Mitigation* (2012 or most recent version) prior to vegetation removal or ground-disturbing activities. If burrowing owls are detected during the focused surveys, the qualified biologist and Project proponent shall begin coordination with CDFW and USFWS immediately, and shall prepare a Burrowing Owl Avoidance and Monitoring Plan that shall be submitted to CDFW for review and approval prior to commencing Project activities. The Burrowing Owl Plan shall describe proposed

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[3] California Department of Fish and Game (CDFG). 2012. Staff report on burrowing owl mitigation. State of California, Natural Resources Agency. Available for download at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline

[4] Survey reports should include details on survey methods and results, including, but not limited to, the names and qualifications of surveyor(s); a description of survey methods; a description of the conditions of the project site and recent photos; map(s) showing the locations of all suitable burrows, occupied burrows, burrowing owls, and burrowing owl sign; descriptions of burrowing owl behavior observed; California Natural Diversity Database (CNDDB) field survey forms, etc. For more information, see Appendix D, Survey Reports, of the CDFW 2012 Staff Report on Burrowing Owl Mitigation.

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avoidance and monitoring actions, including measures necessary to avoid take of burrowing owl individuals, nests, and eggs. The Burrowing Owl Plan shall include the number and location of occupied burrow sites (occupied site means at least one burrowing owl or its sign has been observed within the last three years; may be indicated by owl sign including feathers, pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance or perch site), acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures. If impacts to occupied burrowing owl habitat or burrow(s) or burrowing owl individuals, nests, or eggs cannot be avoided, appropriate CESA authorization (i.e., Incidental Take Permit under Fish and Game Code section 2081) should be obtained from CDFW prior to commencement of Project activities.

Preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the *Staff Report on Burrowing Owl Mitigation* (2012 or most recent version). Preconstruction surveys should be repeated when there is a pause in construction of more than 30 days. Preconstruction surveys shall be performed by a CVMSHCP-approved Acceptable Biologist following the recommendations and guidelines provided in the *Staff Report on Burrowing Owl Mitigation.* If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and prepare a Burrowing Owl Avoidance and Monitoring Plan that shall be submitted to CDFW and USFWS for review and approval prior to commencing Project activities. ~~In accordance with Section 4.4 Required Avoidance, Minimization, and Mitigation Measures of the CVMSHCP, a pre-construction survey will be conducted within 500 feet of the project disturbance footprint to identify burrows that could be utilized by burrowing owl. Potentially suitable burrows shall be checked by a qualified biologist to see if they are occupied or not prior to the start of project disturbance activities. If the burrow is unoccupied, the burrow shall be made inaccessible to burrowing owl, and the project may proceed. If either a nesting or escape burrow is occupied, the burrowing owl shall be relocated pursuant to accepted CDFW protocols. A burrow is assumed occupied if records indicate that at least one burrowing owl has been observed occupying a burrow on site during the past three years. If there are no records for the site, surveys must be conducted to determine, prior to construction, if burrowing owl are present. Active burrows shall be avoided during the burrowing owl breeding season (January 15 to August 31) with an appropriate buffer zone as determined by a qualified biologist. If occupied burrows cannot be avoided, determination of the appropriate method of relocation, such as eviction/passive relocation or active relocation, shall be based on the specific site conditions (e.g. distance to nearest suitable habitat and presence of burrow) and in coordination with CDFW and the City. Passive relocation may only occur in the non-breeding season (September to January).~~

14-13 Cont.

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4) Bats

With regard to the suitability of the Project site and surrounding area to support bats, Page F-10 (Appendix F) of the Biological Assessment states that pallid bat (*Antrozous pallidus*), a California Species of Special Concern, "roosts in crevices of rock outcrops, caves, mine tunnels, buildings, *bridges*, and hollows of live and dead trees." Page F-10 of the Biological Assessment also indicates that Townsend's big-eared bat (*Corynorhinus townsendii*), a California Species of Special Concern, roosts in bridges, and "suitable roosting habitat associated [sic] occurs with the Airport Boulevard bridge in the southwest portion of the Study Area." CDFW concurs that the Airport Boulevard bridge may contain crevice habitat (e.g., expansion joints, cavities accessed via weep holes, etc.) that is suitable roosting habitat for these and other bridge-roosting bat species. CDFW also notes that bats have the potential to roost in cliff swallow nests that may be built on the Airport Boulevard bridge, as observed on other nearby bridges that cross the Whitewater River. Importantly, the DEIR and its supporting documents lack an assessment of potential roosting habitat for bats associated with the Airport Boulevard bridge, the findings of focused surveys associated with suitable bat roosting habitat, or an analysis and discussion of potential direct and indirect impacts of the Project, such lighting and noise, and appropriate avoidance, minimization, and mitigation measures. Without survey results and an impact analysis, CDFW is limited in its ability to provide biological expertise to support the City in avoiding or reducing impacts to special-status bats to a level less than significant. To support the City in reducing impacts to bats to a level less than significant, CDFW recommends the DEIR is revised to include the findings of a habitat assessment for suitable bat roosting habitat within the adjacent bridge, appropriate focused surveys (see recommended mitigation measure below), and an impact analysis, along with appropriate avoidance, minimization, and mitigation measures. 14-14

The DEIR and its supporting documents also lack the findings from focused surveys for western yellow bat (*Lasiurus xanthinus*), a California Species of Special Concern and CVMSHCP Covered Species, which have the potential to roost in the grove of fan palms (*Washingtonia* sp.) located just north of the proposed Project. Without findings from a habitat assessment and focused surveys, an impact assessment, and appropriate avoidance, minimization, and mitigation measures, the Project is at risk of impacting bats, such as the abandonment of roosting habitat or a maternity colony, which could result in the take of bats including special-status species.

In particular, CDFW recommends the DEIR is revised to include an analysis of Project impacts associated with artificial nighttime lighting on bats that may use the grove of fan palms and the Airport Boulevard bridge. Numerous studies have shown that direct lighting on roost structures can have profound negative effects on bats roosting in those structures. For example, the complete abandonment (or significant reduction of the bat population) at human-made structures used by roosting bats following the installation of 14-15

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bright artificial lighting has been documented on multiple occasions.[5,6] The intensity of the artificial light near the roost affected the bats' behavior during emergence more than the color of the light,[7] while the loss of bat colonies at structures that were newly illuminated was most apparent when light was applied in such a manner that there was no dark corridor for the bats to exit and return to the roost.[8]

Adverse effects from the illumination of a roost structure by artificial lights extend beyond simply having the potential to discourage further use of that structure by bats. Not only did bright artificial lighting at roosts delay the start of the emergence and/or prolong the duration of bats' emergence from that structure, but also juveniles at roost structures that were illuminated were significantly smaller than juveniles at roost structures that were not illuminated by bright artificial lights[9]. The smaller body masses of juveniles at illuminated sites may be attributed to the delayed emergences at those sites, which not only reduces the total foraging time available for lactating female bats (and later, juveniles learning to hunt) each night, but also causes those bats to miss the peak insect abundance that occurs at dusk, reducing their foraging efficiency. These findings suggest that even if a maternity colony chooses to remain at a newly illuminated roost site, juvenile survivorship is negatively affected, and therefore the reproductive success of those colonies could be severely compromised.

14-15 Cont.

Maintaining darkness at maternity roosts is particularly important because at these types of roosts, aggregations of bats are present consistently over a long period of time, individual bats emerge from predictable locations, and juvenile bats are learning how to

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[5] Boldogh, S.D., D. Dobrosi, and P. Samu. 2007. The Effects of the Illumination of Buildings on House-Dwelling Bats and Its Conservation Consequences. *Acta Chiropterologica* 9:527–534. doi:10.3161/1733-5329 (2007)9[527:TEOTIO]2.0.C;2.

[6] Rydell, J., J. Eklöf, and S. Sánchez-Navarro. 2017. Age of Enlightenment: Long-Term Effects of Outdoor Aesthetic Lights on Bats in Churches. *Royal Society Open Science* 4(8):161077. http://dx.doi.org/10.1098/rsos.161077.

[7] Downs, N.C., et al. 2003. The Effects of Illuminating the Roost Entrance on the Emergence Behavior of *Pipistrellus pygmaeus*. *Biological Conservation* 111:247–252. doi:10.1016/S0006-3207(02)00298-7

[8] Rydell, J., J. Eklöf, and S. Sánchez-Navarro. 2017. Age of Enlightenment: Long-Term Effects of Outdoor Aesthetic Lights on Bats in Churches. *Royal Society Open Science* 4(8):161077. http://dx.doi.org/10.1098/rsos.161077.

[9] Boldogh, S.D., D. Dobrosi, and P. Samu. 2007. The Effects of the Illumination of Buildings on House-Dwelling Bats and Its Conservation Consequences. *Acta Chiropterologica* 9:527–534. doi:10.3161/1733-5329 (2007)9[527:TEOTIO]2.0.C;2.

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fly.[10,11] Illumination of a maternity roost renders the colony more vulnerable to opportunistic predators such as raptors and owls, and predator-avoidance behaviors such as delayed emergence times reduce their foraging opportunities, thereby lowering juvenile survivorship. Suitable maternity roost sites are a limited resource, and if an alternate roost site is not available, extirpation of the entire colony could occur as a result of artificial lighting. Because bright artificial lighting at roost structures has significant negative effects on bats, including the potential for the extirpation of an entire maternity colony, the addition of lighting near an established roost needs to be considered during the environmental impact review process. CDFW recommends all Project lighting is shielded to ensure no overspill into the Whitewater River and the Airport Boulevard bridge or into the vacant, vegetated area to the north of the Project site where the grove of fan palms is located.

14-15 Cont.

The DEIR includes Mitigation Measure BIO-3 for bats indicating that "a special-status bat species emergence survey shall be conducted if construction activities are to occur within 300 feet of the California fan palm oasis during the bat maternity season (April 1 through August 31)." CDFW considers this measure to be inadequate in scope and timing to avoid or reduce impacts to bats to a level less than significant. For example, the mitigation measure does not address potential impacts to bats that may roost within the Airport Boulevard bridge. Further, multiple focused surveys are needed to determine if a potential roost site is occupied by bats. To reduce impacts to bats to a level less than significant, CDFW recommends the City revise Mitigation Measure BIO-3 with the following additions in **bold** and removals in ~~strikethrough~~:

14-16

Mitigation Measure BIO-3: Surveys for Daytime, Nighttime, Wintering (Hibernacula), and Maternity Roosting Sites for Bats

Prior to the initiation of Project activities within suitable bat roosting habitat—including both the Airport Boulevard bridge and the fan palm grove located north of the Project site—the City and Project proponent shall retain a qualified biologist to conduct focused surveys to determine presence of daytime, nighttime, wintering (hibernacula), and maternity roost sites. Two spring surveys (April through June) and two winter surveys (November through January) shall be performed by qualified biologists. Surveys shall be conducted during favorable weather conditions only. Each survey shall consist of one dusk emergence

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[10] Rydell, J., J. Eklöf, and S. Sánchez-Navarro. 2017. Age of Enlightenment: Long-Term Effects of Outdoor Aesthetic Lights on Bats in Churches. *Royal Society Open Science* 4(8):161077. http://dx.doi.org/10.1098/rsos.161077.

[11] Voigt, C.C., et al. 2018. *Guidelines for Consideration of Bats in Lighting Projects*. EUROBATS Publication Series No. 8. Bonn, Germany: UNEP/EUROBATS Secretaria.

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survey (start one hour before sunset and last for three hours), followed by one pre-dawn re-entry survey (start one hour before sunrise and last for two hours), and one daytime visual inspection of all potential roosting habitat on the Project site. Surveys shall be conducted within one 24-hour period. Visual inspections shall focus on the identification of bat sign (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks and bats squeaking and chattering). Bat detectors, bat call analysis, and visual observation shall be used during all dusk emergence and pre-dawn re-entry surveys.

If active maternity roosts are identified in the work area or 500 feet extending from the work area, Project construction will only occur between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost. Maternity roosts shall not be evicted, excluded, removed, or disturbed. If active hibernacula are identified in the work area or 500 feet extending from the work area, a minimum 500-foot no-work buffer shall be provided around wintering roosts (hibernacula). The buffer shall not be reduced. Project-related construction and activities shall not occur within 500 feet of or directly under or adjacent to hibernacula. Buffers shall be left in place until the end of Project construction and activities or until a qualified bat biologist determines that the hibernacula are no longer active. Project-related construction and activities shall not occur between 30 minutes before sunset and 30 minutes after sunrise. Hibernacula roosts shall not be evicted, excluded, removed, or disturbed during winter torpor (November to mid-February). If avoidance of a hibernacula is not feasible, the Project Biologist will prepare a relocation plan to remove the hibernacula and provide for construction of an alternative bat roost outside of the work area. A bat roost relocation plan shall be submitted for CDFW review and approval prior to construction activities. The qualified biologist will implement the relocation plan and new roost sites shall be in place before the commencement of any ground-disturbing activities that will occur within 500 feet of the hibernacula. New roost sites shall be in place prior to the initiation of Project-related activities to allow enough time for bats to relocate. Removal of roosts will be guided by accepted exclusion and deterrent techniques. The Project proponent shall compensate no less than 2:1 for permanent impacts to roosting habitat.

14-16
Cont.

~~A special-status bat species emergence survey shall be conducted if construction activities are to occur within 300 feet of the California fan palm oasis during the bat maternity season (April 1 through August 31). The emergence survey will be conducted in areas of suitable roosting habitat during the maternity season to document the presence of special-status bat species maternal roosting habitat. The emergence survey will be conducted 30 minutes before sunset and last for up to two hours after sunset. Any special-status bat species observed during the maternity roosting season within or adjacent to the Project Area should be avoided and provided a minimum buffer as determined by the qualified biologist (a 100-foot to 300-foot buffer is recommended) prior to the commencement of construction.~~

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5) Artificial Nighttime Lighting

Page 4.1-22 of the DEIR states that "implementation of the proposed Project has the potential to generate new sources of daytime glare and nighttime lighting onto and from the Project site from the following sources: glass interposed facades; lighting around and interior to the proposed buildings; internal vehicular circulation; security, walkway and street lighting; signage; and an on-site freeway-oriented electronic billboard that would be visible along SR 86." Regarding construction impacts associated with lighting, page 4.1-23 of the DEIR indicates that the "Project would adhere to the City's construction hour limitations and no nighttime construction would occur. However, there would be nighttime security lighting onsite, which would introduce a new source of nighttime lighting in the Project vicinity on currently vacant land and may result in a significant impact to surrounding receptors. Therefore, in order to minimize any potential light/glare impacts to sensitive uses, mitigation is required. Specifically, as provided for in Mitigation Measures AES-1 and AES-2, construction equipment staging and stockpile areas would be situated on the central and western portions of the Project site, away from Airport Boulevard and the neighboring existing residential uses, and all construction-related lighting would be down-directed toward the work areas and oriented away from adjacent uses and would consist of the minimal wattage necessary to provide safety at the construction site." Regarding operational impacts, page 4.1-23 states that "potential sources of nighttime lighting would include outdoor sources such as lighting for entryways, walkways, security lighting, and vehicle headlights. [...] These nighttime lighting sources could result in impacts related to off-site spill or glare." Mitigation Measures AES-1 and AES-2 focus on shielding lighting impacts from residential and non-residential areas near the Project site.

14-17

The DEIR lacks an analysis of direct, indirect, and cumulative impacts of artificial nighttime lighting, including impacts associated with construction and long-term operations, on biological resources including migratory birds that fly at night, burrowing owls, bats, and other nocturnal and crepuscular wildlife. See the Nesting Bird, Burrowing Owl, and Bats sections above highlighting examples of biological resources that could be negatively impacted by artificial nighttime lighting proposed by the Project. The Project site is located adjacent to the Whitewater River, the Airport Boulevard bridge, and a vacant, vegetated area to the north that includes a grove of fan palms—areas that provide suitable nesting, roosting, foraging, and refugia habitat for birds, migratory birds that fly at night, burrowing owls, bats, and other nocturnal and crepuscular wildlife. The Project's proposed artificial nighttime lighting has the potential to significantly and adversely affect wildlife in these vacant areas adjacent to the Project site. Artificial lighting alters ecological processes including, but not limited to, the temporal niches of species; the repair and recovery of physiological function; the measurement of time through interference with the detection of circadian and lunar and

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seasonal cycles; the detection of resources and natural enemies; and navigation.[12] Many species use photoperiod cues for communication (e.g., bird song[13]), determining when to begin foraging,[14] behavioral thermoregulation,[15] and migration.[16] Phototaxis, a phenomenon that results in attraction and movement towards light, can disorient, entrap, and temporarily blind wildlife species that experience it.[10]

14-17 Cont.

CDFW recommends that the DEIR is revised to include an analysis of the direct, indirect, and cumulative impacts of artificial nighttime lighting associated with Project construction and long-term operations on biological resources, and appropriate avoidance, minimization, and mitigation measures that will reduce impacts to less than significant.

To support the Project in avoiding, minimizing, and mitigating for the Project's direct and indirect impacts of artificial nighttime lighting, CDFW recommends that the City of Coachella include in a revised DEIR the following mitigation measure:

Mitigation Measure BIO-[B]: Artificial Nighttime Lighting

Throughout construction and the lifetime operations of the Project, the City and Project proponent shall eliminate all nonessential lighting throughout the Project area and avoid or limit the use of artificial light at night during the hours of dawn and dusk when many wildlife species are most active. The City and Project proponent shall ensure that all lighting for the Project is fully shielded, cast downward and directed away from surrounding open-space and agricultural areas, reduced in intensity to the greatest extent possible, and does not result in lighting trespass including glare into surrounding areas or upward into the night sky (see the International Dark-Sky Association standards at http://darksky.org/). The City and Project proponent shall ensure use of LED lighting with a correlated color temperature of 3,000 Kelvins or less, proper disposal of hazardous waste, and recycling of lighting that contains toxic compounds with a qualified recycler.

14-18

6) Construction Noise

Construction activities may result in substantial noise through road use, equipment, and

14-19

[12] Gatson, K. J., Bennie, J., Davies, T., Hopkins, J. 2013. The ecological impacts of nighttime light pollution: a mechanistic appraisal. Biological Reviews, 88.4: 912-927.
[13] Miller, M. W. 2006. Apparent effects of light pollution on singing behavior of American robins. The Condor 108:130–139.
[14] Stone, E. L., G. Jones, and S. Harris. 2009. Street lighting disturbs commuting bats. Current Biology 19:1123–1127.
[15] Beiswenger, R. E. 1977. Diet patterns of aggregative behavior in tadpoles of *Bufo americanus*, in relation to light and temperature. Ecology 58:98–108.
[16] Longcore, T., and C. Rich. 2004. Ecological light pollution - Review. Frontiers in Ecology and the Environment 2:191–198.

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other project-related activities. This may adversely affect wildlife species in several ways as wildlife responses to noise can occur at exposure levels of only 55 to 60 decibels (Barber et al. 2009). Anthropogenic noise can disrupt the communication of many wildlife species including frogs, birds, and bats (Sun and Narins 2005, Patricelli and Blickley 2006, Gillam and McCracken 2007, Slabbekoorn and Ripmeester 2008). Noise can also affect predator-prey relationships as many nocturnal animals such as bats and owls primarily use auditory cues (i.e., hearing) to hunt. Additionally, many prey species increase their vigilance behavior when exposed to noise because they need to rely more on visual detection of predators when auditory cues may be masked by noise (Rabin et al. 2006, Quinn et al. 2017). Noise has also been shown to reduce the density of nesting birds (Francis et al. 2009) and cause increased stress that results in decreased immune responses (Kight and Swaddle 2011). 14-19 Cont.

Page 4.4-24 of the DEIR indicates that the noise associated with Project construction activities may result in direct impacts to nesting birds located in close proximity to the Project area. CDFW notes that the Project may result in direct and indirect impacts associated with noise to biological resources occupying the adjacent Whitewater River, the Airport Boulevard bridge, and the vacant, vegetated parcel to the north of the Project area. The DEIR lacks additional analysis and discussion of the potential impacts of noise on biological resources in areas surrounding the Project area. As discussed in the Biological Resources section above, CDFW recommends the DEIR is revised to include an analysis of potential impacts to wildlife associated with construction noise and to incorporate appropriate avoidance, minimization, and mitigation measures. CDFW also recommends that the City include in a revised DEIR the following mitigation measure: 14-20

Mitigation Measure BIO-[C]: Construction Noise

During construction of the Project, the City shall restrict use of equipment to hours least likely to disrupt wildlife (e.g., not at night or in the early morning) and restrict use of generators except for temporary use in emergencies. Power to sites can be provided by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro-hydroelectric systems, or small wind turbine systems. The City shall ensure use of noise suppression devices such as mufflers or enclosure for generators. Sounds generated from any means must be below the 55-60 dB range within 50-feet from the source.

7) Cannabis-Specific Impacts on Biological Resources

There are many impacts to biological resources associated with cannabis cultivation, whether indoor or outdoor cultivation (i.e., pesticides, fertilizers/imported soils, water pollution, groundwater depletion, vegetation clearing, construction and other development in floodplains, fencing, roads, noise, artificial light, dams and stream crossings, water diversions, and pond construction). CDFW recommends that the City include in the DEIR an analysis of cannabis-specific impacts to biological resources that 14-21

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may result from the Project activities. Design specifications of cultivation structures should be included in the DEIR to demonstrate that the structures are fully enclosed structures with permanent walls/roof and impermeable floors.

Pesticides, Including Fungicides, Herbicides, Insecticides, and Rodenticides

Cannabis cultivation sites (whether indoor or outdoor) often use substantial quantities of pesticides, including fungicides, herbicides, insecticides, and rodenticides. Wildlife, including beneficial arthropods, birds, mammals, amphibians, reptiles, and fish, can be poisoned by pesticides after exposure to a toxic dose through ingestion, inhalation, or dermal contact (Fleischli et al. 2004, Pimentel 2005, Berny 2007). They can also experience secondary poisoning through feeding on animals that have been directly exposed to the pesticides. (Even if used indoors, rodenticides may result in secondary poisoning through ingestion of sickened animals that leave the premises or ingestion of lethally poisoned animals disposed of outside.) Nonlethal doses of pesticides can negatively affect wildlife; pesticides can compromise immune systems, cause hormone imbalances, affect reproduction, and alter growth rates of many wildlife species (Pimentel 2005, Li and Kawada 2006, Relyea and Diecks 2008, Baldwin et al. 2009). 14-21 Cont.

CDFW recommends minimizing use of synthetic pesticides, and, if they are used, to always use them as directed by the manufacturer, including proper storage and disposal. Toxic pesticides should not be used where they may pass into waters of the state, including ephemeral streams, in violation of Fish and Game Code section 5650(6). Anticoagulant rodenticides and rodenticides that incorporate "flavorizers" that make the pesticides appetizing to a variety of species should not be used at cultivation sites. Alternatives to toxic rodenticides may be used to control pest populations at and around cultivation sites, including sanitation (removing food sources like pet food, cleaning up refuse, and securing garbage in sealed containers) and physical barriers (e.g., sealing holes in roofs/walls). Snap traps should not be used outdoors as they pose a hazard to nontarget wildlife. Sticky or glue traps should be avoided altogether; these pose a hazard to nontarget wildlife and result in prolonged/inhumane death. California Department of Pesticide Regulation stipulates that pesticides must certain criteria to be legal for use on cannabis. For details, visit: https://www.cdpr.ca.gov/docs/cannabis/questions.htm; https://www.cdpr.ca.gov/docs/county/cacltrs/penfltrs/penf2015/2015atch/attach1502.pdf.

The DEIR lacks a discussion of whether the Project's cultivation activities will involve pesticides such as fungicides, herbicides, insecticides, and rodenticides. Because of the potential for Project activities to involve the use of pesticides in cannabis cultivation and other cannabis-related activities, CDFW recommends that the City include a mitigation measure conditioning the Project to development of a plan to avoid, minimize, and mitigate the impacts of pesticides used in cannabis cultivation. CDFW recommends that the City add the following mitigation measure to a revised DEIR: 14-22

Mitigation Measure BIO-[D]: Pesticides

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Prior to construction and issuance of any grading permit, the Project proponent shall develop a plan in consultation with the City. The plan shall be reviewed and approved by the City as a condition of project approval. The plan shall identify measures to avoid, minimize, or mitigate the impacts of pesticides used in cannabis cultivation, including fungicides, herbicides, insecticides, and rodenticides. The plan should include, but is not limited to, the following elements: (1) Proper use, storage, and disposal of pesticides, in accordance with manufacturers' directions and warnings. (2) Avoidance of pesticide use where toxic runoff may pass into waters of the State, including ephemeral streams. (3) Avoidance of pesticides that cannot legally be used on cannabis in the state of California, as set forth by the Department of Pesticide Regulation. (4) Avoidance of anticoagulant rodenticides and rodenticides with "flavorizers." (5) Avoidance of sticky/glue traps. (6) Inclusion of alternatives to toxic rodenticides, such as sanitation (removing food sources like pet food, cleaning up refuse, and securing garbage in sealed containers) and physical barriers.

14-22 Cont.

Artificial Light for Cannabis Operations

Cannabis cultivation operations often use artificial lighting or "mixed-light" techniques in greenhouse structures and indoor operations to increase yields. They also employ exterior lighting for security. If not disposed of properly, these lighting materials pose significant environmental risks because they contain mercury and other toxins (O'Hare et al. 2013). In addition to containing toxic substances, artificial lighting often results in light pollution, which has the potential to significantly and adversely affect biological resources (see previous section "Artificial Nighttime Lighting"). The DEIR does not specify whether artificial light will be used either indoors or outdoors for cannabis cultivation or whether building design will allow indoor light to escape. Because the Project is located immediately adjacent to riparian habitat associated with Whitewater River, and because of the potential for the use of artificial light to impact nocturnal wildlife species and migratory birds that fly at night, CDFW recommends the DEIR be revised to include an analysis of cannabis-specific impacts on biological resources and Mitigation Measure BIO-[B]: Artificial Nighttime Lighting. Light should not be visible outside of any structure used for cannabis cultivation.

14-23

Role of CDFW LSA Program in Cannabis Licensing

Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may adversely impact any river, stream, or lake. Department of Cannabis Control (DCC) requires cannabis cultivators to demonstrate compliance with Fish and Game Code section 1602 prior to issuing a cultivation license (Business and Professions Code, § 26060.1). To qualify for an Annual License from DCC, cultivators must have an LSA Agreement or written verification from CDFW that one is not needed. Cannabis cultivators may apply online for an LSA Agreement through EPIMS (Environmental Permit Information Management System; https://epims.wildlife.ca.gov) and learn more about permitting at

14-24

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https://wildlife.ca.gov/Conservation/Cannabis/Permitting. 14-24 Cont.

8) Landscaping

Page 4.10-25 of the DEIR states that "native plant materials and other drought-tolerant plants will be used in all non-turf areas of Project landscaping. Large expanses of lawn and other water-intensive landscaped areas will be kept to the minimum necessary and consistent with the functional and aesthetic needs of the Project, while providing soil stability to resist erosion." The DEIR lacks additional information on landscaping plans, such as a plant palette or planting locations. CDFW recommends that the DEIR include recommendations regarding landscaping from Section 4.0 of the CVMSHCP "Table 4-112: Coachella Valley Native Plants Recommended for Landscaping" (pp. 4-180 to 4-182; https://cvmshcp.org/plan-documents/). CDFW also recommends incorporation of water-wise concepts in any Project landscape design plans. In particular, CDFW recommends xeriscaping with locally native California species and installing water-efficient and targeted irrigation systems (such as drip irrigation). Native plants support butterflies, birds, reptiles, amphibians, small mammals, bees, and other pollinators that evolved with those plants. More information on native plants suitable for the Project location and nearby nurseries is available at Calscape: https://calscape.org/. Local water agencies/cities and resource conservation cities in your area may be able to provide information on plant nurseries that carry locally native species, and some facilities display drought-tolerant locally native species demonstration gardens. Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website: https://saveourwater.com/. 14-25

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals. 14-26

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. 14-27

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14-27 Cont.

(Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts to biological resources. CDFW concludes that the DEIR does not adequately identify or mitigate the Project's significant, or potentially significant, impacts to biological resources. CDFW also concludes that the DEIR lacks sufficient information for a meaningful review of impacts to biological resources, including a complete assessment of biological resources for special-status species, burrowing owl, and bats. CDFW recommends that a revised DEIR, including a complete assessment of biological resources be recirculated for public comment. The CEQA Guidelines indicate that recirculation is required when insufficient information in the DEIR precludes a meaningful review (§ 15088.5). CDFW recommends that revised and additional mitigation measures and analysis as described in this letter be added to a revised DEIR. 14-28

CDFW personnel are available for consultation regarding biological resources and strategies to avoid and minimize impacts. Questions regarding this letter or further coordination should be directed to Jacob Skaggs, Senior Environmental Scientist Specialist, at jacob.skaggs@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Kim Freeburn
84F02FFEEFD24C8...

Kim Freeburn
Environmental Program Manager

Attachment 1: MMRP for CDFW-Proposed Mitigation Measures

ec:

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September 4, 2025
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ATTACHMENT 1: MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

Mitigation Measures	Timing and Methods	Responsible Parties
Mitigation Measure BIO-[A]: Assessment of Biological Resources **Prior to Project construction activities, a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas, including the Whitewater River, Airport Boulevard bridge, and the vacant, vegetated area to the north, with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511), will be completed. Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-specific survey procedures should be developed in**	**Timing:** Prior to Project construction activities **Methods:** See Mitigation Measure	**Implementation**: City of Coachella and Project proponent **Monitoring and Reporting**: City of Coachella

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consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.		
Mitigation Measure BIO-1: Nesting Birds **To the greatest extent feasible, the Project will avoid construction activities during the peak nesting season (February 1 through September 15). Regardless of the time of year, nesting bird surveys shall be performed by a qualified avian biologist no more than 3 days prior to vegetation removal or ground-disturbing activities. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Construction activities may not occur inside the established buffers, which shall remain on-site until a qualified biologist determines the**	**Timing:** No more than 3 days prior to all vegetation removal or ground-disturbing activities throughout all phases of the Project. **Methods:** See Mitigation Measure	**Implementation**: City of Coachella and Project proponent **Monitoring and Reporting**: City of Coachella

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young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.		
Mitigation Measure BIO-2: Burrowing Owl Focused and Pre-Construction Surveys **Suitable burrowing owl habitat has been confirmed on the site; therefore, focused burrowing owl surveys shall be conducted by a CVMSHCP-approved Acceptable Biologist in accordance with the *Staff Report on Burrowing Owl Mitigation* (2012 or most recent version) prior to vegetation removal or ground-disturbing activities. If burrowing owls are detected during the focused surveys, the qualified biologist and Project proponent shall begin coordination with CDFW and USFWS immediately, and shall prepare a Burrowing Owl Avoidance and Monitoring Plan that shall be submitted to CDFW for review and approval prior to commencing Project activities. The Burrowing Owl Plan shall describe proposed avoidance and monitoring actions, including measures necessary to avoid take of burrowing owl individuals, nests, and eggs. The Burrowing Owl Plan shall include the number and location of occupied burrow sites (occupied site means at least one burrowing owl or its sign has been observed within the last three years; may be indicated by owl sign including feathers, pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance or perch site), acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other**	**Timing: Focused surveys:** Prior to vegetation removal or ground-disturbing activities for all phases of the Project. **Pre-construction surveys:** No less than 14 days prior to start of Project-related activities and within 24 hours prior to ground disturbance for all phases of the Project and when there is a pause in construction of more than 30 days. **Methods:** See Mitigation Measure	**Implementation**: City of Coachella and Project proponent **Monitoring and Reporting**. City of Coachella

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avoidance measures. If impacts to occupied burrowing owl habitat or burrow(s) or burrowing owl individuals, nests, or eggs cannot be avoided, appropriate CESA authorization (i.e., Incidental Take Permit under Fish and Game Code section 2081) should be obtained from CDFW prior to commencement of Project activities. **Preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the *Staff Report on Burrowing Owl Mitigation* (2012 or most recent version). Preconstruction surveys should be repeated when there is a pause in construction of more than 30 days. Preconstruction surveys shall be performed by a CVMSHCP-approved Acceptable Biologist following the recommendations and guidelines provided in the *Staff Report on Burrowing Owl Mitigation*. If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and prepare a Burrowing Owl Avoidance and Monitoring Plan that shall be submitted to CDFW and USFWS for review and approval prior to commencing Project activities.**		
Mitigation Measure BIO-3: Surveys for Daytime, Nighttime, Wintering (Hibernacula), and Maternity Roosting Sites for Bats **Prior to the initiation of Project activities within suitable bat roosting habitat—including both the Airport Boulevard bridge and the fan palm grove located north of the Project site—the City and Project proponent shall retain a qualified biologist to conduct focused surveys to determine presence of daytime, nighttime, wintering (hibernacula),**	**Timing:** Prior to initiation of Project activities. **Methods:** See Mitigation Measure	**Implementation**: City of Coachella and Project proponent **Monitoring and Reporting**: City of Coachella

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and maternity roost sites. Two spring surveys (April through June) and two winter surveys (November through January) shall be performed by qualified biologists. Surveys shall be conducted during favorable weather conditions only. Each survey shall consist of one dusk emergence survey (start one hour before sunset and last for three hours), followed by one pre-dawn re-entry survey (start one hour before sunrise and last for two hours), and one daytime visual inspection of all potential roosting habitat on the Project site. Surveys shall be conducted within one 24-hour period. Visual inspections shall focus on the identification of bat sign (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks and bats squeaking and chattering). Bat detectors, bat call analysis, and visual observation shall be used during all dusk emergence and pre-dawn re-entry surveys. **If active maternity roosts are identified in the work area or 500 feet extending from the work area, Project construction will only occur between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost. Maternity roosts shall not be evicted, excluded, removed, or disturbed. If active hibernacula are identified in the work area or 500 feet extending from the work area, a minimum 500-foot no-work buffer shall be provided around wintering roosts (hibernacula). The buffer shall not be reduced. Project-related construction and activities shall not occur within 500 feet of or directly under or adjacent to hibernacula. Buffers shall be left in place until the end of Project construction and activities or until a qualified bat biologist determines that the hibernacula are no longer active. Project-related construction and activities shall not occur between 30 minutes before sunset**		

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and 30 minutes after sunrise. Hibernacula roosts shall not be evicted, excluded, removed, or disturbed during winter torpor (November to mid-February). If avoidance of a hibernacula is not feasible, the Project Biologist will prepare a relocation plan to remove the hibernacula and provide for construction of an alternative bat roost outside of the work area. A bat roost relocation plan shall be submitted for CDFW review and approval prior to construction activities. The qualified biologist will implement the relocation plan and new roost sites shall be in place before the commencement of any ground-disturbing activities that will occur within 500 feet of the hibernacula. New roost sites shall be in place prior to the initiation of Project-related activities to allow enough time for bats to relocate. Removal of roosts will be guided by accepted exclusion and deterrent techniques. The Project proponent shall compensate no less than 2:1 for permanent impacts to roosting habitat.		
Mitigation Measure BIO-[B]: Artificial Nighttime Lighting **Throughout construction and the lifetime operations of the Project, the City and Project proponent shall eliminate all nonessential lighting throughout the Project area and avoid or limit the use of artificial light at night during the hours of dawn and dusk when many wildlife species are most active. The City and Project proponent shall ensure that all lighting for the Project is fully shielded, cast downward and directed away from surrounding open-space and agricultural areas, reduced in intensity to the greatest extent possible, and does not result in lighting trespass including glare into surrounding areas or upward into the night**	**Timing**: Throughout construction and the lifetime operations of the Project **Methods:** See Mitigation Measure	**Implementation**: City of Coachella and Project proponent **Monitoring and Reporting**: City of Coachella

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sky (see the International Dark-Sky Association standards at http://darksky.org/). The City and Project proponent shall ensure use of LED lighting with a correlated color temperature of 3,000 Kelvins or less, proper disposal of hazardous waste, and recycling of lighting that contains toxic compounds with a qualified recycler.		
Mitigation Measure BIO-[C]: Construction Noise **During construction of the Project, the City shall restrict use of equipment to hours least likely to disrupt wildlife (e.g., not at night or in the early morning) and restrict use of generators except for temporary use in emergencies. Power to sites can be provided by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro-hydroelectric systems, or small wind turbine systems. The City shall ensure use of noise suppression devices such as mufflers or enclosure for generators. Sounds generated from any means must be below the 55-60 dB range within 50-feet from the source**	**Timing**: During construction **Methods:** See Mitigation Measure	**Implementation**: City of Coachella and Project proponent **Monitoring and Reporting**: City of Coachella
Mitigation Measure BIO-[D]: Pesticides **Prior to construction and issuance of any grading permit, the Project proponent shall develop a plan in consultation with the City. The plan shall be reviewed and approved by the City as a condition of project approval. The plan shall identify measures to avoid, minimize, or mitigate the impacts of pesticides used in cannabis cultivation, including fungicides, herbicides, insecticides, and rodenticides. The plan should include, but is not limited to, the following elements: (1) Proper use, storage,**	**Timing**: Prior to construction and issuance of any grading permit **Methods:** See Mitigation Measure	**Implementation**: City of Coachella and Project proponent **Monitoring and Reporting**: City of Coachella

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and disposal of pesticides, in accordance with manufacturers' directions and warnings. (2) Avoidance of pesticide use where toxic runoff may pass into waters of the State, including ephemeral streams. (3) Avoidance of pesticides that cannot legally be used on cannabis in the state of California, as set forth by the Department of Pesticide Regulation. (4) Avoidance of anticoagulant rodenticides and rodenticides with "flavorizers." (5) Avoidance of sticky/glue traps. (6) Inclusion of alternatives to toxic rodenticides, such as sanitation (removing food sources like pet food, cleaning up refuse, and securing garbage in sealed containers) and physical barriers.		

Response to Comment Letter 14

Kim Freeburn, Environmental Program Manager
California Department of Fish and Wildlife
September 4, 2025

14-1 This comment includes a general introduction and does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

14-2 This comment discusses CDFW's role as California's Trustee Agency and a Responsible Agency under CEQA. Comment noted that CDFW is submitting comments as a Responsible Agency under CEQA and may need to exercise regulatory authority as provided by the Fish and Game Code. The Comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines.

14-3 This comment includes a general summary of the proposed Project, its objectives, location, and timeframe and does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

14-4 The commenter asserts that the DEIR has not adequately identified and disclosed the Project's direct, indirect, and cumulative impacts on biological resources. The commenter also concludes that the DEIR lacks sufficient information to facilitate a meaningful review by CDFW. The commenter requests that additional information and analyses be added to a revised DEIR.

The comment is overly broad and cannot be addressed in detail. Responses to individual issues raised by the commenter are addressed below.

14-5 The commenter expresses a concern that the assessment of the existing environmental setting has not been adequately analyzed in the DEIR. The commenter states that the DEIR lacks a complete assessment of biological resources associated with nesting birds, burrowing owls, and bats within the Project site and surrounding areas.

As confirmed in the Biological Resources Responses to Comments Technical Memorandum (provided as Attachment C2 of this FEIR), the assessment of the existing environmental setting associated with the Project site is provided in Section 4.4.1 on pages 4.4-1 through 4.4-16 of the DEIR. The assessment is adequate as required by CEQA. These issues are discussed as responses to individual comments further below.

14-6 The commenter states that CDFW is concerned that the Mitigation Measures proposed in the DEIR are not adequate to avoid or reduce impacts to biological resources to below a level of significance. The comment is overly broad. Individual issues are discussed below.

14-7 The commenter states that the DEIR and its supporting documents lack an adequate assessment of biological resources that may occupy the adjacent Whitewater River and the

Airport Boulevard bridge. Specifically, the commenter states that the DEIR lacks the following: 1) an analysis of the potential for the Airport Boulevard bridge to support nesting birds and bats, 2) the results of focused burrowing owl surveys within the Project site and adjacent Whitewater River, 3) adequate analysis of the potential direct and indirect impacts of the Project associated with lighting, and 4) adequate analysis of the potential direct and indirect impacts of the Project associated with noise on wildlife using the Whitewater River, including the Airport Boulevard bridge, and the vacant, vegetated parcel to the north.

The DEIR contains an assessment of the Project's Study Area (Project site and a 300-foot surrounding buffer) that includes much of the width of the Whitewater River/Coachella Valley Stormwater Channel and the Airport Boulevard bridge. The Airport Boulevard bridge is outside of the Project site and would not be impacted by the Project. As stated on page 4.4-24 of the DEIR, direct impacts may occur if active nests are located near the Project site and are abandoned due to visual and/or acoustic Project-related actions such as construction noise, lighting, and fugitive dust. These impacts could lead to individual mortality and/or harassment that might reduce nesting success. Additionally, as stated on page 4.4-25 of the DEIR, direct impacts to western yellow bat may occur if an active roost is located within the California fan palm oasis that occurs just north of the Project area, due to visual and/or acoustic Project-related disturbance. In addition, as discussed in Response 4-5 and shown in Section 3.0, Errata, of this FEIR, MM BIO-3 will be clarified to include the Airport Boulevard bridge since it is included as an area of suitable roosting habitat. Therefore, as noted in the Project's BRA and DEIR, these impacts would be reduced to less than significant through implementation of MM BIO-1 (Nesting Bird Avoidance/Pre-construction Surveys), MM BIO-3 (Emergence Bat Survey), MM BIO-5 (Worker Environmental Awareness Program), and MM BIO-8 (Standard Construction Best Management Practices). Further responses regarding each species are provided below.

Additionally, the commenter recommends the DEIR be revised to include the findings of a complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including Special Species of Concern ("SSC") and California Fully Protected Species. The commenter recommends a biological inventory include a buffer area surrounding the Project including the Whitewater River and Airport Boulevard bridge. The commenter recommends the DEIR be revised to include an analysis of direct, indirect, and cumulative impacts to biological resources, including, but not limited to lighting and noise, and identification of appropriate avoidance, minimization, and Mitigation Measures.

As described in Section 2.5 Literature and Database Review of the BRA, the biological resources within a Study Area comprising the Project site plus a 300-foot buffer were analyzed, which is standard practice for a biological reconnaissance survey. Figures 2, 4, 5, 6, and 7 of the BRA show that the Study Area included much of the width along the portion of the Whitewater River that is adjacent to the Project site as well as the Airport Boulevard bridge crossing over the Whitewater River. Therefore, the Study Area described in the BRA and DEIR is adequate.

Based on the Attachment C2 of this FEIR, Project site conditions have not appreciably changed since the time of the field reconnaissance survey. The commenter provides no evidence to suggest any changes or any reason to believe that the inventory is inaccurate as to current conditions on the site, and an updated field reconnaissance survey would not likely result in substantial changes to the BRA's or DEIR's observed species lists, described vegetation communities, presence or absence of potentially jurisdictional waters, or determination of habitat suitability for special-status species with at least some potential to occur on or adjacent to the Project site. Therefore, no further action is recommended.

14-8 The commenter suggests adding the following Mitigation Measure addressing the assessment of Biological Resources to the DEIR:

"Prior to Project construction activities, a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas, including the Whitewater River, Airport Boulevard bridge, and the vacant, vegetated area to the north, with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511), will be completed. Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-species survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to 3 years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, of if surveys are completed during periods of drought."

As noted in Response 14-7, there is a low potential for findings from the July 7, 2023, field reconnaissance survey to appreciably change with an updated reconnaissance survey. Therefore, the addition of the Mitigation Measure suggested above is not warranted.

14-9 The commenter quotes the relevant sections of the Fish and Game Code related to nesting birds, and summarizes Take authorization under the CVMSHCP. The commenter concurs that the Project site and surrounding areas, including the Whitewater River, contain suitable habitat for birds that nest on the ground and in shrubs and trees, as confirmed in the Draft EIR. However, the commenter considers Mitigation Measure BIO-1 to be inadequate in scope and timing to reduce impacts to nesting birds to a level less than significant. The commenter recommends the completion of nesting bird surveys regardless of the time of year to ensure that impacts to nesting birds and their nests and eggs are avoided.

As noted in Section 4.4, Biological Resources, of the DEIR and in Attachment C2 of this FEIR, no state listed threatened or endangered birds were detected within the Study Area. As discussed in Response 4-3 of this FEIR in response to a similar comment made by the USFWS,

MM BIO-1 has been revised in order to clarify and amplify this MM and facilitate its adequacy in protecting nesting birds. This comment is further addressed in Response 14-11 below.

14-10 The commenter states that the DEIR lacks an adequate discussion of the Project's potential direct, indirect, and cumulative impacts to nesting birds located within the Project site and within the adjacent Whitewater River, including the Airport Boulevard bridge, which may provide suitable habitat for cliff swallow (*Petrochelidon pyrrhonota*), and requires additional mitigation.

The impact analysis in Section 4.4.3 of the DEIR contains an analysis of impacts to nesting birds within both the Project site and areas near the Project site, which include both the Whitewater River and the Airport Boulevard bridge. This comment is further addressed in Response 14-11 below.

14-11 The commenter recommends that disturbance of occupied nests of migratory birds and raptors within the Project site and surrounding area be avoided any time birds are nesting on-site. The commenter recommends updates to Mitigation Measure BIO-1 (Nesting Birds). As noted in Attachment C2 and Section 3.0, Errata, of this FEIR, and as discussed in Response 4-3 of this FEIR in response to a similar comment made by the USFWS regarding the scope and timing to reduce impacts to nesting birds, Mitigation Measure BIO-1 has been updated with some of the commenter's suggested language in order to clarify and amplify this Mitigation Measure and facilitate its adequacy in protecting nesting birds. The recommended updated Mitigation Measure BIO-1, Nesting Bird Avoidance/Pre-construction Surveys is as follows:

"Prior to issuance of the Project's grading permit, the following measures shall be implemented:

To avoid disturbance of nesting and special-status bird species protected by the MBTA and CFGC, activities related to the Project, including but not limited to, vegetation removal, ground disturbance, and construction shall not occur during the bird breeding season (January 15 through August 31) unless a pre-construction nesting bird survey is conducted within three ~~seven~~ days prior to vegetation removal or ground disturbance.

A qualified biologist, who is familiar with the identification of avian species in the Coachella Valley, will conduct the preconstruction nesting bird survey within three ~~seven~~ days prior to vegetation removal or ground disturbance to evaluate the presence/absence, location, and status of any active nests on or adjacent to the Project Area. The extent of the survey area surrounding the Project Area shall be determined by the qualified biologist to help ensure that direct and indirect effects to nesting birds are avoided. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist will make every effort to avoid potential nest predation as a result of survey efforts. If an active nest(s) is discovered, a suitable buffer shall be established around the active nests, as determined by the biologist, and construction activity will not occur within the buffer until the biologist has determined that the nest is no longer active. Buffer size shall

consider the species involved and relevant level of tolerance to adjacent activity, the location of the nest relative to proposed activities, and site conditions that naturally buffer the location, such as vegetation screening, topography, etc. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged, the nest is no longer active, or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If construction activities are delayed or paused for more than 14 days during the nesting season, the nest survey will be re-initiated for areas that still contain potential nesting habitat. No activities shall occur within this buffer until the qualified biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into this buffer shall occur only at the discretion of the qualified biologist, if it is determined that encroachment will not adversely impact the nesting birds."

This change has been made to Section 4.4, *Biological Resources,* page 4.4-26 of the DEIR and is reflected in Section 3.0, Errata, of the Final EIR.

14-12 The commenter summarizes the Fish and Game Commission's determination that western burrowing owl warrants protection as a candidate species under CESA, which affords the same protection as threatened and endangered species under CESA, and states if Project activities, including relocation, could result in take, appropriate CESA authorization (i.e., Incidental Take Permit under Fish and Game Code section 2081) should be obtained prior to commencement of Project activities.

The commenter further states that throughout the CVMSHCP area, Permittees must ensure that activities occurring within their jurisdictions do not result in the take, possession, or destruction of burrowing owl individuals, nests, or eggs, and that any such activity is unlawful and would not be a Covered Activity under the CVMSHCP.

The commenter concurs that the Project site and surrounding area including the Whitewater River contain suitable nesting and foraging habitat for burrowing owl.

As noted in Section 4.4, Biological Resources, of the DEIR and in Attachment C2 of this FEIR, Section 4.4 of the CVMSHCP requires burrowing owl surveys in CVMSHCP Conservation Areas. The Project site is outside of a Conservation Area; therefore, focused burrowing owl surveys are not required by the CVMSHCP for the Project. Although the commenter notes that, since the time of the field reconnaissance survey (July 7, 2023), and as described in CDFW's comment above, burrowing owl has been listed by the California Fish and Game Code Commission as a candidate species for listing under CESA, the potential listing does not change the provisions of the MSHCP or the impact analysis and conclusions set forth in the DEIR. The City will enforce the MSHCP provisions, and with implementation of Mitigation Measure BIO-2 as clarified in this FEIR, significant impacts to burrowing owls will be avoided. In addition, there was no sign or burrows onsite during the biological resources field survey. This comment is further addressed in Response 14-13 below.

14-13 The commenter notes the DEIR includes Mitigation Measure BIO-2, which generally aligns with Required Avoidance, Minimization, and Mitigation measures for burrowing owl under the CVMSHCP (Section 4.4). However, the commenter states these measures are outdated and do not ensure that impacts to burrowing owl individuals and their nests and eggs will be avoided.

The biological resource field survey found no burrowing owl or their sign, and no burrows on the Project site. The commenter provides no evidence that the species occupies the site. The site is not located in a CVMSHCP Conservation Area. MM BIO-2 requires pre-construction surveys for the species. If the species were to locate on the site, the required pre-construction surveys would identify them, and cause Project activities, including grubbing prior to grading, to stop until such time as a mitigation program, including a relocation if needed, was reviewed and implemented by CDFW, thereby eliminating the potential for Take of the species on the Project site. The City is complying with the requirements of both the CVMSHP and CESA by requiring MM BIO-2, and no change is required to assure protection of the species on the site. In order to provide clarity and direction, MM BIO-2 has been modified to explicitly cite the CDFW Staff Report as the correct protocol, and to prohibit Project activities until mitigation or avoidance measures are implemented, should the species be identified on site.

Based on the comments provided, MM BIO-2 will be revised as follows:

"BIO-2 Burrowing Owl Pre-construction Survey

In accordance with Section 4.4 Required Avoidance, Minimization, and Mitigation Measures of the CVMSHCP, a pre-construction burrowing owl surveys shall~~will~~ be conducted by a qualified biologist no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the Staff Report on Burrowing Owl Mitigation (2012 or most recent version). Pre-construction surveys shall be conducted within 500 feet of the Project disturbance footprint to identify burrows that could be utilized by burrowing owl. Potentially suitable burrows shall be checked by a qualified biologist to see if they are occupied or not prior to the start of Project disturbance activities. If the burrow is unoccupied, the burrow shall be made inaccessible to burrowing owl, and the Project may proceed. If either a nesting or escape burrow is occupied, Project activities shall be immediately halted within 500 feet of the burrow. The qualified biologist shall coordinate with CDFW and USFWS and prepare a Burrowing Owl Avoidance and Monitoring Plan that shall be submitted to CDFW and USFWS for review and approval prior to re-commencing Project activities within the restricted area ~~the burrowing owl shall be relocated pursuant to accepted CDFW protocols~~. A burrow is assumed occupied if records indicate that at least one burrowing owl has been observed occupying a burrow on site during the past three years. For ground-disturbing activities, pre-construction surveys should be repeated when there is a pause in construction of more than 30 days. ~~If there are no records for the site, surveys must be conducted to determine, prior to construction, if burrowing owl are present. Active burrows shall be avoided during the burrowing owl breeding season (January 15 to August 31) with an appropriate buffer zone as determined by a qualified biologist. If occupied burrows cannot be avoided, determination of the appropriate method of relocation, such as eviction/passive relocation or active relocation, shall be based on the specific site conditions (e.g., distance to~~

~~nearest suitable habitat and presence of burrow) in coordination with CDFW and the City. Passive relocation may only occur in the non-breeding season (September to January)~~.

This change has been made to Section 4.4, *Biological Resources,* page 4.4-26 of the DEIR and is reflected in Section 3.0, Errata, of the Final EIR. It should be noted that this change does not constitute significant new information requiring recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5. Rather, it serves only to clarify or amplify information already presented in the DEIR and/or the respective technical studies.

14-14 The commenter notes the BRA's language describing known roosting habitats of special-status bat species having potential to occur onsite and concurs that the Airport Boulevard bridge may contain crevice habitat that is suitable roosting habitat for these and other bridge-roosting bat species. The commenter states that the DEIR lack an assessment of potential roosting habitat for bats associated with the Airport Boulevard bridge, the findings of focused surveys associated with suitable bat roosting habitat, or an analysis and discussion of potential direct and indirect impacts of the Project, such appropriate avoidance, minimization, and mitigation measures.

The commenter also suggests the DEIR also include focused surveys for western yellow bat (CVMSHCP-Covered Species, SSC), which has the potential to roost in the grove of fan palms (*Washingtonia* sp.) located just north of the Project site.

As noted on page 4.4-25 of the DEIR, and in Attachment C2 of this FEIR, western yellow bat is a covered species under the CVMSHCP, and the CVMSHCP does not require focused bat surveys. Mitigation Measure BIO-3 requires a special-status bat species emergence survey if construction activities are to occur within 300 feet of the California fan palm oasis during the bat maternity season (April 1 through August 31). The emergence survey will be conducted in areas of suitable roosting habitat, which also include the Airport Boulevard bridge, during the maternity season to document the presence of special-status bat species maternal roosting habitat. Mitigation Measure BIO-3 also requires that any special-status bat species observed during the maternity roosting season within or adjacent to the Project area be avoided and provided a minimum buffer as determined by the qualified biologist (a 100-foot to 300-foot buffer is recommended) prior to the commencement of construction. Implementation of Mitigation Measure BIO-3 adequately reduces potential impacts to special-status bat species to less than significant levels. Therefore, no revisions to DEIR are warranted relative to this comment, other than the clarification that the Airport Boulevard Bridge will be included in the areas subject to emergence survey required under Mitigation Measure BIO-3.

14-15 The commenter recommends the DEIR be revised to include an analysis of Project impacts associated with artificial nighttime lighting on bats that may use the grove of fan palms and the Airport Boulevard bridge.

The Project site is located immediately west of SR 86, which produces significant existing light sources from travelers on that roadway. Potential Project lighting impacts are described in Section 4.1, Aesthetics, on pages 4.1-22 and 4.1-23 of the DEIR. Specifically, page 4.1-23 of the DEIR states that all light sources in the Project site's parking areas, walkways and on the

exterior of proposed buildings would be shielded downwards and use of building materials on the Project site would be required to minimize glare. As such, light spill would not be permitted to occur, and the Project's compliance with City regulations and standards including the Coachella Municipal Code Chapters 16.28.150(L), *Improvements and Grading*, and Chapter 17.56.010(J)(2)(e), *Glare from Signs*, and lighting requirements in Chapter 17.60, *Development Standards,* would maintain appropriate and safe lighting levels onsite while minimizing light and glare on adjacent properties. Additionally, pages 4.4-24 and 4.4-25 of the DEIR include a description of potential Project impacts to nesting birds and bats due to visual (which includes lighting) and/or acoustic Project-related disturbance. Mitigation Measure AES-2 of the DEIR requires the construction contractor to locate and aim all construction-related nighttime security lighting away from adjacent uses, including both residential and non-residential areas neighboring the Project site. Additionally, Mitigation Measure BIO-8 requires, among other standard construction Best Management Practices, any construction lighting to be directed toward the work area and away from adjacent habitats. Therefore, no revisions to the DEIR are warranted relative to this comment.

14-16 The commenter considers Mitigation Measure BIO-3 in the DEIR to be inadequate in scope and timing to avoid or reduce impacts to bats to a level less than significant, and recommends updates to the Mitigation Measure.

Please see Response 14-14. Mitigation Measure BIO-3 as written will facilitate avoidance of special-status bat species during the maternity roosting season with establishment of a 100-foot to 300-foot buffer should any special-status bat species be detected. Additionally, the Project would not directly impact suitable habitat for special-status bat species. As shown on Figure 5 of the BRA and Exhibit 4.4-1 of the DEIR, the California fan palm oasis is located outside and north of the Project site, and the Airport Boulevard bridge is located outside and southwest of the Project site. Therefore, the analysis and proposed Mitigation Measures in the BRA and DEIR are adequate to reducing impacts to special-status bats to less than significant. No additional actions are recommended.

14-17 The commenter states that the DEIR lacks an analysis of direct, indirect, and cumulative impacts of artificial nighttime lighting, including impacts associated with construction and long-term operations, on biological resources including migratory birds that fly at night, burrowing owls, bats, and other nocturnal and crepuscular wildlife. The comment further states that the Project's proposed artificial nighttime lighting has the potential to significantly and adversely affect wildlife in vacant areas adjacent to the Project site.

See Response 14-15. Potential direct and indirect Project lighting impacts are described in Section 4.1, Aesthetics, on pages 4.1-22 and 4.1-23 of the DEIR and potential cumulative Project lighting impacts are described on pages 4.1-25 and 4.1-26. Project compliance with City regulations and standards related to artificial nighttime lighting and Mitigation Measures described above and in the DEIR would reduce any potential direct, indirect, and/or cumulative artificial nighttime lighting impacts to biological resources to less than significant. No additional analysis or Mitigation Measures are warranted.

14-18 The commenter suggests the City add a new mitigation measure related to potential artificial light impacts associated with the Project.

See Response 14-15. No additional analysis or Mitigation Measures are warranted.

14-19 The commenter states that construction activities may result in substantial noise through road use, equipment, and other Project-related activities, which may adversely affect wildlife species in several ways as wildlife responses to noise can occur at exposure levels of only 55 to 60 decibels. The commenter further cites several studies that describe how noise can impact wildlife. Refer to Response 14-20, below. This comment does not warrant changes to the DEIR. The Comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines.

14-20 The commenter acknowledges page 4.4-24 of the DEIR indicates that the noise associated with Project construction activities may result in direct impacts to nesting birds located near the Project site. CDFW notes that the Project may result in direct and indirect impacts associated with noise to biological resources occupying the adjacent Whitewater River, the Airport Boulevard bridge, and the vacant, vegetated parcel to the north of the Project area. The commenter states that the DEIR lacks additional analysis discussion of the potential impacts of noise on biological resources in areas surrounding the Project area. CDFW recommends the DEIR be revised to include an analysis of potential impacts to wildlife associated with construction noise and to incorporate appropriate avoidance, minimizations, and Mitigation Measures. Specifically, the commenter recommends the inclusion of Mitigation Measure BIO-[C]: Construction Noise, which would require the City to ensure the use of noise suppression devices for generators for temporary use in emergencies and to restrict the use of construction equipment to hours least likely to disrupt wildlife (e.g., not at night or in the early morning).

As noted in Attachment C2 of this FEIR, pages 4.4-24 and 4.4-25 of the DEIR state that direct impacts may occur if active nests are located near the Project site and are abandoned due to visual and/or acoustic Project-related actions such as construction noise, lighting, and fugitive dust. These impacts could lead to individual mortality and/or harassment that might reduce nesting success. Therefore, impacts to special-status birds and raptors would be potentially significant without mitigation. Additionally, page 4.4-25 of the DEIR states that direct impacts to western yellow bat may occur if an active roost is located within the California fan palm oasis that occurs just north of the Project site, due to visual and/or acoustic Project-related disturbance. Impacts to special-status bat species would be considered significant without mitigation. Section 4.13, Noise, on pages 4.13-1 through 4.13-28 of the DEIR contains an analysis of potential noise impacts associated with the Project and Mitigation Measures that would reduce Project noise impacts to less than significant levels. Cumulatively, implementation of the revised Mitigation Measure BIO-1 and Mitigation Measure BIO-2 described above, the rest of the Mitigation Measures in Section 4.4, Biological Resources, of the DEIR, and the noise Mitigation Measures described within Section 4.13, Noise, of the DEIR, would reduce noise impacts associated with the Project to biological resources to less than significant levels. Therefore, the existing analysis in the DEIR, the revised Mitigation Measure BIO-1 and Mitigation Measure BIO-2 described above, the rest of the Mitigation Measures in

Section 4.4, and the Mitigation Measures in Section 4.13 of the DEIR are adequate to mitigate noise impacts to biological resources in accordance with CEQA. No additional analysis or Mitigation Measures, including Mitigation Measure BIO-[C] as proposed by the commenter, are warranted.

14-21 The commenter lists a number of impacts to biological resources associated with cannabis cultivation, including pesticides, fertilizers/imported soils, water pollution, groundwater depletion, vegetation clearing, construction and other development in floodplains, fencing, roads, noise, artificial light, dams and stream crossings, water diversions, and pond construction, as applicable to the Project. CDFW recommends that the DEIR includes an analysis of cannabis-specific impacts to biological resources that may result from Project activities. First, any potential cannabis operations would be located within buildings constructed on the Project site, thus avoiding the potential impacts described in this comment.

Moreover, the implementation and operations of a Conditionally Approved Cannabis operation would be required to comply with the State and Local regulatory requirements that would avoid impacts to biological resources, which include:

Public Resources Code (PRC) §1602 prohibits the diversion or obstruction of any bed, channel, or bank of, any river, stream or lake

1) PRC §5650 prohibits discharge of cannabis irrigation water into any Waters of the State
2) PRC §5652 prohibits disposal of cannabis waste near any body of water
3) Public Resources Code (PRC) §12029(b) establishes a watershed enforcement program

In addition to mandatory State regulations associated with Commercial or Retail Cannabis uses, local regulations would include the following standard regulatory requirements preventing impacts to surface and groundwater or on-site native vegetation:

1) Cannabis waste material shall be handled separate of solid waste collection services (trash, recyclable, organics) unless alternative disposal method approved by the State Department of Cannabis Control (DCC)
2) Cannabis waste material shall be housed in a locking enclosure that is not accessible to unauthorized, individuals including the public.
3) Installation of a backflow device on all common-area buildings and at each irrigation water connection shall be required in order to prevent groundwater contamination. The backflow device must be in compliance with City of standards and specifications.[7]

[7] City of Coachella Municipal Code, Article VI: Chapter 13.03 – Water Service Systems. https://library.municode.com/ca/coachella/codes/code_of_ordinances?nodeId=TIT13PUSE_CH13.03WASESY (accessed February 25, 2026)

In addition to the aforementioned potential environmental impacts, the commenter lists additional impacts that are not applicable to the Project.

1) Fencing: The Project does not propose fencing that would obstruct or divert any river, stream, lake, or other body of water.
2) Roads: The Project would construct, and dedicate public Rights-of-Way, in accordance with the City's road standards. The Project would not construct any roads that obstruct or divert any river, stream, lake, or other body of water.
3) The Project would not create sources of artificial lighting creating impacts to wildlife or wildlife corridors. Refer to Section 4.1 of the DEIR for a more detailed discussion of lighting impacts.
4) The Project is not located near any dams, stream crossing, or ponds. As such, the Project would not impact such resources from any potential Retail or Commercial cannabis operations. Refer to Section 4.4 of the DEIR for a more detailed discussion of impacts to wetlands or riparian features.

Additional operational odor impacts could result from future commercial cannabis operations, which have the potential to create significant odor impacts to nearby sensitive receptors. As discussed in Responses 14-21 and 14-22, any future commercial or retail cannabis uses would be subject to State and local regulations, including SCAQMD Rule 402, Coachella Municipal Code § 5.68.040(P), and Coachella Municipal Code Chapter 5.68.130, *Operating Standards, (C) Odor Control*. As such, with compliance with applicable regional and local cannabis-related regulations, this impact would be less than significant

14-22 The commenter states the DEIR lacks discussion of whether the Project's cultivation activities will involve pesticides such as fungicides, herbicides, insecticides, and rodenticides. Because of the potential for Project activities to involve the use of pesticides in cannabis cultivation and other cannabis-related activities, the commenter requests the addition of a mitigation measure specifically related to pesticides.

Should cannabis uses occur on the Project site, a Cannabis Cultivator license would be required from the Department of Cannabis Control (DCC). Pursuant to Business and Professions Code (BPC) §26060(c), the DCC has developed guidelines and regulations for the use of pesticides in the cultivation of cannabis and residue in harvested cannabis.

In April 2025, the DCC adopted the Medicinal & Adult Use Cannabis Regulations which includes Article 5, §15719 requiring residual pesticide testing for all cultivated cannabis products. In addition, the Department of Pesticide Regulation requires that the application of pesticides or other pest control in connection with the indoor, outdoor, nursery, specialty cottage, or mixed-light cultivation of cannabis complies with Division 6, §11401 et seq. of the Food and Agricultural Code and its implementing regulations.

Any future Cannabis Cultivation use shall be licensed by the State in order to operate and would be subject to the aforementioned regulatory requirements. As such, no specific mitigation measure is required and compliance with these requirements ensures that no

impacts would occur from the use of pesticides in conjunction with cannabis operations. No additional analysis or Mitigation Measures are warranted.

14-23 The commenter notes that cannabis cultivation operations often use artificial lighting or "mixed-light" techniques in greenhouse structures and indoor operations to increase yields, and that they also employ exterior lighting for security. The commentor then describes common impacts associated with cannabis operations and states the DEIR does not specify whether artificial light will be used either indoors or outdoors for cannabis cultivation or whether building design will allow indoor light to escape. The commentor then suggests the DEIR be revised to include an analysis of cannabis-specific impacts of artificial light on biological resources and MM BIO-[B]: Artificial Nighttime Lighting.

Refer to Response 14-18, above. The Project does not propose greenhouse facilities. Any cannabis uses would be fully contained within a building, and cannabis cultivation and manufacturing uses would not be viewable from public areas, in compliance with Section 5.68.130 of the City Municipal Code. As such, light spill would not be permitted to occur, and the Project's design features would maintain appropriate and safe lighting levels onsite while minimizing light and glare on adjacent properties. No additional analysis or Mitigation Measures are warranted.

14-24 The commenter describes the role of the CDFW LSA Program in cannabis licensing and provides a link for additional information on permitting. This comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. In addition, the Project is not anticipated to impact any river, stream, or lake. Therefore, no further response is warranted.

14-25 The commenter notes that the DEIR states that "native plant materials and other drought-tolerant plants will be used in all non-turf areas of Project landscaping. Large expanses of lawn and other water-intensive landscaped areas will be kept to the minimum necessary and consistent with the functional and aesthetic needs of the Project, while providing soil stability to resist erosion." The commenter asserts that the DEIR lacks additional information on landscaping plans, such as plant palette or planting locations. The commenter recommends the DEIR include recommendations regarding landscaping from Section 4.0 of the CVMSHCP Table 4-112. The commenter also recommends water-wise concepts in any Project landscape designs.

The City and Project Applicant acknowledge that Table 4-112 in Section 4 of the CVMSHCP contains a list of Coachella Valley native plants that are recommended for landscaping, which the Project's landscaping plan would be in compliance with. Since the Project will meet the City's landscape requirements and because invasive species are already covered by MM BIO-7, the existing Mitigation Measure BIO-7 is sufficient to address the commenter's concerns regarding Project landscaping and no revisions to the measure are warranted.

14-26 The commenter states that information developed in EIRs and negative declarations be incorporated into a database to be used for subsequent or supplemental environmental

determinations. Comment noted. The Comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines.

14-27 The commenter states that environmental document filing fees are payable upon filing of the Notice of Determination and required for the Project approval to be final. Comment noted. The Comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines.

14-28 The commenter concludes by restating the assertions discussed above and provides contact information for CDFW.

See Responses 14-1 through 14-27. As described above, with minor modification to mitigation measures required for clarity, the DEIR comprehensively addresses impacts to biological resources, and provides mitigation measures which will assure that these impacts are reduced to less than significant levels.

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Comment Letter No. 15

CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 8
464 WEST 4TH STREET
SAN BERNARDINO CA, 92401
(909) 925-7520
www.dot.ca.gov

September 10, 2025

Route & Postmile #: SR-86 / PM 17.011
Cross Street: SR-86 & Airport Blvd.
GTS ID: 37392
SCH #: 2023040106

City of Coachella
Planning Division
Attn: Kendra Reif
53990 Enterprise Way,
Coachella, CA 92236

Subject: Caltrans LDR Branch Review of the Coachella Airport Business Park; APN: 763-330-013, 763-330-018, and 763-330-029.

The California Department of Transportation (Caltrans) Local Development Review (LDR) Branch has completed its review of the Coachella Airport Business Park Draft Environmental Impact Report (EIR). The project is located at the northwest corner of the SR-86 and Airport Boulevard interchange in the City of Coachella, Riverside County and encompasses approximately 47.96 acres in size. 15-1

The project is proposing an industrial development on currently vacant land that will include large and small warehouses, personal vehicle and self-storage units, small business spaces, limited retail and restaurant uses, a 44-foot electronic billboard along the SR-86 frontage, and a fuel station with a convenience store, along with associated landscaping, parking, lighting, and signage. In addition, an Imperial Irrigation District (IID) electrical substation will be constructed at the northern end of the site on a parcel acquired from Caltrans. The 315-foot by 315-foot substation will house at least one 1–25 MVA 92/13.2 kV transformer bank to provide adequate power for the project. Moreover, the project is proposing two driveways and local road traffic signal that is within 400 feet from the southbound SR-86 Ramps and Airport Boulevard interchange. 15-2

Given the planned driveways and the signalization that is within 400 feet from the southbound SR-86 Ramps/Airport Boulevard interchange, the project will require a Caltrans Encroachment Permit prior to construction to address impacts from the anticipated increase in traffic generated by the development. Based on the project documents currently available, these comments are considered preliminary and may be subject to revision as site development progresses. 15-3

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Local Development Review

General

1. Submit a comment response letter addressing the LDR letter along with your Encroachment Permit application.
2. During the Encroachment Permit phase, coordinate with the Caltrans Division of Right of Way to verify the extent of impacts to Caltrans' right-of-way (ROW).
3. During the Encroachment Permit phase, please coordinate with Caltrans Division of Design's Hydraulics, Stormwater, Electrical and Traffic units.
4. During the Encroachment Permit phase, please coordinate with Caltrans Operations Truck Services group for their input in your project.
5. A more in-depth review of the project will be conducted during the Encroachment Permit process.

15-4

Vehicle Miles Traveled (VMT)

While we understand that the VMT impacts associated with this project are considered significant and unavoidable, and that the applicant has proposed certain VMT mitigation measures, we strongly encourage the continued exploration and implementation of additional VMT reduction strategies, wherever feasible. These efforts can support long-term sustainability objectives, improve multimodal accessibility, and promote environmentally responsible development.

15-5

Traffic Operations

Traffic Impact Analysis

1. Please include detail layout plan of the project included lane geometry, striping and spacing distance from the driveway access to the nearest intersection. (provide with readable engineering scale)
2. Please include the queueing analysis in the report.

15-6

Traffic Forecasting & Analysis

Traffic Impact Analysis

1. Figure 1-2 identifies study intersections by number only and does not depict the study roadway segments listed in the report text. Per Caltrans TIA Guidelines, the project study area should be clearly documented for both intersections and roadway segments. Recommend (1) including a table cross-referencing each numbered intersection with its roadway names, including project access points, and (2) revising the figure to also show and label the study roadway segments so that all facilities identified in the study area description are consistently referenced in the text, figures, and LOS analysis tables.
2. The methodology for developing future volumes does not fully align with Caltrans TIA Guidelines. Per Section 4.3, base year model volumes must be validated against observed counts (PeMS/Caltrans ramp stations) and documented if adjustments exceed ~10%. The use of interpolated years (2027, 2030, 2033) should be justified against SCAG/RIVCOM official horizon years, and reliance on the NCHRP 255 Directional Volume Method may not be consistent with regional model practices for State facilities. In addition, capping 2045 volumes at the lower of 2033 or model 2045 outputs understates long-range growth and is inconsistent with the requirement to use adopted 2045 model outputs as the governing horizon year. Recommend revising the methodology to follow Caltrans TIA Guidelines and RTP/SCS horizon years for forecasting future traffic volumes.
3. Per Caltrans TIA Guidelines, the adopted SCAG/RIVCOM RTP/SCS horizon year (2045) should be used as the governing cumulative year. Furthermore, since the project's final phase extends to 2033, cumulative analysis may also need to consider a 20-year horizon beyond

15-7

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buildout (~2053) to ensure long-range impacts on State facilities are fully addressed. Recommend revising the methodology accordingly.

4. The TIA applies a 2% heavy vehicle share with SANBAG PCE factors. For State facility analysis, Caltrans typically references Highway Design Manual/HCM-based PCE standards. Recommend confirming that the truck mix and PCE assumptions used are consistent with Caltrans requirements for the SR-86 ramps or provide justification for use of SANBAG factors.
5. Distribution comes from a RIVCOM select-zone run, but the TIA does not include a distribution matrix or truck routing confirmation to/from designated truck routes (SR-86/CA-111). Recommend (1) appending an AM/PM distribution-by-approach table derived from the RIVCOM select-zone run, and (2) documenting truck routing to/from SR-86/CA-111 using the Caltrans Truck Network (with a note that no restricted local streets are used). 15-7 Cont.
6. The TIA's existing traffic counts were collected on January 18, 2024, which falls within the same week as the Martin Luther King Jr. holiday. Per Caltrans TIA Guidelines, traffic counts should avoid holiday weeks or other atypical periods. Recommend either (a) verifying these counts against supplemental counts collected during a typical non-holiday week, or (b) providing confirmation using later 2024 counts or PeMS/Caltrans station data that January 18 conditions are representative. In addition, several appendix sections appear incomplete or blank; recommend revising the submittal to include the full supporting materials.
7. Several items fall outside the scope of Traffic Forecasting & Analysis and should be reviewed in consultation with Caltrans Traffic Operations. These include (a) freeway/ramp operational analyses and 95th-percentile off-ramp queue checks, (b) reliance on CMP "Modified HCM 1999" methods versus Caltrans-approved operational methodologies, (c) provision of 5-year TASAS collision history at SR-86 ramp terminals and CA-111 intersections, (d) evaluation of ramp-area crossings and frontage facilities consistent with Caltrans Complete Streets policy, and (e) documentation of on-site stacking/queue containment for the fast-food drive-through and fuel bays. Please coordinate with Operations to determine whether additional HCM6 freeway/ramp analysis, safety evaluation, and site circulation checks are required.

Equitable Access

If any Caltrans facilities are impacted by the project, they must comply with American Disabilities Act (ADA) Standards upon project completion. Additionally, the project must ensure the maintenance of bicycle and pedestrian access throughout the construction phase. These access considerations align with Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users. 15-8

Caltrans Encroachment Permit

Be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' R/W requires a Caltrans-issued encroachment permit.

For information regarding the Encroachment Permit application and submittal requirements, contact: 15-9

Caltrans Office of Encroachment Permits
464 West 4th Street, Basement, MS 619
San Bernardino, CA 92401-1400
(909) 383-4526
D8.E-permits@dot.ca.gov
https://dot.ca.gov/programs/traffic-operations/ep
Important Note: All new permit applications must now be submitted through our new CEPS Online Portal at: https://ceps.dot.ca.gov/
Local Development Review and Encroachment Permit Process

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Please be advised that LDR's point of contact role will conclude upon the completion of the development entitlement process. Once project is entitled, the Encroachment Permit Office will serve as the primary point of contact moving forward. 15-10

Thank you again for including the Caltrans LDR Branch in the review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D8@dot.ca.gov or call 909-925-7520. 15-11

Sincerely,

Janki Patel

Janki Patel
Branch Chief - Local Development Review
Division of Transportation Planning
Caltrans District 8

"Improving lives and communities through transportation"

4

Response to Comment Letter 15

Janki Patel, Branch Chief - Local Development Review
Division of Transportation Planning
California Department of Transportation, District 8
September 10, 2025

15-1 This comment provides a general introduction and includes a summary of the proposed Project's general location. Responses to specific comments are provided below.

15-2 This comment includes a general summary of the proposed Project and does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

15-3 The commenter notes that the Project will require a Caltrans Encroachment Permit prior to construction.

As discussed on page 55 of the TIA, the Project will be conditioned to submit for a Caltrans Encroachment Permit application process prior to the signalization of the main access point on Airport Boulevard for consistency to applicable Caltrans standards and guidelines to the satisfaction of Caltrans Traffic Operations and Electrical Operations Functional Units.

An Encroachment Permit from Caltrans is already shown as a required permit in Table 2.5 in Section 2.0, Project Description, of the DEIR. Therefore, no changes to the DEIR are warranted.

15-4 This comment provides general instructions for the Encroachment Permit discussed above, from the Local Development Review Department. As discussed in Response 15-3, the Project will be conditioned to submit for a Caltrans Encroachment Permit, which will include compliance with the steps provided in this comment. No revisions to the DEIR are warranted relative to this comment.

15-5 The commenter states that, while Caltrans understands that the VMT impacts associated with this Project are considered significant and unavoidable, and that the applicant has proposed certain VMT mitigation measures, Caltrans strongly encourages the continued exploration and implementation of additional VMT reduction strategies, wherever feasible. The Project applicant will continue to coordinate on additional feasible VMT reduction through the Project phased development. Therefore, no revisions to the DEIR are warranted relative to this comment.

15-6 The commenter requests the following additions/revisions to the Project's Traffic Impact Analysis, from the Traffic Operations Department:

1. Please include detail layout plan of the Project included lane geometry, striping and spacing distance from the driveway access to the nearest intersection. (provide with readable engineering scale)

Please refer to Attachment I3, *Supplemental Transportation Exhibits (Replacement of the Airport Boulevard Bridge Over Whitewater River Project, Preliminary Project Overview Interim Striping) (Dokken Engineering, September 2024*), of this FEIR, which provides the information requested by the commenter. It should be noted that this attachment does not constitute significant new information requiring recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5. Rather, it serves only to clarify or amplify information already presented in the DEIR and/or the respective technical studies. These exhibits will be added to Section 4.17, *Transportation,* of the DEIR. This comment does not assert any issue that must be addressed further pursuant to CEQA Guidelines.

2. Please include the queueing analysis in the report.

   The queuing analysis is already included in Appendix L of the Project's TIA. Therefore, no revisions to the Project's TIA or the DEIR are warranted relative to this comment.

15-7 The commenter requests the following additions/revisions to the Project's TIA, from the Traffic Forecasting & Analysis Department. It should be noted that the requested revisions are the preferences of the commenter only and do not affect the Project's transportation analysis or impacts.

1. Figure 1-2 identifies study intersections by number only and does not depict the study roadway segments listed in the report text. Per Caltrans TIA Guidelines, the project study area should be clearly documented for both intersections and roadway segments. Recommend (1) including a table cross-referencing each numbered intersection with its roadway names, including project access points, and (2) revising the figure to also show and label the study roadway segments so that all facilities identified in the study area description are consistently referenced in the text, figures, and LOS analysis tables.

Numbered intersections with roadway names are provided in the Project's TIA Executive Summary and Section 1.0, Project Introduction (Appendix I1 of the DEIR). Numbered roadway segments are provided in the Project's TIA Executive Summary and Section, 1.0 Project Introduction. Please refer to Attachment I2 of this FEIR, for the updated roadway segment tables and updated Figure 1-2. As mentioned above, the requested revisions are the preferences of the commenter only and do not affect the Project's transportation analysis or impacts.

2. The methodology for developing future volumes does not fully align with Caltrans TIA Guidelines. Per Section 4.3, base year model volumes must be validated against observed counts (PeMS/Caltrans ramp stations) and documented if adjustments exceed ~10%. The use of interpolated years (2027, 2030, 2033) should be justified against SCAG/RIVCOM official horizon years, and reliance on the NCHRP 255 Directional Volume Method may not be consistent with regional model practices for State facilities. In addition, capping 2045 volumes at the lower of 2033 or model 2045 outputs understates long-range growth and is inconsistent with the requirement to use adopted 2045 model outputs as the governing horizon year. Recommend revising the methodology to follow Caltrans TIA Guidelines and RTP/SCS horizon years for forecasting future traffic volumes.

There are no detectors and therefore, no available PeMS counts along the SR-86 or SR-111 facilities within the Project vicinity to validate base year model volumes. The approved scoping agreement in Appendix A of the Project's TIA (Appendix I1 of the DEIR) was coordinated with Caltrans to use the *Caltrans Guide for the Preparation of Traffic Impact Studies* (2002). Per section IV.D in the Caltrans Guide, the regional traffic model reflecting the most current land use and planned improvements was used. The methodology requested by the commenter is not included as an approved methodology in the Caltrans Guide. The future volume approach and methodology has been approved by the City of Coachella. Therefore, no revisions to the Project's TIA or the DEIR are warranted relative to this comment.

3. Per Caltrans TIA Guidelines, the adopted SCAG/RIVCOM RTP/SCS horizon year (2045) should be used as the governing cumulative year. Furthermore, since the Project's final phase extends to 2033, cumulative analysis may also need to consider a 20-year horizon beyond buildout (~2053) to ensure long-range impacts on State facilities are fully addressed. Recommend revising the methodology accordingly.

Caltrans approved the scoping agreement in Appendix A of the Project's TIA (Appendix I1 of the DEIR) which specified the use of the *Caltrans Guide for the Preparation of Traffic Impact Studies* (2002). Per section III.B in the Caltrans Guide, the methodology requested by the commenter is not included as an approved methodology in the Caltrans Guide. The study scenarios have been approved by the City of Coachella. Therefore, no revisions to the Project's TIA or the DEIR are warranted relative to this comment.

4. The TIA applies a 2% heavy vehicle share with SANBAG PCE factors. For State facility analysis, Caltrans typically references Highway Design Manual/HCM-based PCE standards. Recommend confirming that the truck mix and PCE assumptions used are consistent with Caltrans requirements for the SR-86 ramps or provide justification for use of SANBAG factors.

Please refer to the Attachment I2 of this FEIR for the updated SR-86 ramp intersections using truck percentages from the latest Caltrans Traffic Census Program Truck Traffic counts, which were revised in order to be consistent with Caltrans requirements for the SR-86 ramps, as noted by the commenter. The increase in heavy vehicle share requested by Caltrans did not change any of the traffic study conclusions. Therefore, no revisions to the Project's TIA or the DEIR are warranted relative to this comment.

5. Distribution comes from a RIVCOM select-zone run, but the TIA does not include a distribution matrix or truck routing confirmation to/from designated truck routes (SR-86/CA-111). Recommend (1) appending an AM/PM distribution-by-approach table derived from the RIVCOM select-zone run, and (2) documenting truck routing to/from SR-86/CA-111 using the Caltrans Truck Network (with a note that no restricted local streets are used).

Please refer to Attachment I2 of this FEIR for the updated for distribution by approach figure and truck network discussion, which were revised in order to be consistent with Caltrans requirements. This additional information requested by Caltrans did not change any of the

traffic study conclusions. Therefore, no revisions to the Project's TIA or the DEIR are warranted relative to this comment.

6. The TIA's existing traffic counts were collected on January 18, 2024, which falls within the same week as the Martin Luther King Jr. holiday. Per Caltrans TIA Guidelines, traffic counts should avoid holiday weeks or other atypical periods. Recommend either (a) verifying these counts against supplemental counts collected during a typical non-holiday week, or (b) providing confirmation using later 2024 counts or PeMS/Caltrans station data that January 18 conditions are representative. In addition, several appendix sections appear incomplete or blank; recommend revising the submittal to include the full supporting materials.

There are no detectors and therefore, no available PeMS counts along the SR-86 or SR-111 facilities within the Project vicinity to validate the existing counts. Additionally, scheduling of the traffic data collection was coordinated and approved by the City of Coachella to be conducted on the Thursday after the Monday holiday, with two days in between for traffic to normalize. The January 18, 2024, date is an appropriate date to conduct traffic counts and reflects typical, high-season conditions. In addition, the commenter is incorrect that several TIA appendix sections were not provided. All TIA appendix sections are provided including the full supporting materials; however, additional blank appendix cover slip sheets were erroneously inserted which appeared on PDF pages 212 - 226, which have since been removed from the overall appendices. Therefore, no revisions to the Project's TIA or the DEIR are warranted relative to this comment.

7. Several items fall outside the scope of Traffic Forecasting & Analysis and should be reviewed in consultation with Caltrans Traffic Operations. These include (a) freeway/ramp operational analyses and 95th-percentile off-ramp queue checks, (b) reliance on CMP "Modified HCM 1999" methods versus Caltrans-approved operational methodologies, (c) provision of 5-year TASAS collision history at SR-86 ramp terminals and CA-111 intersections, (d) evaluation of ramp-area crossings and frontage facilities consistent with Caltrans Complete Streets policy, and (e) documentation of on-site stacking/queue containment for the fast-food drive-through and fuel bays. Please coordinate with Operations to determine whether additional HCM6 freeway/ramp analysis, safety evaluation, and site circulation checks are required.

The approved scoping memo dated December 13, 2023, was based on the Interim LDIGR Safety Review Practitioners Guidance published July 2020. The methodologies requested by the commenter were added to the Final version of the Guidance published February 2024 and are not applicable here since the approved December 13, 2023, scoping memo pre-dates the February 2024 version of the guidance. Therefore, no revisions to the Project's TIA or the DEIR are warranted relative to this comment.

15-8 This comment advises that the project must conform to American Disabilities Act (ADA) Standards requirements, and of the maintenance of bicycle and pedestrian access throughout the construction phase.

This comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

15-9 This comment reiterates that any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans-issued encroachment permit and provides contact information for the Caltrans Office of Encroachment Permits.

This comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

15-10 This comment identifies Caltrans' departmental responsibilities. This does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

15-11 The commenter concludes by providing a contact email and phone number for any questions associated with the above comments. Comment noted. The Comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines.

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Comment Letter No. 16

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September 11, 2025

Via Email and Overnight Mail
City of Coachella Development Services, Planning Division
Attn: Kendra Reif, Community Development Director
53990 Enterprise Way,
Coachella, CA 92236
Email: Kreif@coachella.org

Via Email Only
Nicole Sauviat Criste, Consulting Planner
Email: ncriste@terranovaplanning.com

Re: Comments on Draft Environmental Impact Report for Coachella Airport Business Park Project (SCH No. 2023040106)

Dear Ms. Reif and Ms. Criste:

We are writing on behalf of Californians Allied for a Responsible Economy ("CARE CA") regarding the Draft Environmental Impact Report ("DEIR") prepared by the City of Coachella ("City") for the Coachella Airport Business Park Project (SCH No. 2023040106) ("Project") proposed by Haagen Co., LLC (dba Empire Airport Co., LLC) ("Applicant").

The proposed Project site would be developed for industrial uses comprised of the following uses: large and small warehouse; personal vehicle storage and self-storage units; small business use spaces; a small retail and restaurant development; a 44-foot-tall electronic billboard sign located along the Project's small business frontage along SR 86; a fuel station with a convenience store; and associated landscaping, parking, lighting, and signage.[1] An Imperial Irrigation District ("IID") electrical substation facility would also be constructed as part of the Project, at the northern end of the overall Project site. The project would be located on northwest corner of SR 86 and Airport Blvd (APNs 763-330-013, -018, -029). 16-1

[1] DEIR, pg. ES-1, 2.

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We reviewed the DEIR with the assistance of air quality expert Dr. James Clark,[2] transportation expert Norm Marshall,[3] and noise expert Ani Toncheva.[4] The City must separately respond to these technical comments.

CARE CA's review of the DEIR, its supporting documentation, and City records demonstrates that the DEIR fails to comply with the requirements of the California Environmental Quality Act ("CEQA").[5] The DEIR omits key Project components from its discussion by failing to analyze impacts associated with a necessary water line extension, reasonably foreseeable use of onsite backup generators, and reasonably foreseeable cold storage uses of the proposed warehouse space. The DEIR fails to address potentially significant public health risks by omitting a discussion of, and mitigation for, Valley Fever risks to workers and nearby residents that would occur during construction activities. The DEIR also fails to disclose and mitigate significant health risks from exposure to Toxic Air Contaminants ("TACs") that will be emitted by the Project's fuel station and diesel truck trips. These emissions would be cumulatively significant under updated South Coast Air Quality Management District ("SCAQMD") thresholds, an impact that the DEIR fails to disclose and mitigate. 16-2

The DEIR's transportation analysis is unsupported. The DEIR fails to support its Vehicle Miles Travelled ("VMT") analysis with substantial evidence by relying on unsupported screening and significance thresholds that screen out the majority of the Project from analysis. The DEIR then compounds the errors in its transportation analysis by overestimating reductions from VMT mitigation and underestimating the distance travelled by trucks, resulting in underestimated air quality impacts from trucks and other mobile sources. The DEIR also finds that Project-related and cumulative VMT impacts would be significant and unavoidable, but Mr. Marshall identifies feasible mitigation that would further reduce the Project's impacts which the City must consider. 16-3

The DEIR fails to support its noise analysis and mitigation with substantial evidence. In particular, the DEIR's analysis of construction noise impacts fails to consider the increase over ambient noise levels. CARE CA's noise consultant found that construction activities would increase noise at nearby residences by 30 dBA.[6] The DEIR would not fully mitigate this impact. The DEIR fails to disclose 16-4

[2] Dr. Clark's technical comments and curricula vitae are attached hereto as **Exhibit A.**
[3] Mr. Marshall's technical comments and curricula vitae are attached hereto as **Exhibit B.**
[4] Ms. Toncheva's technical comments and curricula vitae are attached hereto as **Exhibit C.**
[5] PRC § 21100 et seq.
[6] Toncheva Comments, pg. 4.

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significant nighttime noise impacts during operation by assuming, without support, that none of the Project's industrial uses would operate at night. 16-4 Cont.

As a result of its shortcomings, the DEIR lacks substantial evidence to support its conclusions, violates CEQA's analytical requirements, and fails to properly mitigate the Project's significant environmental impacts. CARE CA urges the City to remedy the deficiencies in the DEIR by preparing a legally adequate revised DEIR and recirculating it for public review and comment.[7]

These comments are timely submitted in accordance with a limited extension of the comment period by the City of Coachella.[8] As will be explained in greater detail herein, the City provided an extension for CARE CA to submit its DEIR comments due to the City's failure to make DEIR appendices and other reference documents available throughout the entire comment period.[9] CARE CA reserves the right to provide supplemental comments at any and all later proceedings related to this Project.[10] 16-5

I. STATEMENT OF INTEREST

CARE CA is non-profit organization which advocates for protecting the environment and the health of their communities' workforces. The organization's members include Coachella residents Jose Quintero, Jesse Meraz, and Jesus Verdugo, as well as the District Council of Ironworkers and Southern California Pipe Trades DC 16, along with their members, their families, and other individuals who live and work in the City of Coachella and in Riverside County. These individuals and labor organization members may be adversely affected by the potential public and worker health and safety hazards, and the environmental impacts of the Project. 16-6

[7] We reserve the right to supplement these comments at later hearings on this Project. Gov. Code § 65009(b); Public Resources Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199–1203; *see Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.

[8] **Exhibit D**: Email from Nicole Sauviat Criste, Consulting Planner, City of Coachella to Aidan P. Marshall re: Request for Extension of Public Review Period, Airport Business Park EIR (SCH No. 2023040106) (Tuesday, August 26, 2025) (stating "the City will allow CARE CA to submit comments no later than the close of business on September 11, 2025 and consider them timely.").

[9] Cal. Code Regs. Tit. 14, § 15105 (the minimum public review period for this document is 45 days).

[10] Gov. Code § 65009(b); PRC § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; *see Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

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CARE CA seeks to ensure a sustainable construction industry over the long-term by supporting projects that offer genuine economic and employment benefits, and which minimize adverse environmental and other impacts on local communities. CARE CA members live, work, recreate, and raise their families in the City of Brea and surrounding communities. Accordingly, they would be directly affected by the Project's environmental and health and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist onsite. 16-6 Cont.

In addition, CARE CA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

I. FAILURE TO PROVIDE ACCESS TO REFERENCE DOCUMENTS

1. The City Failed to Make DEIR Appendices and References Available During the Public Review Period

The City failed to provide timely access to documents referenced, relied upon and incorporated by reference in the DEIR during the public review and comment period, which originally ran from July 21, 2025, to September 3, 2025,[11] in violation of CEQA's requirement that the DEIR and all reference documents be made available during the comment period.[12] As a result, CARE CA had to request access to missing reference documents and an extension of the DEIR comment period, which was only partially granted. 16-7

On August 6, 2025, CARE CA submitted a letter to the City ("DEIR References Request"), pursuant to CEQA section 21092(b)(1) and CEQA Guidelines section 15087(c)(5), requesting "immediate access to any and all documents referenced, incorporated by reference, and relied upon" in the DEIR.[13] On August

[11] City of Coachella, Notice of Availability of The Draft Environmental Impact Report For The Coachella Airport Business Park Project
[12] Pub. Resources Code § 21092(b)(1); 14 C.C.R. § 15087(c)(5).
[13] Letter from Adams, Broadwell, Joseph & Cardozo ("ABJC") to City re: Request for Immediate Access to Documents Referenced in the Draft Environmental Impact Report– Coachella Airport Business Park Project (SCH No. 2023040106) (August 6, 2025).

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12, 2025, the City sent a letter stating that records would be provided by September 4, 2025.[14]

On August 21, 2025, CARE CA submitted another letter to the City requesting missing DEIR reference documents, including Appendices C through G of Appendix B of the DEIR (containing the DEIR's health risk assessment's supporting calculations). Without these appendices, the accuracy of the Project's air quality and health risk analysis could not be meaningfully evaluated or verified. Also identified in CARE CA's letter were documents listed in the References sections of Appendices B, C, D, E1, E2, E3, F1, G2, and G3 which were not attached or made available via weblink. CARE CA's letter also requested an extension of the comment period for at least 45 days from the date on which the City releases these documents for public review.

On August 22, 2025, the City provided access to the missing appendices to Appendix B (the HRA's supporting calculations), acknowledging that they were not available.[15] However, the documents listed in the References sections of Appendices B, C, D, E1, E2, E3, F1, G2, and G3 have still not been made available. On August 26, 2025, the City stated that "the City does not believe that an extension to the public review period is warranted, but the City will allow CARE CA to submit comments no later than the close of business on September 11, 2025 and consider them timely."[16] While CARE CA utilized the extension provided by the City, the City's response provided insufficient time for public review of the missing DEIR reference documents, as required by CEQA. To comply with CEQA's requirement that the *entire* DEIR be circulated for 45 days[17] and be "readily accessible,"[18] the comment period should have been extended 45 days after all missing DEIR references documents were made available.

16-7 Cont.

Courts have held that the failure to provide even a few pages of CEQA documents for a portion of the review period invalidates the entire process, and that such a failure must be remedied by permitting additional public comment.[19] It is well settled that a CEQA document may not rely on hidden studies or documents

[14] Letter from City to ABJC re: City of Coachella - Public Records Act Requests (3) Received August 6, 2025 - Determination Letter (August 12, 2025).
[15] **Exhibit E**: Email from Nicole Criste to Aidan P. Marshall on 8/22/2025 ("As you note, Appendix B was missing its Appendix C through G. Those have been added and attached here, as well as on the City's website.")
[16] Exhibit A.
[17] Cal. Code Regs. Tit. 14, § 15105 (the minimum public review period for this document is 45 days).
[18] Cal. Code Regs. Tit. 14, § 15087(c).
[19] *Ultramar v. South Coast Air Quality Man. Dist.* (1993) 17 Cal.App.4th 689, 699.

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that are not provided to the public.[20] Here, public review of the City's analysis of the Project's air emissions and health risk was substantially impaired without access to the DEIR Appendices' supporting calculations, which included the HRA's AERMOD files and risk calculation spreadsheets. Moreover, review of other analyses in the DEIR remains impaired without access to documents listed in the DEIR's References sections. The DEIR's review and comment period was thus improperly shortened, and several DEIR reference documents have not yet been released for public review.

16-7 Cont.

2. The City Has Not Produced Responsive Records in Response to CARE CA's Public Record Act Request

The City is in violation of the Public Records Act because the City has not provided timely access to public records related to the Project in response to a Public Records Act request submitted by CARE CA on August 6, 2025. CARE CA's letter requested for immediate access to any and all public records in the City's possession referring or related to the Project.[21] The request was made pursuant to the California Public Records Act,[22] Article I, section 3(b) of the California Constitution, and Section 7922.525 of the Public Records Act, which requires public records to be "open to inspection at all times during the office hours of a state or local agency" and provides that "every person has a right to inspect any public record."[23]

16-8

The City sent a determination letter on August 12, 2025, stating that responsive records would be made available on September 4, 2025 (almost a month after the request was filed). On September 4, the City sent a second determination letter containing a link purportedly containing responsive records. However, the link only contained the DEIR and its appendices–documents that were already publicly available. No other requested records have been made available, including correspondence, project application materials, or any other records identified in CARE CA's August 6, 2025 Public Records Act request. The City's September 4, 2025 letter further delayed access to records, stating that the City now anticipates an update or another production may be available beginning on September 24, 2025. No legally supportable reason was provided by the City for the 1 ½ month-

[20] *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3d 818, 831 ("Whatever is required to be considered in an EIR must be in that formal report; what any official might have known from other writings or oral presentations cannot supply what is lacking in the report.").
[21] Letter from Adams Broadwell Joseph & Cardozo to City re: Request for Immediate Access to Public Records – 3100 Wilshire Project (Case Nos. DIR-2023-3859-TOC-SPR-HCA, VTT-83914-CN-HCA, ENV-2023-3860-CE, and ENV-2023-3860-EAF) (January 31, 2024).
[22] Government Code §§ 7920.000, *et seq.*).
[23] Gov. Code §7922.525(a).

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long delay in providing access to public records, and CARE CA has not yet received access to any responsive records. The City's failure to provide immediate access to the records is an ongoing violation of the California Public Records Act and the California Constitution. 16-8 Cont.

II. THE PROJECT DESCRIPTION IS INADEQUATE

The DEIR does not meet CEQA's requirements because it fails to include an accurate and complete Project description, rendering the entire analysis inadequate. California courts have repeatedly held that "an accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR."[24] CEQA requires that a project be described with enough particularity that its impacts can be assessed.[25] Without a complete project description, the environmental analysis under CEQA is impermissibly limited, thus minimizing the project's impacts and undermining meaningful public review.[26] Accordingly, a lead agency may not hide behind its failure to obtain a complete and accurate project description.[27] 16-9

CEQA Guidelines section 15378 defines "project" to mean "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment."[28] "The term "project" refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. The term project does not mean each separate governmental approval."[29] Courts have explained that a complete description of a project must "address not only the immediate environmental consequences of going forward with the project, but also all "*reasonably foreseeable* consequence[s] of the initial project."[30] "If a[n]...EIR...does not adequately apprise all interested parties of the true scope of the project for intelligent weighing of the environmental consequences of the

[24] *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 17; *Communities for a Better Environment v. City of Richmond* ("*CBE v. Richmond*") (2010) 184 Cal.App.4th 70, 85–89; *County of Inyo v. City of Los Angeles* (3d Dist. 1977) 71 Cal.App.3d 185, 193.
[25] 14 CCR § 15124; *see Laurel Heights Improvement Assn. v. Regents of Univ. of Cal* ("*Laurel Heights I*") (1988) 47 Cal.3d 376.
[26] *Id.*
[27] *Sundstrom v. County of Mendocino* ("*Sundstrom*") (1988) 202 Cal.App.3d 296, 311.
[28] CEQA Guidelines § 15378.
[29] *Id.*, § 15378(c).
[30] *Laurel Heights I*, 47 Cal. 3d 376, 398 (emphasis added); *see also Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449-50.

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16-9 Cont.

project, informed decision-making cannot occur under CEQA and the final EIR is inadequate as a matter of law."[31]

A. The DEIR Fails to Describe a New Water Line Extension Required for the Project

The DEIR states that "[t]he proposed Project would connect to a new water line extension through the CWA's [Coachella Water Authority's] proposed 20" water line from near Avenue 54 southerly along Grapefruit Boulevard, then easterly under the existing railroad tracks and the CVSC to the Project site."[32] The DEIR fails to clearly disclose the location and construction schedule of the planned water line. Dr. Clark estimates, based on the description provided in the DEIR, that construction of the water line will require approximately 1.5 miles of excavations to be completed from Avenue 54 to the Project Site.[33] The DEIR acknowledges that the water line on the Project site is not currently connected to existing water lines, stating that the proposed 20" line is necessary for the Project's operations.[34] And the DEIR states that CWA will supply water for the proposed Project.[35] However, the proposed 20" line is not included in the DEIR's analysis of the Project's impacts or in the cumulative impacts analysis.

16-10

Instead, the DEIR states that "CWA's new 20-inch water line extension from Grapefruit Boulevard is a separate project being undertaken by CWA with independent utility (including serving portions of the City located to the east of SR 86) and separate CEQA review",[36] indicating that the City intends to proceed with piecemealed environmental review of the water line extension from the rest of the Project. CEQA prohibits a project proponent from seeking approval of a large project in a piecemeal fashion in order to take advantage of environmental exemptions or lesser CEQA review for smaller projects.[37]

In *Banning Ranch Conservancy v. City of Newport Beach*,[38] the Court of Appeal stated that "there may be improper piecemealing when the reviewed project legally compels or practically presumes completion of another action."[39] A test for

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[31] *Riverwatch v. Olivenhain Municipal Water Dist.* (2009) 170 Cal. App. 4th 1186, 1201.
[32] DEIR, pg. 2.0-6.
[33] Clark Comments, pg. 6.
[34] DEIR, pg. 4.10-2 ("Since CWA's water infrastructure does not currently extend to the site or its vicinity, the proposed Project would need to tie into CWA's future water line").
[35] DEIR, Appendix G3.
[36] DEIR, pg. 4.19-13
[37] *Arviv Enterprises, Inc. v. South Valley Area Planning Com.* (2002) 101 Cal. App. 4th at 1340.
[38] ("Banning Ranch"), 211 Cal.App.4th 1209.
[39] *Id.*

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whether an activity is a component of a project is if the activity "is a crucial functional element" of the project such that, without it, the project could not proceed.[40] "On the other hand, two projects may properly undergo separate environmental review (i.e., no piecemealing) when the projects have different proponents, serve different purposes, or can be implemented independently."[41]

In *San Joaquin Raptor/Wildlife Rescue Ctr. v County of Stanislaus*, the Fifth District Court of Appeal rejected an EIR for a housing project that did not include construction of sewer lines and expansion of a wastewater treatment plant designed to serve the project.[42] The court held that the project description violated CEQA because "[s]ewer expansion was recognized by the DEIR as necessary to the project, yet was excluded from the description of the development project and its effects ignored in the FEIR... The FEIR was thus premised on an improperly "curtailed" and "distorted" project description."[43] The court noted that the plant may have "excess sewer capacity which would then 'accommodate additional residential growth within the Town of Grayson.'"[44] The court explained that "even assuming the sewer expansion was severable from the development project, the FEIR still did not comply with CEQA." The court reasoned that "even were the sewer expansion deemed to be a separate 'project,' Public Resources Code section 21083 requires that the cumulative environmental effects of the development project plus the "expansion project" must be considered in the FEIR."[45]

16-10 Cont.

This EIR is analogous to the one rejected in *San Joaquin Raptor*. Here, because "the proposed Project ***would need*** to tie into CWA's future water line,"[46] the Project "practically presumes completion" of the proposed 20" water line. The fact that the DEIR's water supply assessment assumes CWA will be supplying water to the Project "practically presumes completion" of the proposed 20" water line. For the same reason, the water line is a "crucial functional element" of the Project. Thus, a full description of the water line and its environmental impacts must be included in the DEIR.

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[40] *Communities for a Better Env't v City of Richmond* (2010) 184 CA4th 70, 99.
[41] *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1223; *Del Mar Terrace Conservancy, Inc. v City Council* (1992) 10 CA4th 712, 736.
[42] *San Joaquin Raptor/Wildlife Rescue Ctr. v County of Stanislaus* (1994) 27 CA4th 713.
[43] *Id.* at 730-731.
[44] *Id.* at 733.
[45] *Id.*
[46] DEIR, pg. 4.10-2; *see* pg. 4.19-13 ("The CWA will supply water to the proposed Project, which will require the construction of new onsite water and wastewater facilities and will require connection to CWA facilities.").

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Even if CWA applies for separate entitlements to construct the water line, per *San Joaquin Raptor*, the Project's EIR would still need to analyze its cumulative effects, which the DEIR fails to do. The DEIR does not analyze impacts from construction of the water line in combination with construction of the main Project, resulting in a failure to disclose the entirety of the Project's impacts (either as a single project or cumulatively). Dr. Clark explains that the Project's air quality impacts are underestimated because construction of the line is not included in the description of the Project's phasing or in the air quality models.[47] Health risk impacts are also consequently underestimated, as construction activities result in emissions of DPM. Noise and vibration impacts are underestimated, as construction equipment used in construction of the line will generate noise and vibration. Impacts on biological resources may be impacted, depending on where the line is constructed. 16-10 Cont.

By failing to analyze impacts associated with construction of the water line which the DEIR acknowledges is necessary for the Project's operations, the DEIR fails to analyze the "whole of the action."[48] The EIR must be revised and recirculated to describe and analyze these impacts.

B. Use of Back-Up Generators is a Reasonably Foreseeable Component of the Project

The DEIR's discussion of the Project's air quality and health risk impacts fails to describe the reasonably foreseeable use of back-up generators. The DEIR's CalEEMod analysis of criteria air pollutants fails to include emissions from backup generators,[49] and the DEIR's quantitative and qualitative discussion of health risk impacts fails to disclose use of back-up generators. The DEIR's analysis indicates that use of back-up generators is reasonably foreseeable: "[n]oise sources commonly associated with warehouse uses typically include mechanical equipment such as backup power generators... operational noise levels associated with backup power generators can reach levels of approximately 78 dBA Leq at 50 feet."[50] Also, the use of backup generators is a reasonably foreseeable activity during Project operation due to the prevalence of power safety shutoffs, extreme heat events, and other emergencies which lead to temporary losses of power. 16-11

In *East Oakland Stadium Alliance v. City of Oakland*,[51] the Court of Appeal upheld an EIR's analysis of emissions from backup generators. The EIR's analysis

[47] Clark Comments, pg. 6.
[48] CEQA Guidelines section 15378.
[49] Clark Comments, pg. 16.
[50] DEIR, pg. 4.13-20.
[51] (2023) 889 Cal. App. 5th 1226.

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assumed that generators would operate for 50 hours of testing and maintenance annually, while allocating no time for actual emergency use. In discussing the lead agency's duty to analyze backup generator emissions, the Court stated that "if the annual need for emergency generator use is reasonably foreseeable, the EIR was not entitled to disregard such use merely because it would occur at unpredictable times."[52] The Court explained that use of a generator was reasonably foreseeable because, "[a]s noted in the EIR, some parts of the Bay Area are subject to predictable, sustained power outages undertaken to reduce the risk of fire."[53] Thus, "[t]he EIR was required to make neither a generally applicable nor a worst-case assumption; rather it was required to make a reasonable estimate of likely annual use of the generators at the project site."[54]

Here, as in *East Oakland Stadium Alliance*, backup generator emissions are a reasonably foreseeable consequence of the Project due to increasingly common Public Safety Power Shutoff ("PSPS") events and extreme heat events ("EHE"). EHEs are defined as periods where in the temperatures throughout California exceed 100 degrees Fahrenheit.[55] From January 2019 through December 2019, Southern California Edison reported 158 of their circuits underwent a PSP event.[56] In Los Angeles County, two circuits had 4 PSPS events during that period, lasting an average of 35 to 38 hours. The total duration of the PSPS events lasted between 141 hours to 154 hours in 2019. According to the California Public Utilities Commission ("CPUC") de-energization report[57] in October 2019, there were almost 806 PSPS events that impacted almost 973,000 customers (~7.5% of households in California). The California Air Resources Board estimates that with 973,000 customers impacted by PSPS events in October 2019, approximately 125,000 back-up generators were used by customers to provide electricity during power outages.[58] The widespread use of back-up generators to adapt to PSPS and EHE events suggests that back-up generators are a reasonably foreseeable consequence of the Project. In addition to emergency use, any generators included in the Project would be operated for routine testing.

16-11 Cont.

[52] *Id.* at 1252.
[53] *Id.* at 1253.
[54] *Id.*
[55] Governor of California. 2021. Proclamation of a state of emergency. June 17, 2021.
[56] SCAQMD. 2020. Proposed Amendment To Rules (PARS) 1110.2, 1470, and 1472. Dated December 10, 2020. http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1110.2/1110-2_1470_1472/par1110-2_1470_wgm_121020.pdf?sfvrsn=6.
[57] https://www.cpuc.ca.gov/deenergization/ as cited in CARB, 2020. Potential Emission Impact of Public Safety Power Shutoff (PSPS), Emission Impact: Additional Generator Usage associated With Power Outage.
[58] California Air Resources Board, Emission Impact: Additional Generator Usage Associated with Power Outage (January 30, 2020), available at https://ww2.arb.ca.gov/resources/documents/emissions-impact-generator-usage-during-psps.

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Generators can emit criteria air pollutants, greenhouse gases, and toxic air contaminants. This equipment commonly relies on fuels such as natural gas or diesel,[59] and thus can significantly impact public health through diesel particulate matter ("DPM") emissions.[60] This equipment can emit significant amounts of NOx, sulfur dioxides ("SO2"), particulate matter ("PM10"), carbon dioxide ("CO2"), carbon monoxide ("CO"), volatile organic compounds ("VOC"), particulate matter less than 10 microns ("PM_{10}"), PM less than 2.5 microns ("$PM_{2.5}$"), and air toxins such as DPM.[61] The DEIR's omission of onsite generator emissions thus results in an underestimation of the Project's air quality, greenhouse gas, and health risk impacts.

16-11 Cont.

[59] SCAQMD, Fact Sheet on Emergency Backup Generators, http://www.aqmd.gov/home/permits/emergency-generators ("Most of the existing emergency backup generators use diesel as fuel").
[60] California Air Resources Board, Emission Impact: Additional Generator Usage Associated with Power Outage (January 30, 2020), available at https://ww2.arb.ca.gov/resources/documents/emissions-impact-generator-usage-during-psps (showing that generators commonly rely on gasoline or diesel, and that use of generators during power outages results in excess emissions); California Air Resources Board, Use of Back-up Engines for Electricity Generation During Public Safety Power Shutoff Events (October 25, 2019), available at https://ww2.arb.ca.gov/resources/documents/use-back-engines-electricity-generation-during-public-safety-power-shutoff ("When electric utilities de-energize their electric lines, the demand for back-up power increases. This demand for reliable back-up power has health impacts of its own. Of particular concern are health effects related to emissions from diesel back-up engines. Diesel particulate matter (DPM) has been identified as a toxic air contaminant, composed of carbon particles and numerous organic compounds, including over forty known cancer-causing organic substances. The majority of DPM is small enough to be inhaled deep into the lungs and make them more susceptible to injury. Much of the back-up power produced during PSPS events is expected to come from engines regulated by CARB and California's 35 air pollution control and air quality management districts (air districts)").
[61] University of California, Riverside Bourns College of Engineering—Center for Environmental Research and Technology, Air Quality Implications Of Backup Generators In California, (March 2005), pg. 8, available at https://citeseerx.ist.psu.edu/document?repid=rep1&type=pdf&doi=84c8463118e4813a117db3d768151a8622c4bf6b; South Coast AQMD, Fact Sheet on Emergency Backup Generators ("Emissions of Nitrogen Oxides (NOx) from diesel-fired emergency engines are 200 to 600 times greater, per unit of electricity produced, than new or controlled existing central power plants fired on natural gas. Diesel-fired engines also produce significantly greater amounts of fine particulates and toxics emissions compared to natural gas fired equipment."), available at http://www.aqmd.gov/home/permits/emergency-generators#Fact2.

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C. The DEIR Fails to Analyze Impacts Associated with Reasonably Foreseeable Warehouse Uses

The DEIR assumes that none of the Project's 329,100 sf of warehouse space would be used for cold storage.[62] However, the DEIR fails to identify any condition of approval or mitigation measure precluding cold storage.[63] Thus, cold storage is a possible consequence of the Project. Because impacts associated with cold storage are not analyzed in the DEIR, the DEIR fails to analyze "the whole of the action."

Cold storage is a reasonably foreseeable consequence of the project. The court in *Maintain Our Desert Environment v. Town of Apple Valley* explained that "land use entitlements such as conditional use permits and development approvals run with the land and do not belong to the permittee.... had [the developer] developed the Project and then held it out for sale to any interested buyer, no additional CEQA review would have been necessary for the new owner so long as the use was consistent with that that had already been approved."[64] Here, even if the proposed warehouse space proposed is not currently envisioned as cold storage by Applicant, the Project approvals would allow this use. Specifically, the Project proposes rezoning the Project site to MS-IP (Manufacturing Services – Industrial Park Overlay).[65] Section 17.30.020 of the Coachella Municipal Code identifies "ice and cold storage plant" as a permitted use in the Manufacturing Service zone. Therefore, the impacts of reasonably foreseeable cold storage uses must be analyzed in the DEIR.

16-12

The DEIR's assumption that the Project will include no cold storage uses results in underestimation of health risk, air quality, energy, GHG, and noise impacts. Cold storage generates more trips per square foot and has higher energy impacts due to the low temperatures required by transport refrigeration units ("TRUs") and on-site storage. TRUs are refrigeration systems powered by integral diesel engines.[66] The refrigeration systems are used to control the environment of temperature-sensitive products transported in insulated trucks, trailers, shipping containers, or railcars. The California Air Resources Board ("CARB") states that TRUs emit DPM, PM2.5, oxides of nitrogen ("NOx"), and GHGs while in transit and during stationary operation at refrigerated warehouses or distribution centers, grocery stores, seaport facilities, intermodal railyards, and other locations of

[62] DEIR, Appendix B, pg. 2.
[63] DEIR, Appendix B, pg. 53.
[64] *Maintain Our Desert Environment v. Town of Apple Valley, supra,* 124 Cal.App.4th at 444.
[65] DEIR, pg. 2.0-3.
[66] California Air Resources Board, 2022 TRU Technology Assessment, pg. 1, https://ww2.arb.ca.gov/sites/default/files/2022-10/CARB%202022%20TRU%20Technology%20Assessment%2010-14-22.pdf.

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operation. CARB explains that communities near facilities where TRUs operate bear a disproportionate health burden:

> PM2.5 pollution contributes to more fatalities than other air pollutants and can lodge deep in the lungs or pass through the lungs to enter the blood stream and affect the heart, brain, and other organs. Adverse health effects from long-term exposure to PM2.5 pollution include increased risk of heart attacks and heart disease, impaired lung development in children, the development and exacerbation of asthma, and premature death. NOx is a precursor to ozone, which can cause irritation and damage lung tissue, worsen asthma and chronic illnesses including obstructive pulmonary disease and reduce lung function.[67]

CARB also explains that TRUs' emissions of GHGs contribute towards climate change,[68] and that TRUs generate noise impacts: "TRU operations produce noise that can be problematic when deliveries that often occur late evening or early morning are near residential neighborhoods, hotels, hospitals, and elder care facilities... One study conducted by LSA Associates found that a diesel-powered TRU operating at high idle produces an A-weighted decibel (dBA) noise rating of 104 dBA, while a diesel truck at idle produces a noise rating of 96 dBA."[69]

16-12 Cont.

In the California Attorney General's ("AG") guidance for warehouse projects, the AG recommends that, unless a developer adopts mitigation measures limiting cold storage impacts, the developer should record a covenant on the title of the underlying property to ensuring that the property cannot be used to provide refrigerated warehouse space.[70] The City should include such title restrictions for this Project unless an EIR is prepared that analyzes and mitigates impacts associated with reasonably foreseeable cold storage uses and other more intensive warehousing uses.

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[67] California Air Resources Board, 2022 TRU Technology Assessment, pg. 10.
[68] California Air Resources Board, 2022 TRU Technology Assessment, pg. 10.
[69] California Air Resources Board, 2022 TRU Technology Assessment, pg. 17-18.
[70] *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act (Updated September 2022)*, pg. 9, available at https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf ("Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.").

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III. THE DEIR FAILS TO DISCLOSE, ANALYZE AND MITIGATE POTENTIALLY SIGNIFICANT IMPACTS

An EIR must fully disclose all potentially significant impacts of a Project and implement all feasible mitigation to reduce those impacts to less than significant levels. The lead agency's significance determination with regard to each impact must be supported by accurate scientific and factual data.[71] An agency cannot conclude that an impact is less than significant unless it produces rigorous analysis and concrete substantial evidence justifying the finding.[72]

Even when the substantial evidence standard is applicable to agency decisions to certify an EIR and approve a project, reviewing courts will not 'uncritically rely on every study or analysis presented by a project proponent in support of its position. A clearly inadequate or unsupported study is entitled to no judicial deference.'"[73]

16-13

Moreover, the failure to provide information required by CEQA is a failure to proceed in the manner required by CEQA.[74] Challenges to an agency's failure to proceed in the manner required by CEQA, such as the failure to address a subject required to be covered in an EIR or to disclose information about a project's environmental effects or alternatives, are subject to a less deferential standard than challenges to an agency's factual conclusions.[75] In reviewing challenges to an agency's approval of an EIR based on a lack of substantial evidence, the court will "determine de novo whether the agency has employed the correct procedures, scrupulously enforcing all legislatively mandated CEQA requirements."[76]

Additionally, CEQA requires agencies to commit to all feasible mitigation measures to reduce significant environmental impacts.[77] In particular, the lead agency may not make required CEQA findings, including finding that a project impact is significant and unavoidable, unless the administrative record demonstrates that it has adopted all feasible mitigation to reduce significant environmental impacts to the greatest extent feasible.[78]

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[71] CEQA Guidelines § 15064(b).
[72] *Kings Cty. Farm Bur. v. Hanford* (1990) 221 Cal.App.3d 692, 732.
[73] *Berkeley Jets*, 91 Cal.App.4th at 1355.
[74] *Sierra Club v. State Bd. Of Forestry* (1994) 7 Cal.4th 1215, 1236.
[75] *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435.
[76] *Id., Madera Oversight Coal., Inc. v. County of Madera* (2011) 199 Cal. App. 4th 48, 102.
[77] CEQA Guidelines § 15002(a)(2).
[78] PRC § 21081(a)(3), (b); CEQA Guidelines §§ 15090, 15091; *Covington v. Great Basin Unified Air Pollution Control Dist.* (2019) 43 Cal.App.5th 867, 883.

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A. The DEIR Fails to Disclose and Mitigate Potentially Significant Health Risk from Exposure to Valley Fever

The DEIR fails to disclose, analyze, and mitigate exposure to *Coccidiodes Immitis* (Valley Fever cocci) on the Project site. The DEIR fails to include any discussion or mitigation of this impact. Dr. Clark's comments describe the health risks associated with Valley Fever, its potential for being present on the Project site, and feasible mitigation measures that should be implemented by the City.

Dr. Clark explains that when soil containing cocci spores are disturbed by construction activities, the fungal spores become airborne, exposing construction workers and other nearby sensitive receptors.[79] Valley fever is the initial form of coccidioidomycosis infection, and can develop into a more serious disease, including chronic and disseminated coccidioidomycosis.[80] This puts workers and nearby residents at risk, particularly during digging activities.[81] Dr. Clark states that disturbed spores could be blown into the mobile home community south of the Project site.[82] Valley Fever risks are potentially significant for development of this Project site. Dr. Clark reviewed data demonstrating that Coachella has rates of Valley Fever up to 20 per 100,000.[83] Valley Fever rates in the area have increased 30% since 2022, demonstrating that this risk will continue to rise.[84] 16-14

The DEIR is inadequate as an informational document because it fails to disclose a significant effect on public health. CEQA Guidelines Section 15065(a)(4) provides that the City is required to find that a project will have a significant impact on the environment if the environmental effects of a project will cause a substantial adverse effect on human beings.[85] Workers' and nearby residents' potential exposure to Valley Fever from Project construction activities constitutes a substantial adverse effect on human beings.

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[79] Clark Comments, pg. 7.
[80] *Id.* at 10.
[81] *Id.* at 8.
[82] *Id.* at 10
[83] *Id.* at 8.
[84] *Id.* at 7.
[85] PRC § 21083(b)(3), (d); *see Cal. Build. Indust. Ass'n v. BAAQMD* (2015) 62 Cal.4th 369, 388-90 (*"CBIA v. BAAQMD"*) (disturbance of toxic soil contamination at project site is potentially significant impact requiring CEQA review and mitigation); *Madera Oversight Coalition v. County of Madera* (2011) 199 Cal. App. 4th 48, 82; *Berkeley Keep Jets Over the Bay Com. v. Bd. of Port Comrs. ("Berkeley Jets")* (2001) 91 Cal.App.4th 1344, 1370-71.

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The DEIR also fails to accurately describe the environmental setting. CEQA requires that a lead agency include a description of the physical environmental conditions in the vicinity of the Project as they exist at the time environmental review commences.[86] Use of the proper baseline is critical to a meaningful assessment of a project's environmental impacts.[87] By failing to disclose existing Valley Fever incident rates, the DEIR fails to accurately evaluate the likelihood of exposure to Valley Fever cocci on the Project site during Project construction and operation.

16-14 Cont.

The DEIR also fails to mitigate this potentially significant impact. Dr. Clark explains that compliance with standard dust control regulations such as SCAQMD Rule 403 do not meaningfully reduce Valley Fever risks.[88] Conventional dust control measures do not prevent the spread Valley Fever because they largely focus on visible dust or larger dust particles—the PM_{10} fraction—not the very fine particles where the Valley Fever spores are found.[89] Dr. Clark proposes feasible and effective mitigation measures that must be considered in a revised DEIR that acknowledges the potentially significant risk of exposure to Valley Fever.[90]

In sum, the DEIR must be revised to disclose and mitigate this impact in a recirculated EIR.

B. The DEIR Fails to Adequately Analyze and Mitigate Significant Transportation Impacts

1. The City's VMT Thresholds Are Not Supported by Substantial Evidence

16-15

The DEIR applies VMT screening and significance thresholds that are unsupported by substantial evidence. The DEIR states: "[t]he City of Coachella has yet to adopt Senate Bill 743 (SB 743) guidelines and therefore, the VMT analysis was based upon the methodology and significant threshold criteria identified in the County of Riverside Transportation Analysis (TA) Guidelines for Level of Service (LOS) and Vehicle Miles Traveled, December 2020 (Guidelines)."[91] The DEIR fails

[86] CEQA Guidelines, § 15125, subd. (a).
[87] *Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Ca.4th 310, 320.
[88] Clark Comments, pg. 10.
[89] Clark Comments, pg. 11.
[90] *Id.* at 12-13.
[91] DEIR, Appendix I, PDF pg. 489.

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to provide substantial evidence that these thresholds are appropriate for local conditions.[92]

In *Cleveland National Forest Foundation, et al. v. County of San Diego,*[93] the Fourth District Court of Appeal held that two screening thresholds of significance for VMT impacts adopted by the County of San Diego as part of its 2022 Transportation Study Guide were invalid because they were unsupported by substantial evidence. At issue were two of County's screening thresholds: its "infill" and "small project" thresholds. The "small project" threshold exempted from VMT analysis a residential or office project that is expected to generate fewer than 110 daily automobile trips."[94] The County adopted this threshold based on Office of Planning and Research recommendations, but failed to make any adjustment for local VMT or how it compares to the statewide average.[95]

16-15 Cont.

The Court invalidated the County's small project screening threshold as lacking the required substantial evidence support showing that projects screened out under it would likely cause a less-than-significant transportation effect in the County.[96] The Court rejected County's arguments that it was allowed to simply adopt another agency's significance threshold without such a showing and that statewide goals can automatically be used as local thresholds.[97] Rather, "substantial evidence in this context includes evidence that the threshold applies as intended in the local conditions."[98] OPR's recommendation alone could not excuse County's failure to provide any evidentiary support for applying the no significant impact assumption under local conditions. The County acknowledged OPR's small project threshold was based on evaluating projects statewide, not in a single jurisdiction, and it made "no effort... to develop any evidence that small projects generating 110 or fewer trips are likely to cause a less than significant transportation effect in San Diego County."[99]

Here, the City's reliance on County separate screening and significance thresholds, and assumption that the Project is a "mixed-use" project, are similarly

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[92] Guidelines, § 15064.7, subd. (c) [agency's adoption of another agency's threshold must be supported by substantial evidence].)
[93] *Cleveland National Forest Foundation, et al. v. County of San Diego* (2025) 109 Cal.App.5th 948.
[94] *Id.* at 956.
[95] *Id.* at 965.
[96] *Id.*
[97] *Id.*
[98] *Id.* (Citing *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 226-227 [as explaining "statewide criterion is an acceptable significance threshold only if there is substantial evidence to support its application to a specific project"].)
[99] *Id.* at 966.

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unsupported. As in *Cleveland National Forest Foundation*, the County thresholds were "developed by evaluating projects across the [County] and [were] not developed based on a single jurisdiction."[100] As in *Cleveland National Forest Foundation*, the DEIR does not present evidence that the County's significance thresholds or screening thresholds are appropriate for projects in the City of Coachella. Indeed, as discussed below, Mr. Marshall finds that the DEIR's interpretation of County VMT guidance is unsupported and resulted in the omission of the Project's small warehouse uses from its VMT analysis of the Project's industrial components.[101] The DEIR's analysis is thus unsupported by substantial evidence in violation of CEQA.

16-15 Cont.

2. The DEIR Fails to Analyze the VMT Impacts of Major Project Components

The DEIR improperly claims that major components of the Project screen out of a VMT analysis and thus fails to analyze and mitigate their impacts. The DEIR acknowledges that the 233,000 sf warehouse does not screen out of a VMT analysis and correctly identifies that it would have a significant impact.[102] But the DEIR fails to analyze the other Project components, which include Small Warehouses, Small Business, Personal Vehicle Storage, Self-Storage, and Retail.[103] The total industrial square footage proposed by the Project is 624,500 square feet, so failure to analyze VMT from these other uses results in a failure to meaningfully analyze the bulk of the Project.[104]

16-16

The DEIR's rationale for screening out the other non-retail uses is that "[t]he [Riverside] County Guidelines recommend evaluation of each land use separately in case of a mixed-use project."[105] Mr. Marshall explains that the DEIR misapplies this guidance; the Project's does not likely constitute a mixed-use project.[106] First, he explains that the term "mixed-use," as used in the County guidelines, appears to refer to projects that have a dense mix of residential and retail uses.[107] This Project's mix of industrial buildings of various sizes would not fit this designation.

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[100] *Id.* at 965.
[101] Marshall Comments, pp. 2-3.
[102] DEIR, Appendix I, PDF pg. 490; Marshall Comments, pg. 2.
[103] DEIR, Appendix B, PDF pg. 9; Marshall Comments, pg. 2.
[104] City, Notice of Availability and Completion of the Draft Environmental Impact Report for the Coachella Airport Business Park Project, pg. 1.
[105] DEIR, pg. 4.17-30; Marshall Comments, pg. 2.
[106] Marshall Comments, pg. 2-3.
[107] *Id.* at 3.

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Mr. Marshall also explains that even if the term "mixed-use" applied broadly to projects with a mix of non-residential uses, the Project's mix of industrial buildings would not be considered diverse enough to be considered different uses. Specifically, the County guidelines recommend that analysis of mixed-use projects be done by applying either the EPA's MXD Model or the Institute of Traffic Engineers ("ITE") mixed-use trip generation methodology.[108] Mr. Marshall explains that neither of these tools split land use down to the level done in the DEIR when doing VMT screening.[109]

16-16 Cont.

Mr. Marshall notes that the DEIR itself groups most of the Project components together as "industrial park," excluding only the fast-food restaurant, convenience store, and mini-warehouse uses.[110] The DEIR's approach would allow nearly any industrial park project to screen out of a VMT analysis. This demonstrates that the DEIR lacks substantial evidence for its methodology that most of the Project's components screen out of a VMT analysis, and renders the DEIR's VMT analysis unsupported.

3. The DEIR Fails to Fully Mitigate the Project's Significant VMT Impacts

The DEIR finds that Project-related and cumulative VMT impacts would be significant and unavoidable.[111] To reduce the significant VMT impacts, the DEIR includes a vanpooling measure in MM-GHG-1:

> The Project Applicant shall require any business that operates in the proposed project and has 20 or more full-time employees shall implement at least one of the following programs:
>
> o Pre-tax election program to allow employees to exclude wages for commuting costs for transit or vanpools;
> o An employer supplied transit pass;
> o Employer provided transit; or
> o Other, similar demand management programs.[112]

16-17

The DEIR calculates that this measure would reduce impacts by 3.55%, relying on a calculation in California Air Pollution Control Officers Association

[108] *Id.*
[109] *Id.*
[110] *Id.*; DEIR, pg. 4.17-7 - 4.17-9.
[111] DEIR, pg. ES-23.
[112] DEIR, pg. 4.3-23.

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("CAPCOA") Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity.[113] Mr. Marshall observes that this calculation would only apply to a vanpool measure where the employer covers "... the capital costs of vehicle acquisition and the labor costs of drivers, either through incentives to current employees or the hiring of dedicated drivers."[114] The Handbook definition requires substantial payments by employers above wages; but MM-GHG-1 requires no additional payments, and only paperwork to make the employee costs pre-tax.[115] Therefore, the Handbook formula is not applicable to the vanpool measure in MM-GHG-1. The reduction claimed in the DEIR is thus not supported by substantial evidence. 16-17 Cont.

Before an impact can be declared significant and unavoidable, the lead agency must first adopt all feasible mitigation to reduce impact to greatest extent feasible.[116] Mr. Marshall explains that a project can achieve an up to 20.4% reduction in employee commute VMT if a vanpool measure is compliant with the CAPCOA Handbook.[117] To reduce the Project's significant VMT impact to the greatest extent feasible, MM-GHG-1's vanpool measure must be revised to meet the Handbook's definition.[118]

C. The DEIR Fails to Adequately Analyze Mobile Source Air Quality Impacts

1. The DEIR's Air Quality Analysis Overestimates VMT Mitigation

The air quality analysis assumes a 5% VMT reduction from "Measure T-6, Implement Commute Trip Reduction Program (Mandatory)."[119] Reducing VMT would result in a reduction in mobile source emissions. The air study states: "[T]he CalEEMod Mitigation Measure T-6 – Implement Commute Trip Reduction Program was selected for 20 percent of employees in order to account for Mitigation Measure 3, that requires any business within the proposed project that has 20 or more full-time employees to implement a commute trip reduction program."[120] Mitigation 16-18

[113] DEIR, Appendix B, pg. 73; Marshall Comments, pg. 4.
[114] Marshall Comments, pg. 4.
[115] *Id.*
[116] Pub. Res. Code § 21081; 14 CCR §§ 15090, 15091; Covington v. GBUAPCD (2019) 43 Cal.App.5th 867, 879-883.
[117] Marshall Comments, pg. 4.
[118] Marshall Comments, pg. 4.
[119] DEIR, Appendix B, PDF pg. 118, 186-187; Marshall Comments, pg. 4.
[120] DEIR, Appendix B, PDF pg. 52.

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Measure 3 corresponds to a vanpool measure in MM-GHG-1.[121] But this reduction is not supported by substantial evidence.

Mr. Marshall observes that the DEIR's transportation study calculates that the vanpool measure would only reduce VMT by 3.55%.[122] Thus, the air quality study overestimates emissions reductions from the measure.[123] Mr. Marshall further explains that a 3.55% reduction is likely an overestimation.[124] As explained above, the DEIR's mitigation measure lacks features set forth in the CAPCOA Handbook.[125] As a result, the DEIR's estimated 3.55% VMT reduction would overestimate actual reductions, resulting in higher levels of unmitigated emissions than disclosed in the DEIR. 16-18 Cont.

The DEIR's flawed air quality analysis must be revised in a recirculated EIR.

2. The DEIR Underestimates Emissions from Warehouse Truck Trips

The DEIR underestimates the distances of the truck trips associated with the Project's warehouse uses, which consequently underestimates the Project's emissions of criteria air pollutants and GHGs.

The DEIR's CalEEMod air quality analysis assumes an average trip length of 8.62 miles.[126] Mr. Marshall explains that the 8.62 mile trip length is a default CalEEMod trip length and does not reflect reasonably foreseeable distances travelled by trucks to and from this particular Project.[127] Reliance on a default trip length is entirely unsupported.[128] Dr. Clark and Mr. Marshall's comments demonstrate that the Ports of Los Angeles and Long Beach are a major destination of warehouse truck trips in Southern California, and should be used to calculate average truck trips for the Project.[129] The distance to the Ports of Los Angeles and Long Beach is approximately 150 miles from the Project site.[130] Dr. Clark and Mr. Marshall's assessment is consistent with SCAQMD's own approach. SCAQMD has 16-19

[121] DEIR, pg. ES-15.
[122] DEIR, Appendix I, PDF pg. 73.
[123] Marshall Comments, pg. 4.
[124] *Id.*
[125] Marshall Comments, pg. 4.
[126] Marshall Comments, pg. 4-5; Clark Comments, pg. 14.
[127] DEIR, pg. Appendix B, PDF pg. 76 ("The average trip length in CalEEMod is 8.62 miles"); Marshall Comments, pg. 4.
[128] Marshall Comments, pg. 4-5; Clark Comments, pg. 14.
[129] *Id.*
[130] *Id.*

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repeatedly criticized warehouse projects that rely on default average distances, without adjusting for distance to the Ports, as underestimating truck trips.[131] An example of SCAQMD's comments is referenced in Mr. Marshall's comments,[132] demonstrating that the DEIR's 8.62-mile average trip length severely underestimates the distances that would be travelled by the Project's trucks. Thus, the DEIR's analysis of mobile source emissions underestimates truck trip lengths and is not supported by substantial evidence.

16-19 Cont.

The City may argue that trips to the Ports are not proposed by the Project. But CEQA requires analysis of reasonably foreseeable consequences of the Project – which include reasonably foreseeable end uses permitted by the Project.[133] The lack of specific tenants identified for the Project does not justify omission of this analysis. Dr. Clark's comments present evidence showing that trips to the Ports are a reasonably foreseeable consequence for a warehouse in this area.[134] Additionally, the National Center for Sustainable Transportation ("NCST"), sponsored by the California Department of Transportation, prepared a research report titled "Warehousing and Distribution Center Facilities in Southern California: The Use of the Commodity Flow Survey Data to Identify Logistics Sprawl and Freight Generation Patterns" in 2017.[135] The report analyzed Southern California

[131] SCAQMD, Comments on the Draft Subsequent Environmental Impact Report for the Hemlock Warehouse Development Project (SCH No.: 2009091089) (November 22, 2023), available at https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/november-2023/SBC231011-05.pdf; SCAQMD, Comments on Notice of Availability of a Recirculated Draft Environmental Impact Report (EIR) for Rubidoux Commerce Park Project (Proposed Project) (SCH No. 2020110449) (October 9, 2023), available at https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/october-2023/RVC230901-01.pdf; SCAQMD, Comments on Draft Environmental Impact Report (DEIR) for the Optimus Logistics Center 2 (September 11, 2015), pg. 3, available at https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/september/deiroptimus.pdf?sfvrsn=2 ("Since the port areas are over 70 miles away from the project site and that trucks will be serving other destinations within the basin and out of state, the SCAQMD staff recommends, absent a tenant-specific analysis with trip length information, that all applicable analyses be revised in the Final EIR using a one-way trip length that more accurately estimates air quality emission and related impacts based on the anticipated activities and distances described in the DEIR."); SCAQMD, Comments on Draft Environmental Impact Report (DEIR) for the Proposed Westgate Specific Plan (SCH No. 1995052002) (March 5, 2015), pg. 5, available at https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/march/deirwestgate.pdf?sfvrsn=4; SCAQMD, Comments on Draft Mitigated Negative Declaration (Draft MND) for the Proposed Colton – DEXUS Project (February 1, 2013), available at https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2013/february/colton-dexus.pdf.
[132] Marshall Comments, p. 6.
[133] *Laurel Heights I, supra*, 47 Cal. 3d 376, 398.
[134] Clark Comments, pg. 15-16.
[135] NCST, Warehousing and Distribution Center Facilities in Southern California: The Use of the Commodity Flow Survey Data to Identify Logistics Sprawl and Freight Generation Patterns (July

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Association of Governments ("SCAG") data on warehouses in the six counties that comprise the SCAG region (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura). The report finds that 56% of the facilities in the SCAG region receive goods from the Port of Los Angeles and Long Beach, and around 50% deliver to Southern California warehouses, retail stores or manufacturing plants.[136] This data suggests that trips to the Ports are reasonably foreseeable, and that it would be speculative not to account for distance to the Ports.

16-19 Cont.

In June 2014, SCAQMD staff conducted a business survey of warehouse operators in the SCAQMD region.[137] The survey found that 42% of goods going to high-cube warehouses in the SCAQMD region originated from the Ports, per the figure below.[138]

2017), available at https://dot.ca.gov/-/media/dot-media/programs/research-innovation-system-information/documents/final-reports/ca17-2975-finalreport-a11y.pdf.
[136] *Id.* at 6-7.
[137] SCAQMD, SCAQMD High Cube Warehouse Truck Trip Study White Paper Summary Of Business Survey Results (June 2014), available at https://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/business-survey-summary.pdf.
[138] *Id.* at pg. 11.

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Origin and Destination of Goods

22 of 34 high cube warehouse respondents provided the origins and destinations of goods flowing to and from their facility. Major trends seen in the charts below include:

- The ports of Los Angeles and Long Beach make up a large share of imported goods yet only a minor component of exported goods
- Approximately 1 in 5 truck trips occurs between warehouses
- Approximately 1 in 7 truck trips involves an out of state location
- Approximately 1 in 10 truck trips involves a rail yard



Because truck trips to and from the Ports are reasonably foreseeable and unanalyzed in the DEIR, the DEIR underestimates transportation, air quality, and GHG impacts. 16-19 Cont.

D. The DEIR Fails to Adequately Analyze Operational Health Risk Impacts

1. The Location of the Fuel Center Significantly Increases Health Risks

The Project proposes a fuel center at the southern border of the Project site at Airport Blvd.[139] Across the street is a mobile home community. The DEIR's health risk analysis demonstrates that emissions from the fuel center would result in a 16-20

[139] DEIR, Exhibit 2.4 – Site Plan.

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cancer risk of 1.5 in one million at these receptors.[140] This would nearly double the community's health risks from the Project's operations (which result primarily from emissions of DPM) to 3.3 in one million.[141] The Project's site plan conflicts with Policy 11.3 of the General Plan:

> Prohibit the siting of land uses that adversely impact existing sensitive receptors, including schools, childcare centers, senior housing, and subsidized affordable housing. The minimum distance separating these uses should be 500 feet.[142]

The mobile home community is a sensitive receptor. The fuel center is a land use that would adversely impact this receptor because it would nearly double the Project's health risk impacts on the community. Dr. Clark concludes that the health risk from exposure to emissions associated with the fuel center will exacerbate existing health risk, resulting in a significant impact.[143] The City may argue that the Project does not conflict with the policy because the Project's health risk impacts would not exceed a 10 in one million threshold.[144] This ignores that these health risks may be significant cumulatively. These comments demonstrate below that the Project's health risks would cumulatively considerable under draft SCAQMD numeric thresholds, which lower the significance threshold to 1 in one million. Therefore, the siting of the fuel center violates Policy 11.3. 16-20 Cont.

And even if the Project's health risk impacts did not exceed SCAQMD thresholds, the Project design conflicts with Policy 11.3 by unnecessarily locating the fuel center near as close as possible to residences. The fuel center must be relocated at least 500 feet from the nearest sensitive receptors in order to comply with the General Plan and protect public health. There is no evidence in the record that relocating the fuel center elsewhere on the 47.96-acre site is infeasible.

2. The DEIR Underestimates Health Risk Impacts from Exposure to DPM

The DEIR includes analysis of the mobile home community's health risks from exposure to the Project's operations. Dr. Clark reviewed the DEIR's AERMOD model and found that impacts were underestimated. Dr. Clark explains that the model only includes emissions from trucks travelling onsite and on Airport Blvd, 16-21

[140] DEIR, Appendix B, PDF, pg. 80.
[141] *Id.*; Clark Comments, pg. 24.
[142] DEIR, pg. 4.3-14.
[143] Clark Comments, pp. 23-24.
[144] DEIR, Appendix B, PDF, pg. 80.

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when in reality, trucks would also be driving past the mobile home community on CA 86.[145] This underestimates the community's exposure to DPM generated by trucks. The DEIR's analysis must be revised to fully disclose and mitigate these health risk impacts. 16-21 Cont.

E. The DEIR Fails to Adequately Disclose, Analyze and Mitigate the Project's Cumulative Impacts

An EIR must evaluate a cumulative impact if the project's incremental effect combined with the effects of other projects is "cumulatively considerable."[146] This determination is based on an assessment of the project's incremental impacts "viewed in connection with the effects of past project, the effects of other current projects, and the effects of probable future projects."[147] Proper cumulative impact analysis is vital because "the full environmental impact of a proposed project cannot be gauged in a vacuum. One of the most important environmental lessons that has been learned is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact."[148] 16-22

1. The DEIR's Cumulative Air Emissions Analysis Does Not Comply with CEQA, Attorney General Warehouse Guidance, and Updated SCAQMD Guidance

The DEIR fails to adequately analyze the significance of the Project's cumulative air quality emissions. The DEIR asserts that, under SCAQMD guidance, any exceedance of a project-level threshold for criteria pollutants also is considered to be a cumulatively-considerable effect, while air pollutant emissions that fall below applicable project-level thresholds are not considered cumulatively-considerable.[149] The DEIR concludes that this Project's emissions of criteria air pollutants would be less-than-significant because they would not exceed the project-level thresholds.[150] The DEIR's analysis of cumulative health risks is flawed for the same reason as the air quality analysis. This approach is inadequate because it fails 16-23

[145] Clark Comments, pg. 18.
[146] CEQA Guidelines § 15130(a).
[147] *Id.*, §§ 15065(a)(3), 15355(b).
[148] *Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 114.
[149] DEIR, pg. 4.3-19; 4.3-30.
[150] *Id.*

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to analyze the Project's cumulative effects with existing and proposed development near Project site.[151]

The DEIR's approach has been rejected by the courts for failing to comply with CEQA's requirement that a project mitigate impacts that are "cumulatively considerable."[152] The leading case on this issue is *Kings County Farm Bureau v. City of Hanford*.[153] In *Kings County*, the city prepared an EIR for a 26.4-megawatt coal-fired cogeneration plant. Notwithstanding the fact that the EIR found that the project region was out of attainment for PM_{10} and ozone, the city failed to incorporate mitigation for the project's cumulative air quality impacts from project emissions because it concluded that the Project would contribute "less than one percent of area emissions for all criteria pollutants."[154] The city reasoned that, because the project's air emissions were small in ratio to existing air quality problems, that this necessarily rendered the project's "incremental contribution" minimal under CEQA. The court rejected this approach, finding it "contrary to the intent of CEQA," and that "[t]he EIR improperly focused upon the individual project's relative effects and omitted facts relevant to an analysis of the collective effect this and other sources will have upon air quality."[155]

16-23
Cont.

This DEIR's analysis is similarly flawed because it improperly focuses upon the individual project's relative effects and omits facts relevant to an analysis of the collective effect this and other sources will have upon air quality. For example, the DEIR does not evaluate the significance of the combined emissions from construction of the Project and other industrial projects listed in Table 3-1 of the DEIR.[156] The DEIR also fails to analyze the combined emissions from mobile sources generated by the cumulative projects' operations. Dr. Clark calculates that

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[151] DEIR, pg. 3.0-3, Table 3-1 Cumulative Projects in the City of Coachella
[152] PRC § 21083(b)(2); 14 CCR § 15130; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 719-21.
[153] *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692 ("Kings County"); *see also, Friends of Oroville v. City of Oroville* (2013) 219 Cal. App. 4th 832, 841-42.
[154] *Kings County, supra,* at 719.
[155] *Id.* at 721; *see also People of the State of California v. City of Fontana,* Case No. CIVSB2121829, Petition for Writ of Mandate, available at https://climatecasechart.com/wp-content/uploads/case-documents/2021/20210723_docket-CIVSB2121829_petition-for-writ-of-mandate.pdf ("The MND's cumulative air quality impact analysis does not account for—or even acknowledge—the multitude of other warehouses near the Project. Rather than consider the environmental setting within which the Project will be situated, the MND simply states that the Project will not result in a cumulatively considerable increase in emissions because the Project's individual air quality impacts will be less than significant. The MND even applies this reasoning to its analysis of health impacts from localized emissions, despite making no attempt to determine or disclose the severity of the existing health impacts from localized emissions in the community")
[156] DEIR, pg. 3.0-3, Table 3-1 Cumulative Projects in the City of Coachella

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existing projects within 5 kilometers (km) of the Project site generate 4,000 daily truck trips, producing 5.5 lbs of diesel particulate matter (DPM) per day and 623 lbs of oxides of nitrogen (NO_x) per day.[157] These combined emissions may result in significant air quality and health risks. These potentially significant cumulative health risks are unanalyzed in the DEIR, in violation of CEQA and the principles articulated in *Kings County*.

The approach used in the DEIR also directly conflicts with the recent Attorney General guidance document setting forth best practices for evaluating the environmental impacts of industrial projects like this one under CEQA.[158] With respect to cumulative air quality and GHG emissions analysis, the Attorney General's guidance states that best practices include "[w]hen analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, *even if the project's individual impacts alone do not exceed the applicable significance threshold* [emphasis added]."[159]

16-23 Cont.

The DEIR's cumulative impacts analysis relies on a 2003 SCAQMD guidance document titled White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution.[160] The City of Fontana was recently sued by the State Attorney General for erroneous reliance on this guidance.[161] The Attorney General's petition explained: "[t]o the extent that the 2003 SCAQMD White Paper asserts that any project with less than significant individual air quality impacts also necessarily has less than significant cumulative air quality impacts, it is inconsistent with CEQA."[162] The Attorney General's litigation resulted in a settlement which requires compliance with an ordinance adopted on April 12, 2022 that establishes sustainability standards for warehouses in Fontana, including standards intended to address cumulative air quality impacts. For example, the standards include requirements that rooftop solar panels supply 100% of power for non-refrigerated portions of facilities with buildings over 400,000 square feet, trees

[157] Clark Comments, pg. 19.
[158] *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act* (Updated September 2022), available at https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf .
[159] *Id.*, pg. 7.
[160] DEIR, Appendix B, pg. 63.
[161] *People of the State of California v. City of Fontana,* Case No. CIVSB2121829, Petition for Writ of Mandate, available at https://climatecasechart.com/wp-content/uploads/case-documents/2021/20210723_docket-CIVSB2121829_petition-for-writ-of-mandate.pdf
[162] *Id.*

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in automobile parking areas, zero emission motorized operational equipment, other equipment electrification requirements, and solar-ready buildings roofs.[163]

SCAQMD is in the process of updating its guidance to reflect modern science and CEQA's requirements, specifically referencing the City of Fontana case.[164] SCAQMD's November 6, 2024, Working Group's draft cumulative impacts guidance recommends that agencies lower the cancer risk significance threshold to better reflect cumulative impacts.[165] The draft SCAQMD protocols lower the cancer risk threshold from 10 in one million if certain factors reflecting high pollution burden are met.[166] These factors include (1) MATES excess cancer risk, (2) if there are 951 daily heavy-duty truck trips or more that would traverse the truck route, and (3) if the Project is located in a SB 535 disadvantaged community or an AB 617 community. The DEIR's failure to consider pollution burden in its analysis of cumulative health risks thus violates CEQA. 16-23 Cont.

In sum, the DEIR's cumulative air quality impacts analysis fails to comply with CEQA. The City must prepare a revised EIR that properly evaluates and mitigates such impacts.

2. The Project's Impacts Would be Cumulatively Considerable Under the Draft SCAQMD Thresholds

The Project's health risk impacts would exceed SCAQMD's draft cumulative impacts significant thresholds. Although the new protocols have not been formally adopted, SCAQMD comments on similar industrial projects recommend that the draft protocols be applied.[167] This demonstrates that the new thresholds are supported by substantial evidence, unlike the outdated 2003 guidance. 16-24

[163] *Id.*, Stipulation For Entry Of Final Judgment On Consent, available at https://climatecasechart.com/wp-content/uploads/case-documents/2022/20220414_docket-CIVSB2121605-CIVSB2121829_stipulation.pdf.
[164] SCAQMD, Working Group Meeting #6, Cumulative Impacts from Air Toxics for CEQA Projects, November 6, 2024, https://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-6-20241106.pdf?sfvrsn=405a8561_13, pg. 4; *see* SCAQMD, Analyzing Cumulative Impacts from Air Toxics in CEQA Documents, https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new).
[165] https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new); https://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-6-20241106.pdf?sfvrsn=405a8561_13.
[166] *Id.*
[167] SCAQMD, Comments on Draft Environmental Impact Report (DEIR) for the Proposed DJT4 Parcel Delivery Facility Project (Proposed Project) (SCH No. 2023070241) (December 20, 2024), available at https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/december-2024/orc241106-09-deir-djt4-parcel-delivery-facility-project.pdf?sfvrsn=8acd8361_8.

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The draft SCAQMD protocols include a flowchart lowering the cancer risk significance threshold (from 10 in one million) if certain factors reflecting high pollution burden are met.[168] Dr. Clark applied the flowchart and found that the Project's impacts would be significant.[169]

Step 1 of the flowchart is to determine the background cancer risk affecting the Project area via the SCAQMD Multiple Air Toxics Exposure Study (MATES). Per the MATES V Data Visualization Tool, the location of the Project site is in the 63rd percentile of highest cancer risks in the South Coast Air Basin, with a cancer risk of 316 in one million.[170] Per the draft thresholds, areas experiencing a background excess cancer risk in the 90th to 50th percentile would result in a drop of the Cancer Risk Threshold from 10 in one million to 5 in one million.[171]

Step 2 of the WG 6 flow diagram is to determine if there are 951 daily heavy-duty truck trips or more that would traverse the truck route to the freeway with Existing + Project + Future volumes. If there are more than 951 heavy duty truck trips, then the Cancer Risk Threshold would again drop from 5 in one million to 3 in one million.[172] The DEIR's transportation study demonstrates that the Project would generate well over 951 truck trips a day.[173] The vast majority of daily truck trips will travel on SR 86 to the north of Airport Boulevard.[174] This reduces the significance threshold to 3 in one million.

Step 3 is to determine if the Project is located in a SB 535 disadvantaged community or an AB 617 community. If the project is within such an area, then the threshold would be reduced further to one in one million. Here, Dr. Clark demonstrates that the Project is located in an AB 617 community.[175] This lowers the significance threshold from 3 in one million to 1 in one million.

16-24 Cont.

[168] SCAQMD, Working Group Meeting #6, Cumulative Impacts from Air Toxics for CEQA Projects, November 6, 2024.
[169] Clark Comments, pg. 20.
[170] Clark Comments, pg. 20; Gridded Cancer Risk, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?views=Click-tabs-for-other-data%2CGridded-Cancer-Risk#data_s=id%3AdataSource_112-7c8f2a4db79b4a918d46b4e8985a112b%3A15547, last accessed August 28, 2025.
[171] Clark Comments, pg. 21; SCAQMD, Working Group Meeting #6, Cumulative Impacts from Air Toxics for CEQA Projects, November 6, 2024, pg. 8.
[172] *Id.*
[173] DEIR, Appendix I, Table 1-4, pg. 5 (991 4+-axle trucks, 219 3-axle trucks, and 132 2-axle trucks would be generated daily from the Industrial Park component).
[174] DEIR, Appendix I, Figure 1-2, PDF pg. 20.
[175] Clark Comments, pg. 21-22.

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The DEIR calculates that the cancer risk from the Project's DPM emissions would be as high as 1.8 per million persons at the mobile homes located south of the Project site.[176] When combined with the gas station TAC emissions, this would result in a cancer risk as high as 3.3 per million.[177] These health risk impacts would exceed the one in one million significance threshold potentially applicable to the Project. This constitutes substantial evidence of a significant impact requiring disclosure and mitigation in a recirculated EIR. 16-24 Cont.

F. The DEIR Fails to Adequately Evaluate Potentially Significant Noise Impacts

1. The DEIR's Construction Noise Significance Threshold is Unsupported by Substantial Evidence

Appendix G of the CEQA Guidelines provides that the Project would cause a significant noise impact if it would result in "[g]eneration of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies."[178] For this project, the DEIR provides that daytime construction noise under 80 dBA and nighttime construction noise under 70 dBA would be less than significant.[179] The DEIR sources these thresholds from the Federal Transit Administration's ("FTA") Transit Noise And Vibration Impact Assessment Manual.[180] But the DEIR violates CEQA by failing to also identify a significance threshold for the increase in noise over ambient levels. 16-25

California courts have held that "the lead agency should consider both the increase in noise level and the absolute noise level associated with a project".[181] The courts have held that reliance on a maximum noise level as the sole threshold of significance for noise impacts violates CEQA because it fails to consider whether the magnitude of changes in noise levels is significant.[182] In *Keep our Mountains Quiet*

[176] DEIR, Appendix B, PDF pg. 80.
[177] *Id.*
[178] DEIR, Appendices PDF, pg. 2056.
[179] DEIR, pg. 4.13-8.
[180] *Id.*; Federal Transit Administration, Transit Noise And Vibration Impact Assessment Manual, September 2018, pg. 179, available at https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.
[181] *Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714, 733; see *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 894 (citing *Keep Our Mountains Quiet*).
[182] *King & Gardiner Farms, LLC*, 45 Cal.App.5th at 865.

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v. County of Santa Clara,[183] neighbors of a wedding venue sued over the County of Santa Clara's failure to prepare an EIR for a proposed project to allow use permits for wedding and other party events at a residential property abutting an open space preserve. Neighbors and their noise expert contended that previous events at the facility had caused significant noise impacts that reverberated in neighbors' homes and disrupted the use and enjoyment of their property.[184] The County's EIR relied on the noise standards set forth in its noise ordinance as its thresholds for significant noise exposure from the project, deeming any increase to be insignificant so long as the absolute noise level did not exceed those standards.[185] The Court examined a long line of CEQA cases which have uniformly held that conformity with land use regulations is not conclusive of whether or not a project has significant noise impacts[186] in holding that the County's reliance on the project's compliance with noise regulations did not constitute substantial evidence supporting the County's finding of no significant impacts.[187]

16-25 Cont.

In *King and Gardiner Farms, LLC v. County of Kern*,[188] the Court of Appeal cited *Keep our Mountains Quiet* and decisions cited therein when it rejected the use of a single "absolute noise level" threshold of significance (construction and operational noise impacts were only deemed significant if they exceeded 65 dBA CNEL) on the grounds that the sole use of such a threshold fails to consider the magnitude or severity of increases in noise levels attributable to the project in different environments. The Court explained the lead agency failed to "refer to evidence showing why the magnitude of an increase was irrelevant in determining the significance of a change in noise."[189]

Here, the DEIR evaluates the Project's construction noise impacts using absolute thresholds (80/70 dBA). As in *King and Gardiner Farms*, the DEIR's current thresholds fail to consider the increase in noise without referring to any

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[183] *Keep our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714.
[184] *Id.* at 724.
[185] *Id.* at 732.
[186] *Id., citing Citizens for Responsible & Open Government v. City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1338; *Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 881–882; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1416 (project's effects can be significant even if "they are not greater than those deemed acceptable in a general plan"); *Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 354, ("CEQA nowhere calls for evaluation of the impacts of a proposed project on an existing general plan").
[187] *Id.* at 732-734; see also *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 893, as modified on denial of rehearing (Mar. 20, 2020).
[188] *King and Gardiner Farms, LLC, supra*, 45 Cal.App.5th 814.
[189] *Id.* at 894.

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evidence showing why that metric is irrelevant in determining the significance of a change in noise.

Substantial evidence demonstrates that the increase in noise is relevant in determining the significance of construction noise. The FTA Manual cited by the DEIR states that "[p]roject construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use."[190] A single 70 or 80 dBA threshold does not account for the existing noise environment. Figure 3-6 of the FTA Manual presents data from case studies showing that reactions to increases in noise between 5 to 10 dBA above existing levels vary from "widespread complaints" to "threats of legal action."[191] Increases in noise of 20 dBA over existing levels typically results in "vigorous action." These responses to noise increases are caused because "[o]n average, each A-weighted sound level increase of 10 dB corresponds to an approximate doubling of subjective loudness."[192] The DEIR's noise study itself states that "[a]n increase of 5 dBA is typically considered substantial."[193] Thus, the increase in noise over ambient levels must be analyzed in order to fully evaluate the Project's impacts. An EIR must be prepared that applies a legally adequate construction noise threshold. 16-25 Cont.

2. Construction Noise Impacts Would Significantly Increase Noise Over Ambient Levels

The DEIR estimates that the Project's construction would result in construction noise levels of 86 to 89 dBA at the nearest residences.[194] These noise impacts would be significant because they would result in noticeable increases over ambient levels.[195] Ms. Toncheva explains that these increases are up to 30 dB above ambient levels measured at the nearest residence during daytime hours.[196] A 30 dBA increase would subjectively sound 8 times louder than ambient levels. This is because, while a 10 dB increase is 10 times the intensity and perceived as twice as loud, this effect is logarithmic.[197] 16-26

[190] FTA Manual, September 2018, pg. 179.
[191] *Id.* at 18, Figure 3-6 (Community Reaction to New Noise, Relative to Existing Noise in a Residential Urban Environment)
[192] FTA Manual, September 2018, pg. 206.
[193] DEIR, Appendix H, PDF pg. 8.
[194] DEIR, pg. 4.13-19.
[195] DEIR, pg. 4.13-19.
[196] DEIR p. 4.13-4, Table 4.13-2; Toncheva Comments, pg. 4.
[197] https://www.merckmanuals.com/home/multimedia/table/measurement-of-loudness (30 dB is 1,000 times the intensity of 0 dB and seems 8 times as loud.).

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Ms. Toncheva explains that FTA guidance predicts that the community response to a 30 dBA noise increase would likely reach "vigorous action."[198] This noise increase would thus constitute a significant noise increase, even if mitigation reduces it to just below an 80 dBA threshold. This impact must be disclosed and mitigated in a recirculated EIR. 16-26 Cont.

3. The DEIR's Mitigation Measures Would Not Fully Mitigate Construction Noise Impacts

The DEIR claims that MM-NOI-1 would reduce the Project's construction noise levels below the 80 dBA absolute threshold.[199] MM-NOI-1 requires that construction equipment use mufflers that reduce engine noise by 10 dBA, and that construction equipment be staged as far as possible from nearby noise-sensitive land uses, located near the northern boundary of the Project site.[200] The noise reductions claimed by this measure are not supported by substantial evidence.

Ms. Toncheva explains that while the mitigation measures outlined are generally good practice for any construction site, they would not reduce levels by 6-9 dB in order to meet the 80 dBA threshold.[201] The claim that mufflers would reduce noise levels by 10 dB relies on an outdated EPA reference from the 1970s.[202] Mufflers have since become standard on modern construction equipment, and are already accounted for in the FHWA Road Construction Noise Model reference levels used in the DEIR.[203] Further, mufflers only reduce noise from internal combustion engines of the equipment, not activity noise from breaking up or impacting earth and other materials.[204] Thus, MM-NOI-1 would reduce the predicted 86-89 dBA impact. 16-27

MM-NOI-1 states that "construction equipment be staged as far as possible from nearby noise-sensitive land uses, located near the northern boundary of the Project site."[205] This statement should be revised to state that the noise-sensitive land uses are located near the *southern* boundary to accurately reference the residences 60 feet south of the Project.[206]

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[198] Toncheva Comments, pg. 4.
[199] https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf
[200] DEIR, pg. ES-18.
[201] DEIR, pg. 4.13-19.
[202] Toncheva Comments, pg. 3.
[203] *Id.*
[204] *Id.*
[205] DEIR, pg. ES-18.
[206] DEIR, pg. 4.13-18.

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Ms. Toncheva notes that this measure is good standard practice, but only applies to certain equipment.[207] Activities that need to take place within 60 feet of the nearby residences will remain above the FTA threshold. MM-NOI-1 would thus not effectively reduce noise impacts. 16-27 Cont.

In sum, the Project's significant construction noise impacts would continue to exceed the City's 80 dBA threshold. Ms. Toncheva recommends requiring temporary noise barriers, which could reduce levels by 8-10 dB depending on their placement, material, and height.[208]

4. Project Operations Would Result in Significant, Unmitigated Noise Impacts

The DEIR claims that the Project's operational noise impacts would not exceed daytime or nighttime standards (55 and 45 dBA, respectively).[209] The DEIR finds that daytime operational noise impacts at the nearest residential receptor would be 54 dBA and nighttime impacts would be 44 dBA.[210] Ms. Toncheva demonstrates that the DEIR underestimates these noise impacts, which would exceed the 55/45 dBA thresholds.

Ms. Toncheva explains that the DEIR appears to underestimate noise from warehouse mechanical equipment. The DEIR states that noise levels associated with commercial air conditioning units can range from 60 to 65 dBA Leq at 3 feet.[211] This assumption is not supported by substantial evidence because the DEIR fails to provide input references for noise sources used in the operational analysis SoundPLAN model.[212] Substantial evidence demonstrates that mechanical equipment noise would be louder than assumed in the DEIR. Ms. Toncheva explains that the most common large air conditioning unit size for warehouses is 25 tons, with a typical sound power level of 85-95 dBA, which would be equivalent to a sound pressure level of 78-88 dBA at 3 feet.[213] 16-28

Further, the contours shown in Figure 7 of the Noise Study ("Daytime Operational Noise Contours and Modeled Receiver Locations") do not appear to reflect mechanical equipment sources and appear to represent only the contribution

[207] Toncheva Comments, pg. 3.
[208] *Id.*
[209] DEIR, pg. 4.13-21.
[210] *Id.*
[211] *Id.* at 4.13-20.
[212] Toncheva Comments, pg. 6.
[213] *Id.*

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of the truck route and loading docks.[214] Thus, the mechanical equipment noise may not have been included in the impacts analysis.

16-28 Cont.

Since the DEIR's calculations are extremely close to exceeding thresholds (only 1 dB under the daytime and nighttime standards), the Project's operational impacts would likely exceed these standards when mechanical equipment noise is correctly analyzed. This impact must be disclosed and mitigated in a recirculated EIR.

5. The DEIR Fails to Adequately Analyze Noise from Nighttime Operations

16-29

The DEIR states that, "[b]ased on information obtained from the Project Applicant, daytime operations for most on-site land uses, excluding the gas station minimart, would extend from 7:00 am to 9:00 pm."[215] Based on this assumption, the DEIR's analysis of nighttime noise impacts only includes noise from the gas station minimart (anticipated to operate until midnight), and the proposed substation (anticipated to operate 24 hours per day)[216] This omission is shown in Figure 8 of the noise study, excerpted below.[217]

Figure 8
Nighttime Operational Noise Contours and Modeled Receiver Locations



[214] Toncheva Comments, pg. 7; DEIR, Appendix H, pg. 24.
[215] DEIR, pg. 4.13-17; 4.13-21; Appendix H, pg. 19.
[216] DEIR, pg. 4.13-17.
[217] DEIR, Appendix H, pg. 25, Figure 8: Nighttime Operational Noise Contours and Modeled Receiver Locations.

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The assumption that no operations would occur in the industrial park after 9:00 PM is unsupported by substantial evidence. The only evidence supporting this assumption is an allusion to "information obtained from the Project Applicant."[218] This does not constitute substantial evidence because the assumed hours of operation are not binding on future tenants–there is no condition of approval or mitigation measure prohibiting nighttime operations in the DEIR. Undermining the Applicant's assumption are multiple discussions in the DEIR stating that "the proposed Project's future tenants are unknown at this time."[219] Thus, the Applicant does not appear to have concrete information regarding the future tenants' hours of operation.

The City may argue that, because nighttime operations are not specifically proposed by the Applicant, and future tenants are unknown, it would be speculative to analyze nighttime operations. The City may also argue that it need not analyze the "worst case scenario."[220] But CEQA requires "*reasonably foreseeable* consequence[s] of the initial project."[221] Here, it is reasonably foreseeable that the Project's industrial components, such as its warehouses, may have nighttime operations. For example, the Project proposes warehouses, and logistics operations can run 24 hours a day.[222] The DEIR itself assumes that site operations would occur 24 hours, 7 days a week in its air study, rendering the DEIR internally inconsistent.[223] And the Project approvals would allow nighttime operations. Without any condition of approval or mitigation measure providing otherwise, the City cannot rule out nighttime operations. 16-29

The DEIR calculates that nighttime operational noise impacts would be 44 dBA, barely below the 45 dBA threshold.[224] When noise from increased nighttime

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[218] DEIR, pg. 4.13-17; 4.13-21; Appendix H, pg. 19.
[219] DEIR, pg. 4.13-19; *see* 4.13-19 ("Since the proposed Project's future tenants are unknown at this time, the potential hours of operation of future drive-thru restaurant businesses are unknown."); 7.0-37 ("While this alternative could result in a potentially higher VMT than the Project, it is too speculative to try to quantify this difference without knowing the end users of both the proposed Project and the "Heavy Industrial" Alternative.").
[220] *East Oakland Stadium Alliance v. City of Oakland* (2023) 889 Cal. App. 5th 1226.
[221] *Laurel Heights I*, 47 Cal. 3d 376, 398 (emphasis added); *see also Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449-50.
[222] https://cxtsoftware.com/whitepaper/white-house-announces-a-new-standard-in-logistics-24-7-operations/; EIR for Amazon DJT4 Delivery Facility, SCH No. 2023070241, available at https://ceqanet.lci.ca.gov/20201101671/4; https://files.ceqanet.lci.ca.gov/289432-2/attachment/DvnZIrfkn2anTtUbk18pv1hBF_u4a3dz7ybNhvZyauRGrrJLR87M9ZLUCh8t8Z8tbUxRHGIIN6OBZjOR0 ("The Project would operate 24 hours per day, 7 days per week to support delivery of packages to customer locations.")
[223] DEIR, pg. 4.3-16.
[224] DEIR, pg. 4.13-21.

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16-29

operations is considered, the 45 dBA significance threshold would likely be exceeded.[225] The DEIR must be revised to disclose and mitigate this potentially significant impact.

6. Noise from Nighttime Truck Trips Is Potentially Significant and Unmitigated

The Project may generate nighttime truck trips that would result in potentially significant sleep disturbance impacts. However, such impacts are not fully evaluated in the DEIR. The DEIR finds that nighttime noise impacts from truck traffic would be less than significant because the Project would not exceed the 45 dBA leq nighttime exterior noise standard.[226] But courts have held that conformity with land use regulations is not conclusive of whether a project would have significant noise impacts.[227]

16-30

Ms. Toncheva explains that individual nighttime truck trips may result in sleep disturbances despite compliance with the DEIR's nighttime noise standard. Specifically, the City's noise standards, which use the metric "dBA Leq," refer to an *average* sound level over a designated period.[228] Ms. Toncheva explains that a standard relying on *hourly* leq would not reflect the significance of noise from *individual* trucks passing by sensitive receptors.[229] An indoor Lmax noise level of 45 dBA from a single truck has an approximately 10% chance of disturbing sleep.[230] Ms. Toncheva calculates that an individual truck passby would result in an interior Lmax level of 64 dBA at the nearest residence, 60 feet away from the driveway.[231] This level has an approximately 17% chance of disturbing sleep. Therefore, nighttime truck trips generated by the Project would result in potentially significant sleep disturbances. The DEIR must be revised to analyze the full scope

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[225] Toncheva Comments, pg.5.
[226] DEIR, pg. 4.13-21.
[227] *Keep our Mountains Quiet v. County of Santa Clara*, (2015) 236 Cal.App.4th 714, *citing Citizens for Responsible & Open Government v. City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1338; *Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 881–882; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1416 (project's effects can be significant even if "they are not greater than those deemed acceptable in a general plan"); *Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 354 ("CEQA nowhere calls for evaluation of the impacts of a proposed project on an existing general plan"); *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 893, as modified on denial of rehearing (Mar. 20, 2020).
[228] Toncheva Comments, pg. 5.
[229] *Id.*
[230] Basner, "WHO Environmental Noise Guidelines for the European Region: A Systematic Review on Environmental Noise and Effects on Sleep," Figure 4, available at https://pubmed.ncbi.nlm.nih.gov/29538344/.
[231] Toncheva Comments, Pg. 5.

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of noise impacts generated by the Project, which include sleep disturbance impacts from individual truck passbys.

16-30 Cont.

IV. CONCLUSION

For the reasons discussed above, the DEIR for the Project is inadequate under CEQA. It must be revised to provide legally adequate analysis of, and mitigation for, all of the Project's potentially significant impacts. These revisions will necessarily require that the DEIR be recirculated for additional public review. Until the DEIR has been revised and recirculated, as described herein, the City may not lawfully approve the Project.

16-31

Thank you for your consideration of these comments. Please include them in the record of proceedings for the Project.

Sincerely,

Aidan P. Marshall

Attachments
APM:acp

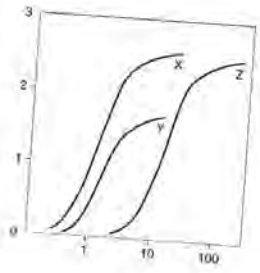
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EXHIBIT A

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September 10, 2025

Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

Attn: Mr. Aidan Marshall

Subject: Comment Letter on Draft Environmental Impact Report (DEIR) Coachella Airport Business Park Development, City of Coachella, Riverside County, California, State Clearinghouse Number (SCH No. 2023040106)

Dear Mr. Marshall:

At the request of Adams Broadwell Joseph & Cardozo (ABJC), Clark and Associates (Clark) has reviewed materials related to the May 2025 City of Coachella (City) DEIR for the above referenced project.

Clark's review of the materials in no way constitutes a validation of the conclusions or materials contained within the plan. If we do not comment on a specific item this does not constitute acceptance of the item.

Project Description:

According to the CEQAnet Project Information description, "As a new business park development within the City, the overall proposed Project site would be developed for industrial uses comprised of the following uses: large and small warehouse; personal vehicle storage and self-storage units; small business use spaces; a small retail and restaurant development; a 44-foot-tall electronic billboard sign located along the Project's small business frontage along SR 86; a fuel station with a convenience store; and associated landscaping, parking, lighting, and signage. An Imperial Irrigation District (IID) electrical substation facility would also be constructed as part of the project, at the northern end of the overall Project site on a parcel that has been acquired from the California Department of Transportation (Caltrans). The new 315 foot x

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315 foot electrical substation will require at least one 1-25 mega volt ampere (MVA) 92/13.2 kilovolt (kV) transformer bank in order to provide adequate power for the proposed Project."

The proposed Project site is located at the northwest corner of the intersection of State Route 86 (SR 86) and Airport Boulevard in the City of Coachella (City), in the County of Riverside (County), California. The site is comprised of four (4) parcels totaling approximately 47.96 acres in size. The proposed site is a currently vacant parcel surrounded by SR 86 to the east, Airport Boulevard to the south, the Coachella Valley Stormwater Channel (CVSC) and Avenue 54 to the approximate west and north. The specifics of the Project include:

1. The approximate 4,000 square foot (sq ft) fuel station with associated convenience store and parking would be located at the site's entrance along Airport Boulevard, with an approximate 4,650 sq ft retail and drive-through restaurant located to the northeast of the site entrance.
2. Eighteen (18) proposed small business buildings, approximately 4,500 sq ft in size each and totaling about 81,000 sq ft, would be located along the site's eastern frontage along SR 86 and to the north of the fuel station and convenience store site within the southern portion of the overall Project site.
3. Four (4) structures for storing personal vehicles averaging 19,200 sq ft (for an estimated total of 76,800 sq ft) with an internal open space area would be located to the north of the small business buildings and to the west of the proposed small warehouse buildings on site.
4. Seventeen (17) self-storage buildings totaling 128,600 sq ft, ranging in size between 5,200 sq ft and 10,400 sq ft, would be located in the center portion of the site, west of the small warehouse buildings.
5. Five (5) small warehouse structures, ranging in size from 9,600 sq ft to 24,000 sq ft (totaling approximately 96,000 sq ft) would also be located along the site's eastern frontage along SR 86. Six (6) large warehouse structures ranging in size from 22,400 sq ft to 48,800 sq ft, totaling approximately 233,100 sq ft of warehouse space would be located along the northern portion of the site, in close proximity to the proposed electric substation.
6. An IID substation facility would be located at the northern end of the overall Project site on a parcel that has been acquired from the California Department of Transportation (Caltrans). The Project Applicant now owns the substation parcel. The new 315-foot x 315-foot electrical substation will require at least one 1-25 mega volt ampere (MVA) 92/13.2 kilovolt (kV) transformer bank in order to provide adequate power for the proposed Project. The final

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components of the new substation will be determined in consultation with IID and may include additional facilities to improve electrical system resiliency and reliability to the surrounding community. There also would be 92 kV transmission line extensions and associated distribution feeders/backbones and distribution line extensions installed on the substation portion of the overall Project site.

7. Utility connections to Coachella Water Authority (CWA) waterlines and Coachella Valley Water District (CVWD) sewer lines are proposed as part of Project implementation

The proposed buildings on the site would range in height from 24 feet to 50 feet in height, primarily consisting of one (1) and two (2) story structures, with some four (4) story buildings. All building design and materials would be consistent with the Project Design Guidelines and would be submitted for architectural review to the City.

Table 2.1: Proposed Project Components

Building Type	Size (in square feet)
Large Warehouse Structures	233,100 sq ft
Small Warehouse Structures	96,000 sq ft
Small Business Development Buildings	81,000 sq ft
Personal Vehicle Storage Facilities	76,800 sq ft
Self-Storage Facilities	128,600 sq ft
Service Station/ Mini Mart	4,000 sq ft
Restaurant and Drive-through Facility	4,650 sq ft
TOTAL	624,500 sq ft

Figure 1: Project Summary

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Figure 2: Regional Location Of Project

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Figure 3: Local Vicinity Map

The City of Coachella is located within the South Coast Air Basin (SCAB) which is guided by the Air Quality Management Plan (AQMP) of the South Coast Air Quality Management District (SCAQMD). The SCAB, is a non-attainment area for both the federal and state standards for ozone and $PM_{2.5}$. The SCAB is in attainment for the state and federal standards for PM_{10}, nitrogen dioxide, and carbon monoxide. SCAQMD has adopted a series of AQMPs to meet the State and federal ambient air quality standards. AQMPs are updated regularly to more effectively reduce emissions, accommodate growth, and minimize any negative fiscal impacts of air pollution control on the economy. The current AQMP was adopted by the SCAQMD Governing Board on December 2, 2022. The AQMP control measures and related emission reduction estimates are based on emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, conformance with the

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AQMP for development projects is determined by demonstrating compliance with local land use plans and/or population projections.

The proposed project would result in the emission of criteria pollutants (ozone (O3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulates less than 10 and 2.5 microns in diameter (PM_{10} and $PM_{2.5}$), and toxic air contaminants (TACs), such as diesel particulate matter, during the construction phase and operational phase of the Project. The DEIR's conclusion that the emissions will not result in significant impacts is not supported by the information within the DEIR.

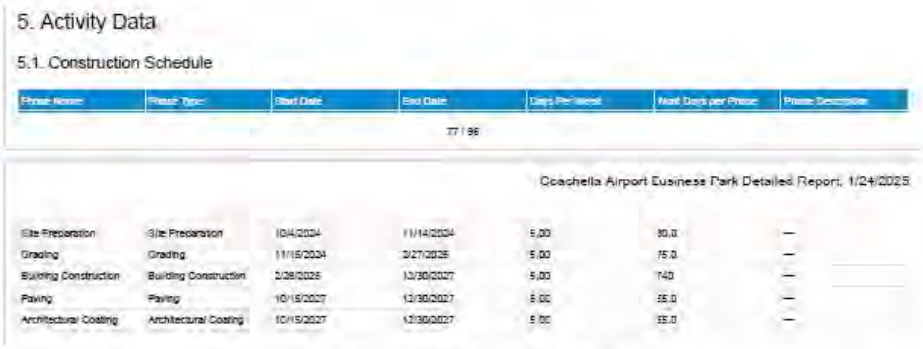
Specific Comments

1. **The DEIR Fails To Include The Emissions From The Utility Connections From Coachella Water Authority (CWA) Waterlines In The Air Quality Analysis**

The DEIR states that the "proposed Project site has an existing 30-inch CVWD waterline adjacent to the site, that is a "dry line", that is, it is not connected to any existing water lines. The Coachella Water Authority (CWA) plans to extend their water facilities with a 20" water line from Avenue 54 southerly along Grapefruit Boulevard, then easterly under the existing railroad tracks and the CVSC to the Project site. Grapefruit Boulevard, then easterly under the existing railroad tracks and the CVSC to the Project site. This will require approximately 1.5 miles of excavations to be completed from Avenue 54 to the Project Site. The equipment that would be needed to install the water line would include at a minimum backhoes, loaders, generator sets, cranes, pavers, and rollers. Based on the distance from Avenue 54 to the site, the offsite improvements would be expected to take between 30 and 45 days to complete. The DEIR is missing the emissions from this foreseeable construction phase in the air quality analysis.

Since sewer connections exist near the proposed Project site, the existing CVWD sewer line near Orange Street and Airport Boulevard would be extended easterly along Airport Boulevard, and then cross the CVSC (either underground or attached to the bridge on Airport Boulevard) and connect to the project site directly on the east side of the CVSC." A review of the CalEEMod analysis of the Project provided in Appendix B of the DEIR fails to show where the emissions from the utility connections are accounted for in the model.

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5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
			77 / 96			

Coachella Airport Business Park Detailed Report, 1/24/2025

Site Preparation	Site Preparation	10/4/2024	11/14/2024	5.00	30.0	—
Grading	Grading	11/15/2024	3/27/2025	5.00	75.0	—
Building Construction	Building Construction	3/28/2025	12/30/2027	5.00	740	—
Paving	Paving	10/15/2027	12/30/2027	5.00	55.0	—
Architectural Coating	Architectural Coating	10/15/2027	12/30/2027	5.00	55.0	—

Figure 4: Construction Schedule

The phases of construction include site preparation, grading, building construction, paving, and architectural coatings but does not include the necessary utility connection work. This deficiency clearly underestimates the emissions from the Project and the City should prepare a revised DEIR which models emissions from all phases of the Project's construction work, including the utility connections.

2. The DEIR Fails To Address The Potentially Significant Health Impacts From Exposure to Valley Fever Spores Present In The Soils Of Riverside County.

During the construction phase of the Project, in addition to exposing the community to criteria pollutants and TACs, a significant risk from exposure to Valley Fever spores is present that may negatively impact the community. Dust exposure is one of the primary risk factors for contracting Valley Fever (via *Coccidiodes immitis (cocci)* exposure).[1] When soil containing the *cocci* spores are disturbed by construction activities, the fungal spores become airborne, exposing construction workers and other nearby sensitive receptors.[2] Valley Fever is on the rise in Riverside County and in Coachella in particular. According to the CA Dept of Public Health, Valley Fever rates have increased 30% since 2022 (from 13 per 100,000 to 17 per 100,000). Based on a study by UCR

[1] RUH-SHPH. 2024. Valley Fever (2019-2023) Riverside County. Riverside University Health System Public Health (RUH-SHPH).

[2] *Ibid.*

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(see figure below) it is evident that Coachella is a hot spot for the County of Riverside with rates of Valley Fever at 17 per 100,000 to 20 per 100,000.



Figure 3: Rates of Valley Fever In Riverside County 2019-2023

Dust exposure is a primary risk factor for contracting Valley Fever (via *Coccidiodes imimitis (cocci)* exposure). When soil containing the *cocci* spores are disturbed by construction activities, the fungal spores become airborne, exposing construction workers and other nearby sensitive receptors. The fungus lives in the top 2 to 12 inches of soil. When soil containing this fungus is disturbed by activities such as digging, vehicles, construction activities, dust storms, or during earthquakes, the fungal spores become airborne. The most at-risk populations are construction and agricultural workers.[3] Here, construction workers are the very population that would be most directly exposed by the Project. A peer reviewed journal article on occupational exposures notes that "[l]abor groups where occupation involves close contact with the soil are at greater risk, especially if the work involves dusty digging operations."[4]

The potentially exposed population in surrounding areas is much larger than construction workers because the nonselective raising of dust during Project construction will carry the very small spores, 0.002–0.005 millimeters ("mm"), into nonendemic areas, potentially exposing large non-Project-related populations.[5],[6] These very small particles are not controlled by conventional

[3] Lawrence L. Schmelzer and R. Tabershaw, Exposure Factors in Occupational Coccidioidomycosis, *American Journal of Public Health and the Nation's Health*, v. 58, no. 1, 1968, pp. 107–113, Table 3; available at http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1228046/?page=1.

[4] *Ibid.*, p. 110.

[5] Schmelzer and Tabershaw, 1968, p. 110; Pappagianis and Einstein, 1978

[6] Pappagianis and Einstein, 1978, p. 527 ("The northern areas were not directly affected by the ground level windstorm that had struck Kern County but the dust was lifted to several thousand feet elevation and, borne on high currents, the

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construction dust control mitigation measures because standard dust control largely focuses on visible dust or larger dust particles—the PM_{10} fraction—not the very fine particles where the Valley Fever spores are found.[7]

A study in Antelope Valley identified a clear link between soil disturbance - due to large-scale renewable energy construction projects, agricultural management practices and PM_{10} fugitive dust emissions - and increased incidence of coccidioidomycosis.[8]



Figure 4: Valley Fever Incidence And Soil Disturbance

It is evident from the figure above that, as the number of acres of soil in the Antelope Valley were disturbed, the incidence rate of Valley Fever also increased. The mass disturbance of soils

soil and arthrospores along with some moisture were gently deposited on sidewalks and automobiles as 'a mud storm' that vexed the residents of much of California." The storm originating in Kern County, for example, had major impacts in the San Francisco Bay Area and Sacramento).

[7] Frederick S. Fisher, Mark W. Bultman, and Demosthenes Pappagianis, Operational Guidelines (version 1.0) for Geological Fieldwork in Areas Endemic for Coccidioidomycosis (Valley Fever), U.S. Geological Survey Open-File Report 00-348, 2000, pp. 5, 7; https://pubs.usgs.gov/of/2000/0348/pdf/of00-348.pdf.

[8] Colson. 2017. Large-Scale Land Development, Fugitive Dust, and Increased Coccidioidomycosis Incidence in the Antelope Valley of California, 1999-2014. https://knowthecause.com/wp-content/uploads/2017/03/Colson2017FugitiveDustCoccidiodes.pdf

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anticipated by the proposed Project will create the same conditions that were detailed in the study by Colson. [9]

Valley Fever often manifests as a mild respiratory illness, but it can progress to serious chronic forms, especially in immunocompromised individuals, and may even become disseminated, impacting organs including the skin, bones, brain, and spinal cord. Disseminated Valley Fever is associated with severe symptoms like meningitis, painful lesions, and swollen joints. The potentially exposed population in areas surrounding the Project site is much larger than just its construction workers because the nonselective raising of dust during Project construction will carry the very small spores, 0.002–0.005 millimeters ("mm"), into nonendemic areas, potentially exposing large non-Project-related populations.[10],[11] For a particle entrained the relative air speed determines the distance it will travel before settling. At a relatively low speed of 3 miles per hour (mph) a particle could travel 0.85 miles in less than 17 minutes. Given the wind flows within the area, it is clear that entrained particles could travel well into residential neighborhoods from the Project site. Given that there is no minimum threshold concentration for exposure to Valley Fever spores, any level of exposure could pose significant health risks to construction workers and nearby residents. The City must disclose this potentially significant impact and require effective mitigation measures to ensure that exposure risk to construction workers and local residents is reduced to the greatest extent feasible.

3. The Proposed Dust Control Measures In The DEIR Fail To Effectively Mitigate Significant Valley Fever Exposure Risks.

The standard fugitive dust mitigation measures proposed in the DEIR are not adequate to protect construction workers and nearby sensitive receptors from exposure to Valley Fever spores. Rule 403 includes requirements for a Dust Control Plan, signage and fencing requirements, as well as surface watering and stabilization with chemicals, gravel and asphaltic pavement to eliminate

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[9] *ibid*

[10] Schmelzer and Tabershaw, 1968, p. 110; Pappagianis and Einstein, 1978

[11] Pappagianis and Einstein, 1978, p. 527 ("The northern areas were not directly affected by the ground level windstorm that had struck Kern County but the dust was lifted to several thousand feet elevation and, borne on high currents, the soil and arthrospores along with some moisture were gently deposited on sidewalks and automobiles as 'a mud storm' that vexed the residents of much of California." The storm originating in Kern County, for example, had major impacts in the San Francisco Bay Area and Sacramento).

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visible fugitive dust from vehicular travel and wind erosion. All the mitigation measures outlined above allow for a percentage of dust that could be generated to migrate offsite. Based on the mitigation measures outlined in the CalEEMOD model (utilized in the DEIR), watering exposed areas twice a day would reduce PM_{10} and $PM_{2.5}$ emissions by 61 percent (61%). Increasing the watering frequency to 3 times per day would reduce PM_{10} and $PM_{2.5}$ emissions by 74%. Conventional dust control measures primarily focus on visible dust or larger dust particles—the PM_{10} fraction—and fail to address the very fine particles that transport Valley Fever spores, which are approximately 5 times smaller than typical PM_{10} particles and remain airborne much longer.[12] These fine particles, when disturbed by soil-disturbing activities, spread widely beyond site, posing a significant risk to both onsite workers and nearby communities.

The proposed compliance with SCAQMD Rule 403, which relies on a visual opacity readings for dust control, is insufficient to prevent exposure to Valley Fever spores. This rule is based on smoke-monitoring methods (U.S. EPA Methods 9 and 22) that require active monitoring by certified observers, rely on subjective observation, and are affected by variable such as lighting, distance, and weather conditions. Due to these limitations, opacity readings do not provide accurate, continuous data on fine airborne particles.

To address these shortcomings, the City should require active monitoring with dust monitors (particle measuring devices) immediately outside of the facility and around its perimeter. Continuous particle measures would offer several advantages. It eliminates the subjectivity inherent in visual opacity readings, leading to more reliable and consistent data. It allows for real-time tracking of dust particle levels, enabling prompt corrective actions if thresholds are exceeded. And it offers robust data sets that can be used for repeatability test and to validate compliance with air quality standards. Incorporating active dust monitoring systems would ensure that air quality impacts are accurately assessed and mitigated, fulfilling the intent of the mitigation measures and conditions of compliance to protect public health and the environment.[13]

The City should also require that the Applicant implement mitigation measures to actively

[12] See, e.g., Cummings and others, 2010, p. 509; Schneider et al., 1997, p. 908 ("Primary prevention strategies (e.g., dust-control measures) for coccidioidomycosis in endemic areas have limited effectiveness.").

[13] See e.g. National Library of Medicine: Valley Fever: Fine Mineral Dust Modeling Points to High-Risk Regions and Seasons in California (January, 2025). Silke Schmidt, PhD, available at https://pmc.ncbi.nlm.nih.gov/articles/PMC11750424/ (last visited 9/10/25).

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suppress the spread of Valley Fever by implementing the following methods:

1. Include specific requirements in the Project's Injury and Illness Prevention Program (as required by Title 8, Section 3203) regarding safeguards to prevent Valley Fever.
2. Control dust exposure:
   - Rule 403 requires application of nontoxic chemical soil stabilizers according to manufacturers' specifications to inactive construction areas. Additionally, chemical stabilizers should be applied at least 24-hours prior to high wind event.
   - In addition to Rule 403's requirement to apply water to all disturbed areas a minimum of three times per day, watering frequency should be increased to a minimum of *four times per day* if there is any evidence of visible wind-driven fugitive dust.
   - Provide National Institute for Occupational Safety and Health (NIOSH)-approved respirators for workers with a prior history of Valley Fever.
   - Half-face respirators equipped with a minimum N-95 protection factor for use during worker collocation with surface disturbance activities. Half-face respirators equipped with N-100 or P-100 filters should be used during digging activities. Employees should wear respirators when working near earth-moving machinery.
   - Prohibit eating and smoking at the worksite, and provide separate, clean eating areas with hand-washing facilities.
   - Avoid outdoor construction operations during unusually windy conditions or in dust storms.
   - Consider limiting outdoor construction during the fall to essential jobs only, as the risk of cocci infection is higher during this season.
3. Prevent transport of cocci outside endemic areas:
   - Thoroughly clean equipment, vehicles, and other items before they are moved off-site to other work locations.
   - Prevent spillage or loss of bulk material from holes or other openings in the cargo compartment's floor, sides, and/or tailgate.
   - Load all haul trucks such that the freeboard is not less than six inches when material is transported on any paved public access road and apply water to the top

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of the load sufficient to limit VDE to 20 percent opacity; or cover haul trucks with a tarp or other suitable cover.

- Provide workers with coveralls daily, lockers (or other systems for keeping work and street clothing and shoes separate), daily changing and showering facilities.
- Clothing should be changed after work every day, preferably at the work site.
- Train workers to recognize that cocci may be transported offsite on contaminated equipment, clothing, and shoes; alternatively, consider installing boot-washing.
- Post warnings onsite and consider limiting access to visitors, especially those without adequate training and respiratory protection.

4. Improve medical surveillance for employees:
   - Employees should have prompt access to medical care, including suspected work-related illnesses and injuries.
   - Work with a medical professional to develop a protocol to medically evaluate employees who have symptoms of Valley Fever.
   - Consider preferentially contracting with 1-2 clinics in the area and communicate with the health care providers in those clinics to ensure that providers are aware that Valley Fever has been reported in the area. This will increase the likelihood that ill workers will receive prompt, proper and consistent medical care.
   - Respirator clearance should include medical evaluation for all new employees, annual re-evaluation for changes in medical status, and annual training, and fit-testing.
   - Skin testing is not recommended for evaluation of Valley Fever.[14]
   - If an employee is diagnosed with Valley Fever, a physician must determine if the employee should be taken off work, when they may return to work, and what type of work activities they may perform.

The City must disclose the risk of Valley Fever exposure as a significant impact and should adopt these evidence-based mitigation measures – proven effective in similar construction projects in endemic areas – in a revised DEIR to ensure comprehensive protection of public health. Standard dust

[14] Short-term skin tests that produce results within 48 hours are now available. See Kerry Klein, NPR for Central California, New Valley Fever Skin Test Shows Promise, But Obstacles Remain, November 21, 2016; available at http://kvpr.org/post/new-valley-fever-skin-test-shows-promise-obstacles-remain.

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control measures are insufficient for preventing Valley Fever exposure, and only concrete, enforceable steps like those listed above will safeguard both onsite workers and surrounding communities.

4. The DEIR Severely Underestimates The Average Truck Trip Length By Relying On An Average Value Of 8.6 Mile-Length Trips In The Air Quality Analysis.

The underreporting of the number of truck trips and the length of the truck trips correlate to an underreporting of the mobile source emissions for the Project. According to Note 1 of Table 4.3-7: Operational Local Criteria Pollutant Emissions, the average trip length in CalEEMod is 8.62 miles. The figure below includes an 8.6 mile radius from the Project Site. The air quality estimate assumes that the truck trips would go as far as Indio to the north and Mecca to the south. This "average" distance clearly far too low an estimate of the actual truck trip distance that will be part of the Project.

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Figure 5: 8.6 Mile Radius From Project Site

The primary (largest) sources of containerized products are the Ports of Los Angeles (POLA) and Long Beach (POLB). POLA and POLB are located approximately 150 miles away from the Project Site. "In 2020, the Ports of Los Angeles, Long Beach, and Oakland collectively accounted for over 34% of all United States international container trade. The Ports of Los Angeles and Long Beach alone generate about 35,000 container truck trips every day. Accordingly, the South Coast Air Basin now contains approximately 3,000 warehouses of over 100,000 square feet each, with a total warehouse capacity of approximately 700 million square feet, an increase of 20 percent over the last

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five years"),[15] citing Data from the Bureau of Transportation Statistics, Container TEUs (Twenty-foot Equivalent Units)[16] from 2020, the Ports of Los Angeles, Long Beach, and Oakland combined for 14.157 million TEUs, 34% of 41.24 million TEUs total nationwide.[17]

In this case, using Project-specific data would increase the trip length by 1,744% ((150/8.6)*100 = 1,744%). At this length, truck emissions would create an even greater NO_x problem for the Region. The City must revise the DEIR's air quality analysis to accurately calculate emissions using fact-based, reasonably foreseeable truck trip lengths.

5. The DEIR Failed To Address Concerns Raised By SCAQMD In Its Comment Letter On The Project.

In the September 28, 2023 comment letter from SCAQMD, the agency noted that operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). As noted below, the DEIR fails to include stationary sources (e.g., fire pumps and back up generators) in the air quality analysis of the Project. Additionally, the letter notes that under Rule 2305 - Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, since the Proposed Project consists of the development of a 329,100-square-foot warehouse, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305. Nowhere in the DEIR is the issue of compliance with Rule 2305 is addressed. Finally, the SCAQMD recommends in the Health Risk Reduction Strategies section of the letter that there are strategies available to reduce exposures, including, but are not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Again, the DEIR fails to address the issue of filtration to reduce exposure to DPM from the Project site. this failing to consider feasible mitigation that could further

[15] Available at https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf

[16] https://data.bts.gov/stories/s/Container-TEU/x3fb-aeda/

[17] U.S. Dept. of Transportation, Federal Highway Administration, FHWA Operations Support – Port Peak Pricing Program Evaluation (2020), available at https://ops.fhwa.dot.gov/publications/fhwahop09014/sect2.htm

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reduce health risk associated with Project construction and operation. These issues should be addressed in a revised DEIR.

6. **The CalEEMod Analysis For The Operational Phase Does Not Include Fire Pumps And Back-Up Generators.**

A review of the CalEEMod analyses that accompanies the DEIR failed to show where emissions from the stationary equipment, including fire pumps and back-up generators are quantified. Line items are inserted in the AERMOD analysis for Fire pumps and Generators, but no supporting information is provided in the analysis.



Coachella Airport Business Park Detailed Report, 1/24/2025

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

The City must provide the supporting documentation regarding the stationary sources in a revised DEIR.

7. **The Operational Phase Air Model And HRA Ignore Emissions From The Project On CA State Route 86 Which Will Impact The Community.**

The Operational Phase HRA underestimates the emissions from the trucks accessing the Project Site. A review of the AERMOD models utilized in the operational phase health risk assessment (files DPM28-41.isc and DPM42-54.isc) cut emissions from vehicles off at the entrance to CA State Route 86.

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Figure 6: Operational Phase AERMOD model

The blue squares indicated in Figure 6 are volume sources that represent the trucks accessing the Project Site. The model stops the truck emissions at the service entrances from State Route CA 86 to Airport Boulevard. It is obvious that emissions from the trucks on CA 86 will also impact the receptors south of Airport Boulevard, yet were not included. The City should quantify these emissions, and evaluate their impact when combined with other Project-related emissions, in a revised DEIR.

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8. The City's Cumulative Impact Analysis Fails To Incorporate A Quantitative Analysis of The Substantial Public Health Impacts From Nearby Warehouse Projects.

The DEIR fails to incorporate a quantitative analysis of public health risks associated with the emissions from nearby warehouses. According to data from the Redford Conservancy at Pitzer College and Radical Research LLC (presented on the Warehouse CITY website)[18], within 5 km of the Project Site in the Cities of Coachella and Thermal there are 27 existing warehouses covering 5,991,300 square feet. There is 1 vacant warehouse (totaling 308,700 sq ft). The existing projects within 5 kilometers (km) of the Project site generate 4,000 daily truck trips, producing 5.5 lbs of diesel particulate matter (DPM) per day and 623 lbs of oxides of nitrogen (NO_x) per day.



Figure 7: Existing, Approved And Project Undergoing CEQA Review Within 5 km of Site

[18] Warehouse City v. 1.21. Accessed August 21, 2025. https://radicalresearch.shinyapps.io/WarehouseCITY/

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The development of 5,735,535 square feet of business uses and 428,507 square feet of commercial uses (the Project Site) clearly adds a substantial number of truck trips, daily DPM emissions, and NOx emissions to an already heavily impacted region, which the DEIR did not account for.

9. The DEIR Fails To Analyze The Project's Health Impacts from Diesel Particulate Matter Emissions Consistent With The Latest SCAQMD Working Group Guidance On The Aggregation Of Warehouses

The DEIR's air quality analysis fails to consider cumulative impacts in light of existing pollution levels or emissions from other nearby projects. Instead, the DEIR relies on SCAQMD's outdated cumulative threshold which looks only at project-specific emissions rather than emissions from cumulative sources.

For cumulative impacts, SCAQMD has initiated a public process to update existing guidance due to community concerns about high-risk health impacts from air toxics, particularly from aggregation of warehouses. Since 2022, SCAQMD has held six Working Group (WG) meetings to develop additional guidance for analyzing such potential impacts.[19] The first two WG meetings focused on Information Gathering and Analysis as well as the Initial Objective and Scope of the WGs. The third WG meeting was specific to the Initial Objective and Scope of the WGs and pushed into the Conceptual/Potential Cumulative Health Risk Assessment protocols. WG meetings #4 and #5 focused only on the Conceptual/Potential Cumulative Health Risk Assessment protocols. WG meeting #6 (WG 6), held in November of 2024, refined the proposed the Conceptual/Potential Cumulative Health Risk Assessment protocols based on public comments. The result of WG 6 was a draft process/analysis flow diagram which is intended to be used to inform the drafting of a planned Draft Guidance Document for conducting Cumulative Health Risk Assessments in the South Coast Air Basin.

Step 1 of the WG 6 process for determining the cumulative significance threshold is to identify the background cancer risk affecting the Project area via the SCAQMD Multiple Air Toxics Exposure Study (MATES).[20] According to SCAQMD's MATES V study, zip code 92236 (the location of the

[19] https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new).

[20] https://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-6-20241106.pdf?sfvrsn=405a8561_13.

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Project Site) has a cumulative cancer risk of 316 in 1 million, placing it in the top 63% of communities in the South Coast Air Basin (SCAB) impacted by TACs.

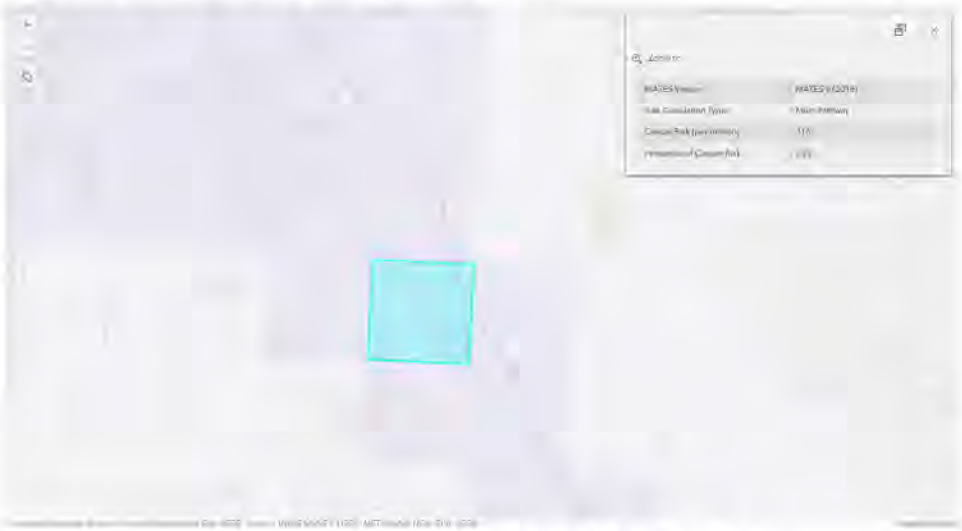


Figure 8: MATES Cancer Risk Analysis Of Project Location

Per WG 6, areas experiencing background excess cancer risk in the 50th percentile to 90th percentile would result in a drop of the Cancer Risk Threshold from 10 in one million to 5 in one million.

Step 2 of WG flow diagram is to determine whether daily truck trips along the route from the Project to the nearest freeway would exceed 951 (adding the truck trips generated by the proposed Project to existing truck traffic). Here, Table 1-4 of the DEIR's transportation study demonstrates that the project is expected to generate well over 951 truck trips a day on Airport Boulevard.[21] 991 4+-axle trucks, 219 3-axle trucks, and 132 2-axle trucks would be generated daily from the Industrial Park component. This lowers the Cancer Risk Threshold from 5 in one million to 3 in one million.

Step 3 of the WG 6 flow diagram is to determine whether the sensitive receptors along the truck are a health sensitive population (either within an SB 535 or SB 617 area). Here, the Project

[21] DEIR, Coachella Airport Business Park Traffic Impact Analysis, pg. 5.

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meets this criteria because it is an AB 617 community. This lowers the Cancer Risk Threshold from 3 in one million to 1 in one million.

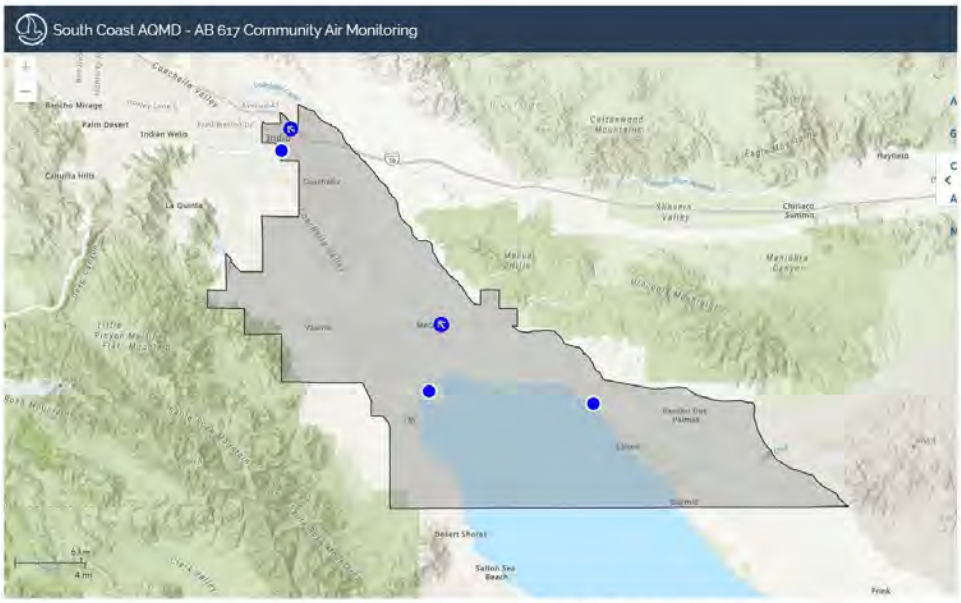


Figure 9: AB 617 Classification Of Project Area

The DEIR's attempt to analyze cumulative impacts without considering these background conditions or comparing cumulative exposures against SCAQMD's new draft threshold is unsupported, fails to provide basic information related to the Project, and is contrary to both CEQA's cumulative impact analysis directives and SCAQMD's draft guidance on cumulative impacts. To comply with CEQA and the SCAQMD's Working Group guidance, the Project's cumulative impacts should be evaluated against an adjusted cumulative cancer risk threshold of 1 in one million rather than the 10 in one million cited in the DEIR. Clearly, the City must re-evaluate the health risks against this lower health risk threshold in a revised DEIR.

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10. The SCAQMD's Working Group Conceptual/Potential Cumulative Health Risk Assessment Guidance Shows That The Project's Operational Emissions Exceed The Adjusted Cumulative Risk Threshold

As detailed above, the Project's cumulative impacts should be evaluated against an adjusted cumulative cancer risk threshold of 1 in one million based on the process outlined by SCAQMD. According to the health risk analysis (HRA) prepared for the Project,[22] when combined with the gas station TAC emissions, this would result in a cancer risk as high as **3.3 per million persons** at the mobile homes located south of the project site. Clearly, the risk from the operational emissions from the Project are significant for residential receptors nearest to the Project. The City must re-evaluate the Project in light of this finding and present the results in a revised DEIR.

11. The Project Is Inconsistent With City Of Coachella General Plan (GP) Policy 11.3.

Goal 11 of the City of Coachella's 2035 General Plan Update focuses on creating healthy indoor and outdoor air quality by reducing locally generated pollutant concentrations. Policy 11.3 states that it would "Prohibit the siting of land uses that adversely impact existing sensitive receptors, including schools, childcare centers, senior housing, and subsidized affordable housing. The minimum distance separating these uses should be 500 feet." From the Site Plan included as Exhibit 2.4 to the DEIR it is evident that the gasoline station is proposed to be developed directly across Airport Boulevard from the existing mobile homes.

[22] Vista Environmental. 2025. *Air Quality, Energy, Greenhouse Gas Emissions And Health Risk Impact Analysis, Coachella Airport Business Park Project, City of Coachella.* Pg 73

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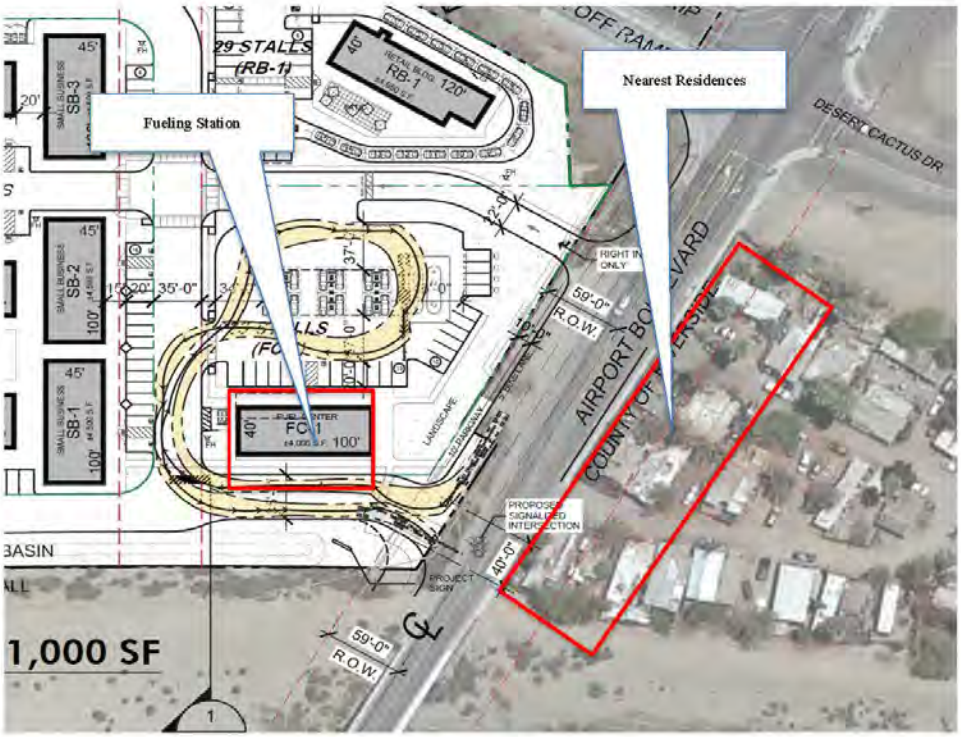


Figure 10: Site Plan and Location of Nearest Residences

The location of the fueling station is less than 150 feet from the nearest sensitive receptor (mobile home). The current location of the fueling center will violate Policy 11.3 because the DEIR's HRA calculates that emissions from the fueling center will result in a cancer risk of 1.5 in one million.[23] This cancer risk would exceed the SCAQMD working group's 1 in one million cumulative impacts threshold. It would combine with the Project's other health risks to result in a 3.3 in one million health risk. Because the location of the fueling center nearly doubles the Project's health risk impacts, the Project's layout conflicts with Policy 11.3. The City must address this inconsistency and require the Proponent to reconfigure the Project to move the fueling center at least 500 feet away from the location of the nearest residences and present the results in a revised DEIR.

[23] DEIR, pg. 4.3-26.

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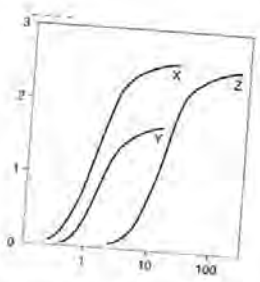
Conclusion

The facts identified and referenced in this comment letter lead me to reasonably conclude that the Project will result in significant impacts if allowed to proceed.

Sincerely,



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Education:

Ph.D., Environmental Health Science, University of California, 1995
M.S., Environmental Health Science, University of California, 1993
B.S., Biophysical and Biochemical Sciences, University of Houston, 1987

Professional Experience:

Dr. Clark is a well recognized toxicologist, air modeler, and health scientist. He has 20 years of experience in researching the effects of environmental contaminants on human health including environmental fate and transport modeling (SCREEN3, AEROMOD, ISCST3, Johnson-Ettinger Vapor Intrusion Modeling); exposure assessment modeling (partitioning of contaminants in the environment as well as PBPK modeling), conducting and managing human health risk assessments for regulatory compliance and risk-based clean-up levels; and toxicological and medical literature research.

Significant projects performed by Dr. Clark include the following:

LITIGATION SUPPORT

Case: James Harold Caygle, et al, v. Drummond Company, Inc. Circuit Court for the Tenth Judicial Circuit, Jefferson County, Alabama. Civil Action. CV-2009

Client: Environmental Litgation Group, Birmingham, Alabama

Dr. Clark performed an air quality assessment of emissions from a coke factory located in Tarrant, Alabama. The assessment reviewed include a comprehensive review of air quality standards, measured concentrations of pollutants from factory, an inspection of the facility and detailed assessment of the impacts on the community. The results of the assessment and literature have been provided in a declaration to the court.

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Case Result: Settlement in favor of plaintiff.

Case: Rose Roper V. Nissan North America, et al. Superior Court of the State Of California for the County Of Los Angeles – Central Civil West. Civil Action. NC041739

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to multiple chemicals, including benzene, who later developed a respiratory distress. A review of the individual's medical and occupational history was performed to prepare an exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to respiratory irritants. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: O'Neil V. Sherwin Williams, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to petroleum distillates who later developed a bladder cancer. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Summary judgment for defendants.

Case: Moore V., Shell Oil Company, et al. Superior Court of the State Of California for the County Of Los Angeles

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to chemicals while benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

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Case Result: Settlement in favor of plaintiff.

Case: Raymond Saltonstall V. Fuller O'Brien, KILZ, and Zinsser, et al. United States District Court Central District of California

Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to benzene who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a quantitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Richard Boyer and Elizabeth Boyer, husband and wife, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-7G.

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

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Case: JoAnne R. Cook, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-9R

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of an individual exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Patrick Allen And Susan Allen, husband and wife, and Andrew Allen, a minor, V. DESCO Corporation, et al. Circuit Court of Brooke County, West Virginia. Civil Action Number 04-C-W

Client: Frankovitch, Anetakis, Colantonio & Simon, Morgantown, West Virginia.

Dr. Clark performed a toxicological assessment of a family exposed to chlorinated solvents released from the defendant's facility into local drinking water supplies. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to chlorinated solvents. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Michael Fahey, Susan Fahey V. Atlantic Richfield Company, et al. United States District Court Central District of California Civil Action Number CV-06 7109 JCL.

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Client: Rose, Klein, Marias, LLP, Long Beach, California

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Settlement in favor of plaintiff.

Case: Constance Acevedo, et al., V. California Spray-Chemical Company, et al., Superior Court of the State Of California, County Of Santa Cruz. Case No. CV 146344

Dr. Clark performed a comprehensive exposure assessment of community members exposed to toxic metals from a former lead arsenate manufacturing facility. The former manufacturing site had undergone a DTSC mandated removal action/remediation for the presence of the toxic metals at the site. Opinions were presented regarding the elevated levels of arsenic and lead (in attic dust and soils) found throughout the community and the potential for harm to the plaintiffs in question.

Case Result: Settlement in favor of defendant.

Case: Michael Nawrocki V. The Coastal Corporation, Kurk Fuel Company, Pautler Oil Service, State of New York Supreme Court, County of Erie, Index Number I2001-11247

Client: Richard G. Berger Attorney At Law, Buffalo, New York

Dr. Clark performed a toxicological assessment of an individual occupationally exposed to refined petroleum hydrocarbons who later developed a leukogenic disease. A review of the individual's medical and occupational history was performed to prepare a qualitative exposure assessment. The exposure assessment was evaluated against the

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known outcomes in published literature to exposure to refined petroleum hydrocarbons. The results of the assessment and literature have been provided in a declaration to the court.

Case Result: Judgement in favor of defendant.

SELECTED AIR MODELING RESEARCH/PROJECTS

Client – Confidential

Dr. Clark performed a comprehensive evaluation of criteria pollutants, air toxins, and particulate matter emissions from a carbon black production facility to determine the impacts on the surrounding communities. The results of the dispersion model will be used to estimate acute and chronic exposure concentrations to multiple contaminants and will be incorporated into a comprehensive risk evaluation.

Client – Confidential

Dr. Clark performed a comprehensive evaluation of air toxins and particulate matter emissions from a railroad tie manufacturing facility to determine the impacts on the surrounding communities. The results of the dispersion model have been used to estimate acute and chronic exposure concentrations to multiple contaminants and have been incorporated into a comprehensive risk evaluation.

Client – Los Angeles Alliance for a New Economy (LAANE), Los Angeles, California

Dr. Clark is advising the LAANE on air quality issues related to current flight operations at the Los Angeles International Airport (LAX) operated by the Los Angeles World Airport (LAWA) Authority. He is working with the LAANE and LAX staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

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Client – City of Santa Monica, Santa Monica, California

Dr. Clark is advising the City of Santa Monica on air quality issues related to current flight operations at the facility. He is working with the City staff to develop a comprehensive strategy for meeting local community concerns over emissions from flight operations and to engage federal agencies on the issue of local impacts of community airports.

Client: Omnitrans, San Bernardino, California

Dr. Clark managed a public health survey of three communities near transit fueling facilities in San Bernardino and Montclair California in compliance with California Senate Bill 1927. The survey included an epidemiological survey of the effected communities, emission surveys of local businesses, dispersion modeling to determine potential emission concentrations within the communities, and a comprehensive risk assessment of each community. The results of the study were presented to the Governor as mandated by Senate Bill 1927.

Client: Confidential, San Francisco, California

Summarized cancer types associated with exposure to metals and smoking. Researched the specific types of cancers associated with exposure to metals and smoking. Provided causation analysis of the association between cancer types and exposure for use by non-public health professionals.

Client: Confidential, Minneapolis, Minnesota

Prepared human health risk assessment of workers exposed to VOCs from neighboring petroleum storage/transport facility. Reviewed the systems in place for distribution of petroleum hydrocarbons to identify chemicals of concern (COCs), prepared comprehensive toxicological summaries of COCs, and quantified potential risks from carcinogens and non-carcinogens to receptors at or adjacent to site. This evaluation was used in the support of litigation.

Client – United Kingdom Environmental Agency

Dr. Clark is part of team that performed comprehensive evaluation of soil vapor intrusion of VOCs from former landfill adjacent residences for the United Kingdom's Environment

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Agency. The evaluation included collection of liquid and soil vapor samples at site, modeling of vapor migration using the Johnson Ettinger Vapor Intrusion model, and calculation of site-specific health based vapor thresholds for chlorinated solvents, aromatic hydrocarbons, and semi-volatile organic compounds. The evaluation also included a detailed evaluation of the use, chemical characteristics, fate and transport, and toxicology of chemicals of concern (COC). The results of the evaluation have been used as a briefing tool for public health professionals.

EMERGING/PERSISTENT CONTAMINANT RESEARCH/PROJECTS

Client: Ameren Services, St. Louis, Missouri

Managed the preparation of a comprehensive human health risk assessment of workers and residents at or near an NPL site in Missouri. The former operations at the Property included the servicing and repair of electrical transformers, which resulted in soils and groundwater beneath the Property and adjacent land becoming impacted with PCB and chlorinated solvent compounds. The results were submitted to U.S. EPA for evaluation and will be used in the final ROD.

Client: City of Santa Clarita, Santa Clarita, California

Dr. Clark is managing the oversight of the characterization, remediation and development activities of a former 1,000 acre munitions manufacturing facility for the City of Santa Clarita. The site is impacted with a number of contaminants including perchlorate, unexploded ordinance, and volatile organic compounds (VOCs). The site is currently under a number of regulatory consent orders, including an Immanent and Substantial Endangerment Order. Dr. Clark is assisting the impacted municipality with the development of remediation strategies, interaction with the responsible parties and stakeholders, as well as interfacing with the regulatory agency responsible for oversight of the site cleanup.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of perchlorate in environment. Dr. Clark evaluated the production, use, chemical characteristics, fate and transport, toxicology, and remediation of perchlorate. Perchlorates form the basis of solid rocket fuels and have recently been detected in water supplies in the United States. The results of this research

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were presented to the USEPA, National GroundWater, and ultimately published in a recent book entitled *Perchlorate in the Environment*.

Client – Confidential, Los Angeles, California

Dr. Clark is performing a comprehensive review of the potential for pharmaceuticals and their by-products to impact groundwater and surface water supplies. This evaluation will include a review if available data on the history of pharmaceutical production in the United States; the chemical characteristics of various pharmaceuticals; environmental fate and transport; uptake by xenobiotics; the potential effects of pharmaceuticals on water treatment systems; and the potential threat to public health. The results of the evaluation may be used as a briefing tool for non-public health professionals.

PUBLIC HEALTH/TOXICOLOGY

Client: Brayton Purcell, Novato, California

Dr. Clark performed a toxicological assessment of residents exposed to methyl-tertiary butyl ether (MTBE) from leaking underground storage tanks (LUSTs) adjacent to the subject property. The symptomology of residents and guests of the subject property were evaluated against the known outcomes in published literature to exposure to MTBE. The study found that residents had been exposed to MTBE in their drinking water; that concentrations of MTBE detected at the site were above regulatory guidelines; and, that the symptoms and outcomes expressed by residents and guests were consistent with symptoms and outcomes documented in published literature.

Client: Confidential, San Francisco, California

Identified and analyzed fifty years of epidemiological literature on workplace exposures to heavy metals. This research resulted in a summary of the types of cancer and non-cancer diseases associated with occupational exposure to chromium as well as the mortality and morbidity rates.

Client: Confidential, San Francisco, California

Summarized major public health research in United States. Identified major public health research efforts within United States over last twenty years. Results were used as a briefing tool for non-public health professionals.

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Client: Confidential, San Francisco, California

Quantified the potential multi-pathway dose received by humans from a pesticide applied indoors. Part of team that developed exposure model and evaluated exposure concentrations in a comprehensive report on the plausible range of doses received by a specific person. This evaluation was used in the support of litigation.

Client: Covanta Energy, Westwood, California

Evaluated health risk from metals in biosolids applied as soil amendment on agricultural lands. The biosolids were created at a forest waste cogeneration facility using 96% whole tree wood chips and 4 percent green waste. Mass loading calculations were used to estimate Cr(VI) concentrations in agricultural soils based on a maximum loading rate of 40 tons of biomass per acre of agricultural soil. The results of the study were used by the Regulatory agency to determine that the application of biosolids did not constitute a health risk to workers applying the biosolids or to residences near the agricultural lands.

Client – United Kingdom Environmental Agency

Oversaw a comprehensive toxicological evaluation of methyl-*tertiary* butyl ether (MtBE) for the United Kingdom's Environment Agency. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of MtBE. The results of the evaluation have been used as a briefing tool for public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of *tertiary* butyl alcohol (TBA) in municipal drinking water system. TBA is the primary breakdown product of MtBE, and is suspected to be the primary cause of MtBE toxicity. This evaluation will include available information on the production, use, chemical characteristics, fate and transport in the environment, absorption, distribution, routes of detoxification, metabolites, carcinogenic potential, and remediation of TBA. The results of the evaluation were used as a briefing tool for non-public health professionals.

Client – Confidential, Los Angeles, California

Prepared comprehensive evaluation of methyl *tertiary* butyl ether (MTBE) in municipal drinking water system. MTBE is a chemical added to gasoline to increase the octane

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rating and to meet Federally mandated emission criteria. The evaluation included available data on the production, use, chemical characteristics, fate and transport, toxicology, and remediation of MTBE. The results of the evaluation have been were used as a briefing tool for non-public health professionals.

Client – Ministry of Environment, Lands & Parks, British Columbia

Dr. Clark assisted in the development of water quality guidelines for methyl tertiary-butyl ether (MTBE) to protect water uses in British Columbia (BC). The water uses to be considered includes freshwater and marine life, wildlife, industrial, and agricultural (e.g., irrigation and livestock watering) water uses. Guidelines from other jurisdictions for the protection of drinking water, recreation and aesthetics were to be identified.

Client: Confidential, Los Angeles, California

Prepared physiologically based pharmacokinetic (PBPK) assessment of lead risk of receptors at middle school built over former industrial facility. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client: Kaiser Venture Incorporated, Fontana, California

Prepared PBPK assessment of lead risk of receptors at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

RISK ASSESSMENTS/REMEDIAL INVESTIGATIONS

Client: Confidential, Atlanta, Georgia

Researched potential exposure and health risks to community members potentially exposed to creosote, polycyclic aromatic hydrocarbons, pentachlorophenol, and dioxin compounds used at a former wood treatment facility. Prepared a comprehensive toxicological summary of the chemicals of concern, including the chemical characteristics, absorption, distribution, and carcinogenic potential. Prepared risk characterization of the carcinogenic and non-carcinogenic chemicals based on the exposure assessment to quantify the potential risk to members of the surrounding community. This evaluation was used to help settle class-action tort.

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Client: Confidential, Escondido, California

Prepared comprehensive Preliminary Endangerment Assessment (PEA) of dense non-aqueous liquid phase hydrocarbon (chlorinated solvents) contamination at a former printed circuit board manufacturing facility. This evaluation was used for litigation support and may be used as the basis for reaching closure of the site with the lead regulatory agency.

Client: Confidential, San Francisco, California

Summarized epidemiological evidence for connective tissue and autoimmune diseases for product liability litigation. Identified epidemiological research efforts on the health effects of medical prostheses. This research was used in a meta-analysis of the health effects and as a briefing tool for non-public health professionals.

Client: Confidential, Bogotá, Columbia

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of a 13.7 hectares plastic manufacturing facility in Bogotá, Colombia. The risk assessment was used as the basis for the remedial goals and closure of the site.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally cadmium) and VOCs from soil and soil vapor at 12-acre former crude oilfield and municipal landfill. The site is currently used as a middle school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and was used as the basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Managed remedial investigation (RI) of heavy metals and volatile organic chemicals (VOCs) for a 15-acre former manufacturing facility. The RI investigation of the site included over 800 different sampling locations and the collection of soil, soil gas, and groundwater samples. The site is currently used as a year round school housing approximately 3,000 children. The Remedial Investigation was performed in a manner

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that did not interrupt school activities and met the time restrictions placed on the project by the overseeing regulatory agency. The RI Report identified the off-site source of metals that impacted groundwater beneath the site and the sources of VOCs in soil gas and groundwater. The RI included a numerical model of vapor intrusion into the buildings at the site from the vadose zone to determine exposure concentrations and an air dispersion model of VOCs from the proposed soil vapor treatment system. The Feasibility Study for the Site is currently being drafted and may be used as the basis for granting closure of the site by DTSC.

Client: Confidential, Los Angeles, California

Prepared comprehensive human health risk assessment of students, staff, and residents potentially exposed to heavy metals (principally lead), VOCs, SVOCs, and PCBs from soil, soil vapor, and groundwater at 15-acre former manufacturing facility. The site is currently used as a year round school housing approximately 3,000 children. The evaluation determined that the site was safe for the current and future uses and will be basis for regulatory closure of site.

Client: Confidential, Los Angeles, California

Prepared comprehensive evaluation of VOC vapor intrusion into classrooms of middle school that was former 15-acre industrial facility. Using the Johnson-Ettinger Vapor Intrusion model, the evaluation determined acceptable soil gas concentrations at the site that did not pose health threat to students, staff, and residents. This evaluation is being used to determine cleanup goals and will be basis for regulatory closure of site.

Client - Dominguez Energy, Carson, California

Prepared comprehensive evaluation of the potential health risks associated with the redevelopment of 6-acre portion of a 500-acre oil and natural gas production facility in Carson, California. The risk assessment was used as the basis for closure of the site.

Kaiser Ventures Incorporated, Fontana, California

Prepared health risk assessment of semi-volatile organic chemicals and metals for a fifty-year old wastewater treatment facility used at a 1,100-acre former steel mill. This evaluation was used as the basis for granting closure of the site by lead regulatory agency.

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AMR Freight - Los Angeles, California

Prepared a comprehensive Preliminary Endangerment Assessment (PEA) of petroleum hydrocarbon and metal contamination of a former freight depot. This evaluation was as the basis for reaching closure of the site with lead regulatory agency.

Kaiser Ventures Incorporated, Fontana, California

Prepared comprehensive health risk assessment of semi-volatile organic chemicals and metals for 23-acre parcel of a 1,100-acre former steel mill. The health risk assessment was used to determine clean up goals and as the basis for granting closure of the site by lead regulatory agency. Air dispersion modeling using ISCST3 was performed to determine downwind exposure point concentrations at sensitive receptors within a 1 kilometer radius of the site. The results of the health risk assessment were presented at a public meeting sponsored by the Department of Toxic Substances Control (DTSC) in the community potentially affected by the site.

Unocal Corporation - Los Angeles, California

Prepared comprehensive assessment of petroleum hydrocarbons and metals for a former petroleum service station located next to sensitive population center (elementary school). The assessment used a probabilistic approach to estimate risks to the community and was used as the basis for granting closure of the site by lead regulatory agency.

Client: Confidential, Los Angeles, California

Managed oversight of remedial investigation most contaminated heavy metal site in California. Lead concentrations in soil excess of 68,000,000 parts per billion (ppb) have been measured at the site. This State Superfund Site was a former hard chrome plating operation that operated for approximately 40-years.

Client: Confidential, San Francisco, California

Coordinator of regional monitoring program to determine background concentrations of metals in air. Acted as liaison with SCAQMD and CARB to perform co-location sampling and comparison of accepted regulatory method with ASTM methodology.

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Client: Confidential, San Francisco, California

Analyzed historical air monitoring data for South Coast Air Basin in Southern California and potential health risks related to ambient concentrations of carcinogenic metals and volatile organic compounds. Identified and reviewed the available literature and calculated risks from toxins in South Coast Air Basin.

IT Corporation, North Carolina

Prepared comprehensive evaluation of potential exposure of workers to air-borne VOCs at hazardous waste storage facility under SUPERFUND cleanup decree. Assessment used in developing health based clean-up levels.

Professional Associations

American Public Health Association (APHA)
Association for Environmental Health and Sciences (AEHS)
American Chemical Society (ACS)
California Redevelopment Association (CRA)
International Society of Environmental Forensics (ISEF)
Society of Environmental Toxicology and Chemistry (SETAC)

Publications and Presentations:

Books and Book Chapters

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Sullivan, P.J., Agardy, F.J., **Clark, J.J.J.** 2002. *America's Threatened Drinking Water: Hazards and Solutions.* Trafford Publishing, Victoria B.C.

Clark, J.J.J. 2001. "TBA. Chemical Properties, Production & Use, Fate and Transport, Toxicology, Detection in Groundwater, and Regulatory Standards" in *Oxygenates in the Environment.* Art Diaz, Ed.. Oxford University Press: New York.

Clark, J.J.J. 2000. "Toxicology of Perchlorate" in *Perchlorate in the Environment.* Edward Urbansky, Ed. Kluwer/Plenum: New York.

Clark, J.J.J. 1995. Probabilistic Forecasting of Volatile Organic Compound Concentrations At The Soil Surface From Contaminated Groundwater. UMI.

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Baker, J., **Clark, J.J.J.**; Stanford, J.T. 1994. Ex Situ Remediation of Diesel Contaminated Railroad Sand by Soil Washing. Principles and Practices for Diesel Contaminated Soils, Volume III. P.T. Kostecki, E.J. Calabrese, and C.P.L. Barkan, eds. Amherst Scientific Publishers, Amherst, MA. pp 89-96.

Journal and Proceeding Articles

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equialency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. Organohalogen Compounds. Volume 70 (2008) page 002254.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008) Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. Organohalogen Compounds. Volume 70 (2008) page 000527

Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** (2007). "Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." *Environmental Research.* 105:194-199.

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Hensley A.R., Scott, A., Rosenfeld P.E., **Clark, J.J.J.** 2006. "Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility." The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006, August 21 – 25, 2006. Radisson SAS Scandinavia Hotel in Oslo Norway.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2005. "The Value Of An Odor Quality Classification Scheme For Compost Facility Evaluations" The U.S. Composting Council's 13th Annual Conference January 23 - 26, 2005, Crowne Plaza Riverwalk, San Antonio, TX.

Rosenfeld, P.E., **Clark, J. J.** and Suffet, I.H. 2004. "The Value Of An Odor Quality Classification Scheme For Urban Odor" WEFTEC 2004. 77th Annual Technical Exhibition & Conference October 2 - 6, 2004, Ernest N. Morial Convention Center, New Orleans, Louisiana.

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Clark, J.J.J., Brown, A., Rodriguez, R. 1998. The Public Health Implications of MtBE and Perchlorate in Water: Risk Management Decisions for Water Purveyors. Proceedings of the National Ground Water Association. Anaheim, CA. June 3-4, 1998.

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EXHIBIT B

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Norman Marshall, President
(802) 356-2969

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September 11, 2025

Aidan P. Marshall
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

Subject: Coachella Airport Business Park

Dear Mr. Marshall,

I have reviewed the vehicle miles traveled (VMT) impacts of the City of Coachella Draft Environmental Impact Report ("DEIR") dated July 2025 for the proposed Coachella Airport Business Park Development (SCH NO. 2023040106).

I make the following findings:

1) The project would result in a significant VMT impact.
2) The significant VMT impact is only partially mitigated, and the proposed mitigation is not as strong as the CAPCOA vanpool measure referenced in the DEIR and used to estimate the VMT reduction. The full CAPCOA vanpool measure should be required.
3) The DEIR's air quality analysis overestimates VMT mitigation and should be redone.
4) The DEIR's air quality analysis underestimates truck trip lengths and should be redone.
5) SR 86 to the north of the project already carries a high truck volume that creates a significant cancer risk. This project is estimated to add another 470 truck trips per day to this section of SR 86. An air toxics analysis should be done.

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The Project Would Result in a Significant VMT Impact

The DEIR states:

> The interpolated values resulted in a Project VMT of 38.2 and a regional average VMT of 31.1 in Year 2027, which results in the proposed Project VMT that is 122.8 percent of the regional average and is thus considered a significant impact. At buildout in 2045, the Project VMT would be 30.2 while the regional average would be 29.0. Since the Project VMT would exceed the regional average, it is considered a significant impact. (DEIR, p. 4.17-31)

The project includes:

Phase I

- Large Warehouse – 110,900 square feet (sf)
- Small Warehouse – 24,000 sf
- Small Business – 31,500 sf
- Personal Vehicle Storage Facilities – 38,400 sf
- Self-storage – 67,300 sf
- Fast Food Restaurant with Drive Through – 4,650 sf
- Service Station with Convenience Store – 10 vehicle fueling positions and 4,000 sf Convenience Store

Phase II

- Large Warehouse – 48,800 sf
- Small Warehouse – 52,800 sf
- Small Business – 22,500 sf
- Personal Vehicle Storage Facilities – 38,400 sf

Phase III

- Large Warehouse – 73,400 sf
- Small Warehouse – 19,200 sf
- Small Business – 27,000 sf
- Self-storage – 61,300 sf (DEIR, p. 4-17-5)

The DEIR states that the significant VMT impact is limited to the large warehouse use, but it is applicable to all of the non-retail uses. The DEIR's stated rationale for screening out the other non-retail uses is based on an assumption that "The Project includes multiple non-residential land uses which is considered as a mixed-use project." (DEIR, 4.17-30) The DEIR then asserts that "The County Guidelines recommend evaluation of each land use separately in case of a mixed-use project." (DEIR, 4.17-30) This is not an accurate representation of the County Guidelines or the Project.

First, the County Guidelines do not actually "recommend" evaluating the uses separately, the word used is "may." The Guidelines state:

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> To identify if the proposed project requires a VMT analysis, the City of Riverside may evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included (e.g. residential and retail).[1]

In the trip generation calculations, the DEIR groups most of these categories together as "industrial park," excluding only the fast-food restaurant, convenience store, and mini-warehouse uses. (DEIR, p. 4.17-7 - 4.17-9)

Second, the label "mixed-use" is generally applied to walkable, relatively dense mixes of residential with retail and other services.[2] This project does not fit this label. The County Guidelines do not define "mixed-use" in the VMT section, but elsewhere in the Guidelines it is recommended that estimating trip internalization for mixed-use projects be done by applying either "EPA's mixed-use trip generation (or MXD) methodology or ITE's mixed use trip generation method." (p. 16) Neither the MXD or ITE tools split land use down to the level done in the DEIR when doing VMT screening. The MXD tool totals industrial land uses within the general categories light industrial, manufacturing and warehousing/self-storage.[3] The EPA states that the purpose of the MXD tool is for modeling residential mixed-use sites, as opposed to single-use, automobile-dependent, suburban sites.[4] The ITE tool does not include industrial uses at all, with the implication that mixed-use does not include industrial uses.

This project includes no residential development and does not fit standard definitions of mixed use. None of the industrial uses are properly screened from VMT analysis. Even if the definition of "mixed-use" is stretched to cover a project that has no residential use, and is primarily industrial, there is no justification for counting the smaller warehouses in the project as separate small uses that are screened from VMT analysis when they would support industrial warehouse uses like the larger warehouse. Only the retail uses are properly screened from VMT analysis, because they are small and locally-serving.

The DEIR estimates that the significant VMT finding applies to only 285 of the estimated 741 employees in the large warehouse category. If this is corrected to include all employees except the retail employees, **the significant VMT finding applies to 689 of the estimated 741 employees**.[5]

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[1] City of Riverside, Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment, April 2025, p. 27.
[2] https://www.epa.gov/smartgrowth/mixed-use-trip-generation-model ("Neighborhoods that mix land uses and make walking safe and convenient allow residents and workers to drive significantly less, thereby reducing traffic and realizing other benefits. To help give communities better tools to analyze new development, EPA, in cooperation with the Institute of Transportation Engineers (ITE), worked with leading researchers and practitioners to develop new data and methods to estimate the trip-generation impacts of mixed-use developments.").
[3] https://www.epa.gov/smartgrowth/mixed-use-trip-generation-model
[4] https://www.epa.gov/smartgrowth/mixed-use-trip-generation-model
[5] 52 of the employees are retail – Haagen Company, Coachella Airport Business Park Traffic Impact Analysis, September 2024 PDF p. 491 of 492.

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The Significant VMT Impact is Only Partially Mitigated

The mitigation proposed in the DEIR only partially mitigates the significant VMT impacts. The DEIR states:

> Although the proposed Project would be required to adhere to all applicable policies in the City's General Plan, as well as Measure T-11 under the CAPCOA Handbook, this would only provide a 3.55 percent reduction to project/site employee commute VMT (i.e. homebase work attraction VMT). This would result in a VMT of approximately 36.5 for the proposed Project in Year 2027. Since this would remain higher than projected regional VMT of 31.1, even with implementation of all feasible mitigation in this rural location, the proposed Project would result in a significant and unavoidable transportation impact related to VMT. (DEIR, p. 4-17-33)

The proposed mitigation is:

> The Project Applicant shall require any business that operates in the proposed project and has 20 or more full-time employees shall implement at least one of the following programs:
>
> - Pre-tax election program to allow employees to exclude wages for commuting costs for transit or vanpools;
> - An employer supplied transit pass;
> - Employer provided transit; or
> - Other, similar demand management programs. (DEIR p. ES-15)

The DEIR estimates VMT reduction on the basis of the vanpool condition using data in the California Air Pollution Control Officers Association ("CAPCOA") *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (2021) However, the vanpool condition in the DEIR is substantially different than the definition in the Handbook. The Handbook states that up to 20.4% reduction is possible with vanpooling when the employer covers "... the capital costs of vehicle acquisition and the labor costs of drivers, either through incentives to current employees or the hiring of dedicated drivers." (Handbook, p. 104) The Handbook definition requires substantial payments by employers above wages; but the DEIR condition requires no additional payments, and only paperwork to make the employee costs pre-tax. Therefore, the Handbook formula is not applicable to quantify reductions achieved by the DEIR's proposed mitigation.

To achieve the maximum possible VMT reduction, the DEIR vanpool measure should be rewritten to match the Handbook definition.

The other mitigation measures listed are unlikely to significantly reduce VMT. The only bus route servicing the area, SunLine Route 8, provides has a stop at the Airport Boulevard/Palm Street intersection with 1-hour headways, a frequency that generally is considered inadequate for commuting. "Employer-supplied transit" would be infeasible unless it is in the form of vanpools as discussed above.

The DEIR Air Quality Analysis Overestimates VMT Mitigation

The air quality analysis assumes a 5% VMT reduction from "Measure T-6, Implement Commute Trip Reduction Program (Mandatory)." (DEIR Appendix B, PDF p. 113, 186-187). This is a totally different

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mitigation plan than that proposed as a condition in the body of the DEIR and discussed above. Furthermore, the DEIR estimates only a 3.55% VMT as a result of the mitigation condition with the reduction only applicable to the large warehouse use – versus 5% applied in the air quality analysis to all trips.

The air quality analysis should be corrected so that the VMT mitigation assumptions are consistent.

The DEIR Underestimates Truck Trip Lengths in the Air Quality Analysis

The DEIR's air quality analysis applies CalEEMod default trip lengths with an average trip length of 8.62 miles for the industrial uses. (DEIR Appendix B, PDF p. 186-187) The South Coast Air Quality Management District (SCAQMD) recommends that large truck trip lengths should be set to the distance from the Ports of Long Beach and Los Angeles. SCAQMD's November 22, 2023 comments on the Hemlock Warehouse Development Project Draft SEIR in the City of Fontana which state:

> However, it is essential to note that the distance from the Proposed Project site to the Port of Los Angeles or Long Beach is approximately 70 miles one-way. Thus, South Coast AQMD staff is concerned about underestimating truck emissions due to the shorter distance that HHDT is analyzed in the Draft SEIR. Hence, it is recommended that the Lead Agency revise the truck emissions analysis using the more conservative trip length between 40 to 70 miles, of which 40 miles could be used for local and 70 miles for Port trips and include the revision in the final CEQA document. Tailoring these parameters and assumptions to be based on project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project. (p. 2)

The Project site is about 150 miles from the Ports of Los Angeles and Long Beach and the SCAQMD recommended heavy truck trip length is 150 miles. The air quality analysis should be redone to account for longer truck trip lengths.

Sincerely,

Norman L. Marshall

Norman L. Marshall

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Resume

NORMAN L. MARSHALL, PrESIDENT

nmarshall@smartmobility.com

EDUCATION:

Master of Science in Engineering Sciences, Dartmouth College, Hanover, NH, 1982

Bachelor of Science in Mathematics, Worcester Polytechnic Institute, Worcester, MA, 1977

PROFESSIONAL EXPERIENCE: (36 Years, 22 at Smart Mobility, Inc.)

Norm Marshall helped found Smart Mobility, Inc. in 2001. Prior to this, he was at RSG for 14 years where he developed a national practice in travel demand modeling. He specializes in analyzing the relationships between the built environment and travel behavior and doing planning that coordinates multi-modal transportation with land use and community needs.

Regional Land Use/Transportation Scenario Planning

Portland Area Comprehensive Transportation System (PACTS) – the Portland Maine Metropolitan Planning Organization. Updating regional travel demand model with new data (including AirSage), adding a truck model, and multiclass assignment including differentiation between cash toll and transponder payments.

Loudoun County Virginia Dynamic Traffic Assignment – Enhanced subarea travel demand model to include Dynamic Traffic Assignment (Cube). Model being used to better understand impacts of roadway expansion on induced travel.

Vermont Agency of Transportation-Enhanced statewide travel demand model to evaluate travel impacts of closures and delays resulting from severe storm events. Model uses innovate Monte Carlo simulations process to account for combinations of failures.

California Air Resources Board – Led team including the University of California in $250k project that reviewed the ability of the new generation of regional activity-based models and land use models to accurately account for greenhouse gas emissions from alternative scenarios including more compact walkable land use and roadway pricing. This work included hands-on testing of the most complex travel demand models in use in the U.S. today.

Climate Plan (California statewide) – Assisted large coalition of groups in reviewing and participating in the target setting process required by Senate Bill 375 and administered by the California Air Resources

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Board to reduce future greenhouse gas emissions through land use measures and other regional initiatives.

Chittenden County (2060 Land use and Transportation Vision Burlington Vermont region) – led extensive public visioning project as part of MPO's long-range transportation plan update.

Flagstaff Metropolitan Planning Organization – Implemented walk, transit and bike models within regional travel demand model. The bike model includes skimming bike networks including on-road and off-road bicycle facilities with a bike level of service established for each segment.

Chicago Metropolis Plan and Chicago Metropolis Freight Plan (6-county region)— developed alternative transportation scenarios, made enhancements in the regional travel demand model, and used the enhanced model to evaluate alternative scenarios including development of alternative regional transit concepts. Developed multi-class assignment model and used it to analyze freight alternatives including congestion pricing and other peak shifting strategies.

Municipal Planning

City of Grand Rapids – Michigan Street Corridor – developed peak period subarea model including non-motorized trips based on urban form. Model is being used to develop traffic volumes for several alternatives that are being additional analyzed using the City's Synchro model

City of Omaha - Modified regional travel demand model to properly account for non-motorized trips, transit trips and shorter auto trips that would result from more compact mixed-use development. Scenarios with different roadway, transit, and land use alternatives were modeled.

City of Dublin (Columbus region) – Modified regional travel demand model to properly account for non-motorized trips and shorter auto trips that would result from more compact mixed-use development. The model was applied in analyses for a new downtown to be constructed in the Bridge Street corridor on both sides of an historic village center.

City of Portland, Maine – Implemented model improvements that better account for non-motorized trips and interactions between land use and transportation and applied the enhanced model to two subarea studies.

City of Honolulu – Kaka'ako Transit Oriented Development (TOD) – applied regional travel demand model in estimating impacts of proposed TOD including estimating internal trip capture.

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City of Burlington (Vermont) Transportation Plan – Led team that developing Transportation Plan focused on supporting increased population and employment without increases in traffic by focusing investments and policies on transit, walking, biking and Transportation Demand Management.

Transit Planning

Regional Transportation Authority (Chicago) and Chicago Metropolis 2020 – evaluated alternative 2020 and 2030 system-wide transit scenarios including deterioration and enhance/expand under alternative land use and energy pricing assumptions in support of initiatives for increased public funding.

Capital Metropolitan Transportation Authority (Austin, TX) Transit Vision – analyzed the regional effects of implementing the transit vision in concert with an aggressive transit-oriented development plan developed by Calthorpe Associates. Transit vision includes commuter rail and BRT.

Bus Rapid Transit for Northern Virginia HOT Lanes (Breakthrough Technologies, Inc and Environmental Defense.) – analyzed alternative Bus Rapid Transit (BRT) strategies for proposed privately-developing High Occupancy Toll lanes on I-95 and I-495 (Capital Beltway) including different service alternatives (point-to-point services, trunk lines intersecting connecting routes at in-line stations, and hybrid).

Roadway Corridor Planning

I-30 Little Rock Arkansas – Developed enhanced version of regional travel demand model that integrates TransCAD with open source Dynamic Traffic Assignment (DTA) software, and used to model I-30 alternatives. Freeway bottlenecks are modeled much more accurately than in the base TransCAD model.

South Evacuation Lifeline (SELL) – In work for the South Carolina Coastal Conservation League, used Dynamic Travel Assignment (DTA) to estimate evaluation times with different transportation alternatives in coastal South Caroline including a new proposed freeway.

Hudson River Crossing Study (Capital District Transportation Committee and NYSDOT) – Analyzing long term capacity needs for Hudson River bridges which a special focus on the I-90 Patroon Island Bridge where a microsimulation VISSIM model was developed and applied.

PUBLICATIONS AND PRESENTATIONS (partial list)

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DTA Love: Co-leader of workshop on Dynamic Traffic Assignment at the June 2019 Transportation Research Board Planning Applications Conference.

Forecasting the Impossible: The Status Quo of Estimating Traffic Flows with Static Traffic Assignment and the Future of Dynamic Traffic Assignment. *Research in Transportation Business and Management* 2018.

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the August 2018 Transportation Research Board Tools of the Trade Conference on Transportation Planning for Small and Medium Sized Communities.

Vermont Statewide Resilience Modeling. With Joseph Segale, James Sullivan and Roy Schiff. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

Pre-Destination Choice Walk Mode Choice Modeling. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

A Statistical Model of Regional Traffic Congestion in the United States, presented at the 2016 Annual Meeting of the Transportation Research Board.

MEMBERSHIPS/AFFILIATIONS

Associate Member, Transportation Research Board (TRB)

Member and Co-Leader Project for Transportation Modeling Reform, Congress for the New Urbanism (CNU)

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EXHIBIT C

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WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION

CALIFORNIA
WASHINGTON
NEW YORK

WI #25-001.36

September 11, 2025

Aidan P. Marshall
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080

SUBJECT: Coachella Airport Business Park Project
City of Coachella, CA
Review and Comment on Noise Study

Dear Mr. Marshall,

Per your request, Wilson Ihrig has reviewed the information and noise impact analysis in the following documents:

Coachella Airport Business Park Project
Draft Environmental Impact Report, July 2025 (DEIR)
Appendix H Noise & Groundborne Vibration Impact Analysis (Noise Study)

The Coachella Airport Business Park (Project) would result in the construction of a new business park development, including large and small warehouses, a small retrial and restaurant development, a fuel station, a parking structure, and an IDD substation facility. The site is surrounded immediately by industrial uses to the west, agricultural uses to the east, and residences to the south.

Wilson Ihrig, Acoustical Consultants, has practiced exclusively in the field of acoustics since 1966. During our 57 years of operation, we have prepared hundreds of noise studies for Environmental Impact Reports and Statements. We have one of the largest technical laboratories in the acoustical consulting industry. We also utilize industry-standard acoustical programs such as Roadway Construction Noise Model (RCNM), SoundPLAN, and CADNA. In short, we are well qualified to prepare environmental noise studies and review studies prepared by others.

5900 HOLLIS STREET, SUITE T1 | EMERYVILLE, CA 94608 | (510) 658-6719 | WWW.WILSONIHRIG.COM

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Adverse Effects of Noise[1]

Although the health effects of noise are not taken as seriously in the United States as they are in other countries, they are real and, in many parts of the country, pervasive.

Noise-Induced Hearing Loss. If a person is repeatedly exposed to loud noises, he or she may experience noise-induced hearing impairment or loss. In the United States, both the Occupational Health and Safety Administration (OSHA) and the National Institute for Occupational Safety and Health (NIOSH) promote standards and regulations to protect the hearing of people exposed to high levels of industrial noise.

Speech Interference. Another common problem associated with noise is speech interference. In addition to the obvious issues that may arise from misunderstandings, speech interference also leads to problems with concentration fatigue, irritation, decreased working capacity, and automatic stress reactions. For complete speech intelligibility, the sound level of the speech should be 15 to 18 dBA higher than the background noise. Typical indoor speech levels are 45 to 50 dBA at 1 meter, so any noise above 30 dBA begins to interfere with speech intelligibility. The common reaction to higher background noise levels is to raise one's voice. If this is required persistently for long periods of time, stress reactions and irritation will likely result.

Sleep Disturbance. Noise can disturb sleep by making it more difficult to fall asleep, by waking someone after they are asleep, or by altering their sleep stage, e.g., reducing the amount of rapid eye movement (REM) sleep. Noise exposure for people who are sleeping has also been linked to increased blood pressure, increased heart rate, increase in body movements, and other physiological effects. Not surprisingly, people whose sleep is disturbed by noise often experience secondary effects such as cognitive decline, increased fatigue, depressed mood, and decreased work performance.

Cardiovascular and Physiological Effects. Human's bodily reactions to noise are rooted in the "fight or flight" response that evolved when many noises signaled imminent danger. These include increased blood pressure, elevated heart rate, and vasoconstriction. Prolonged exposure to acute noises can result in permanent effects such as hypertension and heart disease.

Impaired Cognitive Performance. Studies have established that noise exposure impairs people's abilities to perform complex tasks (tasks that require attention to detail or analytical processes) and it makes reading, paying attention, solving problems, and memorizing more difficult. This is why there are standards for classroom background noise levels and why offices and libraries are designed to provide quiet work environments.

[1] More information on these and other adverse effects of noise may be found in *Guidelines for Community Noise*, eds B Berglund, T Lindvall, and D Schwela, World Health Organization, Geneva, Switzerland, 1999. (https://www.who.int/docstore/peh/noise/Comnoise-1.pdf)

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Insufficient Construction Noise Mitigation

The DEIR shows predicted construction noise levels of 86 to 89 dBA at the nearest sensitive receptor [DEIR p. 4.13-19]. As indicated in Table 4.13-8, these levels exceed the Federal Transit Authority Noise and Vibration Impact Assessment Manual Noise (FTA Manual) threshold adopted by the DEIR for construction noise.[2] The DEIR claims, without evidence, that the Mitigation Measures Noise-1 would reduce levels to less than significant. While the mitigation measures outlined are generally good practice for any construction site, they would not reduce levels by 6-9 dB in order to meet the FTA threshold.

Noise-1a states that construction activities shall be limited to certain hours on weekdays and weekends. This is already required by the Country of Riverside Municipal Code in order for construction activities to be exempt from the county noise criteria of 65 dBA / 45 dBA for residential uses presented in Table 4.13-6 [DEIR p.4.13-15]. Therefore, this is not a mitigation measure, but a county requirement for the work to proceed. If this construction hour restriction was not met, the predicted construction noise levels would be 24 dBA over the county daytime criteria.

Noise-1b states that construction equipment shall be properly maintained and equipped with exhaust mufflers. The Noise Study's incorrect claim that mufflers would reduce noise levels by 10 dB relies on an outdated EPA reference from the 1970s [Noise Study p. 21]. The FHWA Road Construction Noise Model reference levels used in the DEIR are based on data collected through the 2000s using hundreds of emission measurements for some equipment [DEIR p. 4.13-18]. These data already reflect the use of mufflers, which are standard for modern equipment in good operating condition. Further, mufflers only reduce noise from internal combustion engines of the equipment, not activity noise from breaking up or impacting earth and other materials. This measure would not reduce the total predicted construction levels below FTA thresholds.

Noise-1c states that staging areas shall be located away from sensitive receptor. This is good standard practice but only applies to certain equipment. Activities that need to take place within 60 feet of the nearby residences will remain above the FTA threshold.

The DEIR does not discuss the use of temporary noise barriers or enclosures. This is a standard mitigation measure for construction noise and could reduce levels by 8-10 dB depending on their placement, material, and height.[3] The Project should evaluate the effectiveness of this mitigation measure to reduce levels to below the threshold adopted by the DEIR.

Inadequate Construction Noise Impact Criteria

California Environmental Quality Act Guidelines cited in the DEIR state that impacts to noise would be significant if the proposed project would result in "generation of a substantial temporary or permanent increase in ambient noise levels" [DEIR p. 4.13-15]. The DEIR construction noise analysis fails to consider increase over ambient levels and instead compares estimated construction noise levels to the FTA Manual threshold of 80 dBA. The cited FTA document is a guidance document, and

[2] https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf
[3] https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf

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it explicitly discourages projects against using its absolute noise criteria values without consideration of local conditions [FTA page 179, see Figure 1 below].

> No standardized criteria have been developed for assessing construction noise impact. Consequently, criteria must be developed on a project-specific basis unless local ordinances apply. As stated earlier in this section, local noise ordinances are typically not very useful in evaluating construction noise. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the impact of a construction project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land

Figure 1 FTA Manual, Section on Construction Noise and Vibration (page 179)

Construction noise levels may cause community annoyance, even if levels are below the 80 dBA FTA threshold. The predicted construction noise levels of 86 to 89 dBA are up to 30 dB above ambient levels measured at LT-1 during construction hours of 7 a.m. to 6 p.m., as shown in Table 4.13-2 [DEIR p. 4.13-4].

As acknowledged in the Noise Study, "an increase of 5 dB is typically considered substantial" and "a 10 dB change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response" [Noise Study p. 6].

As shown in Figure 3-6 of the FTA Manual (reproduced below), which is based on actual case studies, community reaction to newly introduced noise gets stronger as noise above existing levels increases. Reactions to increases between 5 to 10 dB varied from "widespread complaints" to "threats of legal action" and increases above 15 dB consistently result in "vigorous action." A 30-dB increase would likely result in "vigorous action."

The City must revise the DEIR to properly evaluate construction noise impacts, including the noise increase over ambient levels at sensitive receptor locations.

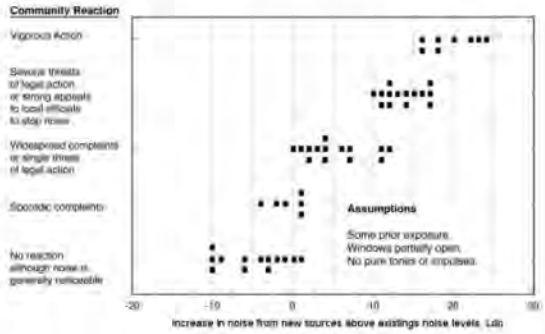


Figure 3-6 Community Reaction to New Noise, Relative to Existing Noise in a Residential Urban Environment

Figure 2 FTA Manual, Section on Construction Noise and Vibration (FTA page 18)

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Potentially Significant Truck Noise Impacts

The DEIR does not address potentially significant impacts from trucks coming in and out of the driveway at night. As shown in Exhibit 2.4, the driveway for the site is located directly across from residences on Airport Boulevard [DEIR p. 2.0-17]. Table 4.17-4 shows that the industrial park will generate 1,342 daily truck trips [DEIR p. 4.17-9]. The DEIR states that the air quality analysis assumed site operations would occur 24 hours, 7 days a week [DEIR p. 4.3-16]. Inconsistently, the nighttime noise SoundPLAN countours shown in Figure 8 of the Noise Study clearly exclude truck activity [Noise Study p.25].

The daytime SoundPLAN contours in Figure 7 of the Noise Study show predicted Leq from the the truck route at residences up to 55 dBA, *exceeding* the nighttime noise limit of 45 dBA. The Noise Study does not indicate what reference level was used for the truck route and the model may be underestimating truck noise at the driveway.

Further, the Leq represents noise from multiple truck events over a period of time (in this case, one hour). Single event truck noise at night can cause sleep disturbance. Reliance on the hourly Leq as the significance threshold is inadequate to assess the significance of truck noise on sleep disturbance. A 2018 review article by Basner and McGuire, titled *WHO Environmental Noise Guidelines for the European Region: A Systematic Review on Environmental Noise and Effects on Sleep* and published in the International Journal of Environmental Research and Public Health (shown in Figure 2) uses data from two fairly large studies of sleep disturbance due to road traffic to estimate the effect of single traffic noise events on sleep.[4]

Lmax levels used in Figure 3 describe the highest "instantaneous" noise level during a specified time period, caused by short duration noises such as a truck passby, pneumatic brake air release, backup alarm, etc. As explained by FHWA-HEP-17-053, the maximum sound level is important in judging the interference caused by a noise event with common activities.[5]

Noise from truck passbys along truck routes (off-site) noise can be modeled using an L_{max} reference level of 88 dBA at 50 ft and 50 mph for heavy trucks and 80 dBA for medium trucks based on current California Vehicle Code[6] noise emission requirements for vehicles. FHWA RCNM uses a reference Lmax of 84 dBA for truck noise at 50 feet. Adjusting for a lower speed entering the driveway (35 mph), the Lmax would be 80 dBA at 50 feet. As show below, this would result in an interior Lmax level of 64 dBA at the nearest residence, 60 feet away from the driveway. This assumes 15-dB reduction from a partially open window, which is standard practice for acoustical analyses in California. As shown in Figure 2, this level has an approximately 17% chance of disturbing sleep.

[4] International Journal of Environmental Research and Public Health 2018, 15, 519; doi:10.3390/ijerph15030519
[5] https://www.fhwa.dot.gov/Environment/noise/resources/sound_descr.cfm
[6] VEH division 12 chapter 5, Article 2.5; 27204 or medium trucks; 27207 for heavy trucks (with a governor/engine brake)
https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?division=12.&chapter=5.&lawCode=VEH&article=2.5

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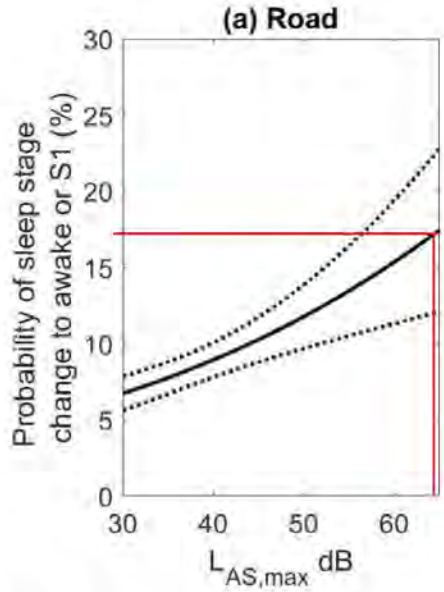


Figure 3 From Basner (2018), Figure 4 Probability of Sleep Disturbance

$$L_{max}(Distance, 50mph) = 84 - 20 \times log\ (60/50) = 82\ dBA$$

$$L_{max\,single}(Speed) = 82 + 25 \times log\ (35/50) = 79\ dBA$$

$$L_{max\,single\,interior} = 79 - 15dB = 64\ dBA$$ [7]

Mitigation measures could include operational conditions such as prohibiting line-haul trucks during nighttime hours, or routing nighttime line-haul trucks away from residential areas, or off-site mitigation in the form of new windows and mechanical ventilation for bedrooms affected by the nighttime line-haul operations. **The City should consider requiring the Project to reroute truck traffic away from the planned Airport Boulevard driveway and nearby residences.**

Operational Noise Impact Analysis May Underestimate HVAC

The SoundPLAN model may be underestimating the contribution from the warehouse mechanical equipment. The Noise Study does not provide input references for noise sources used in the operational analysis SoundPLAN model. The DEIR does state that noise levels associated with commercial air conditioning units can range from 60 to 65 dBA at 3 feet [DEIR p. 4.13-20]. The "Proposed Exterior Noise Sources" figure in Appendix A of the Noise Study shows AC unit and other

[7] Note that the exterior-to-interior adjustment in Equation 3 assumes that the window(s) in sleeping areas are at least partially open, which is standard practice for acoustical analyses in California where residents often leave windows at least partially open at night. (California Model Noise Element, page 378)

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mechanical equipment point sources, including 3-5 rooftop AC units for the small and large warehouses and two AC units for the restaurant. The contours shown in Figure 7 of the Noise Study do not appear to reflect these sources and appear to represent only the contribution of the truck route and loading docks [Noise Study p. 24]. The DEIR states that the rooftop units would be shielded, but there is no discussion of how much reduction is expected from rooftop parapets or other obstructions [p. 22]. Further, the most common large unit size for warehouses is 25 tons, with a typical sound power level of 85-95 dBA, which would be equivalent to a sound pressure level of 78-88 dBA at 3 feet (compared to 60-65 dBA discussed).[8] Since the cumulative operational noise levels shown in Table 4.13-9 are only 1 dB under the daytime and nighttime standards, the Project should verify and document the SoundPLAN inputs and results. **The City should confirm reference sound power levels used in the SoundPLAN model and indicate if any shielding was included from rooftop parapet walls.**

Traffic Analysis Missing Validation

The modeled CNEL levels for 2027 traffic along Airport Boulevard are lower than measured levels reported in the Noise Study. Table 4.13-10 shows a CNEL of 62 dBA between SR-86 SB Ramps and the Project Driveway [DEIR p. 4.13-22]. Table 4.13-2 shows a measured CNEL of 70 dBA at LT-1, 8 dB higher than the modeled 2027 level [DEIR p. 4.13-4]. The DEIR does not discuss this discrepancy or apply a calibration factor to the traffic noise model. The Caltrans Technical Noise Supplement to the Traffic Noise Analysis Protocol (TeNS) provides procedures for traffic studies, including a discussion of model accuracy tolerances.[9] The TeNS recommends that "differences of 5 dBA or more should be approached with caution" when validating traffic noise models [TeNS p. 4-13]. **The City should address this discrepancy and validate the traffic model using measured baseline data.**

Conclusion

The DEIR failed to consider ambient-based significance criteria for noise impacts for construction and does not provide sufficient mitigation measures for the predicted construction noise. The DEIR does not properly document SoundPLAN inputs for operational noise sources and may be underestimating mechanical noise. Finally, the DEIR traffic analysis is missing validation based on measured ambient levels.

Please feel free to contact me with any questions on this information.

Very truly yours,
Ani Toncheva, Senior Consultant, WILSON IHRIG

[8] https://www.shareddocs.com/hvac/docs/1005/Public/00/50FCO-17-28-01PD.pdf
[9] https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf

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WILSON IHRIG
ACOUSTICS, NOISE & VIBRATION



ANI TONCHEVA

Senior Consultant

Since joining the firm in 2011, Ani has conducted analyses for transit systems, vibration sensitive research facilities, public infrastructure, construction, and other environmental noise. She has contributed to literature reviews, including research on current practices of historical preservation. She has extensive experience working on construction projects in New York City and is well versed in local noise codes.

Education

- B.A., Physics; Bard College, New York

Professional Associations

- *Member*, National Council of Acoustical Consultants (NCAC)
- *Member*, Acoustical Society of America (ASA)
- *Board Member*, Transportation Research Forum (TRF), NY Chapter and International board

Research Paper

- NCHRP 25-25, *Current Practices to Address Construction Vibration and Potential Effects to Historic Buildings Adjacent to Transportation Projects*

Relevant Experience

BART Berryessa Station Transit Noise Impact and Mitigation, San Jose, CA Assisted with noise predictions and barrier design recommendations.

Massachusetts Bay Transportation Authority (MBTA) Green Line Extension (GLX), Boston, MA Lead analyst on noise predictions and barrier design.

RTD Eagle P3 Northwest Corridor Noise and Impacts, Denver, CO Assisted with data analysis and helped prepare final technical report.

Alameda CTC, I-880 Interchange Improvements Project (Whipple Road-Industrial Southwest and Industrial Parkway West), Hayward, CA Project Manager for traffic noise study.

Alameda CTC, I-80/Ashby Avenue Interchange Improvements, Berkeley, CA Project Manager for traffic noise study.

Millennium Bulk Terminal, Longview, WA Prepared noise analysis for the project's NEPA and SEPA environmental impact statements.

Peninsula Humane Society & SPCA Haskin Hill Sanctuary, Loma Mar, CA Prepared an environmental study for a planned animal sanctuary in Loma Mar.

Analog (ArtX) Hotel, Palo Alto, CA Prepared preliminary basis of design guidelines for a new five-story boutique hotel in a residential area.

Sunnydale Block 3A & 3B Mixed-Use Residential Development, San Francisco, CA Prepared a CCR Title 24 Noise Study Report for two, mixed-use, 5-story buildings.

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Columbia University Medical Center Medical and Graduate Education Building, New York, NY Conducted baseline noise survey and performed attended noise measurements during preliminary construction work.

Hudson Yards Tower C Foundations and Utilities, New York, NY Conducted a baseline noise survey prior to construction work including a combination of long-term unattended and short-term attended noise measurements.

PANYNJ Lincoln Tunnel Helix Rehabilitation, NJ Assisted in developing construction noise control and mitigation plan and implementing a remote long-term noise monitoring program at three locations.

MSK 74th Street, New York, NY Conducted baseline noise survey, assisted in developing construction noise control and mitigation plan, and implemented a long-term noise monitoring program at two locations.

NY MTA No. 7 Line Subway Extension Ventilation Facility Construction, New York, NY The project involved mining and lining of two shafts and construction of a 2-story ventilation building.

NY MTA ESA/LIRR Grand Central Terminal Fit-Out, New York, NY Prepared the Contractor's noise and vibration control plan updates for fit-out work conducted underground at the Grand Central Terminal Suburban Level.

San Francisco Planning Department, Alameda Street Wet Weather Tunnel and Folsom Area Sewer Improvement, San Francisco, CA Noise and vibration analysis for Folsom Area stormwater infrastructure improvements.

World Trade Center Vehicle Security Center, New York, NY Conducted baseline noise surveys, assisted in developing construction noise control plans, and implementing a remote long-term noise monitoring program.

50 Pine Street Condominiums, New York, NY
Project involved evaluating mechanical noise at residential dwelling units for NYC noise code

Uptown Newport, Newport Beach, CA
Evaluation of noise levels due to mechanical equipment at adjacent property.

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EXHIBIT D

Comment Letter 16 (page 106 of 106)

From: Nicole Criste
To: Aidan P. Marshall; Alisha C. Pember
Cc: Kendra Reif
Subject: Request for Extension of Public Review Period, Airport Business Park EIR (SCH No. 2023040106)
Date: Tuesday, August 26, 2025 3:08:42 PM

Mr. Marshall and Ms. Pember,

Ms. Reif and I have reviewed your request for an extension of time for this project. As detailed below, the City does not believe that an extension to the public review period is warranted, but the City will allow CARE CA to submit comments no later than the close of business on September 11, 2025 and consider them timely. Please send comments electronically to both Ms. Reif and me by that date.

Contrary to the assertions in your letter of August 21, 2025, the City has not, at any time, stated that it would withhold any documents related to the EIR until September 4, 2025. Your Public Records request specifically excluded the EIR and associated documents, and the City has promptly responded to both your requests for additional information relating to the EIR. Documents requested on August 6th were provided to you on August 11th, and documents requested on August 20th were provided on August 22nd.

Furthermore, *Ultramar v. South Coast Air Quality Man. Dist.* (1993) 17 Cal.App.4th 689, concerned notice of an environmental document that omitted an entire chapter related to the cumulative environmental effects of a project for a portion of the notice period; and *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3rd 818, concerned an EIR that the court deemed insufficient as an informational document because the EIR did not provide sufficient substantive information concerning the delivery of water to a proposed sand and gravel mine. Neither case applies here.

The City has complied with PRC § 21092(b)(1) and PRC § 21082.1(d), and met the requirements the courts have found sufficient in *Gilroy Citizens for Responsible Planning v. City of Gilroy (2006) 140 Cal.App.4th 911, 922-924*): "statutory requirements for public notice are fulfilled if the public agency makes a good faith effort to follow the procedures prescribed by law" when reviewing a lead agency's compliance with the notice requirements of PRC § 21092.

Please feel free to contact me if you have any questions.

Nicole Sauviat Criste
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Response to Comment Letter 16

Aidan P. Marshall
Californians Allied for a Responsible Economy via Adams Broadwell Joseph & Cardozo, Attorneys at Law
September 11, 2025

16-1 This comment provides a general introduction and includes a general summary of the proposed Project. Comment noted. The comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines.

16-2 This comment states that upon review of the DEIR by independent air quality, noise and transportation experts, the commenters opine that the DEIR, its supporting documentation, and City records demonstrate that the DEIR fails to comply with the requirements of CEQA by failing to analyze impacts associated with a necessary water line extension; use of onsite backup generators; cold storage uses; Valley Fever; and Toxic Air Contaminants (TACs).

The comment is overbroad and provides no substantial evidence to support the commenter's assertions. Responses to individual environmental issues are provided below.

16-3 This comment asserts that the DEIR's transportation analysis is unsupported in that the DEIR fails to support its VMT analysis with substantial evidence, overestimates reductions from VMT mitigation and underestimates the distance traveled by trucks. The commenters states that feasible mitigation that would further reduce the Project's impacts should be considered.

The comment is overbroad and provides no substantial evidence to support the commenter's assertions. Responses to individual environmental issues are provided below.

16-4 The commenter states that the DEIR fails to support its noise analysis and mitigation with substantial evidence. The comment is overbroad and provides no substantial evidence to support the commenter's assertions. Responses to individual environmental issues are provided below.

16-5 The commenter repeats the assertion that the DEIR lacks substantial evidence to support its conclusions, violates CEQA's analytical requirements, and fails to properly mitigate the Project's significant environmental impacts. The commenter urges the City to remedy the deficiencies in the DEIR by preparing a legally adequate revised DEIR and recirculating it for public review and comment. The commenter further notes that the City provided an extension to submit their DEIR comments due to the City's failure to make DEIR appendices and other reference documents available throughout the entire comment period and the commenter reserves the right to provide supplemental comments at any and all later proceedings related to this Project. The comment is overbroad and provides no substantial evidence to support the commenter's assertions. Responses to individual environmental issues are provided below. Detailed responses have been provided to each of the comments provided by the commenter. Furthermore, the City provided additional information requested in a timely

manner and allowed for an extended response period for the commenter to submit their comment letter. As such, no changes to the DEIR are warranted.

16-6 The commenter provides details regarding a Statement of Interest regarding its non-profit organization, Californians Allied for a Responsible Economy (CARE CA). This comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

16-7 This comment asserts that the City failed to provide timely access to documents referenced, relied upon and incorporated by reference in the DEIR during the public review and comment period, which originally ran from July 21, 2025, to September 3, 2025, in violation of CEQA's requirement that the DEIR and all reference documents be made available during the comment period. As a result, the commenter requested access to reference documents and an extension of the DEIR comment period, which the City partially granted. The commenter continues with the details of previous letters sent to the City for the purpose of requesting additional Project information (refer to Comment Letters 9, 10 and 11 in this FEIR dated August 6, 2025), and Response 9-1). The commenter sent an additional letter on August 21, 2025, requesting additional information and an extension of the comment period for at least 45 days from the date on which the City releases these documents for public review, to which the City replied that late comment letters would be accepted no later than September 11, 2025. The commenter states that not all requested information was received and that the City's response provided insufficient time for public review of the requested DEIR reference documents, as required by CEQA. The commenter asserts that public review of the City's analysis of the Project's air emissions and health risk was substantially impaired without access to the DEIR Appendices' supporting calculations, which included the HRA's AERMOD files and risk calculation spreadsheets; moreover, the commenter asserts that review of other analyses in the DEIR remains impaired without access to documents listed in the DEIR's References sections.

See Responses 9-1, 17-1, 17-2, 17-3, and 17-4. CEQA requires that the public notice specify the address where copies of the draft EIR and all documents referenced in the draft EIR are available for review. (PRC § 21092(b)(1)). CEQA Guidelines Section 15085(e) also requires that the lead agency must post the draft EIR on its internet website, if any. (PRC § 21082.1(d)). The requirements of PRC § 21092(b)(1) and PRC § 21082.1(d) are meaningfully different. PRC § 21092(b)(1) requires that the notice shall specify the "address where copies of the draft environmental impact report or negative declaration, and all documents referenced in the draft environmental impact report or negative declaration, are available for review, and a description of how the draft environmental impact report or negative declaration can be provided in an electronic format." PRC § 21082.1(d) requires that the "draft environmental impact report, environmental impact report, negative declaration, or mitigated negative declaration" must be posted on the agency's website, if any. Therefore, while CEQA requires that the notice must include the *address* where all documents referenced in the draft environmental impact report are available for public review, CEQA does not require that all documents referenced by the draft EIR must be made available electronically or be posted on the agency's website.

The City published a Notice of Availability ("NOA") stating that the draft EIR would be available for public review and comment beginning on July 21, 2025. As required by CEQA, the NOA provided the address where all documents referenced in the draft environmental impact report would be available for review, and the City published the draft EIR and all primary appendices on its website:

"Document Availability: Copies of project documents, the Draft Environmental Impact Report, and appendices are available at the City of Coachella Development Services, Planning Division, 53990 Enterprise Way, Coachella, CA 92236, and on the City's website https://www.coachella.org/departments/development-services/environmental-reviews. The City of Coachella is currently open Monday through Thursday between 7:00 a.m. and 6:00 p.m. and closed every Friday. Additionally, the Draft EIR and Technical Appendices will be provided to the following library for public review:

> Coachella Library, 1500 Sixth Street, Coachella, CA 92236
> Hours: Sunday: Closed. Monday: Closed. Tuesday: 10:00 am-6:00 pm.
> Wednesday: 11:00 am-7:00 pm. Thursday: 11:00 am-7:00 pm. Friday: 10:00 am-6:00 pm. Saturday: 10:00 am-6:00 pm"

On August 11, 2025, the City made a good faith effort to provide the additional reference documents requested by CARE CA in its August 6, 2025, letter. On August 21, the commenter notified the City via email that Appendices C through G of Appendix B were missing from the City's website. On August 22, the City provided those documents to the commenter and posted the documents to the City's website.

The commenter asserts that the CEQA Guidelines (14 CCR section 15087(c)) require that the "*entire* DEIR" including all reference documents must be "readily accessible" in electronic format. This is inaccurate. In fact, 14 CCR section 15087(c) states, in part, that "The notice shall disclose the following . . . (5) The address where copies of the EIR and all documents incorporated by reference in the EIR will be available for public review. This location shall be readily accessible to the public during the lead agency's normal working hours." This aligns with the requirement of PRC § 21092(b)(1), which requires that the notice shall specify the "address where copies of the draft environmental impact report or negative declaration, and all documents referenced in the draft environmental impact report or negative declaration, are available for review" and with the City's NOA, which specifies the address and normal working hours, Monday through Thursday between 7:00 a.m. and 6:00 p.m., during which the City's Development Services Division made the project documents, the draft EIR, and appendices available for public review.

The commenter provides no evidence to indicate that the documents referenced in the draft EIR were not available for public review at the City's Development Services Division as listed in the NOA. In the absence of contrary evidence, it is presumed that the technical appendices and supporting documents were available at the address provided in the NOA for the duration of the required public review period. (Evid. Code § 664; see *Gilroy Citizens for Responsible Planning v. City of Gilroy* (2006) 140 Cal.App.4th 911, 926: "Although circumstantial evidence of compliance with section 21092.5, subdivision (a), appears in the record, we also inquire

"whether the record contains evidence [the agency] failed to comply with the requirements of its ... regulatory program. In the absence of contrary evidence, we presume regular performance of official duty."" (internal citations omitted)). The City is confident that all documents referenced in the Draft EIR could have been provided to the commenter beginning on July 21, 2025, had the commenter visited the City's Development Services Division at the address and during the working hours listed in the NOA. Instead, the commenter elected to submit requests for additional information via email more than two weeks after the Draft EIR was made publicly available, and the City promptly responded to those email requests and supplied the requested information.

Furthermore, CEQA requires that notice must be given in sufficient time so that the public is able to use the full review period, and courts apply the principle that "statutory requirements for public notice are fulfilled if the public agency makes a good faith effort to follow the procedures prescribed by law" when reviewing a lead agency's compliance with the notice requirements of PRC § 21092. (*Gilroy Citizens for Responsible Planning v. City of Gilroy* (2006) 140 Cal.App.4th 911*, 922*-924). The City has fully satisfied that requirement here. In addition to fully complying with statutory notice and availability requirements, the additional efforts by the City, and its CEQA consultant, to provide requested supporting documents in electronic format and to extend the public comment submission period plainly constitute a good faith effort to enable public review.

Finally, CEQA does not require recirculation of the EIR where new information merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. (PRC § 21092.1, *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal. 4th 1112.). Fulfilling the request to provide reference information for the documents requested by CARE CA in its August 6, 2025, letter amplifies the information already contained in an adequate EIR and already available at the address provided in the NOA; therefore, recirculation is not required. Furthermore, this comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

16-8 The commenter asserts that the City is in violation of the California Public Records Act and the California Constitution because the City has not provided timely access to public records related to the Project in response to a Public Records Act request submitted by the commenter on August 6, 2025. Refer to Response 16-7, above.

16-9 The commenter asserts that the DEIR does not meet CEQA's requirements because it fails to include an accurate and complete Project description, rendering the entire analysis inadequate. The commenter cites CEQA Guidelines section 15378 regarding project description definition regulations. This comment includes a generalized statement regarding the Project description and does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

16-10 The commenter states that the DEIR fails to describe the Project impacts and the cumulative impacts associated with the location and construction schedule of a new water line extension

required for the Project ("[t]he proposed Project would connect to a new water line extension through the CWA's [Coachella Water Authority's] proposed 20" water line from near Avenue 54 southerly along Grapefruit Boulevard, then easterly under the existing railroad tracks and the CVSC to the Project site.") The commenter notes that the DEIR states that "CWA's new 20-inch water line extension from Grapefruit Boulevard is a separate project being undertaken by CWA with independent utility (including serving portions of the City located to the east of SR 86) and separate CEQA review," and opines that this is an indication that the City intends to proceed with piecemealed environmental review of the water line extension from the rest of the Project.

The commenter then cites related case law to support their assertion regarding the prohibition of piecemealing under CEQA and states that by failing to analyze impacts associated with construction of the water line which the DEIR acknowledges is necessary for the Project's operations, the DEIR fails to analyze the whole of the action. The commenter reiterates their assertion that the EIR must be revised and recirculated to describe and analyze these impacts.

As detailed in Section 4.19, Utilities and Service Systems, of the DEIR (pages 4.19-13 and 4.19-14), the water line extension is a separate project that would occur with or without the proposed Project. In addition, the water line project IS/MND (*Subsequent Initial Study and Mitigated Negative Declaration (IS/MND), Phase III A-2 Transmission Main, East Coachella Valley Water Supply Project, Valley View Mobile Home Park Water Consolidation Project* (State Clearinghouse No. 2019079095) (April 2022) referenced in the DEIR and utilized in its analysis of domestic water infrastructure, concluded that the water line project would not result in any environmental effects that would cause substantial adverse effects directly or indirectly. As such, no changes in regard to this comment have been made to the DEIR.

16-11 The commenter states that the DEIR's discussion of the Project's air quality, greenhouse gas emissions, and health risk impacts fails to describe the reasonably foreseeable use of back-up generators because backup generator emissions are a reasonably foreseeable consequence of the Project. Therefore, the commenter asserts that the DEIR's omission of onsite generator emissions results in an underestimation of the Project's air quality, greenhouse gas, and health risk impacts.

The Project does not include the use of cold storage; therefore, the need to permanently install emergency backup generators is not required. The SCAQMD defines an emergency backup generator as a standby ICE or turbine for non-utility power generation that does not operate more than 200 hours a year and is only operated in the event of an emergency power failure or for routine testing and maintenance is considered an emergency backup generator for power generation.[8]An emergency power failure is defined as a Stage II or Stage III electrical emergency declared by the Independent System Operator (ISO) and during actual or imminent

[8] SCAQMD. "What Is Considered an Emergency Backup Generator by the South Coast AQMD?" Emergency generators, November 3, 2023. https://www.aqmd.gov/home/permits/emergency-generators#Fact3.

blackouts. CEQA Guidelines §15269 allows for emergency projects to be exempt from the requirements of CEQA (PRC § 21083, 21080, and 21172 et. al.).

In the event that such a declared power emergency were to occur, the use of an emergency backup generator may be utilized on a temporary basis, until power is restored and only SCAQMD approved and certified stand-by generators are authorized for use. The use of any generator would be limited to the duration of any declared power outage and also would be exempt from CEQA under CEQA Guidelines §15269. As such, impacts would be less than significant.

In addition, the use of any emergency backup generator would be covered by Mitigation Measure GHG-1, which requires the Project to be designed to generate a minimum of 50% of the power onsite from renewable sources, which would include the use of solar generation and battery storage systems. In addition, the proposed warehouses are not being designed for cold storage or for 24-hour operations. As a result, the installation of back-up emergency generators are not anticipated to be required for this Project. Therefore, the commenter's assumption that diesel-powered backup generators would be installed as part of the proposed Project is not correct. As such, no changes in regard to this comment have been made to the DEIR.

16-12 The commenter opines that the DEIR fails to analyze impacts associated with cold storage. Therefore, the commenter asserts that the DEIR's assumption that the Project will include no cold storage uses results in underestimation of health risk, air quality, energy, GHG, and noise impacts, since cold storage generates more trips per square foot and has higher energy impacts due to the low temperatures required by transport refrigeration units (TRUs) and on-site storage.

Additionally, the commenter states that the developer should record a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space. The commenter opines that the City should include such title restrictions for this Project unless an EIR is prepared that analyzes and mitigates impacts associated with cold storage uses and other more intensive warehousing uses.

The Project Description was developed in a manner consistent with CEQA Guidelines §15124, which includes a clear statement of the objectives sought by the proposed project and a clearly written statement of the objectives that will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR. The Project Description does not include a description, details, or proposed objectives that include any references to a "cold storage" use. If more intense uses than described in the project description were to be proposed in the future, then the City would be required to evaluate the proposed changes under CEQA Guidelines §15162 and prepare a Supplemental or Subsequent EIR or Addendum to the Certified EIR, as appropriate. The commenter's assertion that the EIR is insufficient because it does not evaluate a use that is not proposed in the clearly written Project Description is inconsistent with CEQA Guidelines §15144, which does not require the City to "foresee the unforeseeable". Accordingly, the DEIR does not analyze the impacts associated with cold storage warehouse uses that have not been proposed, and the commenter's sheer speculation

about such uses does not require or warrant further analysis under CEQA. No changes in regard to this comment have been made to the DEIR.

16-13 The commenter asserts that the DEIR fails to disclose, analyze and mitigate potentially significant impacts and cites CEQA Guidelines, stating that failure to address a subject required to be covered in an EIR or to disclose information about a project's environmental effects or alternatives, are subject to a less deferential standard than challenges to an agency's factual conclusions.

This comment includes a generalized statement regarding requirements under CEQA and does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. The comment is overbroad and refers to no specific environmental issues. Therefore, no response is warranted.

16-14 The commenter claims that the DEIR fails to disclose, analyze, and mitigate exposure to *Coccidiodes Immitis* (Valley Fever cocci) on the Project site, as the DEIR does not include any discussion or mitigation of this potential health risk impact. The commenter opines that the DEIR must be revised to disclose and mitigate this impact in a recirculated EIR.

Valley Fever (*coccidiodes immitis*) is a fungal infection present in the southwestern United States. People and animals can be infected with Valley Fever by breathing in the fungus from the environment. Common symptoms can include fatigue, cough, fever, headache, and muscle aches or joint pain). In a small number of cases, the infection can cause chronic pneumonia. The presence of the Valley Fever fungus can be found in the soil throughout the Coachella Valley. According to the California Department of Public Health (CDPH), the number of reported cases in Riverside County (as of 2024) was 456 and the total number of cases in Riverside County (since recording began in 2001) is 3,377. While Valley Fever can affect humans and animals, certain populations can be more susceptible to infections, such as those who work in the construction industry. The CDPH has published common prevention tips to help reduce infections, such as avoiding dust outside in places where Valley fever is common, staying inside with the windows and doors closed, and use of an N95 respirator if passive avoidance techniques are not possible. When construction is occurring outdoors, state and local regulations require that soils be wet down prior to any ground disturbing activities and staying "upwind" are the areas being disturbed. In addition, the SCAQMD prohibits grading when sustained windspeeds are in excess of 25 mph. SCAQMD also requires implementation of RULES 403 and R403.1, regulating the reduction of fugitive dust and particulate matter. Contrary to the assertion in the memo attached as Exhibit A to this comment letter, the stringent dust control measures required by SCAQMD are recognized, by the California Department of Industrial Relations, as effective in substantially reducing the risk of Valley Fever associated with construction projects in the Coachella Valley. As explained in Exhibit B2 to this Final EIR, SCAQMD provides "the most stringent dust suppressant rules in the State, which is the primary means of transmission of Valley Fever."

In addition, Exhibit B2 points out that the number of reported cases, on a year-by year basis is extremely low (approximately 10 -19 incidents per 100,000 population), as compared to the San Joaquin Valley where incidents are 75+ per 100,000. Based on the stringent SQAQMD

dust control requirements and the extremely low incident rate in the Coachella Valley, the supplemental expert air quality report confirms that "Valley Fever is not likely to be transmitted from construction activities associated with the proposed project (see Exhibit B2 to this Final EIR, at p. 7). As the potential for project impacts relating to Valley Fever is considered negligible, the DEIR does not separately analyze the impacts associated Valley Fever. No changes in regard to this comment have been made to the DEIR.

Finally, neither the comment nor the information provided in memo attached as Exhibit A, from Clark & Associates, provide any substantial evidence that the *Coccidiodes Immitis fungus* is present on the Project site in any substantial quantities or that Valley Fever cases have resulted from similar development projects within the City of Coachella. Valley Fever is not a significant risk in Riverside County and adherence to the SCAQMD's very stringent fugitive dust regulations during construction of the proposed Project would go above and beyond the Valley Fever suppression requirements in the Central Valley, where it is a potential health risk. The additional information provided in this response and the supporting expert evidence provided in Appendix B2 expands and amplifies on the Air Quality analysis set forth in the Draft EIR but does not constitute significant new information requiring recirculation of the Draft EIR because it does not prevent the public from commenting on a significant adverse environmental effect or a feasible means of mitigating such a significant effect. As such, no changes to the DEIR nor recirculation of the Draft EIR are warranted.

16-15 The commenter asserts that the DEIR applies VMT screening and significance thresholds that are unsupported by substantial evidence; specifically, that the DEIR does not present evidence that the County's significance thresholds or screening thresholds are appropriate for projects in the City of Coachella, relying on a court decision in San Diego County as evidence against the DEIR's analysis.

CEQA does not require that a Lead Agency adopt its own standards. In this case, the City applied the Riverside County standards, as have multiple cities in the region, because the City occurs in Riverside County, and conditions in the City are consistent with those in the County. Furthermore, the Project site is located along the boundary between the City of Coachella and unincorporated Riverside County, and use of the County's methodology and thresholds is reasonable. In the absence of local guidance, the Riverside County's "Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled (December 2020)" were properly applied, as they provide an appropriate and CEQA-consistent framework. The guidelines include several project screening criteria which were reviewed for the project evaluation. The project includes multiple non-residential land uses which is considered as a mixed-use project. The County guidelines recommend evaluation of each land use separately in the case of a mixed-use project (Step 1: Evaluate Land Use Type – Mixed Use, page 18). Therefore, each of the below-mentioned project uses were assessed with screening criteria:

1) 233.1 TSF (thousand square feet) large warehouse
2) 96 TSF small warehouse

3) 128.6 TSF self-storage
4) 76.8 TSF personal vehicle storage
5) 81 TSF small business / office
6) 8.65 TSF retail

While most of project uses are screened out, the large warehouse buildings cannot be screened out of a detailed VMT analysis and therefore, a full VMT analysis was conducted using RIVCOM3.51 as recommended in the guidelines. However, all of the project land uses were included in the model runs to appropriately account for internal capture between different uses of the project. Based on the VMT analysis, the project has a significant impact for VMT, as disclosed in the DEIR.
The VMT metric used—VMT per employee for non-residential, non-retail projects—is consistent with both the County guidelines and the Governor's Office of Land Use and Climate Innovation (LCI) formerly the Governor's Office of Planning and Research (OPR) T*echnical Advisory on Evaluating Transportation Impacts in CEQA*.

While the commenter references case law regarding local thresholds, such cases do not preclude reliance on established county-level or State guidance when local standards are not yet adopted. As such, no revisions to the Project's Transportation Analysis or the DEIR are warranted.

16-16 The commenter states the DEIR lacks substantial evidence for its VMT screening methodology that most of the Project's components screen out of a VMT analysis, and renders the DEIR's VMT analysis unsupported. Specifically, the commenter states that the VMT analysis in the DEIR improperly screens out, and fails to analyze, the other Project components besides the 233,000 square foot warehouse (which does not screen out of a VMT analysis), which include Small Warehouses, Small Business, Personal Vehicle Storage, Self-Storage, and Retail. The total industrial square footage proposed by the Project is 624,500 square feet, so failure to analyze VMT from these other uses results in a failure to meaningfully analyze the bulk of the Project. The commenter further adds that the DEIR's rationale for screening out the other non-retail uses is that "[t]he [Riverside] County Guidelines recommend evaluation of each land use separately in case of a mixed-use project," however, the commenter opines that the DEIR misapplies this guidance and the Project does not likely constitute a mixed-use project. Further, even if the term "mixed-use" applied broadly to projects with a mix of non-residential uses, the Project's mix of industrial buildings would not be considered diverse enough to be considered different uses. Specifically, the County guidelines recommend that analysis of mixed-use projects be done by applying either the EPA's MXD Model or the Institute of Traffic Engineers ("ITE") mixed-use trip generation methodology. The commenter explains that neither of these tools split land use down to the level done in the DEIR when doing VMT screening.

As described in Section 4.17, Transportation, pages 4.17-30 through 4.17-33 of the DEIR, and in Attachment I2 of this FEIR, although the VMT metric was reported for the warehouse component that did not screen out of VMT analysis, it should be noted that the modeling

included the entire Project to ensure all Project land uses were represented, as described in Response 16-15. Therefore, no portion of the Project was excluded from the modeling effort, and the commenter's assertion is incorrect.

As it relates to the assertion that the project is not a mixed use project, under the *Riverside County Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled (December 2020, Page 10)*, a mixed-use project is defined as one containing more than one land use type, which applies to this Project since it includes industrial, commercial and retail land uses The reference to the EPA MXD Model and ITE mixed-use trip generation methodologies pertains to the traffic/LOS analysis, not the VMT analysis. The County's regional travel demand model (RIVCOM 3.51) appropriately accounts for trip generation and internal capture among the Project's uses for estimating Project VMT. As such, no revisions to the DEIR are warranted.

16-17 The commenter opines that the DEIR finds that Project-related and cumulative VMT impacts would be significant and unavoidable, and includes a vanpooling measure in Mitigation Measure GHG-1, which would reduce impacts by 3.55%, relying on a calculation in California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity. The commenter states that this measure should not apply and that the reduction claimed in the DEIR is thus not supported by substantial evidence.

Per the CAPCOA Handbook, the proposed Mitigation Measure GHG-1 is consistent with Measure T-11, which states, "This measure will implement an employer-sponsored vanpool service. Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting. The mode shift from long-distance, single-occupied vehicles to shared vehicles reduces overall commute VMT, thereby reducing GHG emissions." The items noted by the commenter are not requirements for Measure T-11.

In addition, as discussed in Attachment B2 of this FEIR, the commenter is not correct in stating that the DEIR calculates that this measure would reduce impacts by 3.55%. Although the Mitigation Measure of a Commute Trip Reduction Program was selected in the CalEEMod model run, the operational emissions shown in Section 4.8, Greenhouse Gas Emissions, of the DEIR, Table 4.8-3 on page 4.8-12, shows the unmitigated emissions levels. Moreover, this table is provided for informational purposes only, as the amounts are not utilized to determine if the project would create a significant impact. However, in the consistency analysis with the CAP Development Review Checklist, it was determined that the Transportation Demand Management Program included in Mitigation Measure GHG-1 would reduce GHG emissions by 1.6%, which is less than half of what CAPCOA calculated for implementation of this measure. In addition, the City's CAP found that a Citywide Transportation Demand Management Program would reduce emissions by 5% and provided substantial evidence to support that conclusion (DEIR page 4.8-13). Therefore, the use of a 1.6% reduction in emissions from implementation of the TDM provides for a conservative analysis supported by substantial evidence. As such, no changes to the DEIR are warranted.

16-18 The commenter opines that the DEIR's air quality analysis overestimates VMT mitigation; specifically, the air quality analysis assumes a 5% VMT reduction from "Measure T-6, Implement Commute Trip Reduction Program (Mandatory)," but this reduction is not supported by substantial evidence. The commenter also notes that the DEIR's transportation study calculates that the vanpool measure would only reduce VMT by 3.55%, and thus, the air quality study overestimates emissions reductions from the measure and results in higher levels of unmitigated emissions than disclosed in the DEIR. As such, the commenter reiterates their assertion that the EIR must be revised and recirculated.

The comment misstates the conclusions of the Air Quality Analysis. As shown on page 66 of the Air Quality analysis included at Appendix B to the DEIR, operational air quality emissions will be substantially below the established SQAQMD thresholds for all criteria pollutants. It appears that the comment is based on a footnote regarding the settings for the CalEEMod modeling, which references transportation measure T-6 regarding implementation of a commute reduction program. However, neither the comment nor the attached memo from Smart Mobility (Exhibit B) provide any substantial evidence or other explanation as to how that CalEEMod setting or assumption could conceivably affect the significance of operational air quality emissions as detailed on Table Y of the Air Quality report, particularly in light of how far below the established thresholds the Project's operational emissions would be. Furthermore, as detailed above in Response 16-17, the 1.6% reduction in GHG emissions that the DEIR takes credit for with implementation of Mitigation Measure GHG-1 provides for a conservative analysis supported by substantial evidence. As such, no changes to the DEIR are warranted.

16-19 The commenter states that the DEIR underestimates the distances of the truck trips associated with the Project's warehouse uses, which consequently underestimates the Project's emissions of criteria air pollutants and GHGs. The commenter asserts that the Ports of Los Angeles and Long Beach should be used to calculate average truck trips which is approximately 150 miles. Consequently, the commenter opines that because truck trips to and from the Ports are reasonably foreseeable and unanalyzed in the DEIR, the DEIR underestimates transportation, air quality, and GHG impacts.

See Response 5-9, explaining why this assumption is inappropriate for the proposed Project.

No changes to the DEIR are warranted.

16-20 The commenter asserts that the DEIR fails to adequately analyze operational health risk impacts associated with the location of the Project's proposed fuel center, at the southern border of the Project site at Airport Boulevard, with specific concern for the mobile home community across the street from the site. The commenter adds that the Project's health risks would cumulatively considerable under draft SCAQMD numeric thresholds, which lower the significance threshold to 1 in one million; and that the siting of the fuel center violates General Plan Policy 11.3 .

As discussed in Section 4.3, Air Quality, of the DEIR and in Attachment B2 of this FEIR, General Plan Policy 11.3 prohibits the siting of land uses that adversely impact existing sensitive

receptors, including schools, childcare centers, senior housing, and subsidized affordable housing. The existing mobile home park is not one of listed sensitive receptors in General Plan Policy 11.3. In addition, the DEIR found that the operation of the proposed Project, including the gas station would not create a significant cancer risk to the residents of the mobile home park (DEIR pages 4.3-26 through 4.3-29). Therefore, the proposed gas station is not a land use that would adversely impact sensitive receptors. The commenter also provides hypothetical thresholds that have not been adopted by the City or SCAQMD. The SCAQMD Working Group threshold changes the commenter cites are being discussed as new regulations for large warehouses that are over 100,000 square feet, which would not apply to the proposed Project. The DEIR shows that the cancer risk is within the SCAQMD adopted thresholds (DEIR pages 4.3-26 through 4.3-29) and the City relies on the SCAQMD's expertise for developing these thresholds. As such, no changes to the DEIR are warranted.

The commenter refers to General Plan Policy 11.3 as lowering the significance threshold to 1 in one million; however, General Plan Policy 11.3 does not stipulate any quantitative metrics related to the evaluation of cancer risk. The proposed fueling station does not exceed the SCAQMD thresholds. This shall be used as the defining criteria for determining significance. As such no additional mitigation is required and not substantial changes to the DEIR are warranted.

16-21 The commenter notes that the DEIR includes analysis of the mobile home community's health risks from exposure to the Project's operations; however, upon review of the DEIR's AERMOD model, the commenter found that impacts were underestimated because the model only includes emissions from trucks traveling onsite and on Airport Boulevard when in reality, trucks would also be driving past the mobile home community on SR-86. The commenter asserts that this underestimates the community's exposure to DPM generated by trucks and that the DEIR's analysis must be revised to fully disclose and mitigate these health risk impacts.

As discussed in Section 4.3, Air Quality, of the DEIR and in Attachment B2 of this FEIR, the HRA was prepared based on guidance provided by SCAQMD that recommends that HRAs analyze truck travel up to a quarter mile from the project site or to the onramps of the nearest freeway, whichever is nearer, which is based on the assumption that trucks are very efficient and produce very little emissions when traveling at constant speeds on freeways. The mobile home park is approximately 60 feet to the south of the Project site. Furthermore, the cancer risk created by the proposed Project at the mobile home park was calculated to be as high as 3.0 per million person, which is well below the 10 per million person threshold. The commenter did not provide any evidence that extension of a road source that is located over 600 feet from the most impacted residents would more than triple the cancer risk levels that would be required to change the significance levels shown in the DEIR. As such, no changes to the DEIR are warranted.

16-22 The commenter makes a general statement that the DEIR fails to describe the Project's cumulative impacts. This comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Refer to the commenter's specific concerns regarding cumulative impacts in Responses 16-23 and 16-24, below.

16-23 The commenter asserts that the Draft EIR is inadequate because it fails to analyze the Project's cumulative air quality effects with existing and proposed development near the Project site. Specifically, the commenter calculates that existing projects within 5 kilometers (km) of the Project site generate 4,000 daily truck trips, producing 5.5 lbs. of diesel particulate matter (DPM) per day and 623 lbs. of oxides of nitrogen (NOx) per day. The commenter also asserts that SCAQMD unadopted thresholds and Attorney General Warehouse Guidance should be used to determine cumulative impacts, including cancer risk. The commenter asserts that this analysis may result in significant cumulative air quality and health risks which are unanalyzed in the DEIR.

Regarding acceptable methodologies for an adequate discussion of significant cumulative impacts, CEQA specifies two approaches: the "List" approach (14 CCR § 15130(b)(1)(A)) or the "Plan" approach (14 CCR § 15130(b)(1)(A)). The Draft EIR utilizes the latter, referencing existing 2003 SCAQMD cumulative analysis guidance, a policy document that SCAQMD adopted to enable compliance with the South Coast Air Quality Management Plan. According to this guidance, individual projects under SCAQMD's jurisdiction would cause a cumulatively considerable increase in emissions for which the South Coast Air Basin (SCAB) is in non-attainment if the project exceeds SCAQMD's recommended thresholds. As shown in Draft EIR section 4.3, Air Quality, and section 10.3 of Appendix B of the Draft EIR, *Air Quality, Energy, Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis*, with implementation of Mitigation Measure GHG-1, the proposed Project would conform to local land use plans, comply with all applicable SCAQMD rules and regulations, and would not exceed the applicable regional thresholds for air pollutant emissions. As such, the Project is consistent with the applicable air quality plans in the Project area, and the Project would result in a less than significant cumulative air quality impact. While the SCAQMD is in the process of reviewing and updating cumulative thresholds, there are no current alternative numeric or qualitative cumulative thresholds adopted for use within the SCAQMD's jurisdictional area. The commenter cites *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692 ("*Kings County*") to argue that the Draft EIR's cumulative air quality impact analysis fails to comply with CEQA. However, the cumulative impacts analysis in *Kings County* did not rely on the Plan approach. Instead, the Court held that the City's EIR was deficient in accordance with the List approach because the record did not provide information regarding similar energy developments in the San Joaquin Valley air basin. (*Kings County* at 724).

Regarding cancer risk, as discussed in Table BB in Attachment B2 of this FEIR, the cancer risk levels drop off from 1.5 per million at Receptors 2 and 3, which represent homes located 60 feet south of the Project site to 0.2 per million at Receptor 11, which represents a home 1,900 feet from the Project site. This shows that DPM emissions disperse rapidly and cumulative projects would need to be within approximately 2,000 feet of the Project site to provide any quantifiable increase to cancer risk rates. Furthermore, the Attorney General's guidance and the examples provided by the commenter are from very large warehouse projects. The largest warehouse in the proposed Project is 48,800 square feet, which would be considered a small warehouse in Southern California. The threshold changes the commenter cites are being discussed as new regulations for large warehouses that are over 100,000 square feet, which would not apply to the proposed Project. As such, no changes to the DEIR are warranted.

16-24 The commenter restates that the Project's health risk impacts would exceed SCAQMD's draft cumulative impacts significant thresholds. The commenter explains that, although the new protocols have not been formally adopted, SCAQMD comments on similar industrial projects recommend that the draft protocols be applied and that this demonstrates that the new thresholds are supported by substantial evidence, unlike the outdated 2003 guidance. The commenter describes draft SCAQMD protocols including a flowchart lowering the cancer risk significance threshold (from 10 in one million) if certain factors reflecting high pollution burden are met. The commenter asserts that this constitutes substantial evidence of a significant impact requiring disclosure and mitigation in a recirculated EIR.

The commenters assertion that application of SCAQMD's draft cumulative impact significant thresholds constitute substantial evidence that was not disclosed in the DEIR is incorrect. CEQA §15064(f)(5) states that, "Argument, speculation or unsubstantiated opinion…shall not constitute substantial evidence." As the draft *Cumulative Impacts from Air Toxics for CEQA Projects* have yet to be adopted, they are considered speculative at this time. Nevertheless, according to Table BB, of Appendix B to the DEIR, the cancer risk, per 10 million population, is 9.7 percent, which is less than the draft guidelines.

Moreover, as confirmed in the expert supplemental technical report attached as Appendix B2 to this Final EIR and detailed above in Response 16-23, the draft SCAQMD protocols are for warehouses that are over 100,000 square feet, which would not apply to the proposed Project. Therefore, the working group thresholds that have not yet been adopted by the SCAQMD are not applicable to the proposed Project. As such, no changes to the DEIR are warranted.

16-25 The commenter states that the DEIR's construction noise significance threshold is unsupported by substantial evidence, stating that the DEIR provides that daytime construction noise under 80 dBA and nighttime construction noise under 70 dBA would be less than significant, which are thresholds from the Federal Transit Administration's (FTA) Transit Noise And Vibration Impact Assessment Manual. However, the commenter notes that the DEIR violates CEQA by failing to also identify a significance threshold for the increase in noise over ambient levels.

In addition, the commenter cites information and anticipated community reactions contained in the FTA Transit Noise and Vibration Impact Assessment Manual that relates to long-term noise exposure over a 24-hour period, based on an average-daily noise level. This information does not pertain to short-term noise exposure, such as the on average-hourly noise thresholds recommended by the FTA for the analysis of construction activities. With regard to the assessment of short-term construction-related noise impacts, the FTA guidelines present recommended noise thresholds, taking into account the noise-sensitivity of the land use and ambient noise conditions. For residential land uses, the guidelines recommend thresholds of 80 dBA Leq for the daytime hours and 70 dBA Leq for the nighttime hours. With regard to these recommended short-term average-hourly construction noise thresholds noted in the guidelines, the guidelines state that "If these criteria are exceeded, there may be adverse community reaction."

The Californians Allied for a Responsible Economy's comment letter was reviewed, and responses were provided by AMBIENT Air Quality and Noise Consulting in the *Noise Responses to Comments Technical Memorandum* dated October 21, 2025, provided as Appendix H2. It should be noted that this attachment does not constitute significant new information requiring recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5. Rather, it serves only to clarify or amplify information already presented in the DEIR and/or the respective technical studies. As discussed in the Attachment H2 of this FEIR and as noted in Section 4.13, Noise, of the DEIR, the nearest noise-sensitive receptors are residential land uses located approximately 60 feet south of the Project site. The analysis noted that predicted daytime and nighttime construction noise levels would exceed corresponding daytime and nighttime noise thresholds of 80 dBA Leq for the daytime hours and 70 dBA Leq. As noted in the DEIR, increases in ambient noise levels during the more noise-sensitive evening and nighttime hours would be of particular concern with regard to residential land uses due to the potential for increased levels of annoyance and sleep disruption.

With regard to daytime exposure to short-term construction noise, the nearest residential land uses are currently exposed to traffic noise emanating from the adjacent Airport Boulevard and nearby SR-86. As noted in Section 4.13, Noise, of the DEIR, ambient daytime noise levels in the vicinity of these nearest residential land uses measured approximately 68 dBA Leq with maximum instantaneous noise levels of approximately 79 dBA Lmax primarily associated with vehicle traffic on Airport Boulevard. Generally speaking, residential land uses are often exposed to increases in daytime ambient noise levels from a variety of sources, such as vehicle traffic on area roadways, landscape maintenance activities, waste-collection activities, and outdoor recreation activities. These sources can result in significant increases in daytime ambient noise levels. For instance, the use of landscape maintenance equipment, such as leaf blowers, can generate noise levels in excess of 90 dBA. With mitigation, predicted construction noise levels at the nearest residential land uses would be approximately 79 dBA Leq, or less. Predicted construction noise levels during the less noise-sensitive daytime hours would not be uncharacteristic of other existing short-term noise events (e.g., landscape maintenance activities, vehicle traffic on area roadways, waste collection activities, etc.) commonly associated with residential land uses. It is also important to note that the construction noise levels noted in the DEIR were conservatively calculated assuming that five pieces of heavy-duty offroad equipment would be located within 60 feet of the nearest residential property line. Given that transient and temporal nature of construction activities, it is highly unlikely that five pieces of heavy-duty off-road construction equipment would be operating simultaneously within 60 feet of these nearest residential land uses. As a result, actual construction-generated noise levels would likely be substantially lower, and in any event, were determined to be reduced to below the threshold of significance with implementation of Mitigation Measure NOI-1 and compliance with the City's Municipal Code restrictions on construction hours (See DEIR, at page 4.13-19).

As identified on page 4.13-15, of the DEIR, no standardized criteria have been developed by the State of California, County of Riverside, or City of Coachella, for assessing construction noise impacts. However, as discussed in the Regulatory Framework subsection above, the FTA has identified criteria for the assessment of construction-generated noise levels. For noise-

sensitive land uses, the FTA's recommended detailed analysis of construction noise identifies daytime and nighttime noise standards of 80 dBA Leq and 70 dBA, respectively. To evaluate whether the Project will generate potentially significant short-term noise levels at nearby receiver locations, a construction-related noise level threshold of 70 dBA Leq is used as an acceptable threshold to assess construction noise level impacts. This threshold is determined not by the existing ambient noise level, measured at the nearest existing residences, which are located approximately 60 feet south of the Project site, but rather by the recommended daytime and nighttime noise standards of 80 dBA Leq and 70 dBA, respectively. As discussed above, with implementation of Mitigation Measure NOI-1, and compliance with the City's Municipal Code restrictions on construction hours, these established thresholds of significance would not be exceeded. With respect to increases in ambient noise levels, as noted above, existing ambient noise levels measured approximately 68 dBA Leq with maximum instantaneous noise levels of approximately 79 dBA Lmax primarily associated with vehicle traffic on Airport Boulevard, meaning that the Project construction levels would not be meaningfully higher than existing ambient noise levels (even though this is not the applicable threshold of significance for construction noise). Therefore, as construction noise would not exceed the established significance thresholds or substantially increase existing noise levels, an adverse community reaction among nearby residents would not be anticipated to occur. No changes to the DEIR are warranted.

16-26 The commenter notes that the DEIR estimates that the Project's construction would result in construction noise levels of 86 to 89 dBA at the nearest residences and disagrees with the existing construction noise impact analysis in the DEIR, stating that these noise impacts would be significant because they would result in noticeable increases over ambient levels. The commenter also notes that FTA guidance predicts that the community response to a 30 dBA noise increase would constitute a significant noise increase, even if mitigation reduces it to just below an 80 dBA threshold.

Refer to Response 16-25, above. As discussed therein, the project's potential construction related noise impacts on the nearest residences was fully analyzed in the DEIR and would not have a significant effect even under the conservative assumptions used in the noise analysis.. Further, as explained in the Draft EIR at pages 4.13-19 through 4.13-23, the Project would not have any significant long-term operational noise impacts or substantial increases in ambient noise levels.

16-27 The commenter opines that the noise reductions claimed by Mitigation Measure NOI-1 in the DEIR are not supported by substantial evidence and that this measure would not fully mitigate construction noise impacts.

As discussed in Attachment H2 of this FEIR and as noted in Section 4.13, Noise, of the DEIR, construction noise levels were conservatively calculated using the FHWA's RCNM based on equipment reference noise levels identified in FHWA's RCNM. These reference noise levels are based on measured data from railroad construction equipment taken during the 1976 Northeast Corridor Improvement Project derived from U.S. EPA report "Noise from Construction Equipment and Operations, Building Equipment and Home Appliances" (NTID300.1, 31 December 1971), and measurements conducted in the early 1990's for the

Central Artery/Tunnel (CA/T) project in Boston, Massachusetts. Although this data is the most current and comprehensive data currently available for off-road construction equipment noise levels, the representative equipment noise levels contained in the FHWA's RCNM are now more than 20 years old and do not specifically account for the use of newer construction equipment fitted with mufflers. As noted by Mitigation Measure NOI-1, of the DEIR, the use exhaust mufflers, and engine shrouds, that reduce equipment noise levels by approximately 10 dBA, shall be required. The commenter states that "mufflers have since become standard on modern construction equipment." However, the commenter does not reference any specific type of standard muffler equipment. In addition, MM NOI-1 states that mufflers are to be used in conjunction with engine shrouds, in order to achieve a noise reduction of 10 dBA. The commenter fails to identify this combination, which has been developed as specific mitigation for the Project. With mitigation, predicted construction noise levels would not exceed the daytime noise threshold of 80 dBA Leq. As such, no revisions to the Project's Noise Analysis or the DEIR are warranted. In addition, refer to Response 16-25, above.

The comment requests that MM-NOI-1 be revised to include reference to the "southern" boundary; however, this reference is already included on page 20, of Appendix H, of the DEIR. As such, no revisions to the Project's Noise Analysis or the DEIR are warranted.

16-28 The commenter asserts that the DEIR underestimates the Project's operational noise impacts, which would exceed the 55/45 dBA thresholds (the DEIR finds that daytime operational noise impacts at the nearest residential receptor would be 54 dBA and nighttime impacts would be 44 dBA). Specifically, the commenter explains that the DEIR appears to underestimate noise from warehouse mechanical equipment. The commenter asserts that mechanical equipment noise would be louder than assumed in the DEIR and that the most common large air conditioning units of 25 tons, have a sound power level of 85-95 dBA, which would be equivalent to a sound pressure level of 78-88 dBA at 3 feet.

As discussed in Section 4.13, Noise, of the DEIR, and in Attachment H2 of this FEIR, to be conservative, the analysis of on-site operational noise levels included the simultaneous operation of all air conditioning (AC) units anticipated to be located on the Project site. A total of 92 AC units were included, which were assigned to onsite structures based on the estimated area of conditioned floor area. Modeled AC unit locations and SoundPlan modeling assumptions are included in Appendix A of the Project's Noise Impact Analysis (Appendix H1 of the DEIR). Modeling was conducted based on an AC unit sound power level of 77 dB LwA. This level is equivalent to an AC unit roughly 6 tons in size. Based on a commonly-applied average of 1,000 square feet per ton of cooling capacity, taking into account current building code requirements for energy efficiency, each AC unit would cool an estimated temperature-controlled floor area of roughly 6,000 square feet. Based on this square-footage cooling area, the modeled AC unit noise levels would be representative of those anticipated to be required for this Project.

In addition, the 25-ton AC units noted by the commenter are more representative of what might be installed for large open-floor commercial retail buildings or refrigerated warehouses. None of the warehouses proposed for the Project are being designed as refrigerated warehouses and no large open-floor commercial retail buildings are proposed as part of the

Project, since the largest warehouse buildings are planned for 22,400 sq. ft. to 48,800 sq. ft. is approximately 233,100 square feet (see Draft EIR Table 2.1, on p. 2.0-4). It is also important to note that AC units typically operate in a cyclic manner and do not operate continuously over a one-hour period. However, to ensure a conservative analysis, all AC units on the Project site were assumed to operate simultaneously over a one-hour period. As a result, actual average-hourly noise levels would likely be lower than estimated. Further, as noted in the DEIR (Tables 4.13-1 and 4.13-2, pages 4.13-3 through 4.13.4), ambient noise levels at the nearest residential land uses located south of the Project site, across Airport Boulevard, are predominantly influenced by vehicle traffic on area roadways. Based on the noise measurements conducted, ambient average-hourly noise levels at the nearest residential land uses range from a nighttime low of 59 dBA Leq to a daytime high of 68 dBA Leq. In comparison to ambient noise conditions, operational noise levels attributable to the proposed Project at these nearest residences would be approximately 44 dBA Leq during the nighttime hours and 54 dBA Leq during the daytime hours, more than 10-dB lower than ambient noise levels. Predicted operational noise levels would be substantially lower than ambient nighttime and daytime noise levels at the nearest residential land uses. As a result, operational on-site noise levels would not result in a substantial increase in ambient noise levels and would be largely masked by existing traffic noise levels.

It is also important to note that the analysis of on-site noise levels was conservatively conducted in comparison to the noise ordinance standards for Riverside County, within which the nearest residential land uses are located. In accordance with the County's noise ordinance, the operation of air conditioning units are considered exempt from these noise standards. As such, no changes to the DEIR are warranted.

16-29 The commenter states that the DEIR fails to adequately analyze noise from nighttime operations. The commenter opines that the assumption that no operations would occur in the industrial park after 9:00 PM is unsupported by substantial evidence because the assumed hours of operation are not binding on future tenants.

Regarding hours of operation, see Response 16-25 above. As discussed in the Noise Responses to Comments Technical Memorandum (provided as Attachment H2 of this FEIR), modeling was conducted based on the anticipated operational hours for the Project. Predicted operational noise levels would not exceed applicable noise standards. In addition, as noted in Response 16-28 above, predicted operational noise levels would be more than 10-dB lower than ambient noise levels at the nearest residential land uses and would be largely masked by existing ambient noise levels.

CEQA does not require a detailed and technical response to comments that are based on speculation: an "EIR is not required to address all of the variations of the issues presented. An analysis of every permutation of the data is not required."" (*Tiburon Open Space Committee v. County of Marin* (2022) 78 Cal.App.5th 700, 726 (internal citations omitted)). Additionally, CEQA does not require the implementation of additional mitigation measures for impacts that have been reduced to a level that is less than significant. (PRC § 21081). Here, the Draft EIR adequately analyzes potential environmental impacts related to noise in section 4.13 and in Attachment H2, and impacts associated with noise have already been reduced to a level that

is less than significant with mitigation incorporated. (DEIR p. ES-18). As such, no changes to the DEIR are warranted.

16-30 The commenter asserts that the Project may generate nighttime truck trips that would result in potentially significant sleep disturbance impacts but that such impacts are not fully evaluated in the DEIR.

As discussed in Section 4.13, Noise, of the DEIR and in the Noise Responses to Comments Technical Memorandum (provided as Attachment H2 of this FEIR) and as previously noted, the nearest residential land uses are located south of the Project site, adjacent to Airport Boulevard and west of SR-86. As a result, ambient noise levels at these nearest residential land uses are largely influenced by vehicle traffic noise on Airport Boulevard and nearby SR-86, which include existing pass-by events associated with truck traffic on these roadways. Implementation of the proposed Project would not result in a substantial increase in the number of heavy-duty truck volumes along Airport Boulevard or SR-86. As a result, the Project would not result in significant increases in traffic noise levels or the number of traffic-related noise events at the nearest residential land uses. In comparison to ambient noise levels measured at the nearest residential land uses, noise levels from on-site noise sources, including on-site truck travel, would be largely masked by existing traffic noise emanating from adjacent Airport Boulevard and the nearby SR-86. In addition, the Project is not anticipated to include nighttime operations associated with proposed onsite warehouses that would generate heavy-duty truck traffic (also see Response 16-25 above).

In addition, on-road heavy-duty trucks traveling on the Project site would be estimated to average approximately 25 mph, or less. At these low speeds, noise generated by on-site truck travel would be associated with the operation of the truck's engine and vehicle exhaust. These sources are not considered instantaneous noise sources and, therefore, are more appropriately evaluated based on an average-daily or average-hourly noise metric, consistent with methodologies currently recommended by Federal and State agencies (i.e., Federal Highway Administration, California Department of Transportation) for the analysis of on-road traffic noise, as was done for the Project (DEIR Section 4.13, Noise, .4.13-22 and Appendix H). For reference, instantaneous noise events refer to sharp, sudden noise events of short duration, typically occurring over a period of seconds and at levels substantially higher than ambient noise levels. Examples of instantaneous noise events commonly associated with transportation noise sources typically include aircraft overflights and the sounding of train horns. Furthermore, it is noted that the commenter does not provide a basis for the reference noise level used for the calculation of Lmax noise levels associated with a single truck. Based on the information presented in the comment, it appears that the calculation is based on noise levels derived from the FHWA's Road Construction Noise Model (RCNM) for off-road construction haul trucks. As noted in Response 16-27 above, the reference noise level data contained in the RCNM is more than 20 years old, does not specifically account for the use of modern mufflers (as is required for on-road vehicles); and, as a result, would not be representative of noise levels associated with the operation of modern on-road trucks. As such, no revisions to the Project's Noise Analysis or the DEIR are warranted.

16-31 The commenter concludes by reiterating their assertion that the Project's DEIR is inadequate under CEQA and should be revised to provide legally adequate analysis of, and mitigation for, all of the Project's potentially significant impacts, and be recirculated for additional public review. As described in Responses 16-1 through 16-30, the DEIR adequately and thoroughly analyzed the project's impacts, and disclosed and mitigated those impacts to the greatest extent possible. Where impacts remain significant, those are also disclosed. Refer to the individual responses above for specific information pertaining to each of the commenter's comments.

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Comment Letter No. 17

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August21, 2025

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Re: RequesttoExtendthePublic Review and Comment Period for theDraftEnvironmental Impact Report– Coachella Airport BusinessParkProject(SCH No. 2023040106)

Dear Mr. PerezandMs.Reif:

On behalfofCaliforniansAllied for a Responsible Economy ("CARE CA"), we respectfully requestthattheCityofCoachella ("City") extend the public review and comment periodforDraftEnvironmental Impact Report ("DEIR") prepared for the Coachella AirportBusinessParkProject (SCH No. 2023040106) ("Project") by an additional 45 daysduetotheCity'sfailure to provide timely access to documents referenced, relieduponandincorporated by reference in the DEIR. The current public commentperiodendsonSeptember 3, 2025. 17-1

CEQA requiresthat"alldocuments referenced" – and the CEQA Guidelines require that "alldocumentsincorporated by reference" – in an environmental document be "readilyaccessibletothe public during the lead agency's normal working hours"duringtheentirepublic comment period.[1]

On August6,2025,CARECAsubmitted a letter to the City ("DEIR References Request"),pursuanttoCEQA section 21092(b)(1) and CEQA Guidelines 17-2

[1] Pub. Resources Code§21092(b)(1);14C.C.R. § 15072(g)(4); see *Ultramar v. South Coast Air Quality Man. Dist.* (1993) 17 Cal.App.4th 689, 699.

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section 15087(c)(5),requesting"immediateaccesstoanyandalldocuments referenced, incorporatedbyreference,andreliedupon"intheDEIR.2OnAugust12, 2025, the City sentaletterstatingthatrecordswouldbeprovidedbySeptember4, 2025.3 This responsefailstomeetCEQA'srequirementthatallreferencedocuments be made availableduringthecommentperiod.4

17-2 Cont.

Moreover, asofthe date ofthisletter, we have identifiedseveralcritical DEIR referencedocumentsthatarenecessaryformeaningfulreviewoftheDEIR which have notbeenmadeavailabletothepublic,including:

- AppendicesoftheAirQuality,Energy,GreenhouseGasEmissionsand Health RiskAssessmentImpactAnalysis(AppendixBoftheDEIR)
  - o AppendixC:GasStationCancerRiskTool(V1.103)Printouts
  - o AppendixD:AERMODModelYears2024–2026ConstructionDPM Printouts
  - o AppendixE:AERMODModelYear2027ConstructionDPMPrintouts
  - o AppendixF:AERMODModelYears2028–2041OperationalDPM Printouts
  - o AppendixF:AERMODModelYears2042–2054OperationalDPM Printouts
- Documents listedintheReferencessectionsofAppendicesB,C,D,E1,E2, E3, F1, G2, andG3whicharenotattachedormadeavailableviaweblink.
- Appendix H (NoiseImpactAnalysis)cites"AltumGroup.(Email correspondence, November 2024)" as a reference, but the correspondence is not available.

17-3

Courts haveheldthatthefailuretoprovideevenafewpagesofCEQA documents for a portionofthereviewperiodinvalidatestheentireprocess,andthat such a failure mustberemediedbypermittingadditionalpubliccomment.5Itisalso well settled that aCEQAdocumentmaynotrelyonhiddenstudiesordocuments that are not providedtothepublic.6Withoutaccesstothesecriticaldeirreference documents duringtheCEQApubliccommentperiod,CARECAandothermembers

[2] Letter from Adams, Broadwell, Joseph & Cardozo("ABJC") to City re:RequestforImmediate Access to Documents Referenced in the Draft Environmental Impact Report- Coachella Airport Business Park Project (SCH No. 2023040106) (August 6, 2025).
[3] Letter from City to ABJC re: City of Coachella - Public Records Act Requests (3) Received August 6, 2025 - Determination Letter (August 12, 2025).
[4] Pub. Resources Code § 21092(b)(1); 14 C.C.R. § 15087(c)(5).
[5] *Ultramar v. South Coast Air Quality Man. Dist.* (1993) 17 Cal.App.4th 689, 699.
[6] *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3d 818, 831 ("Whatever is required to be considered in an EIR must be in that formal report; what any official might have known from other writings or oral presentations cannot supply what is lacking in the report.").

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of the public are precluded from having the meaningful opportunity to comment on the DEIR that is required by CEQA. In particular, public review of the City's analysis of the Project's air emissions and health risk are substantially impaired without access to the HRA's supporting calculations, including the AERMOD files and risk calculation spreadsheets. Review of other analyses in the DEIR are similarly impaired without access to reference documents. 17-3 Cont.

Accordingly, we request that the City extend the public review and comment period on the DEIR for at least 45 days from the date on which the City releases these documents for public review.

Given the shortness of time before the current comment deadline, please contact me as soon as possible with your response to this request, but **no later than Monday, August 25, 2025.** 17-4

Please feel free to email me at amarshall@adamsbroadwell.com with any questions. Thank you for your prompt attention and response.

Sincerely,

Aidan P. Marshall

APM:acp

7982-004acp

Response to Comment Letter 17

Aidan P. Marshall
Californians Allied for a Responsible Economy via Adams Broadwell Joseph & Cardozo, Attorneys at Law
August 21, 2025

17-1
The commenter requests the public review comment period for the DEIR be extended by an additional 45 days. The Commenter states that the City did not provide timely access to documents referenced, relied upon and incorporated into the EIR.

This comment was previously addressed. Refer to response 9-1.

17-2
This comment asserts that the City did not meet the requirements of CEQA section 15087(c)(5) and refers to email communications by the City stating that documents requested in the commenter's letter dated August 6, 2025, would be available by September 4, 2025.

The City provided the requested reference documents to the commenter on August 11, 2025, even though such efforts are not required under CEQA. (Refer to response 9-1). The City allowed comments to be submitted until September 11, 2025, which was only an extension for filing comments, and not an extension of the legally required public review period. As described in Response 9-1, CEQA requires that notice must be given in sufficient time so that the public is able to use the full review period, courts apply the principle that "statutory requirements for public notice are fulfilled if the public agency makes a good faith effort to follow the procedures prescribed by law" when reviewing a lead agency's compliance with the notice requirements of PRC § 21092. (*Gilroy Citizens for Responsible Planning v. City of Gilroy (2006) 140 Cal.App.4th 911, 922*-924). The City has fully satisfied that requirement here. Moreover, the commenter elected to wait more than two weeks after the Draft EIR was made available to request copies of additional materials, and thereafter, the City promptly and in good faith responded to each request made by commenter, thus ensuring that the commenter had ample time to review and comment upon the Draft EIR and all materials referenced therein.

17-3
This comment asserts that several appendices of the Air Quality, Energy, Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis (Appendix B of the DEIR) were not included in the Public Review DEIR and were not available during the Public Review Comment Period. The commenter lists the following Appendices to Appendix B of the DEIR as not being provided during the Public Review Comment Period:

1) Appendix C: Gas Station Cancer Risk Tool (V1.103) Printouts
2) Appendix D – AERMOD Model Years 2024 – 2026 Construction DPM Printouts
3) Appendix E – AERMOD Model Year 2027 Construction DPM Printouts
4) Appendix F – AERMOD Model Years 2028 – 2041 Operational DPM Printouts
5) Appendix G – AERMOD Model Years 2042 – 2054 Operational DPM Printouts

The commenter also stated that certain documents listed in the reference sections of various appendices were not made available via weblink.

As described in response 9-1 and 16-7, the City published the Notice of Availability (NOA), on the City's website, and provided printed copies of the Draft EIR for public review at both the City of Coachella Development Services-Planning Division and the Coachella Library, on July 21, 2025, in accordance with CEQA requirements. The City also uploaded the draft EIR, including the executive summary, all chapters, and all primary appendices containing key environmental analysis (Appendices A, B, C, D, E1, E2, E3, F1, F2, G1, G2, G3, H and I) to the City's website, on July 21, 2025.

The commenter asserts that the City's failure to make the above reference documents available on the City's website on July 21 precluded meaningful public review of the Draft EIR. Regarding this assertion, the standard of review in a CEQA case is abuse of discretion. (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 512). An agency abuses its discretion by failing to proceed in the manner required by law if its action or decision does not substantially comply with the requirements of CEQA. Pub Res C §§21168, 21168.5; *Communities for a Better Env't v South Coast Air Quality Mgmt. Dist.* (2010) 48 Cal.4th 310; *Laurel Heights Improvement Ass'n v Regents of Univ. of Cal*. (1988) 47 Cal.3d 376, 392.). When determining whether an agency abused its discretion by not substantially complying with the law, the analysis depends on the extent to which an EIR "reasonably sets forth sufficient information to foster informed public participation and to enable the decision-makers to consider the environmental factors necessary to make a reasoned decision." (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516). Here, the Draft EIR, and all primary appendices, were available on the City's website at the start of the public review period, and those documents reasonably set forth sufficient information to foster informed public participation.

The commenter cites two cases, *Ultramar v. South Coast Air Quality Man. Dist*. (1993) 17 Cal.App.4th 689 ("*Ultramar*") and *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3rd 818 ("*Santiago*") to support the assertion that the public was "precluded from having the meaningful opportunity to comment on the DEIR" due to the temporary omission of the appendices to the appendices and other documents listed in the reference sections of the secondary appendices from the City's website. However, both *Ultramar* and *Santiago* are distinguishable because those cases involved the omission from the actual environmental document of analysis related to key environmental impacts, which were critical to enable both public participation and informed agency decisions as to the environmental impacts of the proposed projects. Specifically, in *Ultramar*, the court held that the agency's failure to make an entire chapter of the environmental assessment available for public review during the requisite review period subverted the purposes of CEQA. (*Ultramar* at 704). In *Santiago*, the court held that a draft EIR was insufficient as an informative document because the draft EIR lacked any description of the facilities that would have to be constructed to deliver water to the proposed mining operation, a major environmental impact of the project, which frustrated the core goals of CEQA. (*Santiago* at 829-831).

Here, unlike *Santiago*, no significant aspect of the Project or the environmental analysis was omitted from the Draft EIR. Rather, the underlying technical reference documents at issue were utilized by the City in its environmental analysis and decision-making process, and were cited in the Draft EIR. Additionally, unlike in *Ultramar*, no chapter or page of the key environmental analysis in the Draft EIR was omitted from the website, and the City immediately posted the requested reference documents

on its website as soon as it became aware that the reference documents were missing. The draft EIR, including the Executive summary, all chapters, and all primary appendices containing key environmental analysis, were timely uploaded to the City's website and were available for the entirety of the public review period as required by section 15105 of the CEQA guidelines.

Finally, CEQA does not require an in-depth analysis of every possible permutation of the data supporting the EIR: "Too much should not be expected of an EIR. It is not to have the exhaustive scope of a scientific textbook . . . much of what goes into an EIR is left to the discretion of the agency preparing it . . . 'An EIR is not required to address all of the variations of the issues presented. An analysis of every permutation of the data is not required.'" (*Tiburon Open Space Committee v. County of Marin* (2022) 78 Cal.App.5th 700, 726 (internal citations omitted)). The court in *Tiburon* noted that draft EIRs are often more comprehensive than required by CEQA: "The text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300 pages. (Guidelines, § 15141.) . . . It is one of the ironies of CEQA in operation that the EIR . . . ends up being more comprehensive than absolutely required by CEQA. The very completeness of a draft EIR may simply produce more targets for opponents of the project to attack." (*Id*. at fn. 18 and fn. 24).

Here, the commenter is attempting to attack the sufficiency of the Draft EIR based on a minor technicality that is beyond the requirements of CEQA. Neither the commenter nor the public were prejudiced in their evaluation of the Draft EIR due to the delayed availability of a few technical appendices to the Air Quality, Energy, GHG, and HRA report that was included as Appendix B to the Draft EIR and posted on the City's website for the entire 45-day public review period. The lack of any such prejudice is further demonstrated by the City's prompt and good faith efforts to provide the technical reference documents immediately upon the commenter's request for such documents. This plainly constitutes substantial compliance with the procedural requirements of CEQA and fully ensured informed public comment on the Draft EIR . Ultimately, the City reasonably set forth sufficient information in the draft EIR to foster both informed decision-making and informed public participation. (*see Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516). Therefore, recirculation of the Draft EIR is not warranted, and no further response is necessary.

17-4
Refer to Response 17-1

3.0 Errata

Changes to the Draft EIR are noted below. A double underline indicates additions to the text; strikethrough indicates deletions to the text. Changes have been analyzed and responded to in Section 2.0, Response to Comments, of this Final EIR. The changes to the Draft EIR do not affect the overall conclusions of the environmental document. Changes are listed by page and, where appropriate, by paragraph.

These errata address the technical comments on the Draft EIR, which circulated from July 21, 2025, through September 3, 2025. These clarifications and modifications are not considered to result in any new or substantially greater significant impacts as compared to those identified in the Draft EIR. Any changes referenced to mitigation measures contained in the Draft EIR text also apply to Draft EIR Section ES, Executive Summary, of the Draft EIR. All mitigation measure modifications have been reflected in Section 4.0, Mitigation Monitoring and Reporting Program, of this Final EIR.

Section 2.0, Project Description

Page 2.0-9

The City of Coachella is the Lead Agency with responsibility for approving the proposed Project under the California Environmental Quality Act (CEQA). Table 2.5, *Required Permits and Approvals*, shows the actions that would be required to implement the proposed Project.

Table 2.5: Required Permits and Approvals

Agency	Permit/Approval Required
FEDERAL	
No federal agencies identified	
STATE	
State Water Resources Control Board	Construction Stormwater General Permit Notice of Intent to Comply with Section 402 of the Clean Water Act Construction Stormwater Pollution Prevention Plan
California Public Utilities Commission	Proposed utility facility
California Department of Transportation (Caltrans)	Encroachment permits, right-of-way abandonment
REGIONAL	
South Coast Air Quality Management District	PM10 Plan for compliance with Rule 403.1, Dust Control in the Coachella Valley; Odor Management Plan for compliance with Rule 402, Nuisance
Regional Water Quality Control Board Region 7	Water Quality Management Plan
Riverside County Airport Land Use Commission	Review of Project consistency with the Airport Land Use Compatibility Plan
County of Riverside Department of Environmental Health	Approval of Hazardous Waste Business Plan for applicable land uses
Imperial Irrigation District	Connection services to site

Agency	Permit/Approval Required
Coachella Valley Water District	Connection services to site
County of Riverside Transportation and Land Management Agency	Encroachment permit for any work within County right-of-way along Airport Boulevard
LOCAL	
City of Coachella	Approval of the following entitlements: • Change of Zone from M-H to MS-IP and C-G to allow for proposed land uses • Conditional Use Permit (CUP) for the cannabis-related uses • Conditional Use Permit (CUP) for drive-through restaurant use • Conditional Use Permit (CUP) for fuel station and associated retail use • Tentative Parcel Map • Development Agreement • Planning Commission Architectural Review

Section 3.0, Environmental Setting

Page 3.0-3 and 3.0-4

Table 3-1: Cumulative Projects in the City of Coachella

Project	Status	Address	Description	Sqft/ Units	Acres	Distance from Project site
Borrego Health Clinic	Complete	NW corner of Avenue 50 & Calhoun Street	Medical Clinic	40,919 sqft	4.56	4.8 mi
Bellissima by Pulte	Under Construction	E of Fredrick Street between Avenues 53 & 54	Single-Family one - two story	111 units ranging 1,342 sqft, 2,467 sqft	24	3.3 mi
Coachella Greenery	Open	84-801 Avenue 48	Cannabis Business Industrial	1,100 sqft	1.6	4.7 mi
Coachella Releaf Dispensary	Open	86-705 Avenue 54, Ste H	Retail Cannabis MS-IP zone micro business	3,800 sqft		1.0 mi
Fountainhead Plaza	Under Construction	NE corner of 1st Street & Cesar Chavez Street	Super Market Quick Serve Restaurant Starbucks	20,422 sqft	8.25	3.6 mi
Glenroy Hotel Project	Construction Stalled	SE corner of Avenue 48 & Van Buren Street	Bungalow Style Hotel	160,656 sqft	24.43	5.0 mi
HOTN/Sinsemilla Dispensary &	Under Construction	1694 6th Street	Retail cannabis dispensary	1,432 sqft	0.11	3.5 mi

Project	Status	Address	Description	Sqft/ Units	Acres	Distance from Project site
Pub Project						
JJWR Industrial Development	Approved	53-457 & 53-459 Enterprise Way	Industrial Warehouse	25,750 sqft	3.29	1.0 mi
Mariposa Pointe D.R. Horton	Under Construction	SEC Calhoun Street & 50th Avenue	One and two story single family residence	155 vacant lots Plan 1 1,898 sqft Plan 2 2,239 sqft Plan 3 2,435 sqft	37.3	3.5 mi
Placita Dolores Huerta	Under Construction	874-900 Bagdad Avenue	Apartments	110 units 2 & 3 bd	5.76	2.8 mi
Pueblo Viejo Villas	Construction Complete	NE corner of Cesar Chavez and 6th Street	Three-story mixed use building	105 dwelling units 3,000 sqft	2.61	3.3 mi
Rancho Los Flores 2	Under Review	NE corner Avenue 49 & Van Buren Street	Subdivision	1,898-2,435 sqft	30.4	4.8 mi
Sevilla By Plute Homes	Under Construction	NE of Avenue 51 E of Van Buren Street	Single-Family	107 two-story buildings 1,959 – 2,825 sqft	26.8	4.2 mi
Tripoli Mixed-Use Project	Planning Commission approved 4/20/22	NEC of Cesar Chavez Street & Bagdad Avenue	Mixed use apartments and retail	108 units	2.83	3.2 mi
Villa Verde Apartments	Approved	84-824 Calle Verde	Apartment Community	152 units	9.4	3.0 mi
Vista Del Agua	Under Review	E of Tyler Street, N Avenue 48 W Polk Street	Subdivide 42.92 acres	204 single family lots	42.92	4.0 mi
Encanto	Under Review	W Van Buren Street, Avenue 51 & Avenue 52	Subdivision	112 single family	19.2	4.0 mi
La Terraza	Under Review	1562 6th Street	Mixed-use two story building	First story 2,302 sqft; second story 1,583 sqft	N/A	3.2 mi
Pueblo Cannabis	Approved	85-591 Grapefruit Boulevard	Cannabis Dispensary	1500 sqft	0.30	3.5 mi
Sevilla II	Under Review	W Van Buren Street & S Avenue 50	Residential Development	204 single family residences	39	4.5 mi
Airport Boulevard Bridge Replacement Project	Approved	Airport Boulevard over the Whitewater River	Bridge replacement	N/A	25	0.02 mi

Project	Status	Address	Description	Sqft/ Units	Acres	Distance from Project site
CVWD Coachella Valley Stormwater Channel (CVSC) Improvement Project, Avenue 54 to Thermal Drop Structure	Approved	Approximately 130 feet north of Avenue 54 to approximately 300 feet south of the Thermal Drop Structure, which is located between Avenues 57 and 58	Stormwater channel improvements	N/A	116±	0.02 mi

Page 3.0-5

Table 3-2: Cumulative Projects in the County of Riverside

Project	Description	Address	Sqft/Acres	Within 5 miles distance of Project site
PP25073	Contractors Storage Yard	Foundation Road	2160 sqft	3 mi
TTM38861	Single Family Residential lots	Northeast corner of 54th Avenue and Fillmore Street	2.251 acres	1 mi
CUP03158	Farm workers mobile home park	58th Avenue	20 acres	2 mi
CUP190004	Private Truck storage	Airport Boulevard	1,680 sqft	0.3 mi
PM33490	Subdivision	Desert Cactus Road	10.1 acres	1 mi
PM34159	Divide 156 Ac. Into 71 Industrial Parcels	Carnegie Drive	156 acres	2.5 mi
PPT190018	Storage yard landscape company	Foundation Road	3,300 sqft	3 mi
Airport Boulevard Bridge Replacement Project	Bridge Replacement	Airport Boulevard over the Whitewater River	25 acres	0.02 mi

CVWD Coachella Valley Stormwater Channel (CVSC) Improvement Project, Avenue 54 to Thermal Drop Structure	Stormwater channel improvements	Approximately 130 feet north of Avenue 54 to approximately 300 feet south of the Thermal Drop Structure, which is located between Avenues 57 and 58	116±	0.02 mi

Section 4.3, Air Quality

Page 4.3-19

Consistency with the AQMP assumptions is determined by performing an analysis of a project with the assumptions in the AQMP. The AQMP is developed through use of the planning forecasts provided in the RTP/SCS and FTIP. The RTP/SCS is a major planning document for the regional transportation and land use network within southern California, that is required by federal and state requirements placed on SCAG and is updated every four years. Local governments are required to use these plans as the basis of their plans for the purpose of consistency with applicable regional plans under CEQA. For the proposed Project, the City of Coachella General Plan's Land Use Plan defines the long-range land use assumptions that are represented in AQMP. Although the proposed Project would require a zoning change ~~and a general plan amendment (GPA)~~ in order to accommodate all potential uses for the development, the requested change would not result in the alteration of total allowed vehicle trips or other parameters utilized by SCAG in generating the forecasts provided in the RTP/SCS because the resultant zoning and land use designations are consistent with the types, intensity, and patterns of land use envisioned for the site under current designations.

Page 4.3-28

Table 4.3-9: Project-Related Diesel Particulate Matter (DPM) Emissions Cancer Risks at Nearby Sensitive Receptors

Sensitive Receptor[1]	Receptor Location		Annual PM2.5 Concentration (µg/m3)				Cancer Risk Per Million People[2]
	X	Y	Construction 2024-2026	Construction 2027	Operations 2028- 2041	Operations 2042-2054	
1	580,086	3,722,773	0.00259	0.00135	0.00157	0.00134	1.46
2	580,122	3,722,774	0.002630	0.00146	0.00179	0.00156	1.58
3	580,172	3,722,775	0.002730	0.00146	0.00157	0.00145	1.57
4	580,242	3,722,717	0.00214	0.00113	0.000910	0.0008	1.12
5	580,289	3,722,738	0.00224	0.00123	0.000910	0.00089	1.12
6	580,337	3,722,732	0.00202	0.0011	0.00089	0.00078	1.01
7	579,963	3,722,704	0.00146	0.0008	0.0007	0.00076	0.8
8	579,927	3,722,644	0.00102	0.0006	0.0005	0.0005	0.6

Sensitive Receptor[1]	Receptor Location		Annual PM2.5 Concentration (µg/m3)				Cancer Risk Per Million People[2]
	X	Y	Construction 2024-2026	Construction 2027	Operations 2028- 2041	Operations 2042-2054	
9	579,519	3,722,783	0.0005	0.0003	0.0004	0.0004	0.3
10	579,466	3,722,781	0.0004	0.0002	0.00034	0.0003	0.3
11	579,393	3,722,779	0.0004	0.0002	0.0003	0.0003	0.23
Threshold of Significance							10
Exceed Threshold?							No

Section 4.4, Biological Resources

Page 4.4-12

Thirty-five special-status wildlife species have been reported to occur in the vicinity of the Study Area. Of these, the following sixseven species have a moderate potential to occur or are present; and are federally and/or state listed as Species of Special Concern (SSC) and/or are candidates for listing and at least partially covered by the CVMSHCP. These include:

- Burrowing owl (*Athene cunicularia;* SSC and CVMSHCP)
- Loggerhead shrike (*Lanius ludovicianus;* CVMSHCP)
- Black-tailed gnatcatcher (*Polioptila melanura;* CVMSHCP)
- Vermillion flycatcher (*Pyrocephalus rubinus;* SSC)
- Crissal thrasher (*Toxostoma crissale;* SSC and CVMSHCP)
- Western yellow bat (*Lasiurus xanthinus;* SSC and CVMSHCP)
- San Diego desert woodrat (*Neotoma lepida intermedia;* SSC)

Page 4.4-24

Six Seven special-status species (five four birds and two mammals) were determined to have a potential to occur in the Study Area. Of these six seven species, one was determined to be present and all six are considered to have a moderate potential to occur. One species, black-tailed gnatcatcher, is present. No other species or their respective sign (nests, burrows, pellets, whitewash, guano/urine staining) were observed. This species is only covered by the CVMSHCP.

Page 4.4-26

MM BIO-1 Nesting Bird Avoidance/Pre-construction Surveys

"Prior to issuance of the Project's grading permit, the following measures shall be implemented:

To avoid disturbance of nesting and special-status bird species protected by the MBTA and CFGC, activities related to the Project, including but not limited to, vegetation removal, ground disturbance, and construction shall not occur during the bird breeding season (January 15 through August 31) unless a pre-construction nesting bird survey is conducted within three seven days prior to vegetation removal or ground disturbance.

A qualified biologist, who is familiar with the identification of avian species in the Coachella Valley, will conduct the preconstruction nesting bird survey within three ~~seven~~ days prior to vegetation removal or ground disturbance to evaluate the presence/absence, location, and status of any active nests on or adjacent to the Project Area. The extent of the survey area surrounding the Project Area shall be determined by the qualified biologist to help ensure that direct and indirect effects to nesting birds are avoided. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist will make every effort to avoid potential nest predation as a result of survey efforts. If an active nest(s) is discovered, a suitable buffer shall be established around the active nests, as determined by the biologist, and construction activity will not occur within the buffer until the biologist has determined that the nest is no longer active. Buffer size shall consider the species involved and relevant level of tolerance to adjacent activity, the location of the nest relative to proposed activities, and site conditions that naturally buffer the location, such as vegetation screening, topography, etc. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged, the nest is no longer active, or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If construction activities are delayed or paused for more than 14 days during the nesting season, the nest survey will be re-initiated for areas that still contain potential nesting habitat. No parking, storage of materials, or construction activities shall occur within this buffer until the qualified biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into this buffer shall occur only at the discretion of the qualified biologist, if it is determined that encroachment will not adversely impact the nesting birds."

MM BIO-2 Burrowing Owl Pre-construction Survey

In accordance with Section 4.4 Required Avoidance, Minimization, and Mitigation Measures of the CVMSHCP, pre-construction burrowing owl surveys shall ~~will~~ be conducted by a qualified biologist no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the Staff Report on Burrowing Owl Mitigation (2012 or most recent version). Pre-construction surveys shall be conducted within 500 feet of the Project disturbance footprint to identify burrows that could be utilized by burrowing owl. Potentially suitable burrows shall be checked by a qualified biologist to see if they are occupied or not prior to the start of Project disturbance activities. If the burrow is unoccupied, the burrow shall be made inaccessible to burrowing owl, and the Project may proceed. If either a nesting or escape burrow is occupied, Project activities shall be immediately halted within 500 feet of the burrow. The qualified biologist shall coordinate with CDFW and USFWS and prepare a Burrowing Owl Avoidance and Monitoring Plan that shall be submitted to CDFW and USFWS for review and approval prior to re-commencing Project activities within the restricted area ~~the burrowing owl shall be relocated pursuant to accepted CDFW protocols~~. A burrow is assumed occupied if records indicate that at least one burrowing owl has been observed occupying a burrow on site during the past three years. For ground-disturbing activities, pre-construction surveys should be repeated when there is a pause in construction of more than 30 days. ~~If there are no records for the site, surveys must be conducted to determine, prior to construction, if burrowing owl are present. Active burrows shall be avoided during the burrowing owl breeding season~~

~~(January 15 to August 31) with an appropriate buffer zone as determined by a qualified biologist. If occupied burrows cannot be avoided, determination of the appropriate method of relocation, such as eviction/passive relocation or active relocation, shall be based on the specific site conditions (e.g., distance to nearest suitable habitat and presence of burrow) in coordination with CDFW and the City. Passive relocation may only occur in the non-breeding season (September to January)~~.

Page 4.4-27

MM BIO-3 Emergence Bat Survey

A special-status bat species emergence survey shall be conducted if construction activities are to occur within 300 feet of the California fan palm oasis during the bat maternity season (April 1 through August 31). The emergence survey will be conducted in areas of suitable roosting habitat, including the Airport Boulevard bridge, during the maternity season to document the presence of special-status bat species maternal roosting habitat. The emergence survey will be conducted 30 minutes before sunset and last for up to two hours after sunset. Any special-status bat species observed during the maternity roosting season within or adjacent to the Project Area should be avoided and provided a minimum buffer as determined by the qualified biologist (a 100-foot to 300-foot buffer is recommended) prior to the commencement of construction.

Page 4.4-31

The Project is located within the CVMSHCP but is not located within a Conservation Area. As a result, proposed activities at the Project site would avoid direct impacts to the CVMSHCP Conservation Areas and would not otherwise conflict with the CVMSHCP Conservation Objectives. Five ~~Six~~ species (burrowing owl, loggerhead shrike, ~~black-tailed gnatcatcher,~~ vermillion fly catcher, crissal thrasher, and western yellow bat); and three natural sensitive communities (mesquite thickets, arrow weed scrub, and bush seepweed scrub), all have a moderate potential to occur or are present in the Project Area and are covered by the CVMSHCP.

Section 4.5, Cultural Resources

Pages 4.5-9 through 4.5-11

Impact 4.5.2 (*Implementation of the proposed Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5*)

Mitigation Measures

CUL-1 A qualified archaeologist and Tribal monitor(s) from the Agua Caliente Band of Cahuilla Indians and the Torres Martinez Desert Cahuilla Indians shall be present during any ground disturbing activities during the Project construction phase. In the case that archaeological materials are encountered during ground disturbing activities, all work shall be halted in the vicinity of the discovery until a qualified archaeologist can visit the site of discovery and assess the significance of the archaeological resource. The qualified archaeologist and Tribal monitor shall establish all necessary protocols and procedures for the treatment of resources prior to the initiation of earth moving activities.

Section 4.17, Transportation

Page 4.17-35

One of the cumulative projects considered in this analysis is the Airport Boulevard Bridge Replacement Project (SCH No. 2023030456), which adopted a Negative Declaration on May 16, 2023, and filed a Notice of Determination on June 30, 2023. Those documents analyzed hydrology, traffic, and noise issues, finding only incremental construction noise and short-term emissions relevant. Although that project was found not to have significant individual impacts, its temporary construction emissions and traffic detours fall within the same geographic area as the proposed project and were therefore considered in this cumulative impact assessment. As it is anticipated that the Airport Boulevard Bridge project will be completed prior to commencement of construction of the proposed Project, no cumulatively considerable short-term construction impacts would occur. Rather, the proposed Project is being designed to account for and align with the Airport Boulevard Bridge improvements and lane configurations to avoid any operational transportation impacts. The configuration of the proposed bridge improvements are shown in Exhibit 4.17-1, Replacement of the Airport Boulevard Bridge Over Whitewater River Project - Preliminary Project Overview Interim Striping (1 of 2), and Exhibit 4.17-2, Replacement of the Airport Boulevard Bridge Over Whitewater River Project - Preliminary Project Overview Interim Striping (2 of 2).

Exhibit 4.17-1: Replacement of the Airport Boulevard Bridge Over Whitewater River Project - Preliminary Project Overview Interim Striping (1 of 2)

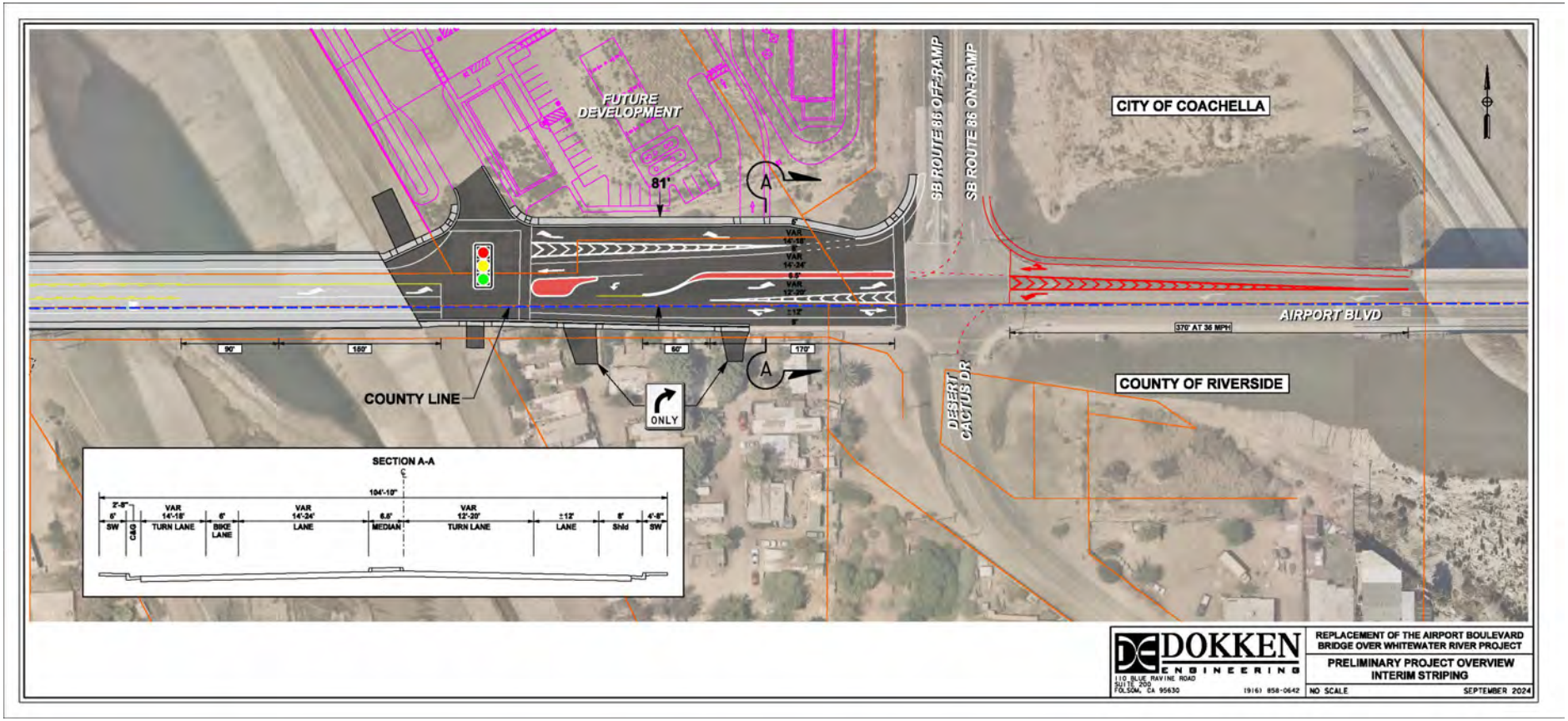
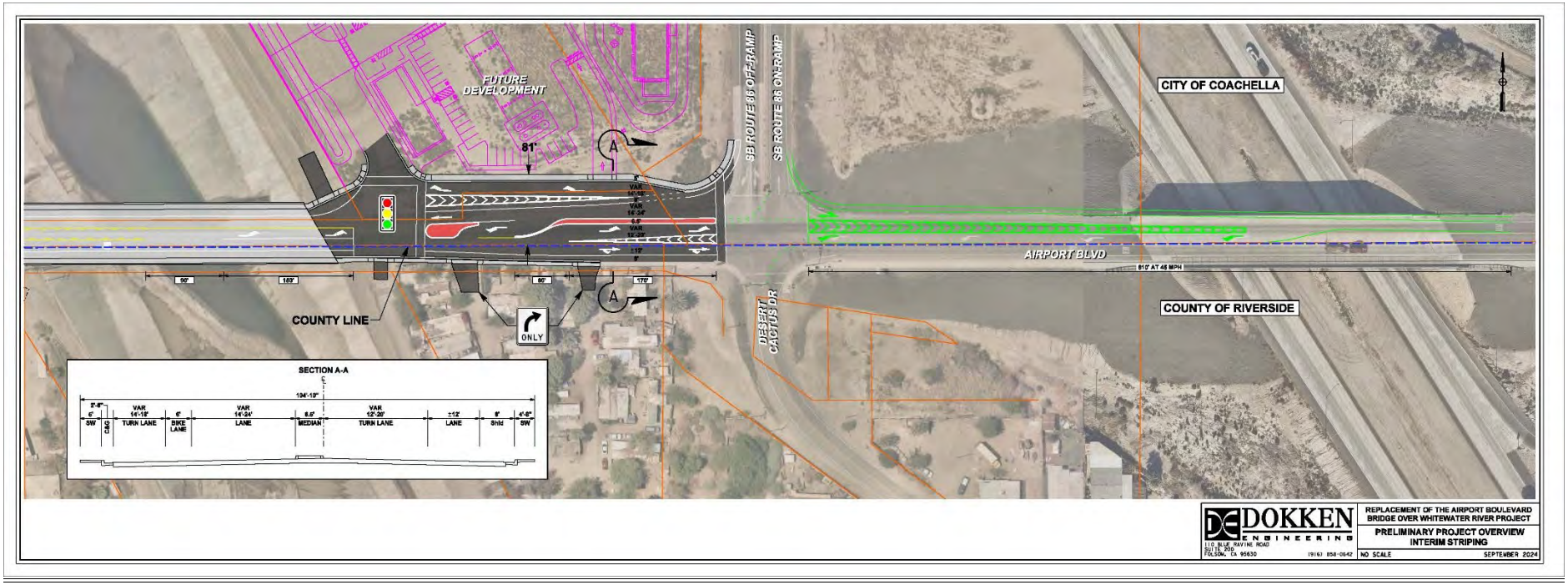


Exhibit 4.17-2, Replacement of the Airport Boulevard Bridge Over Whitewater River Project - Preliminary Project Overview Interim Striping (2 of 2)



Section 4.18, Tribal Cultural Resources

Page 4.18-7

Mitigation Measures

CUL-1 A qualified archaeologist and Tribal monitor(s) from the Agua Caliente Band of Cahuilla Indians and the Torres Martinez Desert Cahuilla Indians shall be present during any ground disturbing activities during the Project construction phase. In the case that archaeological materials are encountered during ground disturbing activities, all work shall be halted in the vicinity of the discovery until a qualified archaeologist can visit the site of discovery and assess the significance of the archaeological resource. The qualified archaeologist and Tribal monitor shall establish all necessary protocols and procedures for the treatment of resources prior to the initiation of earth moving activities.

4.0 Mitigation Monitoring and Reporting Program

The California Environmental Quality Act (CEQA) requires that when a public agency completes an environmental document which includes measures to mitigate or avoid significant environmental effects, the public agency must adopt a reporting or monitoring program. This requirement ensures that environmental impacts found to be significant will be mitigated. The reporting or monitoring program must be designed to ensure compliance during project implementation (Public Resources Code Section 21081.6).

In compliance with Public Resources Code Section 21081.6, Table 2, *Mitigation Monitoring and Reporting Checklist*, has been prepared for the proposed Project. This Mitigation Monitoring and Reporting Checklist is intended to provide verification that all applicable mitigation measures relative to significant environmental impacts are monitored and reported. Monitoring will include: 1) verification that each mitigation measure has been implemented; 2) recordation of the actions taken to implement each mitigation; and 3) retention of records in the Coachella Airport Business Park Project file.

This Mitigation Monitoring and Reporting Program (MMRP) delineates responsibilities for monitoring the Project, but also allows the City flexibility and discretion in determining how best to monitor implementation. Monitoring procedures will vary according to the type of mitigation measure. Adequate monitoring consists of demonstrating that monitoring procedures took place and that mitigation measures were implemented. This includes the review of all monitoring reports, enforcement actions, and document disposition, unless otherwise noted in the Mitigation Monitoring and Reporting Checklist (Table 2). If an adopted mitigation measure is not properly implemented, the designated monitoring personnel shall require corrective actions to ensure adequate implementation.

- Reporting consists of establishing a record that a mitigation measure is being implemented, and generally involves the following steps:
- The City distributes reporting forms to the appropriate entities for verification of compliance.
- Departments/agencies with reporting responsibilities will review the EIR, which provides general background information on the reasons for including specified mitigation measures.
- Problems or exceptions to compliance will be addressed to the City as appropriate.
- Periodic meetings may be held during project implementation to report on compliance of mitigation measures.
- Responsible parties provide the City with verification that monitoring has been conducted and ensure, as applicable, that mitigation measures have been implemented. Monitoring compliance may be documented through existing review and approval programs such as field inspection reports and plan review.
- The City prepares a reporting form periodically during project-specific review and an annual report summarizing all project mitigation monitoring efforts.
- Appropriate mitigation measures are included as conditions of permits/approvals for future project-specific review.

Minor changes to the MMRP, if required, would be made in accordance with CEQA and would be permitted after further review and approval by the City. No change will be permitted unless the MMRP continues to satisfy the requirements of Public Resources Code Section 21081.6.

Based on the Draft EIR, no significant impacts would occur in regard to the following environmental issue areas and no mitigation is required:

- Agriculture and Forest Resources;
- Hydrology and Water Quality;
- Land Use and Planning;
- Mineral Resources;
- Population and Housing;
- Public Services;
- Recreation; and
- Utilities and Public Services.

In accordance with Appendix G of the CEQA Guidelines, the following environmental issue areas were determined in the Draft EIR to have a potentially significant impact and require mitigation measures, and were included in the Draft EIR for further analysis:

- Aesthetics;
- Air Quality;
- Biological Resources;
- Cultural Resources;
- Energy;
- Geology and Soils;
- Greenhouse Gas Emissions;
- Hazards and Hazardous Materials;
- Noise;
- Transportation;
- Tribal Cultural Resources; and
- Wildfire.

For the purposes of the environmental analysis in the Draft EIR, impacts were analyzed in each environmental issue area for the proposed Project. Consideration of mitigation measures that apply to each respective topical area was considered, particularly if that impact would be reduced.

Table 2: Mitigation Monitoring and Reporting Checklist

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
Aesthetics						
AES-1	The construction contractor shall locate construction equipment staging and stockpile areas on the central and western portions of the Project site, away from Airport Boulevard and the neighboring existing residential uses. Appropriate screening (i.e., temporary fencing with opaque material) shall be used to buffer views of construction equipment and material. The staging and stockpile locations shall be indicated on Grading Plans and shall be subject to approval by the City of Coachella Public Works Department prior to issuance of grading permits.	Prior to the Issuance of Grading Permits	City of Coachella Public Works Department			
AES-2	The construction contractor shall locate and aim all construction-related nighttime security lighting away from adjacent uses, including both residential and non-residential areas neighboring the Project site. A construction safety lighting plan shall be submitted to the City of Coachella Public Works Department for review and approval prior to issuance of grading permits.	Prior to the Issuance of Grading Permits	City of Coachella Public Works Department			
Biological Resources						
BIO-1	**Nesting Bird Avoidance/Pre-construction Surveys.** Prior to issuance of the Project's grading permit, the following measures shall be implemented: To avoid disturbance of nesting and special-status bird species protected by the MBTA and CFGC,	Prior to Vegetation Removal or Ground Disturbance	City of Coachella Planning Division			

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	activities related to the Project, including but not limited to, vegetation removal, ground disturbance, and construction shall not occur during the bird breeding season (January 15 through August 31) unless a pre-construction nesting bird survey is conducted within three days prior to vegetation removal or ground disturbance. A qualified biologist, who is familiar with the identification of avian species in the Coachella Valley, will conduct the preconstruction nesting bird survey within three days prior to vegetation removal or ground disturbance to evaluate the presence/absence, location, and status of any active nests on or adjacent to the Project Area. The extent of the survey area surrounding the Project Area shall be determined by the qualified biologist to help ensure that direct and indirect effects to nesting birds are avoided. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist will make every effort to avoid potential nest predation as a result of survey efforts. If an active nest(s) is discovered, a suitable buffer shall be established around the active nests, as determined by the biologist, and construction activity will not occur within the buffer until the biologist has determined that the nest is no longer active. Buffer size shall consider the					

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	species involved and relevant level of tolerance to adjacent activity, the location of the nest relative to proposed activities, and site conditions that naturally buffer the location, such as vegetation screening, topography, etc. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged, the nest is no longer active, or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If construction activities are delayed or paused for more than 14 days during the nesting season, the nest survey will be re-initiated for areas that still contain potential nesting habitat. No parking, storage of materials, or construction activities shall occur within this buffer until the qualified biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into this buffer shall occur only at the discretion of the qualified biologist, if it is determined that encroachment will not adversely impact the nesting birds.					
BIO-2	**Burrowing Owl Pre-construction Survey.** In accordance with Section 4.4 Required Avoidance, Minimization, and Mitigation Measures of the CVMSHCP, pre-construction burrowing owl surveys shall be conducted by a qualified biologist no less than 14 days prior to the start of	Prior to Initial Site Disturbance	City of Coachella Planning Division			

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	Project-related activities and within 24 hours prior to ground disturbance, in accordance with the Staff Report on Burrowing Owl Mitigation (2012 or most recent version). Pre-construction surveys shall be conducted within 500 feet of the Project disturbance footprint to identify burrows that could be utilized by burrowing owl. Potentially suitable burrows shall be checked by a qualified biologist to see if they are occupied or not prior to the start of Project disturbance activities. If the burrow is unoccupied, the burrow shall be made inaccessible to burrowing owl, and the Project may proceed. If either a nesting or escape burrow is occupied, Project activities shall be immediately halted within 500 feet of the burrow. The qualified biologist shall coordinate with CDFW and USFWS and prepare a Burrowing Owl Avoidance and Monitoring Plan that shall be submitted to CDFW and USFWS for review and approval prior to re-commencing Project activities within the restricted area. A burrow is assumed occupied if records indicate that at least one burrowing owl has been observed occupying a burrow on site during the past three years. For ground-disturbing activities, pre-construction surveys should be repeated when there is a pause in construction of more than 30 days.					
BIO-3	**Emergence Bat Survey**. A special-status bat species emergence survey shall be conducted if construction activities are to occur within 300	Prior to Initial Site Disturbance	City of Coachella Planning Division			

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	feet of the California fan palm oasis during the bat maternity season (April 1 through August 31). The emergence survey will be conducted in areas of suitable roosting habitat, including the Airport Boulevard bridge, during the maternity season to document the presence of special-status bat species maternal roosting habitat. The emergence survey will be conducted 30 minutes before sunset and last for up to two hours after sunset. Any special-status bat species observed during the maternity roosting season within or adjacent to the Project Area should be avoided and provided a minimum buffer as determined by the qualified biologist (a 100-foot to 300-foot buffer is recommended) prior to the commencement of construction.					
BIO-4	**Woodrat Middens.** Woodrat middens (nests) are large nests or dens made of woody debris, such as sticks, dead cacti, and bark. Middens were observed along the northern fence separating the business park and the IID substation Project Areas within the Project impact area. Within 30 days prior to initial site disturbance, a pre-construction survey shall be conducted for woodrat middens. All occupied woodrat middens shall be mapped and flagged for avoidance to the extent feasible, with a minimum of 10-feet surrounding the active midden. If avoidance is not feasible, middens will be "daylighted" by a qualified biologist one night before anticipated vegetation removal to allow for the rats to escape	Prior to Initial Site Disturbance	City of Coachella Planning Division			

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	and passively relocate prior to disturbance of the area.					
BIO-5	**Worker Environmental Awareness Program.** The Project Applicant shall implement a WEAP for the construction crew that will be developed by a qualified biologist. Each employee (including temporary, contractors, and subcontractors) will receive the WEAP presentation on the first day of project work. They will be advised of sensitive species in the area and avoidance measures being implemented to protect them at the site. At a minimum, the WEAP will include the following topics: occurrence of the listed and sensitive species in the area, their general ecology, sensitivity of the species to human activities, legal protection afforded these species, penalties for violations of federal and State laws, reporting requirements, and project features and conditions designed to reduce direct and indirect impacts to these species, role of the qualified biologist, and worker responsibilities to maintain compliance with mitigation measures while working at the site.	Prior to and During Construction Activities	City of Coachella Planning Division			
BIO-6	**CVMSHCP Development Fee.** The Project Applicant shall pay the CVMSHCP Local Development Mitigation Fee pursuant to Chapter 4.48 of the Coachella Municipal Code.	Prior to the Issuance of Grading Permit and/or Building Permit	City of Coachella Planning Division			
BIO-7	**Invasive Plant Species Control.** Invasive plant species, for the purpose of this document, shall include all species with a California Invasive Plant	Prior to and During	City of Coachella Planning Division			

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	Council (Cal-IPC) rating of moderate or high. Construction personnel and equipment shall be free of invasive plant seeds, propagules, and any material which may contain them (e.g., soil). Prior to entering the Project Area equipment will be inspected to confirm it is free of mud, dirt, and debris. Tire track stations will be installed at Project Area entrances and exits. Staging areas and access routes shall avoid weed infestations and infestations within the work area(s) shall be flagged and avoided to the maximum extent feasible. Only certified weed-free materials (e.g., fiber rolls, straw, and fill) will be used for the Project.	Construction Activities				
BIO-8	**General Best Management Practices.** Standard construction Best Management Practices will be implemented by the contractor to minimize potential impacts to sensitive species. Standard Construction Best Management Practices shall include the following: • Vehicle speeds will not exceed 10 miles per hour (mph) adjacent to any occupied burrowing owl habitat. Clear signage will be installed and maintained throughout the construction period. • Placement of drip pans under parked equipment and vehicles. • Regular inspection and maintenance of equipment to avoid spills and immediate containment of any spills. • Chemicals and pesticides will not be used.	Prior to and During Construction Activities	City of Coachella Planning Division			

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	• Pets and firearms will not be allowed at the site. • Trash will be removed from the site daily or be stored in wildlife proof containers • Stormwater protection (i.e. straw waddles, silt fence) will be employed to prevent spills, runoff, or sediment from entering nearby aquatic habitats. These materials will be weed free and no Project debris or rubbish will be allowed to enter into or be placed where it may be washed by rainfall or runoff in the wetlands. • Staging/storage areas for equipment and materials will be located at least 100 feet away from the riparian areas. Equipment will be checked and maintained daily to prevent leaks of pollutants into the wetlands. • No equipment maintenance will be carried out within 100 feet of the riparian area. • All pipes, culverts, or similar structures with a four-inch diameter or greater that are stored on the construction site overnight shall be thoroughly inspected for wildlife or nesting birds before the pipe is subsequently curried, capped, or otherwise used or moved in any way. • To prevent inadvertent entrapment of wildlife during construction, all excavated, wells, steepwalled holes or trenches more than two feet deep shall be covered with					

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	plywood or similar materials at the close of each working day. • Any construction lighting will be directed toward the work area and away from adjacent habitats.					
BIO-9	**Habitat Mitigation and Monitoring Plan.** Mitigation for wetland waters of the state impacts will occur as specified during the WDRs permitting process and may occur at a suitable on-site or off-site location where habitat values meeting or exceeding those on site are achievable, or at an approved Conservation or Mitigation Bank. A Habitat Mitigation and Monitoring Plan (HMMP) will be prepared that specifies restoration and monitoring requirements for approval by the City and RWQCB prior to Project initiation. The HMMP will incorporate the WDR permit compensatory mitigation requirements for impacts to the wetland waters of the State, if pursued, along with the impacts to the sensitive natural communities. The HMMP will include, at a minimum, the following information: • Description of the project/impact site (i.e., location, responsible parties, and areas to be impacted by habitat type) • Goal(s) of the compensatory mitigation project (i.e., the acreage of the mitigated habitat to be restored); • Description of the proposed compensatory mitigation site(s) (i.e., location and size,	Prior to Initial Site Disturbance	City of Coachella Planning Division			

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	ownership status, existing conditions of the compensatory mitigation site); • Implementation plan for the compensatory mitigation site (i.e., rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan [container sizes, seeding rates, etc.]); • Maintenance activities during the monitoring period, including weed removal and irrigation as appropriate; • Monitoring plan for the compensatory mitigation site (i.e., performance standards, target acreages to be established and/or preserved, annual monitoring reports); • Success criteria based on the goals and measurable objectives; • Funding mechanisms; and • An adaptive management and remedial measure component.					
Cultural Resources						
CUL-1	A qualified archaeologist and Tribal monitor(s) from the Agua Caliente Band of Cahuilla Indians and the Torres Martinez Desert Cahuilla Indians shall be present during any ground disturbing activities during the Project construction phase. In the case that archaeological materials are encountered during ground disturbing activities, all work shall be halted in the vicinity of the discovery until a qualified archaeologist can visit	Prior and During Ground Disturbing Activities	City of Coachella Planning Division			

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	the site of discovery and assess the significance of the archaeological resource. The qualified archaeologist and Tribal monitor shall establish all necessary protocols and procedures for the treatment of resources prior to the initiation of earth moving activities.					
CUL-2	In the event that human remains are uncovered during ground disturbing activities on the Project site, no further disturbance shall occur and all work shall cease within 100 feet of the discovery until the County Coroner has made a determination of the origin and disposition of the remains. Ground disturbing activities and excavations shall not resume until the following has been addressed: 1. The County Coroner has been contacted and determined that no investigation to the cause of death is required; and, 2. If the County Coroner determines that the remains are of Native American descent, the Coroner shall notify Native American Heritage Commission (NAHC), which will then determine the Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods	During Ground Disturbing Activities	City of Coachella Planning Division			

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	as provided in Public Resource Code Section 5097.98 and Health and Safety Code 7050.5.					
Geology and Soils						
GEO-1	Prior to the issuance of a grading permit, a geotechnical investigation specific to building design and liquefaction, in compliance with City of Coachella requirements, shall be prepared by a licensed professional and submitted to the City of Coachella for review. The geotechnical report shall assess potential consequences of any liquefaction and soil strength loss, estimation of lateral soil movements or reduction in foundation soil bearing capacity. The geotechnical report shall provide recommended measures to ensure compliance with all applicable geotechnical standards for building design consideration, such as mat foundations, pile foundations, or ground improvement to mitigate the potential liquefaction settlements, and all recommendations shall be incorporated into all improvement plans.	Prior to the Issuance of Grading Permits	City of Coachella Planning Division			
GEO-2	During the design level of the Project and prior to issuance of a grading permit, the Project Applicant shall prepare subsurface explorations and laboratory testing of soil samples and submit to the City for review and approval, which shall be utilized to provide specific design recommendations for the earthwork and structures. Field observation and construction review shall be provided by a licensed	Prior to the Issuance of Grading Permits	City of Coachella Planning Division			

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	professional during grading, excavation, and foundation construction, which shall include recommendations and measures for the removal of surface and near surface soils down to competent materials and their replacement with properly compacted fill.					
GEO-3	Prior to the start of any and all proposed Project activities, all field personnel shall receive worker's environmental awareness training on paleontological resources. The training shall be developed by a certified paleontologist familiar with the overall area, the site and specific components of the proposed Project. The training shall: a) provide a description of the laws and ordinances protecting fossil resources; b) provide education and means of identification of the types of fossil resources that may be encountered in the Project area; c) identify the role of the paleontological monitor; d) outline the steps that shall be followed in the event that a fossil discovery is made; and e) provide contact information for the Project paleontologist.	Prior to the Start of Construction Activities	City of Coachella Planning Division			
GEO-4	Prior to the commencement of ground-disturbing activities, a certified paleontologist shall be retained to prepare and implement a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) for the proposed Project and submit it to the City for review and approval. The PRMMP shall describe the monitoring required during excavations that extend into Pleistocene age sediments, and the	Prior Ground Disturbing Activities	City of Coachella Planning Division			

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	location of areas deemed to have a high paleontological resource potential. Part-time monitoring, or spot checking may be required during shallow ground-disturbances (< 10 feet below ground surface) to confirm that sensitive geologic units are not being impacted. Monitoring shall entail the visual inspection of excavated or graded areas and trench sidewalls.					
GEO-5	In the event that a paleontological resource is discovered, the certified paleontological monitor shall have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and, if appropriate, collected and stored according to professional standards and guidelines. If the resource is determined to be of scientific significance, the Project paleontologist shall implement the recovery of resources, as established in the PRMMP.	During Ground Disturbing Activities	City of Coachella Planning Division			
GEO-6	For all excavations and ground disturbance activity (and curation of fossils if necessary) conducted at depths more than 10 feet or in any areas where the paleontologist determines that older deposits are encountered, the Project paleontologist shall prepare a final mitigation and monitoring report outlining the results of the PRMMP. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those	During Ground Disturbing Activities	City of Coachella Planning Division			

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	fossils, and where fossils were curated. The final report shall be provided to the City of Coachella.					
Greenhouse Gas Emissions						
GHG-1	The Project shall include, but not be limited to, the following improvements, which shall be incorporated into the Project site plans to ensure consistency with adopted statewide plans and programs that are in effect at the time the Building Permits are issued. The Project Applicant shall demonstrate compliance with the following measures, prior to issuance of Building Permits: • To the maximum extent feasible, all off-road equipment (non-street legal), such as forklifts and street sweepers, used onsite for warehouse operations shall be powered by alternative fuels, electrical batteries or other alternative/non-diesel fuels (e.g., propane or compressed natural gas (CNG)) that do not emit diesel particulate matter, and that are low or zero emissions. • The Project Applicant shall require that a minimum of 50 percent of the total Project electrical consumption from operation of the Project on an aggregate, site-wide basis is provided by onsite solar photovoltaic (PV) panels or other onsite renewables sources (i.e., wind turbines, geothermal).	Prior to the Issuance of Building Permits	City of Coachella Planning Division			

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	• The Project Applicant shall require any business that operates in the proposed project and has 20 or more full-time employees shall implement at least one of the following programs: o Pre-tax election program to allow employees to exclude wages for commuting costs for transit or vanpools; o An employer supplied transit pass; o Employer provided transit; or o Other, similar demand management programs. • The Project Applicant shall require that temporary power poles are installed in the vicinity of each structure to be installed. The temporary power poles shall be installed after completion of grading and prior to the issuance of each building permit. After electrification of the temporary power poles, the Project Applicant shall restrict building contractors from using gaspowered generators, compressors and saws and this restriction shall be incorporated into all contracts with building contractors that will work on the proposed Project.					
Hazards and Hazardous Materials						

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
HAZ-1	Prior to any ground disturbing activity on the site, a soils investigation shall be conducted by a qualified soils engineer to assess the pesticide contamination levels in the Project site's soils. If the pesticide contamination levels exceed USEPA Regional Screening Levels for pesticides, the Project Applicant shall implement a soils management program to reduce the soil's pesticide concentration levels to below USEPA Regional Screening Levels through soils excavation, removal and offsite disposal in compliance with all applicable USEPA regulations. All activities shall be coordinated with the City of Coachella and the County of Riverside Department of Environmental Health.	Prior Ground Disturbing Activities	City of Coachella Planning Division			
Noise						
NOI-1	The Project Construction Contractor shall ensure adherence to the following noise reduction requirements during Project construction: • The use of exhaust mufflers, and engine shrouds, that reduce equipment noise levels by approximately 10 dBA shall be required. • Construction equipment staging areas shall be located the furthest distance possible from nearby noise-sensitive land uses, located on the central and western portions of the Project site, away from Airport Boulevard and the neighboring existing residential uses.	During Construction Activities	City of Coachella Planning Division			
Transportation						

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
TRA-1	All necessary plans, permits or approvals, including but not limited to traffic control plans, encroachment or other permits from Caltrans, Union Pacific Railroad, Imperial Irrigation District and others, shall be prepared by the Construction Contractor for and approved by the City prior to the initiation of site disturbance such as grading, excavation, hauling, paving and other construction activities where public streets may be affected. Prior to the initiation of site improvements, the Project Applicant shall confer with the appropriate Coachella Public Works Department, Caltrans and the Union Pacific Railroad to ensure that construction activities and traffic control are carried out in a manner that causes minimal disruption to traffic on adjoining facilities.	Prior to Construction Activities	City of Coachella Public Works Department			
TRA-2	The final location and design of construction staging and access shall comply with any applicable City access and design standards, and be reviewed by the Project Engineer. The Project Applicant shall submit traffic control plans to the City prior to the issuance of grading and/or construction permits.	Prior to the Issuance of Grading and/or Construction Permits	City of Coachella Public Works Department			
TRA-3	The Project Applicant shall require all operators on the site to implement, to the maximum extent feasible (taking into consideration factors such as infrastructure availability, cost effectiveness, and incentive programs), Measure T-11, requiring the implementation of van pools under CAPCOA's Handbook for Analyzing Greenhouse Gas	During Project Operation	City of Coachella Planning Division			

Mitigation Measure No.	Mitigation Measure	Implementation Timing	Enforcing Agency or Personnel	Verification		
				Signature or Initials	Date	Notes
	Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity.					

January 6, 2026

Madeline Luke
The Altum Group
44-600 Village Court, Suite 100
Palm Desert, CA 92260

Subject: **City of Coachella – Coachella Airport Business Park Project – Responses to Air, GHG and HRA Public Comments.**

Dear Ms. Luke:

Vista Environmental has reviewed the air quality, greenhouse gas (GHG) and health risk assessment (HRA) related comments provided in Comment Letters 5, 13 and 16 and have provided the following responses to these comments.

Comment Letter #5 – South Coast Air Quality Management District

5-1 Introduction, comment noted.

5-2 Comment noted and we concur with the summary of description of the proposed project and project timing.

5-3 According to https://content.govdelivery.com/accounts/CARB/bulletins/3e00147 the EMFAC2025 model has not yet been approved by the EPA. As such, no changes have been made to the modeling, as the most current approved EMFAC model has been utilized in the DEIR.

5-4 The AERMOD model runs were re-run with the following changes: 1) the most current versions of AERMOD, AERMET, AERMINUTE and AERSURFACE were utilized; 2) the averaging times of 1 hour and Period were selected; 3) the most current meteorological data for Jacqueline Cochran Regional Airport was utilized; and 4) for the operational model runs, the proposed buildings heights were entered into AERMOD and pre-processed with BPIP.

The revised AERMOD model run results and associated cancer risks are shown in the revised Table BB and the revised Appendices D, E, F, and G with the AERMOD model printouts are attached to this letter.

As shown in the revised Table BB the cancer risk from the proposed project's DPM emissions would be as high as 1.5 per million persons at the mobile homes located south of the project site (Sensitive Receptors 2 and 3). When combined with the gas station TAC emissions, this would result in a cancer risk as high as **3.0 per million persons** at the mobile homes located south of the project site. The combined project-related cancer risk from DPM and gas station TAC emissions would be within the SCAQMD's threshold of 10 per million persons. Therefore, operation of the proposed project would result in a less than significant impact due to the cancer risk from TAC emissions.

Table A – Project-Related DPM Emissions Cancer Risks at Nearby Sensitive Receptors

Sensitive Receptor[1]	Receptor Location		Annual PM2.5 Concentration (µg/m^3)				Cancer Risk Per Million People[2]
	X	Y	Construction 2024-2026	Construction 2027	Operations 2028- 2041	Operations 2042-2054	
1	580,086	3,722,773	0.0025	0.0013	0.0015	0.0013	1.4
2	580,122	3,722,774	0.0026	0.0014	0.0017	0.0015	1.5
3	580,172	3,722,775	0.0027	0.0014	0.0015	0.0014	1.5
4	580,242	3,722,717	0.0021	0.0011	0.0009	0.0008	1.1
5	580,289	3,722,738	0.0022	0.0012	0.0009	0.0008	1.1
6	580,337	3,722,732	0.0020	0.0011	0.0008	0.0007	1.0
7	579,963	3,722,704	0.0014	0.0008	0.0007	0.0007	0.8
8	579,927	3,722,644	0.0010	0.0006	0.0005	0.0005	0.6
9	579,519	3,722,783	0.0005	0.0003	0.0004	0.0004	0.3
10	579,466	3,722,781	0.0004	0.0002	0.0003	0.0003	0.3
11	579,393	3,722,779	0.0004	0.0002	0.0003	0.0003	0.2
						Threshold of Significance	**10**
						Exceed Threshold?	**No**

Notes:
[1] The locations of each Sensitive Receptor are shown above in Figure 3.
[2] The residential cancer risk based on: C_{air} (2024-2026) * 342 + C_{air} (2027) * 29 + C_{air} (2028-2041) * 336 + C_{air} (2042-2054) * 45.2.
Source: Calculated from ISC-AERMOD View Version 12.0.0.

5-5 As detailed in Response 5-4 above, the 1-hour and Period averaging times and the building downwash were analyzed in the revised AERMOD model runs and the revised results are shown above in Table BB and the revised AERMOD model output files are attached to this Memo.

5-6 The cancer and non-cancer risks from diesel emissions created from construction and operation of the proposed project that included construction-related off-road equipment and construction and operational idling and truck travel onsite and within a quarter mile of the project site were analyzed through use of AERMOD and Section 8.3 of the Air Report describes the Modeling inputs and Section 10.4 of the Air Report shows the modeling results. The RiskTool has been utilized in hundreds of CEQA documents and is a published analysis method that is utilized for gas stations and other site specific sources. Section 10.4 of the Air Report utilized a very conservative method of adding the cancer risk calculated by AERMOD to the cancer risk calculated by the RiskTool, in order to provide the total cancer risk from the proposed project at the nearby sensitive receptors.

5-7 The import of 21,040 cubic yards of dirt to the project site during the grading phase was analyzed in CalEEMod. It should be noted that there are typically several construction projects with excess dirt and only a few projects that need dirt, so it can be reasonably assumed that the imported dirt will come from a nearby project that is located closer than 20 miles away. Furthermore, if dirt is not available from other projects, there are several mine and other types of dirt storage locations within 20 miles where the dirt can be obtained from.

5-8 The SCAQMD provides a Fact Sheet for Applying CalEEMod to Localized Significance Thresholds that can be found at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=2 and details how to analyze project that are much greater than 5 acres in size by using calculations base on the active construction equipment. The Air Report utilized the methodology provided in the Fact Sheet to analyze the Localized air impacts from construction and operation of the proposed project.

In order to provide a more complete analysis of localized air impacts during construction and operations, the AERMOD PM2.5 DPM model runs were for both the worst-case construction and operational scenarios.

For construction, the AERMOD model was run as detailed in Section 8.3 of the Air Report and was based on the Site Preparation phase of construction, which as shown in Table X of the Air Report is when the highest level of PM2.5 emissions would occur during construction of the proposed project. The Off-road equipment source was set to match the 4.17 pounds per day of PM2.5 emissions as calculated from CalEEMod. The AERMOD model run files are provided in the new Appendix H attached to this Letter, which found that Site Preparation activities would create PM2.5 concentrations as high as 0.192 µg/m^3, which is well below SCAQMD's PM2.5 construction threshold of 10.4 µg/m^3, that was obtained from: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25

For operations, the AERMOD model as detailed in Section 8.3 of the Air Report and was based on the year 2028 PM2.5 emissions rates from the EMFAC2021 model output files provided in Appendix B of the Air Report and included emissions from exhaust (RUNEX), brake wear (PMBW) and tire wear (PMTW). The AERMOD model run files are provided in the new Appendix I attached to this Letter, which found that operational activities would create PM2.5 concentrations as high as 0.024 µg/m^3, which is well below SCAQMD's PM2.5 operational threshold of 2.5 µg/m^3.

5-9 The distance utilized the default trip distances that ranged between 4.79 and 9.65 miles in the CalEEMod model. The trip distances in the CalEEMod model vary for each region of the State and are based on empirical evidence provide in the CalEEMod User Guide and the use of the default trip distances in CalEEMod meets the CEQA requirement of providing substantial evidence of the analysis. The largest warehouse would be 48,800 square feet, which would be considered a small warehouse in Southern California and no warehouses would be designed to be high-cube warehouses, which are the warehouses specifically designed to receive cargo containers. For these reasons, a truck trip directly from the Ports to the project site would likely rarely happen and the default truck trip distances provides a reasonable estimate of the truck trip distances that would occur during operation of the proposed project.

5-10 No railroad connections or loading areas will be provided on the project site as part of the proposed project. Plus the railroad is on the west side of the Whitewater River, which would require a very expensive railroad bridge to connect the project site to the railroad, which would likely never be economically feasible to provide.

5-11 The proposed project is located within the Assembly Bill 617 (AB 617) designated Eastern Coachella Valley (ECV) community, which has been identified by the South Coast Air Quality Management District (South Coast AQMD) as an area subject to cumulative air quality burdens from multiple regional and local emission sources. As part of the environmental analysis, air

quality impacts associated with construction and operation of the proposed project were evaluated in accordance with the CEQA Guidelines, South Coast AQMD significance thresholds, and applicable regulatory requirements.

The Community Emission Reductions Plan (CERP) for the ECV community, adopted by the South Coast AQMD Governing Board on June 4, 2021, was reviewed for consistency with the proposed project. Construction and operation of the proposed project will comply with all applicable AB 617 requirements for the Eastern Coachella Valley community, as well as all applicable South Coast AQMD rules and regulations. The proposed project incorporates mitigation measures designed to minimize emissions of criteria pollutants and toxic air contaminants during construction and operation. These measures are consistent with the air quality improvement strategies identified in the ECV CERP and would not conflict with or impede implementation of the CERP.

As demonstrated in the air quality analysis, the proposed project's emissions would not result in significant air quality impacts after implementation of required mitigation measures and would not contribute substantially to existing air quality burdens within the ECV community. Coordination with South Coast AQMD would continue, as required, to ensure compliance with applicable air quality regulations. This comment does not identify new information that would alter the conclusions of the air quality analysis, and no additional mitigation measures are required.

5-12 The project applicant has committed to ensuring that all contractors that utilize off-road equipment on the project site are registered with CARB and meet the current regulations regarding Zero Emission (ZE) Vehicles. Furthermore, the project applicant has committed to implementing Mitigation Measure GHG-1 that restricts the use of diesel-powered off-road equipment during operation of the proposed project and requires temporary power poles to be installed during construction of the proposed project that will allow for the charging of the ZE vehicles.

5-13 The project applicant will comply with SCAQMD's Rule 2305, however it should be noted that the largest warehouse space on the proposed plans is 48,800 square feet, so unless a tenant were to take leases on multiple warehouse spaces, this Rule will likely not apply to the proposed project.

5-14 As shown in the DEIR, the proposed project has provided adequate mitigation to reduce all air quality-related impacts to less than significant levels. It should be noted that most of the commenter's proposed mitigation has already or will likely become State Regulations that the project applicant will be required to implement.

5-15 Rules 201, 203, 402, 403, 461, 1108, 1113, 1143, 1401, have all been discussed in Section 4.3 of the Air Report.

5-16 Conclusion, comment noted.

Comment Letter 13 – Advocates for the Environment

13-1 Introduction, comment noted.

13-2 The proposed project consists of a business park with a mixture of commercial and industrial uses. The commenter references net zero communities that are primarily residential communities,

where Title 24 regulations require that new homes built in California are net zero through the installation of solar PV systems on each home. When developing the Title 24 regulations, the State recognized the importance of commercial and industrial projects to the State economy as well as the ability of commercial uses to provide local services to the community, and Title 24 provides different standards for non-residential buildings, which allow for these buildings to consume more energy, which cannot currently be met with onsite solar PV systems. However, it should be noted that the project applicant has committed to implementing Mitigation Measure GHG-1, which requires a minimum of 50 percent of the total project electrical consumption to be provided from onsite renewable sources.

13-3 The GHG analysis in Section 10.8 was prepared pursuant to the City's CAP and clearly states that the proposed project's GHG emissions were quantified for informational purposes only and determination of significance has been based on a determination of whether the Project has implemented all applicable development standards presented in the CAP Development Review Checklist. It should be noted that the CAP provides for four compliance paths that either include implementation of all applicable development standards provided in the CAP Development Review Checklist **or** meet the City's performance targets. As such, meeting the City's performance targets, that are set for new residential projects, are not applicable to the proposed project.

13-4 The City's CAP meets the requirements of Section 15183.5(b), since the CAP has (A) quantified GHG emissions for both existing and projected for years 2020 and 2035; (B) established a level, based on substantial evidence, below which the contribution to GHG would not be cumulatively considerable; (C) identified and analyzed the GHG emissions, segmented by Sector and Source within the City; (D) specifies a group of measures in the CAP Development Review Checklist that is to be implemented on a project basis that would collectively achieve the specified emissions levels; (E) establishes mechanisms to monitor the Plan's progress toward achieving the levels; (F) the CAP was adopted by the City Council in June 2014, after a public review process.

13-5 As detailed above in Response 13-4, the CAP meets the requirements of Section 15183.5(b). Since the DEIR has demonstrated that with implementation of Mitigation Measure GHG-1, the proposed project would be in compliance with the CAP, the proposed project was found to create a less than significant GHG emissions impact.

13-6 As detailed above in Response 13-4, the CAP meets the requirements of Section 15183.5(b). Although the CAP was prepared before the 2017 and 2022 Scoping Plans, both of these Plans and the CAP were prepared based on the ultimate goals provided in AB 32 of an 80 percent reduction in GHG emissions below 1990 levels by 2050. Furthermore, as detailed above the Service Population targets are for residential developments and are not applicable to a business park.

13-7 As detailed above in Response 13-3, the CAP provides four compliance paths and the DEIR is based on implementation of all applicable development standards provided in the CAP Development Review Checklist. As such, the Service Population metric is not applicable to the proposed project.

13-8 As shown in the Energy Use Calculations in the Air Report and specifically in Table L – the fuel used by the generators, welders, and air compressors, all of which are stationary equipment that would be required to be electrified and run off of the temporary power poles, represent 8.4 percent of the total off-road equipment fuel used during construction of the proposed project. The remaining 1.6 percent reduction would be achieved through implementation of the

Transportation Demand Management Program. Although, the commenter is correct that there are several other sources of GHG emissions during construction, they are negligible when compared to GHG emissions from petroleum fuel use and the Development Standards for this measure are limited to use of alternative powered equipment as well as implementation of TDM plan for the construction workers.

13-9 The TDM plan is specifically called in the CAP Development Review Checklist as a way to be consistent with the measures in the Checklist. The CAP has provided substantial evidence that shows implementation of TDM deployment Citywide would reduce GHG emissions by approximately 5%. Since the DEIR provides for a very conservative analysis, since it only applies a 1.6 percent reduction for implementing a TDM plan.

13-10 The 2017 and 2022 Scoping Plans are discussed in several places throughout the Air Report, including Sections 3.2, 6.3, and 6.4 of the Air Report. Also, as detailed above in Response 13-6, the CAP was prepared to meet the overall GHG reduction goals provided in the 2017 and 2022 Scoping Plans.

13-11 CEQA allows for taking credit for emissions reductions provided by State Regulations.

13-12 The proposed project will be required to meet the current Title 24 requirements, for each phase of construction, which will likely require any buildings constructed around the year 2045 to be net zero energy.

13-13 The City prepared the CAP and associated CAP Development Review Checklist in order to streamline the GHG emissions analyses for new development projects in the City, so that each new development project does not need to analyze every possibly applicable plan in the State that has been adopted to reduce GHG emissions. As detailed in Response 13-6 above, the Service Population targets are for residential developments and are not applicable to the proposed project.

13-14 Executive Order B-55-18 is discussed in Section 6.3 of the Air Report. As detailed in Response 13-13, above, the CAP was prepared so that each development project does not need to analyze every possibly applicable Plan in the State for reducing GHG emissions.

13-15 As detailed above in Response 13-3, the quantification of GHG emissions was provided for informational purposes only and not used for determination of significance. Furthermore, the Mitigation Measure GHG-1 was prepared to show compliance with the CAP. This is not compression of the analysis, since the unmitigated condition is self-evident, as it consists of not implementing Mitigation Measure GHG-1, which would result in non-compliance with the CAP.

13-16 Mitigation Measure GHG-1 was prepared per the direction of the CAP and utilized the Development Standards provided in the CAP Development Review Checklist to develop the measures included in Mitigation Measure GHG-1.

13-17 The Commenter is not correct as the DEIR found a significant GHG impact and provided Mitigation Measure GHG-1 to reduce the GHG impact to less than significant. As detailed above in Response 13-16, the reduction measures included in Mitigation Measure GHG-1 were developed from the CAP Checklist.

13-18 Conclusion, comment noted.

Comment Letter 16 – Adams Broadwell

16-2 The commenter incorrectly claims that the DEIR failed to analyze emissions from key components, including a water line extension, backup generators, and cold storage uses of the proposed warehouse space and the DEIR failed to analyze Valley Fever. First as detailed in the DEIR, the water line extension is a separate project that would occur with or without the proposed project. Diesel-powered backup generators are quickly becoming obsolete in California, with the new Title 24 regulations that require solar PV systems to include battery storage systems that can also be utilized for backup power. Mitigation Measure GHG-1 requires the project to be designed to generate a minimum of 50% of the power onsite from renewable sources, which is likely to be at least partially met through the use of battery storage systems. The proposed warehouses are not being designed for cold storage, as such cold storage would not be allowed under the current entitlement.

According to: https://www.dir.ca.gov/dosh/valley-fever-home.html, the Valley Fever Rates for Riverside County and Imperial County to the south are in the level of 10-19 per 100,000 persons, which is the same rate as Los Angeles County and Orange County, which are also part of the SCAQMD. Unlike the Central Valley, where the incident rate is four times higher at 75+ per 100,000 persons and where the San Joaquin Valley Air Pollution District has developed guidelines for addressing Valley Fever, due to the low number of Valley Fever cases within the SCAQMD, the SCAQMD CEQA Guidelines do not recommend analyzing Valley Fever in CEQA documents. However, the SCAQMD does provide the most stringent dust suppressant rules in the State, which is the primary means of transmission of Valley Fever. For these reasons, Valley Fever is not likely to be transmitted from construction activities associated with the proposed project.

16-10 As detailed above in Response 16-2, the water line would be constructed with or without the proposed project and as such, is being analyzed as a separate project.

16-11 As detailed above in Response 16-2, diesel powered generators are becoming obsolete in California due to new Title 24 regulations that require PV solar systems to include battery storage systems that can also be utilized for backup power that do not produce any emissions or excessive noise. As such, the commenter's assumption that diesel-powered backup generators would be installed as part of the proposed project is not correct.

16-12 As detailed above in Response 16-2, the proposed warehouses are not being designed for cold storage, as such cold storage warehouse uses would not be an allowed use in the proposed warehouses.

16-14 As detailed above in Response 16-2, Valley Fever is not a significant risk in Riverside County. Regardless, adherence to the SCAQMD's very stringent fugitive dust regulations during construction of the proposed project would go above and beyond the Valley Fever suppression requirements in the Central Valley, where it is a potential health risk.

16-17 The commenter is not correct when he states that the DEIR calculates this measure would reduce impacts by 3.55%. Although the Mitigation Measure of a Commute Trip Reduction Program was selected in the CalEEMod model run, the Operational Emissions shown in the DEIR and Air Report so the unmitigated emissions levels. The only place that the reductions of this measure is shown is in the quantified GHG emissions Table that is provided for informational purposes only as the amounts are not utilized to determine if the project would create a significant impact. However,

in the consistency analysis with the CAP Development Review Checklist, it was determined that the Transportation Demand Management Program included in Mitigation Measure GHG-1 would reduce GHG emissions by 1.6%, which is less than half of what CAPCOA calculated for implementation of this measure. In addition, the City's CAP found that a Citywide Transportation Demand Management Program would reduce emissions by 5% and provided substantial evidence to support that conclusion. As such, the use of a 1.6% reduction in emissions from implementation of the TDM provides for a conservative analysis supported by substantial evidence.

16-18 As detailed above in Response 16-17, the 1.6% reduction in GHG emissions that the DEIR takes credit for with implementation of Mitigation Measure GHG-1 provides for a conservative analysis supported by substantial evidence.

16-19 The distance utilized the default trip distances that ranged between 4.79 and 9.65 miles in the CalEEMod model. The trip distances in the CalEEMod model vary for each region of the State and are based on empirical evidence provide in the CalEEMod User Guide and the use of the default trip distances in CalEEMod meets the CEQA requirement of providing substantial evidence of the analysis. The largest warehouse would be 48,800 square feet, which would be considered a small warehouse in Southern California and no warehouses would be designed to be high-cube warehouses, which are the warehouses specifically designed to receive cargo containers. For these reasons, a truck trip directly from the Ports to the project site would likely rarely happen and the default truck trip distances provides a reasonable estimate of the truck trip distances that would occur during operation of the proposed project.

16-20 General Plan Policy 11.3 prohibits the siting of land uses that adversely impact existing sensitive receptors, including schools, childcare centers, senior housing, and subsidized affordable housing. The existing mobile home park is not one of listed sensitive receptors in General Plan Policy 11.3. In addition, the DEIR found that the operation of the proposed project, including the gas station would not create a significant cancer risk at the residents of the mobile home park, so it can be reasonably assumed that the proposed gas station is not a land use that would adversely impact sensitive receptors. The commenter also provides made up thresholds that have not been adopted by the City or SCAQMD. The DEIR shows that the cancer risk is within the SCAQMD adopted thresholds and the City relies on the SCAQMD's expertise for developing these thresholds.

16-21 The HRA was prepared based on guidance provided by SCAQMD that recommends that HRAs analyze truck travel up to a quarter mile from the project site or to the onramps of the nearest freeway, whichever is nearer, which is based on the assumption that trucks are very efficient and produce very little emissions when traveling at constant speeds on freeways. Furthermore, the cancer risk created by the proposed project at the mobile home park was calculated to be as high as 3.0 per million person, which is well below the 10 per million person threshold. The commenter did not provide any evidence that extension of a road source that is located over 600 feet from the most impacted residents would more than triple the cancer risk levels that would be required to change the significance levels shown in the DEIR.

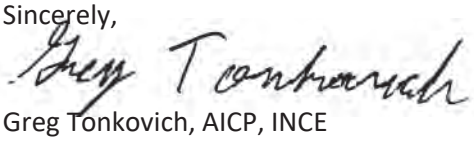
16-23 As detailed in the revised Table BB, the cancer risk levels drop off from 1.5 per million at Receptors 2 and 3, which represent homes located 50 feet south of the project site to 0.2 per million at Receptor 11, which represents a home 1,900 feet from the project site. This shows that DPM

emissions disperse rapidly and cumulative projects would need to be within approximately 2,000 feet of the project site to provide any quantifiable increase to cancer risk rates. Furthermore, the examples provided by the commenter are from very large warehouse projects. The largest warehouse in the proposed project is 48,800 square feet, which would be considered a small warehouse in Southern California. The SCAQMD Working Group is discussing new regulations for large warehouses that are over 100,000 square feet, which would not apply to the proposed project.

16-24 As detailed above in Response 16-23, the draft SCAQMD protocols are for warehouses that are over 100,000 square feet, which would not apply to the proposed project. In addition, the commenter discuses warehouse projects that would generate over 951 daily truck trips. The proposed project would generate 88 2-axle truck trips, 109 3-axle truck trips and 330 4+axle truck trips for a total of 527 daily truck trips, which is well below the 951 daily truck trips referenced by the commenter. As such, the working group thresholds that have not yet been adopted by the SCAQMD is not applicable to the proposed project.

Please call me at (949) 510-5355 if you have any questions related to the above.

Sincerely,



Greg Tonkovich, AICP, INCE
Senior Analyst,
Vista Environmental
949 510 5355

Encl.: Revised Appendices D, E, F, and G
New Appendix H – AERMOD Model Site Preparation PM2.5 Emissions Printouts
New Appendix I – AERMOD Model Operational Year 2028 PM2.5 Emissions Printouts

APPENDIX D

AERMOD Model Years 2024 – 2026 Construction DPM Printouts

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** Lakes Environmental Software Inc.
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** DESCRSRC Onsite Road East
** PREFIX
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LOCATION L0003413     VOLUME   579976.681 3723249.162 -36.93
LOCATION L0003414     VOLUME   579974.814 3723252.307 -36.91
LOCATION L0003415     VOLUME   579972.947 3723255.452 -36.88
LOCATION L0003416     VOLUME   579971.080 3723258.598 -36.85
LOCATION L0003417     VOLUME   579969.213 3723261.743 -36.80
LOCATION L0003418     VOLUME   579967.346 3723264.888 -36.75
LOCATION L0003419     VOLUME   579965.479 3723268.033 -36.70
LOCATION L0003420     VOLUME   579963.612 3723271.178 -36.65
LOCATION L0003421     VOLUME   579961.745 3723274.324 -36.60
LOCATION L0003422     VOLUME   579959.879 3723277.469 -36.55
LOCATION L0003423     VOLUME   579958.012 3723280.614 -36.50
LOCATION L0003424     VOLUME   579956.145 3723283.759 -36.45
LOCATION L0003425     VOLUME   579954.278 3723286.904 -36.40
LOCATION L0003426     VOLUME   579952.411 3723290.050 -36.37
LOCATION L0003427     VOLUME   579950.544 3723293.195 -36.35
LOCATION L0003428     VOLUME   579948.677 3723296.340 -36.32
LOCATION L0003429     VOLUME   579946.810 3723299.485 -36.30
LOCATION L0003430     VOLUME   579944.943 3723302.631 -36.29
LOCATION L0003431     VOLUME   579943.076 3723305.776 -36.28
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LOCATION L0003432     VOLUME   579941.209 3723308.921 -36.27
LOCATION L0003433     VOLUME   579939.342 3723312.066 -36.27
LOCATION L0003434     VOLUME   579937.475 3723315.211 -36.27
LOCATION L0003435     VOLUME   579935.608 3723318.357 -36.27
LOCATION L0003436     VOLUME   579933.741 3723321.502 -36.27
LOCATION L0003437     VOLUME   579931.874 3723324.647 -36.27
LOCATION L0003438     VOLUME   579930.007 3723327.792 -36.27
LOCATION L0003439     VOLUME   579928.140 3723330.937 -36.27
LOCATION L0003440     VOLUME   579926.273 3723334.083 -36.27
LOCATION L0003441     VOLUME   579924.406 3723337.228 -36.27
LOCATION L0003442     VOLUME   579922.539 3723340.373 -36.27
LOCATION L0003443     VOLUME   579920.672 3723343.518 -36.27
LOCATION L0003444     VOLUME   579918.805 3723346.664 -36.27
LOCATION L0003445     VOLUME   579916.938 3723349.809 -36.27
LOCATION L0003446     VOLUME   579915.071 3723352.954 -36.27
LOCATION L0003447     VOLUME   579913.204 3723356.099 -36.27
LOCATION L0003448     VOLUME   579911.337 3723359.244 -36.27
LOCATION L0003449     VOLUME   579909.470 3723362.390 -36.27
LOCATION L0003450     VOLUME   579907.656 3723365.566 -36.27
LOCATION L0003451     VOLUME   579905.871 3723368.758 -36.27
LOCATION L0003452     VOLUME   579904.085 3723371.950 -36.27
LOCATION L0003453     VOLUME   579902.299 3723375.142 -36.27
LOCATION L0003454     VOLUME   579900.513 3723378.334 -36.27
LOCATION L0003455     VOLUME   579898.728 3723381.526 -36.27
LOCATION L0003456     VOLUME   579896.942 3723384.718 -36.27
LOCATION L0003457     VOLUME   579895.156 3723387.910 -36.27
LOCATION L0003458     VOLUME   579893.370 3723391.102 -36.27
LOCATION L0003459     VOLUME   579891.584 3723394.294 -36.27
LOCATION L0003460     VOLUME   579889.799 3723397.486 -36.27
LOCATION L0003461     VOLUME   579888.013 3723400.678 -36.27
LOCATION L0003462     VOLUME   579886.227 3723403.870 -36.27
LOCATION L0003463     VOLUME   579884.441 3723407.062 -36.27
LOCATION L0003464     VOLUME   579882.655 3723410.254 -36.27
LOCATION L0003465     VOLUME   579880.870 3723413.446 -36.27
LOCATION L0003466     VOLUME   579879.084 3723416.638 -36.26
LOCATION L0003467     VOLUME   579877.298 3723419.830 -36.24
LOCATION L0003468     VOLUME   579875.512 3723423.022 -36.22
LOCATION L0003469     VOLUME   579873.727 3723426.214 -36.20
LOCATION L0003470     VOLUME   579871.941 3723429.406 -36.18
LOCATION L0003471     VOLUME   579870.155 3723432.598 -36.17
LOCATION L0003472     VOLUME   579868.369 3723435.790 -36.15
LOCATION L0003473     VOLUME   579866.583 3723438.982 -36.13
LOCATION L0003474     VOLUME   579864.798 3723442.174 -36.11
LOCATION L0003475     VOLUME   579863.012 3723445.366 -36.09
LOCATION L0003476     VOLUME   579861.226 3723448.558 -36.07
LOCATION L0003477     VOLUME   579859.440 3723451.750 -36.06
LOCATION L0003478     VOLUME   579857.655 3723454.942 -36.04
LOCATION L0003479     VOLUME   579855.869 3723458.134 -36.02
LOCATION L0003480     VOLUME   579854.083 3723461.327 -36.00
LOCATION L0003481     VOLUME   579852.297 3723464.519 -35.98
LOCATION L0003482     VOLUME   579850.511 3723467.711 -35.99
LOCATION L0003483     VOLUME   579848.726 3723470.903 -36.04
LOCATION L0003484     VOLUME   579846.940 3723474.095 -36.08
LOCATION L0003485     VOLUME   579845.154 3723477.287 -36.12
LOCATION L0003486     VOLUME   579843.368 3723480.479 -36.16
LOCATION L0003487     VOLUME   579841.582 3723483.671 -36.19
LOCATION L0003488     VOLUME   579839.797 3723486.863 -36.22
LOCATION L0003489     VOLUME   579838.011 3723490.055 -36.24
LOCATION L0003490     VOLUME   579836.225 3723493.247 -36.26
LOCATION L0003491     VOLUME   579834.439 3723496.439 -36.26
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   LOCATION L0003492     VOLUME   579832.654 3723499.631 -36.23
   LOCATION L0003493     VOLUME   579830.868 3723502.823 -36.20
   LOCATION L0003494     VOLUME   579829.082 3723506.015 -36.16
   LOCATION L0003495     VOLUME   579827.296 3723509.207 -36.13
   LOCATION L0003496     VOLUME   579825.510 3723512.399 -36.10
   LOCATION L0003497     VOLUME   579823.725 3723515.591 -36.07
   LOCATION L0003498     VOLUME   579821.939 3723518.783 -36.03
   LOCATION L0003499     VOLUME   579820.153 3723521.975 -36.00
   LOCATION L0003500     VOLUME   579818.367 3723525.167 -35.97
   LOCATION L0003501     VOLUME   579816.581 3723528.359 -35.97
   LOCATION L0003502     VOLUME   579814.796 3723531.551 -35.97
   LOCATION L0003503     VOLUME   579813.010 3723534.743 -35.97
   LOCATION L0003504     VOLUME   579811.224 3723537.935 -35.97
   LOCATION L0003505     VOLUME   579809.438 3723541.127 -35.97
   LOCATION L0003506     VOLUME   579807.653 3723544.319 -35.97
   LOCATION L0003507     VOLUME   579805.867 3723547.511 -35.97
   LOCATION L0003508     VOLUME   579804.081 3723550.703 -35.97
   LOCATION L0003509     VOLUME   579802.295 3723553.895 -35.97
   LOCATION L0003510     VOLUME   579800.509 3723557.087 -35.97
   LOCATION L0003511     VOLUME   579798.724 3723560.279 -35.97
   LOCATION L0003512     VOLUME   579796.938 3723563.471 -35.97
   LOCATION L0003513     VOLUME   579795.152 3723566.663 -35.97
   LOCATION L0003514     VOLUME   579793.366 3723569.855 -35.97
   LOCATION L0003515     VOLUME   579791.580 3723573.047 -35.97
   LOCATION L0003516     VOLUME   579789.795 3723576.239 -35.97
   LOCATION L0003517     VOLUME   579788.009 3723579.431 -35.97
   LOCATION L0003518     VOLUME   579786.223 3723582.623 -35.97
   LOCATION L0003519     VOLUME   579784.437 3723585.815 -35.97
   LOCATION L0003520     VOLUME   579782.652 3723589.007 -35.97
   LOCATION L0003521     VOLUME   579780.866 3723592.199 -35.97
** End of LINE VOLUME Source ID = RDONE
** ------------------------------------------------------------------
** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDAIRW
** DESCRSRC Airport Blvd west of Project Site
** PREFIX
** Length of Side = 12.19
** Configuration = Adjacent
** Emission Rate = 2.0E-07
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 7
** 580077.815, 3722811.474, -38.84, 0.00, 5.67
** 579930.520, 3722810.498, -38.31, 0.00, 5.67
** 579724.565, 3722817.970, -36.23, 0.00, 5.67
** 579657.572, 3722818.633, -36.01, 0.00, 5.67
** 579442.005, 3722818.125, -36.27, 0.00, 5.67
** 579336.736, 3722811.183, -36.27, 0.00, 5.67
** 579251.350, 3722810.179, -35.97, 0.00, 5.67
** ------------------------------------------------------------------
   LOCATION L0003522     VOLUME   580071.719 3722811.433 -38.86
   LOCATION L0003523     VOLUME   580059.528 3722811.353 -38.96
   LOCATION L0003524     VOLUME   580047.336 3722811.272 -38.98
   LOCATION L0003525     VOLUME   580035.144 3722811.191 -39.01
   LOCATION L0003526     VOLUME   580022.952 3722811.110 -39.01
   LOCATION L0003527     VOLUME   580010.761 3722811.030 -39.01
   LOCATION L0003528     VOLUME   579998.569 3722810.949 -38.98
   LOCATION L0003529     VOLUME   579986.377 3722810.868 -38.75
   LOCATION L0003530     VOLUME   579974.185 3722810.787 -38.53
   LOCATION L0003531     VOLUME   579961.994 3722810.707 -38.44
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   LOCATION L0003532     VOLUME   579949.802 3722810.626 -38.42
   LOCATION L0003533     VOLUME   579937.610 3722810.545 -38.38
   LOCATION L0003534     VOLUME   579925.422 3722810.683 -38.28
   LOCATION L0003535     VOLUME   579913.238 3722811.125 -38.18
   LOCATION L0003536     VOLUME   579901.054 3722811.567 -38.07
   LOCATION L0003537     VOLUME   579888.870 3722812.009 -37.95
   LOCATION L0003538     VOLUME   579876.686 3722812.451 -37.79
   LOCATION L0003539     VOLUME   579864.502 3722812.893 -37.54
   LOCATION L0003540     VOLUME   579852.318 3722813.335 -37.30
   LOCATION L0003541     VOLUME   579840.134 3722813.777 -37.24
   LOCATION L0003542     VOLUME   579827.950 3722814.219 -37.21
   LOCATION L0003543     VOLUME   579815.766 3722814.661 -37.15
   LOCATION L0003544     VOLUME   579803.582 3722815.103 -37.07
   LOCATION L0003545     VOLUME   579791.398 3722815.545 -36.99
   LOCATION L0003546     VOLUME   579779.214 3722815.987 -36.83
   LOCATION L0003547     VOLUME   579767.030 3722816.429 -36.67
   LOCATION L0003548     VOLUME   579754.846 3722816.871 -36.52
   LOCATION L0003549     VOLUME   579742.662 3722817.313 -36.39
   LOCATION L0003550     VOLUME   579730.478 3722817.755 -36.27
   LOCATION L0003551     VOLUME   579718.290 3722818.032 -36.20
   LOCATION L0003552     VOLUME   579706.099 3722818.153 -36.13
   LOCATION L0003553     VOLUME   579693.907 3722818.273 -36.07
   LOCATION L0003554     VOLUME   579681.716 3722818.394 -36.02
   LOCATION L0003555     VOLUME   579669.525 3722818.515 -35.97
   LOCATION L0003556     VOLUME   579657.333 3722818.632 -35.97
   LOCATION L0003557     VOLUME   579645.141 3722818.604 -35.97
   LOCATION L0003558     VOLUME   579632.949 3722818.575 -36.01
   LOCATION L0003559     VOLUME   579620.757 3722818.546 -36.08
   LOCATION L0003560     VOLUME   579608.565 3722818.517 -36.14
   LOCATION L0003561     VOLUME   579596.373 3722818.489 -36.14
   LOCATION L0003562     VOLUME   579584.181 3722818.460 -36.14
   LOCATION L0003563     VOLUME   579571.989 3722818.431 -36.14
   LOCATION L0003564     VOLUME   579559.797 3722818.402 -36.14
   LOCATION L0003565     VOLUME   579547.605 3722818.374 -36.14
   LOCATION L0003566     VOLUME   579535.413 3722818.345 -36.14
   LOCATION L0003567     VOLUME   579523.222 3722818.316 -36.14
   LOCATION L0003568     VOLUME   579511.030 3722818.287 -36.14
   LOCATION L0003569     VOLUME   579498.838 3722818.259 -36.14
   LOCATION L0003570     VOLUME   579486.646 3722818.230 -36.14
   LOCATION L0003571     VOLUME   579474.454 3722818.201 -36.14
   LOCATION L0003572     VOLUME   579462.262 3722818.172 -36.14
   LOCATION L0003573     VOLUME   579450.070 3722818.144 -36.19
   LOCATION L0003574     VOLUME   579437.887 3722817.853 -36.24
   LOCATION L0003575     VOLUME   579425.721 3722817.051 -36.27
   LOCATION L0003576     VOLUME   579413.556 3722816.249 -36.27
   LOCATION L0003577     VOLUME   579401.390 3722815.446 -36.27
   LOCATION L0003578     VOLUME   579389.224 3722814.644 -36.27
   LOCATION L0003579     VOLUME   579377.059 3722813.842 -36.27
   LOCATION L0003580     VOLUME   579364.893 3722813.040 -36.27
   LOCATION L0003581     VOLUME   579352.728 3722812.238 -36.27
   LOCATION L0003582     VOLUME   579340.562 3722811.436 -36.27
   LOCATION L0003583     VOLUME   579328.379 3722811.085 -36.25
   LOCATION L0003584     VOLUME   579316.188 3722810.942 -36.23
   LOCATION L0003585     VOLUME   579303.997 3722810.798 -36.22
   LOCATION L0003586     VOLUME   579291.805 3722810.655 -36.22
   LOCATION L0003587     VOLUME   579279.614 3722810.511 -36.21
   LOCATION L0003588     VOLUME   579267.423 3722810.368 -36.11
   LOCATION L0003589     VOLUME   579255.232 3722810.225 -36.01
** End of LINE VOLUME Source ID = RDAIRW
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** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDAIRE
** DESCRSRC Airport Blvd east of Project Site
** PREFIX
** Length of Side = 12.19
** Configuration = Adjacent
** Emission Rate = 4.69E-07
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 3
** 580086.549, 3722811.395, -38.73, 0.00, 5.67
** 580220.964, 3722809.641, -38.34, 0.00, 5.67
** 580570.484, 3722812.421, -37.19, 0.00, 5.67
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   LOCATION L0003590     VOLUME   580092.645 3722811.316 -38.71
   LOCATION L0003591     VOLUME   580104.836 3722811.157 -38.71
   LOCATION L0003592     VOLUME   580117.026 3722810.998 -38.71
   LOCATION L0003593     VOLUME   580129.217 3722810.838 -38.62
   LOCATION L0003594     VOLUME   580141.408 3722810.679 -38.50
   LOCATION L0003595     VOLUME   580153.599 3722810.520 -38.40
   LOCATION L0003596     VOLUME   580165.790 3722810.361 -38.40
   LOCATION L0003597     VOLUME   580177.981 3722810.202 -38.40
   LOCATION L0003598     VOLUME   580190.172 3722810.043 -38.39
   LOCATION L0003599     VOLUME   580202.363 3722809.884 -38.37
   LOCATION L0003600     VOLUME   580214.554 3722809.725 -38.33
   LOCATION L0003601     VOLUME   580226.745 3722809.687 -38.22
   LOCATION L0003602     VOLUME   580238.937 3722809.784 -38.11
   LOCATION L0003603     VOLUME   580251.129 3722809.881 -38.10
   LOCATION L0003604     VOLUME   580263.320 3722809.978 -38.10
   LOCATION L0003605     VOLUME   580275.512 3722810.075 -38.09
   LOCATION L0003606     VOLUME   580287.704 3722810.172 -38.07
   LOCATION L0003607     VOLUME   580299.895 3722810.269 -38.05
   LOCATION L0003608     VOLUME   580312.087 3722810.366 -37.85
   LOCATION L0003609     VOLUME   580324.278 3722810.463 -37.65
   LOCATION L0003610     VOLUME   580336.470 3722810.560 -37.53
   LOCATION L0003611     VOLUME   580348.662 3722810.657 -37.51
   LOCATION L0003612     VOLUME   580360.853 3722810.754 -37.49
   LOCATION L0003613     VOLUME   580373.045 3722810.851 -37.49
   LOCATION L0003614     VOLUME   580385.236 3722810.947 -37.49
   LOCATION L0003615     VOLUME   580397.428 3722811.044 -37.41
   LOCATION L0003616     VOLUME   580409.620 3722811.141 -37.26
   LOCATION L0003617     VOLUME   580421.811 3722811.238 -37.12
   LOCATION L0003618     VOLUME   580434.003 3722811.335 -37.02
   LOCATION L0003619     VOLUME   580446.195 3722811.432 -36.92
   LOCATION L0003620     VOLUME   580458.386 3722811.529 -36.88
   LOCATION L0003621     VOLUME   580470.578 3722811.626 -36.88
   LOCATION L0003622     VOLUME   580482.769 3722811.723 -36.88
   LOCATION L0003623     VOLUME   580494.961 3722811.820 -36.88
   LOCATION L0003624     VOLUME   580507.153 3722811.917 -36.88
   LOCATION L0003625     VOLUME   580519.344 3722812.014 -36.97
   LOCATION L0003626     VOLUME   580531.536 3722812.111 -37.09
   LOCATION L0003627     VOLUME   580543.727 3722812.208 -37.19
   LOCATION L0003628     VOLUME   580555.919 3722812.305 -37.19
   LOCATION L0003629     VOLUME   580568.111 3722812.402 -37.19
** End of LINE VOLUME Source ID = RDAIRE
   LOCATION IDLING       POINT      579913.113  3723302.270      -36.270
** DESCRSRC Construction Truck Idling
   LOCATION OFFRDEQ      POINT      579932.850  3723278.650      -36.320
** DESCRSRC Offroad Construction Equipment
** Source Parameters **
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** LINE VOLUME Source ID = RDONW
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   SRCPARAM L0003034     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003035     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003036     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003037     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003038     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003039     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003040     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003041     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003042     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003043     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003044     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003045     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003046     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003047     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003048     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003049     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003050     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003051     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003052     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003053     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003054     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003055     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003056     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003057     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003058     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003059     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003060     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003061     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003062     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003063     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003064     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003065     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003066     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003067     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003068     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003069     0.000000005427      0.00      1.70      0.85
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   SRCPARAM L0003072     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003073     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003074     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003075     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003076     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003077     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003078     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003079     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003080     0.000000005427      0.00      1.70      0.85
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   SRCPARAM L0003087     0.000000005427      0.00      1.70      0.85
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   SRCPARAM L0003089     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003090     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003091     0.000000005427      0.00      1.70      0.85
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SRCPARAM L0003095     0.000000005427      0.00      1.70      0.85
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SRCPARAM L0003101     0.000000005427      0.00      1.70      0.85
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SRCPARAM L0003106     0.000000005427      0.00      1.70      0.85
SRCPARAM L0003107     0.000000005427      0.00      1.70      0.85
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SRCPARAM L0003109     0.000000005427      0.00      1.70      0.85
SRCPARAM L0003110     0.000000005427      0.00      1.70      0.85
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SRCPARAM L0003149     0.000000005427      0.00      1.70      0.85
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SRCPARAM L0003151     0.000000005427      0.00      1.70      0.85
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SRCPARAM L0003155     0.000000005427      0.00      1.70      0.85
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SRCPARAM L0003158     0.000000005427      0.00      1.70      0.85
SRCPARAM L0003159     0.000000005427      0.00      1.70      0.85
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SRCPARAM L0003208     0.000000005427      0.00      1.70      0.85
SRCPARAM L0003209     0.000000005427      0.00      1.70      0.85
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SRCPARAM L0003211     0.000000005427      0.00      1.70      0.85
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   SRCPARAM L0003214     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003215     0.000000005427      0.00      1.70      0.85
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   SRCPARAM L0003232     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003233     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003234     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003235     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003236     0.000000005427      0.00      1.70      0.85
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   SRCPARAM L0003265     0.000000005427      0.00      1.70      0.85
   SRCPARAM L0003266     0.000000005427      0.00      1.70      0.85
** ------------------------------------------------------------------
** LINE VOLUME Source ID = RDONE
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   SRCPARAM L0003268     0.000000005412      0.00      1.70      0.85
   SRCPARAM L0003269     0.000000005412      0.00      1.70      0.85
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SRCPARAM L0003270     0.000000005412      0.00      1.70      0.85
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SRCPARAM L0003277     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003278     0.000000005412      0.00      1.70      0.85
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SRCPARAM L0003280     0.000000005412      0.00      1.70      0.85
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SRCPARAM L0003283     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003284     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003285     0.000000005412      0.00      1.70      0.85
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SRCPARAM L0003287     0.000000005412      0.00      1.70      0.85
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SRCPARAM L0003289     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003290     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003291     0.000000005412      0.00      1.70      0.85
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SRCPARAM L0003299     0.000000005412      0.00      1.70      0.85
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SRCPARAM L0003312     0.000000005412      0.00      1.70      0.85
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SRCPARAM L0003314     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003315     0.000000005412      0.00      1.70      0.85
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SRCPARAM L0003328     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003329     0.000000005412      0.00      1.70      0.85
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SRCPARAM L0003372     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003373     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003374     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003375     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003376     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003377     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003378     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003379     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003380     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003381     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003382     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003383     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003384     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003385     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003386     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003387     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003388     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003389     0.000000005412      0.00      1.70      0.85
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SRCPARAM L0003390     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003391     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003392     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003393     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003394     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003395     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003396     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003397     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003398     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003399     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003400     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003401     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003402     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003403     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003404     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003405     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003406     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003407     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003408     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003409     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003410     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003411     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003412     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003413     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003414     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003415     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003416     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003417     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003418     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003419     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003420     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003421     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003422     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003423     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003424     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003425     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003426     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003427     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003428     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003429     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003430     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003431     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003432     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003433     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003434     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003435     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003436     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003437     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003438     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003439     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003440     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003441     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003442     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003443     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003444     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003445     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003446     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003447     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003448     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003449     0.000000005412      0.00      1.70      0.85
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SRCPARAM L0003450     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003451     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003452     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003453     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003454     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003455     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003456     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003457     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003458     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003459     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003460     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003461     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003462     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003463     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003464     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003465     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003466     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003467     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003468     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003469     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003470     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003471     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003472     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003473     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003474     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003475     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003476     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003477     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003478     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003479     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003480     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003481     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003482     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003483     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003484     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003485     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003486     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003487     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003488     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003489     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003490     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003491     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003492     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003493     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003494     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003495     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003496     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003497     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003498     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003499     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003500     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003501     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003502     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003503     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003504     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003505     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003506     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003507     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003508     0.000000005412      0.00      1.70      0.85
SRCPARAM L0003509     0.000000005412      0.00      1.70      0.85
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   SRCPARAM L0003510     0.000000005412      0.00      1.70      0.85
   SRCPARAM L0003511     0.000000005412      0.00      1.70      0.85
   SRCPARAM L0003512     0.000000005412      0.00      1.70      0.85
   SRCPARAM L0003513     0.000000005412      0.00      1.70      0.85
   SRCPARAM L0003514     0.000000005412      0.00      1.70      0.85
   SRCPARAM L0003515     0.000000005412      0.00      1.70      0.85
   SRCPARAM L0003516     0.000000005412      0.00      1.70      0.85
   SRCPARAM L0003517     0.000000005412      0.00      1.70      0.85
   SRCPARAM L0003518     0.000000005412      0.00      1.70      0.85
   SRCPARAM L0003519     0.000000005412      0.00      1.70      0.85
   SRCPARAM L0003520     0.000000005412      0.00      1.70      0.85
   SRCPARAM L0003521     0.000000005412      0.00      1.70      0.85
** ------------------------------------------------------------------
** LINE VOLUME Source ID = RDAIRW
   SRCPARAM L0003522     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003523     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003524     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003525     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003526     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003527     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003528     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003529     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003530     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003531     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003532     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003533     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003534     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003535     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003536     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003537     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003538     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003539     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003540     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003541     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003542     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003543     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003544     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003545     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003546     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003547     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003548     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003549     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003550     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003551     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003552     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003553     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003554     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003555     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003556     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003557     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003558     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003559     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003560     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003561     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003562     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003563     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003564     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003565     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003566     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003567     0.000000002941      0.00      5.67      0.85
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   SRCPARAM L0003568     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003569     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003570     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003571     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003572     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003573     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003574     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003575     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003576     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003577     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003578     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003579     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003580     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003581     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003582     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003583     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003584     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003585     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003586     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003587     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003588     0.000000002941      0.00      5.67      0.85
   SRCPARAM L0003589     0.000000002941      0.00      5.67      0.85
** ------------------------------------------------------------------
** LINE VOLUME Source ID = RDAIRE
   SRCPARAM L0003590     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003591     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003592     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003593     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003594     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003595     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003596     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003597     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003598     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003599     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003600     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003601     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003602     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003603     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003604     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003605     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003606     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003607     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003608     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003609     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003610     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003611     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003612     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003613     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003614     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003615     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003616     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003617     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003618     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003619     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003620     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003621     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003622     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003623     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003624     0.00000001172       0.00      5.67      0.85
   SRCPARAM L0003625     0.00000001172       0.00      5.67      0.85
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   SRCPARAM L0003626     0.00000001172      0.00      5.67      0.85
   SRCPARAM L0003627     0.00000001172      0.00      5.67      0.85
   SRCPARAM L0003628     0.00000001172      0.00      5.67      0.85
   SRCPARAM L0003629     0.00000001172      0.00      5.67      0.85
** ------------------------------------------------------------------
   SRCPARAM IDLING        2.05E-06     3.840   366.000        50       0.1
   SRCPARAM OFFRDEQ        0.00583     3.962   366.000        50       0.1
   URBANSRC ALL

** Variable Emissions Type: "By Hour-of-Day (HROFDY)"
** Variable Emission Scenario: "Scenario 2"
   EMISFACT OFFRDEQ      HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT OFFRDEQ      HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT OFFRDEQ      HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT OFFRDEQ      HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT IDLING       HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT IDLING       HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT IDLING       HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT IDLING       HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0003590     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0003590     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0003590     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0003590     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0003591     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0003591     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0003591     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0003591     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0003592     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0003592     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0003592     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0003592     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0003593     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0003593     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
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EMISFACT L0003055     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0003246     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0003247     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0003247     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003248     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0003248     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0003248     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003249     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003249     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0003249     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0003249     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003250     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0003251     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0003251     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
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EMISFACT L0003252     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0003252     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0003252     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0003253     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
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EMISFACT L0003259     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
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EMISFACT L0003262     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0003262     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003263     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003263     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0003263     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0003263     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003264     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003264     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0003264     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0003264     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003265     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
```

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   EMISFACT L0003265     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0003266     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0003266     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0003266     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0003266     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   SRCGROUP ALL
SO FINISHED
**
**************************************
** AERMOD Receptor Pathway
**************************************
**
**
RE STARTING
   INCLUDED Const24.rou
RE FINISHED
**
**************************************
** AERMOD Meteorology Pathway
**************************************
**
**
ME STARTING
   SURFFILE ..\ktrm_sfc_pfl\KTRM_V11_trimmed.sfc
   PROFFILE ..\ktrm_sfc_pfl\KTRM_V11_trimmed.pfl
   SURFDATA 3104 2017
   UAIRDATA 3190 2017
   PROFBASE -36.0 METERS
ME FINISHED
**
**************************************
** AERMOD Output Pathway
**************************************
**
**
OU STARTING
   RECTABLE ALLAVE 1ST
   RECTABLE 1 1ST
   RECTABLE 24 1ST
** Auto-Generated Plotfiles
   PLOTFILE 1 ALL 1ST CONST24.AD\01H1GALL.PLT 31
   PLOTFILE 24 ALL 1ST CONST24.AD\24H1GALL.PLT 32
   PLOTFILE PERIOD ALL CONST24.AD\PE00GALL.PLT 33
   SUMMFILE Const24.sum
OU FINISHED
**
**************************************
** Project Parameters
**************************************
** PROJCTN  CoordinateSystemUTM
** DESCPTN  UTM: Universal Transverse Mercator
** DATUM    World Geodetic System 1984
** DTMRGN   Global Definition
** UNITS    m
** ZONE     11
** ZONEINX  0
**
```

* MODELING OPTIONS USED: RegDFAULT CONC ELEV URBAN ADJ_U*
* PLOT FILE OF PERIOD VALUES AVERAGED ACROSS 0 YEARS FOR SOURCE GROUP: ALL
* FOR A TOTAL OF 11 RECEPTORS.
* FORMAT: (3(1X,F13.5),3(1X,F8.2),2X,A6,2X,A8,2X,I8.8,2X,A8)

* X	Y	AVERAGE CONC	ZELEV	ZHILL	ZFLAG	AVE	GRP	NUM HRS	NET ID
580086.00000	3722773.00000	0.00248	-39.01	-39.01	0.00	PERIOD	ALL	00043800	
580122.00000	3722774.00000	0.00260	-38.71	-38.71	0.00	PERIOD	ALL	00043800	
580172.00000	3722775.00000	0.00268	-38.50	-38.50	0.00	PERIOD	ALL	00043800	
580242.00000	3722717.00000	0.00213	-38.40	-38.40	0.00	PERIOD	ALL	00043800	
580289.00000	3722738.00000	0.00218	-37.99	-37.99	0.00	PERIOD	ALL	00043800	
580337.00000	3722732.00000	0.00200	-37.80	-37.80	0.00	PERIOD	ALL	00043800	
579963.00000	3722704.00000	0.00141	-36.08	-36.08	0.00	PERIOD	ALL	00043800	
579927.00000	3722644.00000	0.00103	-36.33	-36.33	0.00	PERIOD	ALL	00043800	
579519.00000	3722783.00000	0.00049	-36.27	-36.27	0.00	PERIOD	ALL	00043800	
579466.00000	3722781.00000	0.00043	-36.27	-36.27	0.00	PERIOD	ALL	00043800	
579393.00000	3722779.00000	0.00036	-36.27	-36.27	0.00	PERIOD	ALL	00043800	

** CONCUNIT ug/m^3
** DEPUNIT g/m^2

APPENDIX E

AERMOD Model Year 2027 Construction DPM Printouts

```
**
**************************************
**
** AERMOD Input Produced by:
** AERMOD View Ver. 13.0.0
** Lakes Environmental Software Inc.
** Date: 10/1/2025
** File: C:\Vista Env\2019\19039 Coachella\AERMOD\Const27\Const27.ADI
**
**************************************
**
**
**************************************
** AERMOD Control Pathway
**************************************
**
**
CO STARTING
   TITLEONE Coachella Airport Business Park - Construction 2027 DPM
   TITLETWO PM2.5
   MODELOPT DFAULT CONC
   AVERTIME 1 24 PERIOD
   URBANOPT 2189641 Riverside_Co
   POLLUTID PM_2.5
   RUNORNOT RUN
   ERRORFIL Const27.err
CO FINISHED
**
**************************************
** AERMOD Source Pathway
**************************************
**
**
SO STARTING
** Source Location **
** Source ID - Type - X Coord. - Y Coord. **
** ------------------------------------------------------------------------
** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDONW
** DESCRSRC Onsite Road West
** PREFIX
** Length of Side = 3.66
** Configuration = Adjacent
** Emission Rate = 1.84E-06
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 12
** 580077.130, 3722819.702, -38.87, 0.00, 1.70
** 580075.723, 3722829.973, -38.77, 0.00, 1.70
** 580054.577, 3722864.362, -38.73, 0.00, 1.70
** 580045.833, 3722877.181, -38.88, 0.00, 1.70
** 579930.018, 3723057.672, -38.69, 0.00, 1.70
** 579892.856, 3723115.163, -37.71, 0.00, 1.70
** 579849.461, 3723190.506, -36.29, 0.00, 1.70
** 579823.082, 3723246.755, -36.03, 0.00, 1.70
** 579796.274, 3723323.282, -35.97, 0.00, 1.70
** 579782.061, 3723364.922, -35.95, 0.00, 1.70
** 579768.794, 3723424.825, -36.02, 0.00, 1.70
** 579741.158, 3723594.651, -35.95, 0.00, 1.70
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LOCATION L0003632     VOLUME   580075.889 3722828.761 -38.74
LOCATION L0003633     VOLUME   580074.448 3722832.047 -38.73
LOCATION L0003634     VOLUME   580072.532 3722835.163 -38.71
LOCATION L0003635     VOLUME   580070.616 3722838.278 -38.71
LOCATION L0003636     VOLUME   580068.700 3722841.394 -38.71
LOCATION L0003637     VOLUME   580066.784 3722844.510 -38.71
LOCATION L0003638     VOLUME   580064.868 3722847.625 -38.71
LOCATION L0003639     VOLUME   580062.953 3722850.741 -38.71
LOCATION L0003640     VOLUME   580061.037 3722853.857 -38.71
LOCATION L0003641     VOLUME   580059.121 3722856.973 -38.72
LOCATION L0003642     VOLUME   580057.205 3722860.088 -38.74
LOCATION L0003643     VOLUME   580055.289 3722863.204 -38.76
LOCATION L0003644     VOLUME   580053.282 3722866.261 -38.78
LOCATION L0003645     VOLUME   580051.221 3722869.282 -38.79
LOCATION L0003646     VOLUME   580049.160 3722872.303 -38.80
LOCATION L0003647     VOLUME   580047.098 3722875.325 -38.80
LOCATION L0003648     VOLUME   580045.070 3722878.368 -38.80
LOCATION L0003649     VOLUME   580043.095 3722881.447 -38.79
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LOCATION L0003652     VOLUME   580037.169 3722890.682 -38.75
LOCATION L0003653     VOLUME   580035.194 3722893.760 -38.72
LOCATION L0003654     VOLUME   580033.219 3722896.839 -38.71
LOCATION L0003655     VOLUME   580031.243 3722899.917 -38.71
LOCATION L0003656     VOLUME   580029.268 3722902.995 -38.72
LOCATION L0003657     VOLUME   580027.293 3722906.074 -38.73
LOCATION L0003658     VOLUME   580025.318 3722909.152 -38.74
LOCATION L0003659     VOLUME   580023.342 3722912.230 -38.74
LOCATION L0003660     VOLUME   580021.367 3722915.309 -38.74
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LOCATION L0003662     VOLUME   580017.417 3722921.466 -38.73
LOCATION L0003663     VOLUME   580015.441 3722924.544 -38.71
LOCATION L0003664     VOLUME   580013.466 3722927.622 -38.71
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LOCATION L0003666     VOLUME   580009.515 3722933.779 -38.71
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LOCATION L0003668     VOLUME   580005.565 3722939.936 -38.71
LOCATION L0003669     VOLUME   580003.590 3722943.014 -38.71
LOCATION L0003670     VOLUME   580001.614 3722946.092 -38.71
LOCATION L0003671     VOLUME   579999.639 3722949.171 -38.71
LOCATION L0003672     VOLUME   579997.664 3722952.249 -38.71
LOCATION L0003673     VOLUME   579995.689 3722955.328 -38.71
LOCATION L0003674     VOLUME   579993.713 3722958.406 -38.71
LOCATION L0003675     VOLUME   579991.738 3722961.484 -38.71
LOCATION L0003676     VOLUME   579989.763 3722964.563 -38.71
LOCATION L0003677     VOLUME   579987.788 3722967.641 -38.71
LOCATION L0003678     VOLUME   579985.812 3722970.719 -38.71
LOCATION L0003679     VOLUME   579983.837 3722973.798 -38.71
LOCATION L0003680     VOLUME   579981.862 3722976.876 -38.71
LOCATION L0003681     VOLUME   579979.886 3722979.955 -38.71
LOCATION L0003682     VOLUME   579977.911 3722983.033 -38.71
LOCATION L0003683     VOLUME   579975.936 3722986.111 -38.71
LOCATION L0003684     VOLUME   579973.961 3722989.190 -38.71
LOCATION L0003685     VOLUME   579971.985 3722992.268 -38.71
LOCATION L0003686     VOLUME   579970.010 3722995.346 -38.71
LOCATION L0003687     VOLUME   579968.035 3722998.425 -38.71
LOCATION L0003688     VOLUME   579966.060 3723001.503 -38.71
LOCATION L0003689     VOLUME   579964.084 3723004.581 -38.71
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LOCATION L0003695     VOLUME   579952.233 3723023.052 -38.68
LOCATION L0003696     VOLUME   579950.257 3723026.130 -38.67
LOCATION L0003697     VOLUME   579948.282 3723029.208 -38.67
LOCATION L0003698     VOLUME   579946.307 3723032.287 -38.68
LOCATION L0003699     VOLUME   579944.332 3723035.365 -38.68
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LOCATION L0003701     VOLUME   579940.381 3723041.522 -38.71
LOCATION L0003702     VOLUME   579938.406 3723044.600 -38.71
LOCATION L0003703     VOLUME   579936.430 3723047.679 -38.69
LOCATION L0003704     VOLUME   579934.455 3723050.757 -38.67
LOCATION L0003705     VOLUME   579932.480 3723053.835 -38.65
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LOCATION L0003708     VOLUME   579926.536 3723063.059 -38.61
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LOCATION L0003716     VOLUME   579910.651 3723087.633 -38.46
LOCATION L0003717     VOLUME   579908.666 3723090.704 -38.37
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LOCATION L0003720     VOLUME   579902.709 3723099.919 -38.07
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LOCATION L0003723     VOLUME   579896.752 3723109.135 -37.76
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LOCATION L0003746     VOLUME   579854.452 3723181.841 -36.45
LOCATION L0003747     VOLUME   579852.626 3723185.010 -36.40
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LOCATION L0003749     VOLUME   579849.048 3723191.387 -36.29
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LOCATION L0003754     VOLUME   579841.283 3723207.945 -36.22
LOCATION L0003755     VOLUME   579839.730 3723211.256 -36.22
LOCATION L0003756     VOLUME   579838.177 3723214.568 -36.23
LOCATION L0003757     VOLUME   579836.624 3723217.879 -36.24
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LOCATION L0003759     VOLUME   579833.518 3723224.502 -36.27
LOCATION L0003760     VOLUME   579831.965 3723227.814 -36.25
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** LINE VOLUME Source ID = RDONE
** DESCRSRC Onsite Road East
** PREFIX
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LOCATION L0004051     VOLUME   579900.513 3723378.334 -36.27
LOCATION L0004052     VOLUME   579898.728 3723381.526 -36.27
LOCATION L0004053     VOLUME   579896.942 3723384.718 -36.27
LOCATION L0004054     VOLUME   579895.156 3723387.910 -36.27
LOCATION L0004055     VOLUME   579893.370 3723391.102 -36.27
LOCATION L0004056     VOLUME   579891.584 3723394.294 -36.27
LOCATION L0004057     VOLUME   579889.799 3723397.486 -36.27
LOCATION L0004058     VOLUME   579888.013 3723400.678 -36.27
LOCATION L0004059     VOLUME   579886.227 3723403.870 -36.27
LOCATION L0004060     VOLUME   579884.441 3723407.062 -36.27
LOCATION L0004061     VOLUME   579882.655 3723410.254 -36.27
LOCATION L0004062     VOLUME   579880.870 3723413.446 -36.27
LOCATION L0004063     VOLUME   579879.084 3723416.638 -36.26
LOCATION L0004064     VOLUME   579877.298 3723419.830 -36.24
LOCATION L0004065     VOLUME   579875.512 3723423.022 -36.22
LOCATION L0004066     VOLUME   579873.727 3723426.214 -36.20
LOCATION L0004067     VOLUME   579871.941 3723429.406 -36.18
LOCATION L0004068     VOLUME   579870.155 3723432.598 -36.17
LOCATION L0004069     VOLUME   579868.369 3723435.790 -36.15
LOCATION L0004070     VOLUME   579866.583 3723438.982 -36.13
LOCATION L0004071     VOLUME   579864.798 3723442.174 -36.11
LOCATION L0004072     VOLUME   579863.012 3723445.366 -36.09
LOCATION L0004073     VOLUME   579861.226 3723448.558 -36.07
LOCATION L0004074     VOLUME   579859.440 3723451.750 -36.06
LOCATION L0004075     VOLUME   579857.655 3723454.942 -36.04
LOCATION L0004076     VOLUME   579855.869 3723458.134 -36.02
LOCATION L0004077     VOLUME   579854.083 3723461.327 -36.00
LOCATION L0004078     VOLUME   579852.297 3723464.519 -35.98
LOCATION L0004079     VOLUME   579850.511 3723467.711 -35.99
LOCATION L0004080     VOLUME   579848.726 3723470.903 -36.04
LOCATION L0004081     VOLUME   579846.940 3723474.095 -36.08
LOCATION L0004082     VOLUME   579845.154 3723477.287 -36.12
LOCATION L0004083     VOLUME   579843.368 3723480.479 -36.16
LOCATION L0004084     VOLUME   579841.582 3723483.671 -36.19
LOCATION L0004085     VOLUME   579839.797 3723486.863 -36.22
LOCATION L0004086     VOLUME   579838.011 3723490.055 -36.24
LOCATION L0004087     VOLUME   579836.225 3723493.247 -36.26
LOCATION L0004088     VOLUME   579834.439 3723496.439 -36.26
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   LOCATION L0004089     VOLUME   579832.654 3723499.631 -36.23
   LOCATION L0004090     VOLUME   579830.868 3723502.823 -36.20
   LOCATION L0004091     VOLUME   579829.082 3723506.015 -36.16
   LOCATION L0004092     VOLUME   579827.296 3723509.207 -36.13
   LOCATION L0004093     VOLUME   579825.510 3723512.399 -36.10
   LOCATION L0004094     VOLUME   579823.725 3723515.591 -36.07
   LOCATION L0004095     VOLUME   579821.939 3723518.783 -36.03
   LOCATION L0004096     VOLUME   579820.153 3723521.975 -36.00
   LOCATION L0004097     VOLUME   579818.367 3723525.167 -35.97
   LOCATION L0004098     VOLUME   579816.581 3723528.359 -35.97
   LOCATION L0004099     VOLUME   579814.796 3723531.551 -35.97
   LOCATION L0004100     VOLUME   579813.010 3723534.743 -35.97
   LOCATION L0004101     VOLUME   579811.224 3723537.935 -35.97
   LOCATION L0004102     VOLUME   579809.438 3723541.127 -35.97
   LOCATION L0004103     VOLUME   579807.653 3723544.319 -35.97
   LOCATION L0004104     VOLUME   579805.867 3723547.511 -35.97
   LOCATION L0004105     VOLUME   579804.081 3723550.703 -35.97
   LOCATION L0004106     VOLUME   579802.295 3723553.895 -35.97
   LOCATION L0004107     VOLUME   579800.509 3723557.087 -35.97
   LOCATION L0004108     VOLUME   579798.724 3723560.279 -35.97
   LOCATION L0004109     VOLUME   579796.938 3723563.471 -35.97
   LOCATION L0004110     VOLUME   579795.152 3723566.663 -35.97
   LOCATION L0004111     VOLUME   579793.366 3723569.855 -35.97
   LOCATION L0004112     VOLUME   579791.580 3723573.047 -35.97
   LOCATION L0004113     VOLUME   579789.795 3723576.239 -35.97
   LOCATION L0004114     VOLUME   579788.009 3723579.431 -35.97
   LOCATION L0004115     VOLUME   579786.223 3723582.623 -35.97
   LOCATION L0004116     VOLUME   579784.437 3723585.815 -35.97
   LOCATION L0004117     VOLUME   579782.652 3723589.007 -35.97
   LOCATION L0004118     VOLUME   579780.866 3723592.199 -35.97
** End of LINE VOLUME Source ID = RDONE
** ----------------------------------------------------------------------
** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDAIRW
** DESCRSRC Airport Blvd west of Project Site
** PREFIX
** Length of Side = 12.19
** Configuration = Adjacent
** Emission Rate = 3.1E-07
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 7
** 580077.815, 3722811.474, -38.84, 0.00, 5.67
** 579930.520, 3722810.498, -38.31, 0.00, 5.67
** 579724.565, 3722817.970, -36.23, 0.00, 5.67
** 579657.572, 3722818.633, -36.01, 0.00, 5.67
** 579442.005, 3722818.125, -36.27, 0.00, 5.67
** 579336.736, 3722811.183, -36.27, 0.00, 5.67
** 579251.350, 3722810.179, -35.97, 0.00, 5.67
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   LOCATION L0004119     VOLUME   580071.719 3722811.433 -38.86
   LOCATION L0004120     VOLUME   580059.528 3722811.353 -38.96
   LOCATION L0004121     VOLUME   580047.336 3722811.272 -38.98
   LOCATION L0004122     VOLUME   580035.144 3722811.191 -39.01
   LOCATION L0004123     VOLUME   580022.952 3722811.110 -39.01
   LOCATION L0004124     VOLUME   580010.761 3722811.030 -39.01
   LOCATION L0004125     VOLUME   579998.569 3722810.949 -38.98
   LOCATION L0004126     VOLUME   579986.377 3722810.868 -38.75
   LOCATION L0004127     VOLUME   579974.185 3722810.787 -38.53
   LOCATION L0004128     VOLUME   579961.994 3722810.707 -38.44
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   LOCATION L0004129     VOLUME   579949.802 3722810.626 -38.42
   LOCATION L0004130     VOLUME   579937.610 3722810.545 -38.38
   LOCATION L0004131     VOLUME   579925.422 3722810.683 -38.28
   LOCATION L0004132     VOLUME   579913.238 3722811.125 -38.18
   LOCATION L0004133     VOLUME   579901.054 3722811.567 -38.07
   LOCATION L0004134     VOLUME   579888.870 3722812.009 -37.95
   LOCATION L0004135     VOLUME   579876.686 3722812.451 -37.79
   LOCATION L0004136     VOLUME   579864.502 3722812.893 -37.54
   LOCATION L0004137     VOLUME   579852.318 3722813.335 -37.30
   LOCATION L0004138     VOLUME   579840.134 3722813.777 -37.24
   LOCATION L0004139     VOLUME   579827.950 3722814.219 -37.21
   LOCATION L0004140     VOLUME   579815.766 3722814.661 -37.15
   LOCATION L0004141     VOLUME   579803.582 3722815.103 -37.07
   LOCATION L0004142     VOLUME   579791.398 3722815.545 -36.99
   LOCATION L0004143     VOLUME   579779.214 3722815.987 -36.83
   LOCATION L0004144     VOLUME   579767.030 3722816.429 -36.67
   LOCATION L0004145     VOLUME   579754.846 3722816.871 -36.52
   LOCATION L0004146     VOLUME   579742.662 3722817.313 -36.39
   LOCATION L0004147     VOLUME   579730.478 3722817.755 -36.27
   LOCATION L0004148     VOLUME   579718.290 3722818.032 -36.20
   LOCATION L0004149     VOLUME   579706.099 3722818.153 -36.13
   LOCATION L0004150     VOLUME   579693.907 3722818.273 -36.07
   LOCATION L0004151     VOLUME   579681.716 3722818.394 -36.02
   LOCATION L0004152     VOLUME   579669.525 3722818.515 -35.97
   LOCATION L0004153     VOLUME   579657.333 3722818.632 -35.97
   LOCATION L0004154     VOLUME   579645.141 3722818.604 -35.97
   LOCATION L0004155     VOLUME   579632.949 3722818.575 -36.01
   LOCATION L0004156     VOLUME   579620.757 3722818.546 -36.08
   LOCATION L0004157     VOLUME   579608.565 3722818.517 -36.14
   LOCATION L0004158     VOLUME   579596.373 3722818.489 -36.14
   LOCATION L0004159     VOLUME   579584.181 3722818.460 -36.14
   LOCATION L0004160     VOLUME   579571.989 3722818.431 -36.14
   LOCATION L0004161     VOLUME   579559.797 3722818.402 -36.14
   LOCATION L0004162     VOLUME   579547.605 3722818.374 -36.14
   LOCATION L0004163     VOLUME   579535.413 3722818.345 -36.14
   LOCATION L0004164     VOLUME   579523.222 3722818.316 -36.14
   LOCATION L0004165     VOLUME   579511.030 3722818.287 -36.14
   LOCATION L0004166     VOLUME   579498.838 3722818.259 -36.14
   LOCATION L0004167     VOLUME   579486.646 3722818.230 -36.14
   LOCATION L0004168     VOLUME   579474.454 3722818.201 -36.14
   LOCATION L0004169     VOLUME   579462.262 3722818.172 -36.14
   LOCATION L0004170     VOLUME   579450.070 3722818.144 -36.19
   LOCATION L0004171     VOLUME   579437.887 3722817.853 -36.24
   LOCATION L0004172     VOLUME   579425.721 3722817.051 -36.27
   LOCATION L0004173     VOLUME   579413.556 3722816.249 -36.27
   LOCATION L0004174     VOLUME   579401.390 3722815.446 -36.27
   LOCATION L0004175     VOLUME   579389.224 3722814.644 -36.27
   LOCATION L0004176     VOLUME   579377.059 3722813.842 -36.27
   LOCATION L0004177     VOLUME   579364.893 3722813.040 -36.27
   LOCATION L0004178     VOLUME   579352.728 3722812.238 -36.27
   LOCATION L0004179     VOLUME   579340.562 3722811.436 -36.27
   LOCATION L0004180     VOLUME   579328.379 3722811.085 -36.25
   LOCATION L0004181     VOLUME   579316.188 3722810.942 -36.23
   LOCATION L0004182     VOLUME   579303.997 3722810.798 -36.22
   LOCATION L0004183     VOLUME   579291.805 3722810.655 -36.22
   LOCATION L0004184     VOLUME   579279.614 3722810.511 -36.21
   LOCATION L0004185     VOLUME   579267.423 3722810.368 -36.11
   LOCATION L0004186     VOLUME   579255.232 3722810.225 -36.01
** End of LINE VOLUME Source ID = RDAIRW
** ----------------------------------------------------------------------
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** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDAIRE
** DESCRSRC Airport Blvd east of Project Site
** PREFIX
** Length of Side = 12.19
** Configuration = Adjacent
** Emission Rate = 7.26E-07
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 3
** 580086.549, 3722811.395, -38.73, 0.00, 5.67
** 580220.964, 3722809.641, -38.34, 0.00, 5.67
** 580570.484, 3722812.421, -37.19, 0.00, 5.67
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   LOCATION L0004187     VOLUME   580092.645 3722811.316 -38.71
   LOCATION L0004188     VOLUME   580104.836 3722811.157 -38.71
   LOCATION L0004189     VOLUME   580117.026 3722810.998 -38.71
   LOCATION L0004190     VOLUME   580129.217 3722810.838 -38.62
   LOCATION L0004191     VOLUME   580141.408 3722810.679 -38.50
   LOCATION L0004192     VOLUME   580153.599 3722810.520 -38.40
   LOCATION L0004193     VOLUME   580165.790 3722810.361 -38.40
   LOCATION L0004194     VOLUME   580177.981 3722810.202 -38.40
   LOCATION L0004195     VOLUME   580190.172 3722810.043 -38.39
   LOCATION L0004196     VOLUME   580202.363 3722809.884 -38.37
   LOCATION L0004197     VOLUME   580214.554 3722809.725 -38.33
   LOCATION L0004198     VOLUME   580226.745 3722809.687 -38.22
   LOCATION L0004199     VOLUME   580238.937 3722809.784 -38.11
   LOCATION L0004200     VOLUME   580251.129 3722809.881 -38.10
   LOCATION L0004201     VOLUME   580263.320 3722809.978 -38.10
   LOCATION L0004202     VOLUME   580275.512 3722810.075 -38.09
   LOCATION L0004203     VOLUME   580287.704 3722810.172 -38.07
   LOCATION L0004204     VOLUME   580299.895 3722810.269 -38.05
   LOCATION L0004205     VOLUME   580312.087 3722810.366 -37.85
   LOCATION L0004206     VOLUME   580324.278 3722810.463 -37.65
   LOCATION L0004207     VOLUME   580336.470 3722810.560 -37.53
   LOCATION L0004208     VOLUME   580348.662 3722810.657 -37.51
   LOCATION L0004209     VOLUME   580360.853 3722810.754 -37.49
   LOCATION L0004210     VOLUME   580373.045 3722810.851 -37.49
   LOCATION L0004211     VOLUME   580385.236 3722810.947 -37.49
   LOCATION L0004212     VOLUME   580397.428 3722811.044 -37.41
   LOCATION L0004213     VOLUME   580409.620 3722811.141 -37.26
   LOCATION L0004214     VOLUME   580421.811 3722811.238 -37.12
   LOCATION L0004215     VOLUME   580434.003 3722811.335 -37.02
   LOCATION L0004216     VOLUME   580446.195 3722811.432 -36.92
   LOCATION L0004217     VOLUME   580458.386 3722811.529 -36.88
   LOCATION L0004218     VOLUME   580470.578 3722811.626 -36.88
   LOCATION L0004219     VOLUME   580482.769 3722811.723 -36.88
   LOCATION L0004220     VOLUME   580494.961 3722811.820 -36.88
   LOCATION L0004221     VOLUME   580507.153 3722811.917 -36.88
   LOCATION L0004222     VOLUME   580519.344 3722812.014 -36.97
   LOCATION L0004223     VOLUME   580531.536 3722812.111 -37.09
   LOCATION L0004224     VOLUME   580543.727 3722812.208 -37.19
   LOCATION L0004225     VOLUME   580555.919 3722812.305 -37.19
   LOCATION L0004226     VOLUME   580568.111 3722812.402 -37.19
** End of LINE VOLUME Source ID = RDAIRE
   LOCATION IDLING       POINT      579913.113  3723302.270      -36.270
** DESCRSRC Construction Truck Idling
   LOCATION OFFRDEQ      POINT      579932.850  3723278.650      -36.320
** DESCRSRC Offroad Construction Equipment
** Source Parameters **
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   SRCPARAM L0003632     0.000000007863      0.00      1.70      0.85
   SRCPARAM L0003633     0.000000007863      0.00      1.70      0.85
   SRCPARAM L0003634     0.000000007863      0.00      1.70      0.85
   SRCPARAM L0003635     0.000000007863      0.00      1.70      0.85
   SRCPARAM L0003636     0.000000007863      0.00      1.70      0.85
   SRCPARAM L0003637     0.000000007863      0.00      1.70      0.85
   SRCPARAM L0003638     0.000000007863      0.00      1.70      0.85
   SRCPARAM L0003639     0.000000007863      0.00      1.70      0.85
   SRCPARAM L0003640     0.000000007863      0.00      1.70      0.85
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   SRCPARAM L0003642     0.000000007863      0.00      1.70      0.85
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   SRCPARAM L0003650     0.000000007863      0.00      1.70      0.85
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   SRCPARAM L0003688     0.000000007863      0.00      1.70      0.85
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SRCPARAM L0003693     0.000000007863      0.00      1.70      0.85
SRCPARAM L0003694     0.000000007863      0.00      1.70      0.85
SRCPARAM L0003695     0.000000007863      0.00      1.70      0.85
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SRCPARAM L0003698     0.000000007863      0.00      1.70      0.85
SRCPARAM L0003699     0.000000007863      0.00      1.70      0.85
SRCPARAM L0003700     0.000000007863      0.00      1.70      0.85
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SRCPARAM L0003702     0.000000007863      0.00      1.70      0.85
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SRCPARAM L0003748     0.000000007863      0.00      1.70      0.85
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SRCPARAM L0003878     0.000000007882      0.00      1.70      0.85
SRCPARAM L0003879     0.000000007882      0.00      1.70      0.85
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SRCPARAM L0003881     0.000000007882      0.00      1.70      0.85
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SRCPARAM L0003885     0.000000007882      0.00      1.70      0.85
SRCPARAM L0003886     0.000000007882      0.00      1.70      0.85
SRCPARAM L0003887     0.000000007882      0.00      1.70      0.85
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SRCPARAM L0003889     0.000000007882      0.00      1.70      0.85
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SRCPARAM L0003926     0.000000007882      0.00      1.70      0.85
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SRCPARAM L0004008     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004009     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004010     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004011     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004012     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004013     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004014     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004015     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004016     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004017     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004018     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004019     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004020     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004021     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004022     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004023     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004024     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004025     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004026     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004027     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004028     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004029     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004030     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004031     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004032     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004033     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004034     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004035     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004036     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004037     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004038     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004039     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004040     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004041     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004042     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004043     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004044     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004045     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004046     0.000000007882      0.00      1.70      0.85
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SRCPARAM L0004047     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004048     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004049     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004050     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004051     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004052     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004053     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004054     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004055     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004056     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004057     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004058     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004059     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004060     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004061     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004062     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004063     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004064     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004065     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004066     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004067     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004068     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004069     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004070     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004071     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004072     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004073     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004074     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004075     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004076     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004077     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004078     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004079     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004080     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004081     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004082     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004083     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004084     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004085     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004086     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004087     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004088     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004089     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004090     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004091     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004092     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004093     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004094     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004095     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004096     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004097     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004098     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004099     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004100     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004101     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004102     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004103     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004104     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004105     0.000000007882      0.00      1.70      0.85
SRCPARAM L0004106     0.000000007882      0.00      1.70      0.85
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   SRCPARAM L0004107     0.000000007882      0.00      1.70      0.85
   SRCPARAM L0004108     0.000000007882      0.00      1.70      0.85
   SRCPARAM L0004109     0.000000007882      0.00      1.70      0.85
   SRCPARAM L0004110     0.000000007882      0.00      1.70      0.85
   SRCPARAM L0004111     0.000000007882      0.00      1.70      0.85
   SRCPARAM L0004112     0.000000007882      0.00      1.70      0.85
   SRCPARAM L0004113     0.000000007882      0.00      1.70      0.85
   SRCPARAM L0004114     0.000000007882      0.00      1.70      0.85
   SRCPARAM L0004115     0.000000007882      0.00      1.70      0.85
   SRCPARAM L0004116     0.000000007882      0.00      1.70      0.85
   SRCPARAM L0004117     0.000000007882      0.00      1.70      0.85
   SRCPARAM L0004118     0.000000007882      0.00      1.70      0.85
** ------------------------------------------------------------------
** LINE VOLUME Source ID = RDAIRW
   SRCPARAM L0004119     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004120     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004121     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004122     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004123     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004124     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004125     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004126     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004127     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004128     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004129     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004130     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004131     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004132     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004133     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004134     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004135     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004136     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004137     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004138     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004139     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004140     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004141     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004142     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004143     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004144     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004145     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004146     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004147     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004148     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004149     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004150     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004151     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004152     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004153     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004154     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004155     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004156     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004157     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004158     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004159     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004160     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004161     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004162     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004163     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004164     0.000000004559      0.00      5.67      0.85
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   SRCPARAM L0004165     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004166     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004167     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004168     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004169     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004170     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004171     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004172     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004173     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004174     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004175     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004176     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004177     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004178     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004179     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004180     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004181     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004182     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004183     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004184     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004185     0.000000004559      0.00      5.67      0.85
   SRCPARAM L0004186     0.000000004559      0.00      5.67      0.85
** --------------------------------------------------------------------
** LINE VOLUME Source ID = RDAIRE
   SRCPARAM L0004187     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004188     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004189     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004190     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004191     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004192     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004193     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004194     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004195     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004196     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004197     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004198     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004199     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004200     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004201     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004202     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004203     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004204     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004205     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004206     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004207     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004208     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004209     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004210     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004211     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004212     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004213     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004214     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004215     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004216     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004217     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004218     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004219     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004220     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004221     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004222     0.00000001815      0.00      5.67      0.85
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   SRCPARAM L0004223     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004224     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004225     0.00000001815      0.00      5.67      0.85
   SRCPARAM L0004226     0.00000001815      0.00      5.67      0.85
** ------------------------------------------------------------------
   SRCPARAM IDLING        2.96E-06     3.840   366.000        50       0.1
   SRCPARAM OFFRDEQ        0.00309     3.962   366.000        50       0.1
   URBANSRC ALL

** Variable Emissions Type: "By Hour-of-Day (HROFDY)"
** Variable Emission Scenario: "Scenario 2"
   EMISFACT OFFRDEQ      HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT OFFRDEQ      HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT OFFRDEQ      HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT OFFRDEQ      HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT IDLING       HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT IDLING       HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT IDLING       HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT IDLING       HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004187     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004187     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0004187     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0004187     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004188     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004188     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0004188     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0004188     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004189     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004189     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0004189     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0004189     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004190     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004190     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0004190     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0004190     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004191     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004191     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0004191     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0004191     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004192     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004192     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0004192     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0004192     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004193     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004193     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0004193     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0004193     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004194     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004194     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0004194     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0004194     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004195     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004195     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0004195     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0004195     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004196     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004196     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0004196     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0004196     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004197     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0004197     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
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EMISFACT L0004197     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0004198     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0004198     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0004198     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0004198     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0004199     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0004199     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
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EMISFACT L0003960     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003961     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0003727     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0003853     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003853     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0003853     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0003853     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003854     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003854     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0003854     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0003854     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003855     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003855     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0003855     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0003855     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003856     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003856     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0003856     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0003856     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003857     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003857     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0003857     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0003857     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003858     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003858     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
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EMISFACT L0003858     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003859     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003859     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0003859     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0003859     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003860     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003860     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0003860     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0003860     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003861     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0003861     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0003861     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0003862     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
```

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   EMISFACT L0003862     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0003863     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0003863     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0003863     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0003863     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   SRCGROUP ALL
SO FINISHED
**
**************************************
** AERMOD Receptor Pathway
**************************************
**
**
RE STARTING
   INCLUDED Const27.rou
RE FINISHED
**
**************************************
** AERMOD Meteorology Pathway
**************************************
**
**
ME STARTING
   SURFFILE ..\ktrm_sfc_pfl\KTRM_V11_trimmed.sfc
   PROFFILE ..\ktrm_sfc_pfl\KTRM_V11_trimmed.pfl
   SURFDATA 3104 2017
   UAIRDATA 3190 2017
   PROFBASE -36.0 METERS
ME FINISHED
**
**************************************
** AERMOD Output Pathway
**************************************
**
**
OU STARTING
   RECTABLE ALLAVE 1ST
   RECTABLE 1 1ST
   RECTABLE 24 1ST
** Auto-Generated Plotfiles
   PLOTFILE 1 ALL 1ST CONST27.AD\01H1GALL.PLT 31
   PLOTFILE 24 ALL 1ST CONST27.AD\24H1GALL.PLT 32
   PLOTFILE PERIOD ALL CONST27.AD\PE00GALL.PLT 33
   SUMMFILE Const27.sum
OU FINISHED
**
**************************************
** Project Parameters
**************************************
** PROJCTN  CoordinateSystemUTM
** DESCPTN  UTM: Universal Transverse Mercator
** DATUM    World Geodetic System 1984
** DTMRGN   Global Definition
** UNITS    m
** ZONE     11
** ZONEINX  0
**
```

* MODELING OPTIONS USED: RegDFAULT CONC ELEV URBAN ADJ_U*
* PLOT FILE OF PERIOD VALUES AVERAGED ACROSS 0 YEARS FOR SOURCE GROUP: ALL
* FOR A TOTAL OF 11 RECEPTORS.
* FORMAT: (3(1X,F13.5),3(1X,F8.2),2X,A6,2X,A8,2X,I8.8,2X,A8)

* X	Y	AVERAGE CONC	ZELEV	ZHILL	ZFLAG	AVE	GRP	NUM HRS	NET ID
580086.00000	3722773.00000	0.00133	-39.01	-39.01	0.00	PERIOD	ALL	00043800	
580122.00000	3722774.00000	0.00139	-38.71	-38.71	0.00	PERIOD	ALL	00043800	
580172.00000	3722775.00000	0.00143	-38.50	-38.50	0.00	PERIOD	ALL	00043800	
580242.00000	3722717.00000	0.00113	-38.40	-38.40	0.00	PERIOD	ALL	00043800	
580289.00000	3722738.00000	0.00116	-37.99	-37.99	0.00	PERIOD	ALL	00043800	
580337.00000	3722732.00000	0.00107	-37.80	-37.80	0.00	PERIOD	ALL	00043800	
579963.00000	3722704.00000	0.00075	-36.08	-36.08	0.00	PERIOD	ALL	00043800	
579927.00000	3722644.00000	0.00055	-36.33	-36.33	0.00	PERIOD	ALL	00043800	
579519.00000	3722783.00000	0.00026	-36.27	-36.27	0.00	PERIOD	ALL	00043800	
579466.00000	3722781.00000	0.00023	-36.27	-36.27	0.00	PERIOD	ALL	00043800	
579393.00000	3722779.00000	0.00019	-36.27	-36.27	0.00	PERIOD	ALL	00043800	

** CONCUNIT ug/m^3
** DEPUNIT g/m^2

APPENDIX F

AERMOD Model Years 2028 – 2041 Operational DPM Printouts

```
**
**************************************
**
** AERMOD Input Produced by:
** AERMOD View Ver. 13.0.0
** Lakes Environmental Software Inc.
** Date: 10/1/2025
** File: C:\Vista Env\2019\19039 Coachella\AERMOD\DPM28-41\DPM28-41.ADI
**
**************************************
**
**
**************************************
** AERMOD Control Pathway
**************************************
**
**
CO STARTING
   TITLEONE Coachella Airport Business Park - 2028-2041 DPM
   TITLETWO PM2.5
   MODELOPT CONC
   AVERTIME 1 PERIOD
   URBANOPT 2189641 Riverside_Co
   POLLUTID PM_2.5
   RUNORNOT RUN
   ERRORFIL DPM28-41.err
CO FINISHED
**
**************************************
** AERMOD Source Pathway
**************************************
**
**
SO STARTING
** Source Location **
** Source ID - Type - X Coord. - Y Coord. **
** ------------------------------------------------------------------------
** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDONW
** DESCRSRC Onsite Road West
** PREFIX
** Length of Side = 3.66
** Configuration = Adjacent
** Emission Rate = 0.0000138
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 12
** 580077.130, 3722819.702, -38.87, 0.00, 1.70
** 580075.723, 3722829.973, -38.77, 0.00, 1.70
** 580054.577, 3722864.362, -38.73, 0.00, 1.70
** 580045.833, 3722877.181, -38.88, 0.00, 1.70
** 579930.018, 3723057.672, -38.69, 0.00, 1.70
** 579892.856, 3723115.163, -37.71, 0.00, 1.70
** 579849.461, 3723190.506, -36.29, 0.00, 1.70
** 579823.082, 3723246.755, -36.03, 0.00, 1.70
** 579796.274, 3723323.282, -35.97, 0.00, 1.70
** 579782.061, 3723364.922, -35.95, 0.00, 1.70
** 579768.794, 3723424.825, -36.02, 0.00, 1.70
** 579741.158, 3723594.651, -35.95, 0.00, 1.70
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LOCATION L0003633     VOLUME   580074.448 3722832.047 -38.73
LOCATION L0003634     VOLUME   580072.532 3722835.163 -38.71
LOCATION L0003635     VOLUME   580070.616 3722838.278 -38.71
LOCATION L0003636     VOLUME   580068.700 3722841.394 -38.71
LOCATION L0003637     VOLUME   580066.784 3722844.510 -38.71
LOCATION L0003638     VOLUME   580064.868 3722847.625 -38.71
LOCATION L0003639     VOLUME   580062.953 3722850.741 -38.71
LOCATION L0003640     VOLUME   580061.037 3722853.857 -38.71
LOCATION L0003641     VOLUME   580059.121 3722856.973 -38.72
LOCATION L0003642     VOLUME   580057.205 3722860.088 -38.74
LOCATION L0003643     VOLUME   580055.289 3722863.204 -38.76
LOCATION L0003644     VOLUME   580053.282 3722866.261 -38.78
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LOCATION L0003646     VOLUME   580049.160 3722872.303 -38.80
LOCATION L0003647     VOLUME   580047.098 3722875.325 -38.80
LOCATION L0003648     VOLUME   580045.070 3722878.368 -38.80
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LOCATION L0003652     VOLUME   580037.169 3722890.682 -38.75
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LOCATION L0003656     VOLUME   580029.268 3722902.995 -38.72
LOCATION L0003657     VOLUME   580027.293 3722906.074 -38.73
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LOCATION L0003667     VOLUME   580007.540 3722936.857 -38.71
LOCATION L0003668     VOLUME   580005.565 3722939.936 -38.71
LOCATION L0003669     VOLUME   580003.590 3722943.014 -38.71
LOCATION L0003670     VOLUME   580001.614 3722946.092 -38.71
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LOCATION L0003674     VOLUME   579993.713 3722958.406 -38.71
LOCATION L0003675     VOLUME   579991.738 3722961.484 -38.71
LOCATION L0003676     VOLUME   579989.763 3722964.563 -38.71
LOCATION L0003677     VOLUME   579987.788 3722967.641 -38.71
LOCATION L0003678     VOLUME   579985.812 3722970.719 -38.71
LOCATION L0003679     VOLUME   579983.837 3722973.798 -38.71
LOCATION L0003680     VOLUME   579981.862 3722976.876 -38.71
LOCATION L0003681     VOLUME   579979.886 3722979.955 -38.71
LOCATION L0003682     VOLUME   579977.911 3722983.033 -38.71
LOCATION L0003683     VOLUME   579975.936 3722986.111 -38.71
LOCATION L0003684     VOLUME   579973.961 3722989.190 -38.71
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LOCATION L0003686     VOLUME   579970.010 3722995.346 -38.71
LOCATION L0003687     VOLUME   579968.035 3722998.425 -38.71
LOCATION L0003688     VOLUME   579966.060 3723001.503 -38.71
LOCATION L0003689     VOLUME   579964.084 3723004.581 -38.71
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LOCATION L0003696     VOLUME   579950.257 3723026.130 -38.67
LOCATION L0003697     VOLUME   579948.282 3723029.208 -38.67
LOCATION L0003698     VOLUME   579946.307 3723032.287 -38.68
LOCATION L0003699     VOLUME   579944.332 3723035.365 -38.68
LOCATION L0003700     VOLUME   579942.356 3723038.443 -38.70
LOCATION L0003701     VOLUME   579940.381 3723041.522 -38.71
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LOCATION L0003705     VOLUME   579932.480 3723053.835 -38.65
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LOCATION L0003708     VOLUME   579926.536 3723063.059 -38.61
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LOCATION L0003795     VOLUME   579787.872 3723347.896 -35.97
LOCATION L0003796     VOLUME   579786.691 3723351.358 -35.97
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LOCATION L0003801     VOLUME   579781.206 3723368.784 -35.97
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** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDONE
** DESCRSRC Onsite Road East
** PREFIX
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   LOCATION L0004092     VOLUME   579827.296 3723509.207 -36.13
   LOCATION L0004093     VOLUME   579825.510 3723512.399 -36.10
   LOCATION L0004094     VOLUME   579823.725 3723515.591 -36.07
   LOCATION L0004095     VOLUME   579821.939 3723518.783 -36.03
   LOCATION L0004096     VOLUME   579820.153 3723521.975 -36.00
   LOCATION L0004097     VOLUME   579818.367 3723525.167 -35.97
   LOCATION L0004098     VOLUME   579816.581 3723528.359 -35.97
   LOCATION L0004099     VOLUME   579814.796 3723531.551 -35.97
   LOCATION L0004100     VOLUME   579813.010 3723534.743 -35.97
   LOCATION L0004101     VOLUME   579811.224 3723537.935 -35.97
   LOCATION L0004102     VOLUME   579809.438 3723541.127 -35.97
   LOCATION L0004103     VOLUME   579807.653 3723544.319 -35.97
   LOCATION L0004104     VOLUME   579805.867 3723547.511 -35.97
   LOCATION L0004105     VOLUME   579804.081 3723550.703 -35.97
   LOCATION L0004106     VOLUME   579802.295 3723553.895 -35.97
   LOCATION L0004107     VOLUME   579800.509 3723557.087 -35.97
   LOCATION L0004108     VOLUME   579798.724 3723560.279 -35.97
   LOCATION L0004109     VOLUME   579796.938 3723563.471 -35.97
   LOCATION L0004110     VOLUME   579795.152 3723566.663 -35.97
   LOCATION L0004111     VOLUME   579793.366 3723569.855 -35.97
   LOCATION L0004112     VOLUME   579791.580 3723573.047 -35.97
   LOCATION L0004113     VOLUME   579789.795 3723576.239 -35.97
   LOCATION L0004114     VOLUME   579788.009 3723579.431 -35.97
   LOCATION L0004115     VOLUME   579786.223 3723582.623 -35.97
   LOCATION L0004116     VOLUME   579784.437 3723585.815 -35.97
   LOCATION L0004117     VOLUME   579782.652 3723589.007 -35.97
   LOCATION L0004118     VOLUME   579780.866 3723592.199 -35.97
** End of LINE VOLUME Source ID = RDONE
** ------------------------------------------------------------------
** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDAIRW
** DESCRSRC Airport Blvd west of Project Site
** PREFIX
** Length of Side = 12.19
** Configuration = Adjacent
** Emission Rate = 2.71E-06
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 7
** 580077.815, 3722811.474, -38.84, 0.00, 5.67
** 579930.520, 3722810.498, -38.31, 0.00, 5.67
** 579724.565, 3722817.970, -36.23, 0.00, 5.67
** 579657.572, 3722818.633, -36.01, 0.00, 5.67
** 579442.005, 3722818.125, -36.27, 0.00, 5.67
** 579336.736, 3722811.183, -36.27, 0.00, 5.67
** 579251.350, 3722810.179, -35.97, 0.00, 5.67
** ------------------------------------------------------------------
   LOCATION L0004119     VOLUME   580071.719 3722811.433 -38.86
   LOCATION L0004120     VOLUME   580059.528 3722811.353 -38.96
   LOCATION L0004121     VOLUME   580047.336 3722811.272 -38.98
   LOCATION L0004122     VOLUME   580035.144 3722811.191 -39.01
   LOCATION L0004123     VOLUME   580022.952 3722811.110 -39.01
   LOCATION L0004124     VOLUME   580010.761 3722811.030 -39.01
   LOCATION L0004125     VOLUME   579998.569 3722810.949 -38.98
   LOCATION L0004126     VOLUME   579986.377 3722810.868 -38.75
   LOCATION L0004127     VOLUME   579974.185 3722810.787 -38.53
   LOCATION L0004128     VOLUME   579961.994 3722810.707 -38.44
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   LOCATION L0004129     VOLUME   579949.802 3722810.626 -38.42
   LOCATION L0004130     VOLUME   579937.610 3722810.545 -38.38
   LOCATION L0004131     VOLUME   579925.422 3722810.683 -38.28
   LOCATION L0004132     VOLUME   579913.238 3722811.125 -38.18
   LOCATION L0004133     VOLUME   579901.054 3722811.567 -38.07
   LOCATION L0004134     VOLUME   579888.870 3722812.009 -37.95
   LOCATION L0004135     VOLUME   579876.686 3722812.451 -37.79
   LOCATION L0004136     VOLUME   579864.502 3722812.893 -37.54
   LOCATION L0004137     VOLUME   579852.318 3722813.335 -37.30
   LOCATION L0004138     VOLUME   579840.134 3722813.777 -37.24
   LOCATION L0004139     VOLUME   579827.950 3722814.219 -37.21
   LOCATION L0004140     VOLUME   579815.766 3722814.661 -37.15
   LOCATION L0004141     VOLUME   579803.582 3722815.103 -37.07
   LOCATION L0004142     VOLUME   579791.398 3722815.545 -36.99
   LOCATION L0004143     VOLUME   579779.214 3722815.987 -36.83
   LOCATION L0004144     VOLUME   579767.030 3722816.429 -36.67
   LOCATION L0004145     VOLUME   579754.846 3722816.871 -36.52
   LOCATION L0004146     VOLUME   579742.662 3722817.313 -36.39
   LOCATION L0004147     VOLUME   579730.478 3722817.755 -36.27
   LOCATION L0004148     VOLUME   579718.290 3722818.032 -36.20
   LOCATION L0004149     VOLUME   579706.099 3722818.153 -36.13
   LOCATION L0004150     VOLUME   579693.907 3722818.273 -36.07
   LOCATION L0004151     VOLUME   579681.716 3722818.394 -36.02
   LOCATION L0004152     VOLUME   579669.525 3722818.515 -35.97
   LOCATION L0004153     VOLUME   579657.333 3722818.632 -35.97
   LOCATION L0004154     VOLUME   579645.141 3722818.604 -35.97
   LOCATION L0004155     VOLUME   579632.949 3722818.575 -36.01
   LOCATION L0004156     VOLUME   579620.757 3722818.546 -36.08
   LOCATION L0004157     VOLUME   579608.565 3722818.517 -36.14
   LOCATION L0004158     VOLUME   579596.373 3722818.489 -36.14
   LOCATION L0004159     VOLUME   579584.181 3722818.460 -36.14
   LOCATION L0004160     VOLUME   579571.989 3722818.431 -36.14
   LOCATION L0004161     VOLUME   579559.797 3722818.402 -36.14
   LOCATION L0004162     VOLUME   579547.605 3722818.374 -36.14
   LOCATION L0004163     VOLUME   579535.413 3722818.345 -36.14
   LOCATION L0004164     VOLUME   579523.222 3722818.316 -36.14
   LOCATION L0004165     VOLUME   579511.030 3722818.287 -36.14
   LOCATION L0004166     VOLUME   579498.838 3722818.259 -36.14
   LOCATION L0004167     VOLUME   579486.646 3722818.230 -36.14
   LOCATION L0004168     VOLUME   579474.454 3722818.201 -36.14
   LOCATION L0004169     VOLUME   579462.262 3722818.172 -36.14
   LOCATION L0004170     VOLUME   579450.070 3722818.144 -36.19
   LOCATION L0004171     VOLUME   579437.887 3722817.853 -36.24
   LOCATION L0004172     VOLUME   579425.721 3722817.051 -36.27
   LOCATION L0004173     VOLUME   579413.556 3722816.249 -36.27
   LOCATION L0004174     VOLUME   579401.390 3722815.446 -36.27
   LOCATION L0004175     VOLUME   579389.224 3722814.644 -36.27
   LOCATION L0004176     VOLUME   579377.059 3722813.842 -36.27
   LOCATION L0004177     VOLUME   579364.893 3722813.040 -36.27
   LOCATION L0004178     VOLUME   579352.728 3722812.238 -36.27
   LOCATION L0004179     VOLUME   579340.562 3722811.436 -36.27
   LOCATION L0004180     VOLUME   579328.379 3722811.085 -36.25
   LOCATION L0004181     VOLUME   579316.188 3722810.942 -36.23
   LOCATION L0004182     VOLUME   579303.997 3722810.798 -36.22
   LOCATION L0004183     VOLUME   579291.805 3722810.655 -36.22
   LOCATION L0004184     VOLUME   579279.614 3722810.511 -36.21
   LOCATION L0004185     VOLUME   579267.423 3722810.368 -36.11
   LOCATION L0004186     VOLUME   579255.232 3722810.225 -36.01
** End of LINE VOLUME Source ID = RDAIRW
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** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDAIRE
** DESCRSRC Airport Blvd east of Project Site
** PREFIX
** Length of Side = 12.19
** Configuration = Adjacent
** Emission Rate = 6.34E-06
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 3
** 580086.549, 3722811.395, -38.73, 0.00, 5.67
** 580220.964, 3722809.641, -38.34, 0.00, 5.67
** 580570.484, 3722812.421, -37.19, 0.00, 5.67
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   LOCATION L0004187     VOLUME   580092.645 3722811.316 -38.71
   LOCATION L0004188     VOLUME   580104.836 3722811.157 -38.71
   LOCATION L0004189     VOLUME   580117.026 3722810.998 -38.71
   LOCATION L0004190     VOLUME   580129.217 3722810.838 -38.62
   LOCATION L0004191     VOLUME   580141.408 3722810.679 -38.50
   LOCATION L0004192     VOLUME   580153.599 3722810.520 -38.40
   LOCATION L0004193     VOLUME   580165.790 3722810.361 -38.40
   LOCATION L0004194     VOLUME   580177.981 3722810.202 -38.40
   LOCATION L0004195     VOLUME   580190.172 3722810.043 -38.39
   LOCATION L0004196     VOLUME   580202.363 3722809.884 -38.37
   LOCATION L0004197     VOLUME   580214.554 3722809.725 -38.33
   LOCATION L0004198     VOLUME   580226.745 3722809.687 -38.22
   LOCATION L0004199     VOLUME   580238.937 3722809.784 -38.11
   LOCATION L0004200     VOLUME   580251.129 3722809.881 -38.10
   LOCATION L0004201     VOLUME   580263.320 3722809.978 -38.10
   LOCATION L0004202     VOLUME   580275.512 3722810.075 -38.09
   LOCATION L0004203     VOLUME   580287.704 3722810.172 -38.07
   LOCATION L0004204     VOLUME   580299.895 3722810.269 -38.05
   LOCATION L0004205     VOLUME   580312.087 3722810.366 -37.85
   LOCATION L0004206     VOLUME   580324.278 3722810.463 -37.65
   LOCATION L0004207     VOLUME   580336.470 3722810.560 -37.53
   LOCATION L0004208     VOLUME   580348.662 3722810.657 -37.51
   LOCATION L0004209     VOLUME   580360.853 3722810.754 -37.49
   LOCATION L0004210     VOLUME   580373.045 3722810.851 -37.49
   LOCATION L0004211     VOLUME   580385.236 3722810.947 -37.49
   LOCATION L0004212     VOLUME   580397.428 3722811.044 -37.41
   LOCATION L0004213     VOLUME   580409.620 3722811.141 -37.26
   LOCATION L0004214     VOLUME   580421.811 3722811.238 -37.12
   LOCATION L0004215     VOLUME   580434.003 3722811.335 -37.02
   LOCATION L0004216     VOLUME   580446.195 3722811.432 -36.92
   LOCATION L0004217     VOLUME   580458.386 3722811.529 -36.88
   LOCATION L0004218     VOLUME   580470.578 3722811.626 -36.88
   LOCATION L0004219     VOLUME   580482.769 3722811.723 -36.88
   LOCATION L0004220     VOLUME   580494.961 3722811.820 -36.88
   LOCATION L0004221     VOLUME   580507.153 3722811.917 -36.88
   LOCATION L0004222     VOLUME   580519.344 3722812.014 -36.97
   LOCATION L0004223     VOLUME   580531.536 3722812.111 -37.09
   LOCATION L0004224     VOLUME   580543.727 3722812.208 -37.19
   LOCATION L0004225     VOLUME   580555.919 3722812.305 -37.19
   LOCATION L0004226     VOLUME   580568.111 3722812.402 -37.19
** End of LINE VOLUME Source ID = RDAIRE
   LOCATION IDLING1      POINT      579805.150  3723587.850      -35.970
** DESCRSRC Truck Idling at LW-1A
   LOCATION IDLING2      POINT      579874.040  3723475.220      -36.230
** DESCRSRC Truck Idling at LW-1B
   LOCATION IDLING3      POINT      579883.560  3723455.580      -36.270
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** DESCRSRC Truck Idling at LW-2
   LOCATION IDLING4      POINT      579760.060  3723570.450      -35.970
** DESCRSRC Truck Idling at LW-3A
   LOCATION IDLING5      POINT      579788.530  3723421.660      -36.120
** DESCRSRC Truck Idling at LW-3B
   LOCATION IDLING6      POINT      579808.320  3723334.150      -35.850
** DESCRSRC Truck Idling at LW-4
** Source Parameters **
** LINE VOLUME Source ID = RDONW
   SRCPARAM L0003630     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003631     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003632     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003633     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003634     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003635     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003636     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003637     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003638     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003639     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003640     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003641     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003642     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003643     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003644     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003645     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003646     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003647     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003648     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003649     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003650     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003651     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003652     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003653     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003654     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003655     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003656     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003657     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003658     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003659     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003660     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003661     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003662     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003663     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003664     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003665     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003666     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003667     0.00000005897      0.00      1.70      0.85
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   SRCPARAM L0003669     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003670     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003671     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003672     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003673     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003674     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003675     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003676     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003677     0.00000005897      0.00      1.70      0.85
   SRCPARAM L0003678     0.00000005897      0.00      1.70      0.85
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   SRCPARAM L0003680     0.00000005897      0.00      1.70      0.85
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SRCPARAM L0003683     0.00000005897      0.00      1.70      0.85
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SRCPARAM L0003687     0.00000005897      0.00      1.70      0.85
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SRCPARAM L0003690     0.00000005897      0.00      1.70      0.85
SRCPARAM L0003691     0.00000005897      0.00      1.70      0.85
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SRCPARAM L0003701     0.00000005897      0.00      1.70      0.85
SRCPARAM L0003702     0.00000005897      0.00      1.70      0.85
SRCPARAM L0003703     0.00000005897      0.00      1.70      0.85
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SRCPARAM L0003706     0.00000005897      0.00      1.70      0.85
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SRCPARAM L0003709     0.00000005897      0.00      1.70      0.85
SRCPARAM L0003710     0.00000005897      0.00      1.70      0.85
SRCPARAM L0003711     0.00000005897      0.00      1.70      0.85
SRCPARAM L0003712     0.00000005897      0.00      1.70      0.85
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SRCPARAM L0003715     0.00000005897      0.00      1.70      0.85
SRCPARAM L0003716     0.00000005897      0.00      1.70      0.85
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SRCPARAM L0003719     0.00000005897      0.00      1.70      0.85
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SRCPARAM L0003721     0.00000005897      0.00      1.70      0.85
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SRCPARAM L0003728     0.00000005897      0.00      1.70      0.85
SRCPARAM L0003729     0.00000005897      0.00      1.70      0.85
SRCPARAM L0003730     0.00000005897      0.00      1.70      0.85
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SRCPARAM L0003740     0.00000005897      0.00      1.70      0.85
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SRCPARAM L0003742     0.00000005897      0.00      1.70      0.85
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SRCPARAM L0003745     0.00000005897      0.00      1.70      0.85
SRCPARAM L0003746     0.00000005897      0.00      1.70      0.85
SRCPARAM L0003747     0.00000005897      0.00      1.70      0.85
SRCPARAM L0003748     0.00000005897      0.00      1.70      0.85
SRCPARAM L0003749     0.00000005897      0.00      1.70      0.85
SRCPARAM L0003750     0.00000005897      0.00      1.70      0.85
SRCPARAM L0003751     0.00000005897      0.00      1.70      0.85
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SRCPARAM L0003800     0.00000005897      0.00      1.70      0.85
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SRCPARAM L0004046     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004047     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004048     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004049     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004050     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004051     0.00000005922      0.00      1.70      0.85
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SRCPARAM L0004056     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004057     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004058     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004059     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004060     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004061     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004062     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004063     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004064     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004065     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004066     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004067     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004068     0.00000005922      0.00      1.70      0.85
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SRCPARAM L0004070     0.00000005922      0.00      1.70      0.85
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SRCPARAM L0004073     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004074     0.00000005922      0.00      1.70      0.85
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SRCPARAM L0004076     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004077     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004078     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004079     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004080     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004081     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004082     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004083     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004084     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004085     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004086     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004087     0.00000005922      0.00      1.70      0.85
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SRCPARAM L0004089     0.00000005922      0.00      1.70      0.85
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SRCPARAM L0004091     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004092     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004093     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004094     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004095     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004096     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004097     0.00000005922      0.00      1.70      0.85
SRCPARAM L0004098     0.00000005922      0.00      1.70      0.85
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   SRCPARAM L0004101     0.00000005922      0.00      1.70      0.85
   SRCPARAM L0004102     0.00000005922      0.00      1.70      0.85
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   SRCPARAM L0004110     0.00000005922      0.00      1.70      0.85
   SRCPARAM L0004111     0.00000005922      0.00      1.70      0.85
   SRCPARAM L0004112     0.00000005922      0.00      1.70      0.85
   SRCPARAM L0004113     0.00000005922      0.00      1.70      0.85
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   SRCPARAM L0004118     0.00000005922      0.00      1.70      0.85
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** LINE VOLUME Source ID = RDAIRW
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   SRCPARAM L0004120     0.00000003985      0.00      5.67      0.85
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   SRCPARAM L0004125     0.00000003985      0.00      5.67      0.85
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   SRCPARAM L0004127     0.00000003985      0.00      5.67      0.85
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   SRCPARAM L0004158     0.00000003985      0.00      5.67      0.85
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   SRCPARAM L0004164     0.00000003985      0.00      5.67      0.85
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   SRCPARAM L0004168     0.00000003985      0.00      5.67      0.85
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   SRCPARAM L0004171     0.00000003985      0.00      5.67      0.85
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   SRCPARAM L0004183     0.00000003985      0.00      5.67      0.85
   SRCPARAM L0004184     0.00000003985      0.00      5.67      0.85
   SRCPARAM L0004185     0.00000003985      0.00      5.67      0.85
   SRCPARAM L0004186     0.00000003985      0.00      5.67      0.85
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** LINE VOLUME Source ID = RDAIRE
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   SRCPARAM L0004188     0.0000001585       0.00      5.67      0.85
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   SRCPARAM L0004192     0.0000001585       0.00      5.67      0.85
   SRCPARAM L0004193     0.0000001585       0.00      5.67      0.85
   SRCPARAM L0004194     0.0000001585       0.00      5.67      0.85
   SRCPARAM L0004195     0.0000001585       0.00      5.67      0.85
   SRCPARAM L0004196     0.0000001585       0.00      5.67      0.85
   SRCPARAM L0004197     0.0000001585       0.00      5.67      0.85
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   SRCPARAM L0004199     0.0000001585       0.00      5.67      0.85
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   SRCPARAM L0004201     0.0000001585       0.00      5.67      0.85
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   SRCPARAM L0004203     0.0000001585       0.00      5.67      0.85
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   SRCPARAM L0004205     0.0000001585       0.00      5.67      0.85
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   SRCPARAM L0004209     0.0000001585       0.00      5.67      0.85
   SRCPARAM L0004210     0.0000001585       0.00      5.67      0.85
   SRCPARAM L0004211     0.0000001585       0.00      5.67      0.85
   SRCPARAM L0004212     0.0000001585       0.00      5.67      0.85
   SRCPARAM L0004213     0.0000001585       0.00      5.67      0.85
   SRCPARAM L0004214     0.0000001585       0.00      5.67      0.85
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   SRCPARAM L0004215     0.0000001585      0.00      5.67      0.85
   SRCPARAM L0004216     0.0000001585      0.00      5.67      0.85
   SRCPARAM L0004217     0.0000001585      0.00      5.67      0.85
   SRCPARAM L0004218     0.0000001585      0.00      5.67      0.85
   SRCPARAM L0004219     0.0000001585      0.00      5.67      0.85
   SRCPARAM L0004220     0.0000001585      0.00      5.67      0.85
   SRCPARAM L0004221     0.0000001585      0.00      5.67      0.85
   SRCPARAM L0004222     0.0000001585      0.00      5.67      0.85
   SRCPARAM L0004223     0.0000001585      0.00      5.67      0.85
   SRCPARAM L0004224     0.0000001585      0.00      5.67      0.85
   SRCPARAM L0004225     0.0000001585      0.00      5.67      0.85
   SRCPARAM L0004226     0.0000001585      0.00      5.67      0.85
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   SRCPARAM IDLING1      0.0000172     3.840   366.000        50       0.1
   SRCPARAM IDLING2      0.0000172     3.840   366.000        50       0.1
   SRCPARAM IDLING3      0.0000172     3.840   366.000        50       0.1
   SRCPARAM IDLING4      0.0000172     3.840   366.000        50       0.1
   SRCPARAM IDLING5      0.0000172     3.840   366.000        50       0.1
   SRCPARAM IDLING6      0.0000172     3.840   366.000        50       0.1

** Building Downwash **
   BUILDHGT IDLING1         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING1         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING1         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING1          0.00     0.00     0.00    14.94    14.94    14.94
   BUILDHGT IDLING1         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING1         14.94    14.94    14.94    14.94    14.94    14.94

   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94

   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94

   BUILDHGT IDLING4         14.94    14.94    14.94    14.94    14.94     0.00
   BUILDHGT IDLING4          0.00     0.00     0.00    14.94    14.94    14.94
   BUILDHGT IDLING4         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING4         14.94    14.94    14.94    14.94    14.94     0.00
   BUILDHGT IDLING4         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING4         14.94    14.94    14.94    14.94    14.94    14.94

   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94

   BUILDHGT IDLING6         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING6         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING6         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING6         14.94    14.94    14.94    14.94    14.94    14.94
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BUILDHGT IDLING6	14.94	14.94	14.94	14.94	14.94	14.94
BUILDHGT IDLING6	14.94	14.94	14.94	14.94	14.94	14.94
BUILDWID IDLING1	110.05	125.30	136.75	138.75	139.85	136.71
BUILDWID IDLING1	133.41	126.74	118.94	115.88	109.29	99.39
BUILDWID IDLING1	86.46	70.91	53.20	67.65	86.09	101.90
BUILDWID IDLING1	0.00	0.00	0.00	138.75	139.85	136.71
BUILDWID IDLING1	133.41	126.74	118.94	115.88	109.29	99.39
BUILDWID IDLING1	86.46	70.91	53.20	67.65	86.09	101.90
BUILDWID IDLING2	99.31	97.41	92.56	84.90	139.85	136.71
BUILDWID IDLING2	133.41	126.74	118.94	115.88	109.29	99.39
BUILDWID IDLING2	86.46	70.91	53.20	67.65	86.09	101.90
BUILDWID IDLING2	114.62	124.05	133.42	138.75	139.85	136.71
BUILDWID IDLING2	133.41	126.74	118.94	115.88	109.29	99.39
BUILDWID IDLING2	86.46	70.91	53.20	67.65	86.09	98.18
BUILDWID IDLING3	99.31	97.41	92.56	84.90	74.65	235.52
BUILDWID IDLING3	235.02	228.26	214.76	201.15	181.42	99.39
BUILDWID IDLING3	86.46	70.91	53.20	67.65	86.09	101.90
BUILDWID IDLING3	114.62	124.05	133.42	138.75	236.70	235.52
BUILDWID IDLING3	235.02	228.26	214.76	201.15	181.42	99.39
BUILDWID IDLING3	86.46	70.91	53.20	67.65	86.09	98.18
BUILDWID IDLING4	110.05	125.30	136.75	144.03	146.95	0.00
BUILDWID IDLING4	0.00	0.00	0.00	136.59	131.11	121.66
BUILDWID IDLING4	86.46	92.38	72.81	71.83	71.93	91.46
BUILDWID IDLING4	110.05	125.30	136.75	144.03	146.95	0.00
BUILDWID IDLING4	133.41	126.74	118.94	115.88	109.29	99.39
BUILDWID IDLING4	86.46	92.38	72.81	71.83	71.93	91.46
BUILDWID IDLING5	99.31	125.30	136.75	144.03	146.95	145.39
BUILDWID IDLING5	146.45	144.22	91.25	96.68	99.17	98.64
BUILDWID IDLING5	95.12	92.06	72.81	87.10	94.07	98.18
BUILDWID IDLING5	99.31	125.30	136.75	144.03	146.95	145.39
BUILDWID IDLING5	146.45	144.22	91.25	96.68	99.17	98.64
BUILDWID IDLING5	95.12	88.71	79.61	87.10	94.07	98.18
BUILDWID IDLING6	99.31	97.41	92.56	84.90	74.65	62.14
BUILDWID IDLING6	72.33	83.05	91.25	96.68	99.17	98.64
BUILDWID IDLING6	95.12	88.71	79.61	87.10	94.07	98.18
BUILDWID IDLING6	99.31	97.41	92.56	84.90	74.65	62.14
BUILDWID IDLING6	72.33	83.05	91.25	96.68	99.17	98.64
BUILDWID IDLING6	95.12	88.71	79.61	87.10	94.07	98.18
BUILDLEN IDLING1	136.59	131.11	121.66	86.46	70.91	53.20
BUILDLEN IDLING1	67.65	86.09	101.90	114.62	124.05	133.42
BUILDLEN IDLING1	138.75	139.85	136.71	133.41	126.74	118.94
BUILDLEN IDLING1	0.00	0.00	0.00	86.46	70.91	53.20
BUILDLEN IDLING1	67.65	86.09	101.90	114.62	124.05	133.42
BUILDLEN IDLING1	138.75	139.85	136.71	133.41	126.74	118.94
BUILDLEN IDLING2	96.68	99.17	98.64	95.12	70.91	53.20
BUILDLEN IDLING2	67.65	86.09	101.90	114.62	124.05	133.42
BUILDLEN IDLING2	138.75	139.85	136.71	133.41	126.74	118.94
BUILDLEN IDLING2	115.88	109.29	99.39	86.46	70.91	53.20
BUILDLEN IDLING2	67.65	86.09	101.90	114.62	124.05	133.42
BUILDLEN IDLING2	138.75	139.85	136.71	133.41	126.74	91.25
BUILDLEN IDLING3	96.68	99.17	98.64	95.12	88.71	55.76

BUILDLEN	IDLING3	82.18	117.37	148.99	176.09	198.02	133.42
BUILDLEN	IDLING3	138.75	139.85	136.71	133.41	126.74	118.94
BUILDLEN	IDLING3	115.88	109.29	99.39	86.46	92.38	55.76
BUILDLEN	IDLING3	82.18	117.37	148.99	176.09	198.02	133.42
BUILDLEN	IDLING3	138.75	139.85	136.71	133.41	126.74	91.25
BUILDLEN	IDLING4	136.59	131.11	121.66	108.51	92.06	0.00
BUILDLEN	IDLING4	0.00	0.00	0.00	110.05	125.30	136.75
BUILDLEN	IDLING4	138.75	236.70	145.39	146.45	144.22	142.10
BUILDLEN	IDLING4	136.59	131.11	121.66	108.51	92.06	0.00
BUILDLEN	IDLING4	67.65	86.09	101.90	114.62	124.05	133.42
BUILDLEN	IDLING4	138.75	236.70	145.39	146.45	144.22	142.10
BUILDLEN	IDLING5	96.68	131.11	121.66	108.51	92.06	72.81
BUILDLEN	IDLING5	71.83	71.93	98.18	99.31	97.41	92.56
BUILDLEN	IDLING5	84.90	146.95	145.39	72.33	83.05	91.25
BUILDLEN	IDLING5	96.68	131.11	121.66	108.51	92.06	72.81
BUILDLEN	IDLING5	71.83	71.93	98.18	99.31	97.41	92.56
BUILDLEN	IDLING5	84.90	74.65	62.14	72.33	83.05	91.25
BUILDLEN	IDLING6	96.68	99.17	98.64	95.12	88.71	79.61
BUILDLEN	IDLING6	87.10	94.07	98.18	99.31	97.41	92.56
BUILDLEN	IDLING6	84.90	74.65	62.14	72.33	83.05	91.25
BUILDLEN	IDLING6	96.68	99.17	98.64	95.12	88.71	79.61
BUILDLEN	IDLING6	87.10	94.07	98.18	99.31	97.41	92.56
BUILDLEN	IDLING6	84.90	74.65	62.14	72.33	83.05	91.25
XBADJ	IDLING1	-166.84	-164.57	-157.29	-48.98	-27.99	-6.15
XBADJ	IDLING1	-0.37	2.37	5.04	7.56	9.65	7.73
XBADJ	IDLING1	5.58	3.26	0.85	-1.60	-4.00	-6.47
XBADJ	IDLING1	0.00	0.00	0.00	-37.47	-42.91	-47.05
XBADJ	IDLING1	-67.28	-88.46	-106.94	-122.17	-133.70	-141.16
XBADJ	IDLING1	-144.33	-143.11	-137.55	-131.81	-122.74	-112.47
XBADJ	IDLING2	-159.04	-162.04	-160.12	-153.33	-8.37	-9.50
XBADJ	IDLING2	-26.58	-45.91	-63.85	-79.85	-93.61	-108.24
XBADJ	IDLING2	-119.59	-127.30	-131.14	-131.00	-126.88	-119.10
XBADJ	IDLING2	-114.11	-105.66	-93.99	-79.47	-62.54	-43.70
XBADJ	IDLING2	-41.07	-40.17	-38.05	-34.77	-30.44	-25.18
XBADJ	IDLING2	-19.16	-12.55	-5.57	-2.41	0.14	-151.21
XBADJ	IDLING3	-141.35	-146.84	-147.87	-144.40	-136.55	-10.48
XBADJ	IDLING3	-28.81	-51.88	-73.37	-92.63	-109.27	-126.31
XBADJ	IDLING3	-139.50	-148.46	-152.91	-152.71	-147.87	-138.74
XBADJ	IDLING3	-131.80	-120.86	-106.24	-88.40	-67.87	-45.28
XBADJ	IDLING3	-53.37	-65.49	-75.62	-83.45	-88.75	-7.12
XBADJ	IDLING3	0.76	8.61	16.20	19.30	21.13	-131.57
XBADJ	IDLING4	-141.87	-132.79	-119.68	-102.93	-83.05	0.00
XBADJ	IDLING4	0.00	0.00	0.00	-4.55	-1.97	0.67
XBADJ	IDLING4	28.94	18.92	8.14	10.24	11.91	8.73
XBADJ	IDLING4	5.28	1.68	-1.98	-5.58	-9.00	0.00
XBADJ	IDLING4	-115.61	-135.88	-152.03	-163.56	-170.12	-171.51
XBADJ	IDLING4	-167.69	-255.61	-153.54	-156.69	-156.13	-150.83
XBADJ	IDLING5	-91.45	-2.71	-5.06	-7.25	-9.22	-10.91
XBADJ	IDLING5	-12.27	-13.26	-2.29	5.47	13.06	20.26
XBADJ	IDLING5	26.84	-126.48	-134.95	28.73	17.84	6.40
XBADJ	IDLING5	-5.23	-128.40	-116.60	-101.26	-82.84	-61.90
XBADJ	IDLING5	-59.56	-58.67	-95.89	-104.78	-110.48	-112.82

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   XBADJ    IDLING5       -111.74  -107.26   -99.53  -101.06  -100.89   -97.65

   XBADJ    IDLING6         -8.70    -7.00    -5.09    -3.02    -0.86     1.33
   XBADJ    IDLING6         -6.03   -14.27   -22.08   -29.21   -35.46   -40.63
   XBADJ    IDLING6        -44.57   -47.15   -48.30   -60.27   -71.78   -81.11
   XBADJ    IDLING6        -87.97   -92.17   -93.56   -92.11   -87.86   -80.94
   XBADJ    IDLING6        -81.07   -79.80   -76.10   -70.09   -61.95   -51.93
   XBADJ    IDLING6        -40.33   -27.51   -13.84   -12.06   -11.27   -10.14

   YBADJ    IDLING1         -9.09   -24.26   -38.69   -74.96   -73.19   -69.20
   YBADJ    IDLING1        -65.11   -59.37   -53.00   -42.78   -31.26   -18.79
   YBADJ    IDLING1         -5.75     7.46    20.45    33.46    45.41    55.99
   YBADJ    IDLING1          0.00     0.00     0.00    74.96    73.19    69.20
   YBADJ    IDLING1         65.10    59.37    53.00    42.78    31.26    18.79
   YBADJ    IDLING1          5.75    -7.46   -20.45   -33.46   -45.41   -55.99

   YBADJ    IDLING2         19.79     0.26   -19.27   -38.22    57.37    62.79
   YBADJ    IDLING2         64.29    63.51    59.63    56.17    51.01    44.30
   YBADJ    IDLING2         36.24    27.08    17.10     7.24    -2.87   -12.90
   YBADJ    IDLING2        -22.54   -31.58   -41.53   -50.21   -57.37   -62.79
   YBADJ    IDLING2        -64.29   -63.51   -59.63   -56.17   -51.01   -44.30
   YBADJ    IDLING2        -36.24   -27.08   -17.10    -7.24     2.87    38.71

   YBADJ    IDLING3         32.57    15.93    -1.20   -18.30   -34.84    35.15
   YBADJ    IDLING3         35.20    33.74    31.36    31.23    30.15    56.55
   YBADJ    IDLING3         45.17    32.42    18.68     5.01    -8.84   -22.42
   YBADJ    IDLING3        -35.32   -47.25   -59.59   -70.13   -30.11   -35.15
   YBADJ    IDLING3        -35.20   -33.74   -31.36   -31.23   -30.15   -56.55
   YBADJ    IDLING3        -45.17   -32.42   -18.68    -5.01     8.84    48.23

   YBADJ    IDLING4        -50.48   -60.68   -69.04   -75.30   -79.28     0.00
   YBADJ    IDLING4          0.00     0.00     0.00   -73.58   -67.24   -58.85
   YBADJ    IDLING4         36.56    42.45   -24.25    -0.49    24.91    38.74
   YBADJ    IDLING4         50.48    60.68    69.04    75.30    79.28     0.00
   YBADJ    IDLING4         64.18    50.07    35.60    17.82    -0.51   -18.82
   YBADJ    IDLING4        -36.56   -42.45    24.25     0.49   -24.91   -38.74

   YBADJ    IDLING5        -55.12    16.96    30.01    42.15    53.00    62.25
   YBADJ    IDLING5         66.09    67.45   -52.02   -43.11   -32.88   -21.65
   YBADJ    IDLING5         -9.77    36.81    25.49    26.18    37.05    46.80
   YBADJ    IDLING5         55.12   -16.96   -30.01   -42.15   -53.00   -62.25
   YBADJ    IDLING5        -66.09   -67.45    52.02    43.11    32.88    21.65
   YBADJ    IDLING5          9.77    -2.41   -14.52   -26.18   -37.06   -46.80

   YBADJ    IDLING6        -20.44   -13.24    -5.65     2.12     9.82    17.23
   YBADJ    IDLING6         24.11    30.26    35.48    39.64    42.58    44.24
   YBADJ    IDLING6         44.54    43.50    41.13    37.52    32.76    27.01
   YBADJ    IDLING6         20.44    13.24     5.65    -2.12    -9.82   -17.23
   YBADJ    IDLING6        -24.11   -30.26   -35.49   -39.64   -42.58   -44.24
   YBADJ    IDLING6        -44.54   -43.50   -41.13   -37.52   -32.76   -27.01

   URBANSRC ALL
   SRCGROUP ALL
SO FINISHED
**
**********************************
** AERMOD Receptor Pathway
**********************************
**
**
```

```
RE STARTING
   INCLUDED DPM28-41.rou
RE FINISHED
**
**************************************
** AERMOD Meteorology Pathway
**************************************
**
**
ME STARTING
   SURFFILE ..\ktrm_sfc_pfl\KTRM_V11_trimmed.sfc
   PROFFILE ..\ktrm_sfc_pfl\KTRM_V11_trimmed.pfl
   SURFDATA 3104 2017
   UAIRDATA 3190 2017
   PROFBASE -36.0 METERS
ME FINISHED
**
**************************************
** AERMOD Output Pathway
**************************************
**
**
OU STARTING
   RECTABLE ALLAVE 1ST
   RECTABLE 1 1ST
** Auto-Generated Plotfiles
   PLOTFILE 1 ALL 1ST DPM28-41.AD\01H1GALL.PLT 31
   PLOTFILE PERIOD ALL DPM28-41.AD\PE00GALL.PLT 32
   SUMMFILE DPM28-41.sum
OU FINISHED
**
**************************************
** Project Parameters
**************************************
** PROJCTN  CoordinateSystemUTM
** DESCPTN  UTM: Universal Transverse Mercator
** DATUM    World Geodetic System 1984
** DTMRGN   Global Definition
** UNITS    m
** ZONE     11
** ZONEINX  0
**
```

* MODELING OPTIONS USED: CONC ELEV URBAN ADJ_U*
* PLOT FILE OF PERIOD VALUES AVERAGED ACROSS 0 YEARS FOR SOURCE GROUP: ALL
* FOR A TOTAL OF 11 RECEPTORS.
* FORMAT: (3(1X,F13.5),3(1X,F8.2),2X,A6,2X,A8,2X,I8.8,2X,A8)

* X	Y	AVERAGE CONC	ZELEV	ZHILL	ZFLAG	AVE	GRP	NUM HRS	NET ID
580086.00000	3722773.00000	0.00146	-39.01	-39.01	0.00	PERIOD	ALL	00043800	
580122.00000	3722774.00000	0.00166	-38.71	-38.71	0.00	PERIOD	ALL	00043800	
580172.00000	3722775.00000	0.00153	-38.50	-38.50	0.00	PERIOD	ALL	00043800	
580242.00000	3722717.00000	0.00086	-38.40	-38.40	0.00	PERIOD	ALL	00043800	
580289.00000	3722738.00000	0.00090	-37.99	-37.99	0.00	PERIOD	ALL	00043800	
580337.00000	3722732.00000	0.00081	-37.80	-37.80	0.00	PERIOD	ALL	00043800	
579963.00000	3722704.00000	0.00069	-36.08	-36.08	0.00	PERIOD	ALL	00043800	
579927.00000	3722644.00000	0.00052	-36.33	-36.33	0.00	PERIOD	ALL	00043800	
579519.00000	3722783.00000	0.00038	-36.27	-36.27	0.00	PERIOD	ALL	00043800	
579466.00000	3722781.00000	0.00034	-36.27	-36.27	0.00	PERIOD	ALL	00043800	
579393.00000	3722779.00000	0.00031	-36.27	-36.27	0.00	PERIOD	ALL	00043800	

** CONCUNIT ug/m^3
** DEPUNIT g/m^2

APPENDIX G

AERMOD Model Years 2042 – 2054 Operational DPM Printouts

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**
**************************************
**
** AERMOD Input Produced by:
** AERMOD View Ver. 13.0.0
** Lakes Environmental Software Inc.
** Date: 10/1/2025
** File: C:\Vista Env\2019\19039 Coachella\AERMOD\DPM42-54\DPM42-54.ADI
**
**************************************
**
**
**************************************
** AERMOD Control Pathway
**************************************
**
**
CO STARTING
   TITLEONE Coachella Airport Business Park - 2042-2054 DPM
   TITLETWO PM2.5
   MODELOPT CONC
   AVERTIME 1 PERIOD
   URBANOPT 2189641 Riverside_Co
   POLLUTID PM_2.5
   RUNORNOT RUN
   ERRORFIL DPM42-54.err
CO FINISHED
**
**************************************
** AERMOD Source Pathway
**************************************
**
**
SO STARTING
** Source Location **
** Source ID - Type - X Coord. - Y Coord. **
** ------------------------------------------------------------------------
** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDONW
** DESCRSRC Onsite Road West
** PREFIX
** Length of Side = 3.66
** Configuration = Adjacent
** Emission Rate = 0.000011
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 12
** 580077.130, 3722819.702, -38.87, 0.00, 1.70
** 580075.723, 3722829.973, -38.77, 0.00, 1.70
** 580054.577, 3722864.362, -38.73, 0.00, 1.70
** 580045.833, 3722877.181, -38.88, 0.00, 1.70
** 579930.018, 3723057.672, -38.69, 0.00, 1.70
** 579892.856, 3723115.163, -37.71, 0.00, 1.70
** 579849.461, 3723190.506, -36.29, 0.00, 1.70
** 579823.082, 3723246.755, -36.03, 0.00, 1.70
** 579796.274, 3723323.282, -35.97, 0.00, 1.70
** 579782.061, 3723364.922, -35.95, 0.00, 1.70
** 579768.794, 3723424.825, -36.02, 0.00, 1.70
** 579741.158, 3723594.651, -35.95, 0.00, 1.70
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LOCATION L0004227     VOLUME   580076.882 3722821.514 -38.77
LOCATION L0004228     VOLUME   580076.385 3722825.138 -38.76
LOCATION L0004229     VOLUME   580075.889 3722828.761 -38.74
LOCATION L0004230     VOLUME   580074.448 3722832.047 -38.73
LOCATION L0004231     VOLUME   580072.532 3722835.163 -38.71
LOCATION L0004232     VOLUME   580070.616 3722838.278 -38.71
LOCATION L0004233     VOLUME   580068.700 3722841.394 -38.71
LOCATION L0004234     VOLUME   580066.784 3722844.510 -38.71
LOCATION L0004235     VOLUME   580064.868 3722847.625 -38.71
LOCATION L0004236     VOLUME   580062.953 3722850.741 -38.71
LOCATION L0004237     VOLUME   580061.037 3722853.857 -38.71
LOCATION L0004238     VOLUME   580059.121 3722856.973 -38.72
LOCATION L0004239     VOLUME   580057.205 3722860.088 -38.74
LOCATION L0004240     VOLUME   580055.289 3722863.204 -38.76
LOCATION L0004241     VOLUME   580053.282 3722866.261 -38.78
LOCATION L0004242     VOLUME   580051.221 3722869.282 -38.79
LOCATION L0004243     VOLUME   580049.160 3722872.303 -38.80
LOCATION L0004244     VOLUME   580047.098 3722875.325 -38.80
LOCATION L0004245     VOLUME   580045.070 3722878.368 -38.80
LOCATION L0004246     VOLUME   580043.095 3722881.447 -38.79
LOCATION L0004247     VOLUME   580041.120 3722884.525 -38.78
LOCATION L0004248     VOLUME   580039.145 3722887.604 -38.77
LOCATION L0004249     VOLUME   580037.169 3722890.682 -38.75
LOCATION L0004250     VOLUME   580035.194 3722893.760 -38.72
LOCATION L0004251     VOLUME   580033.219 3722896.839 -38.71
LOCATION L0004252     VOLUME   580031.243 3722899.917 -38.71
LOCATION L0004253     VOLUME   580029.268 3722902.995 -38.72
LOCATION L0004254     VOLUME   580027.293 3722906.074 -38.73
LOCATION L0004255     VOLUME   580025.318 3722909.152 -38.74
LOCATION L0004256     VOLUME   580023.342 3722912.230 -38.74
LOCATION L0004257     VOLUME   580021.367 3722915.309 -38.74
LOCATION L0004258     VOLUME   580019.392 3722918.387 -38.74
LOCATION L0004259     VOLUME   580017.417 3722921.466 -38.73
LOCATION L0004260     VOLUME   580015.441 3722924.544 -38.71
LOCATION L0004261     VOLUME   580013.466 3722927.622 -38.71
LOCATION L0004262     VOLUME   580011.491 3722930.701 -38.71
LOCATION L0004263     VOLUME   580009.515 3722933.779 -38.71
LOCATION L0004264     VOLUME   580007.540 3722936.857 -38.71
LOCATION L0004265     VOLUME   580005.565 3722939.936 -38.71
LOCATION L0004266     VOLUME   580003.590 3722943.014 -38.71
LOCATION L0004267     VOLUME   580001.614 3722946.092 -38.71
LOCATION L0004268     VOLUME   579999.639 3722949.171 -38.71
LOCATION L0004269     VOLUME   579997.664 3722952.249 -38.71
LOCATION L0004270     VOLUME   579995.689 3722955.328 -38.71
LOCATION L0004271     VOLUME   579993.713 3722958.406 -38.71
LOCATION L0004272     VOLUME   579991.738 3722961.484 -38.71
LOCATION L0004273     VOLUME   579989.763 3722964.563 -38.71
LOCATION L0004274     VOLUME   579987.788 3722967.641 -38.71
LOCATION L0004275     VOLUME   579985.812 3722970.719 -38.71
LOCATION L0004276     VOLUME   579983.837 3722973.798 -38.71
LOCATION L0004277     VOLUME   579981.862 3722976.876 -38.71
LOCATION L0004278     VOLUME   579979.886 3722979.955 -38.71
LOCATION L0004279     VOLUME   579977.911 3722983.033 -38.71
LOCATION L0004280     VOLUME   579975.936 3722986.111 -38.71
LOCATION L0004281     VOLUME   579973.961 3722989.190 -38.71
LOCATION L0004282     VOLUME   579971.985 3722992.268 -38.71
LOCATION L0004283     VOLUME   579970.010 3722995.346 -38.71
LOCATION L0004284     VOLUME   579968.035 3722998.425 -38.71
LOCATION L0004285     VOLUME   579966.060 3723001.503 -38.71
LOCATION L0004286     VOLUME   579964.084 3723004.581 -38.71
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LOCATION L0004287     VOLUME   579962.109 3723007.660 -38.71
LOCATION L0004288     VOLUME   579960.134 3723010.738 -38.71
LOCATION L0004289     VOLUME   579958.158 3723013.817 -38.71
LOCATION L0004290     VOLUME   579956.183 3723016.895 -38.70
LOCATION L0004291     VOLUME   579954.208 3723019.973 -38.69
LOCATION L0004292     VOLUME   579952.233 3723023.052 -38.68
LOCATION L0004293     VOLUME   579950.257 3723026.130 -38.67
LOCATION L0004294     VOLUME   579948.282 3723029.208 -38.67
LOCATION L0004295     VOLUME   579946.307 3723032.287 -38.68
LOCATION L0004296     VOLUME   579944.332 3723035.365 -38.68
LOCATION L0004297     VOLUME   579942.356 3723038.443 -38.70
LOCATION L0004298     VOLUME   579940.381 3723041.522 -38.71
LOCATION L0004299     VOLUME   579938.406 3723044.600 -38.71
LOCATION L0004300     VOLUME   579936.430 3723047.679 -38.69
LOCATION L0004301     VOLUME   579934.455 3723050.757 -38.67
LOCATION L0004302     VOLUME   579932.480 3723053.835 -38.65
LOCATION L0004303     VOLUME   579930.505 3723056.914 -38.63
LOCATION L0004304     VOLUME   579928.522 3723059.987 -38.62
LOCATION L0004305     VOLUME   579926.536 3723063.059 -38.61
LOCATION L0004306     VOLUME   579924.550 3723066.130 -38.61
LOCATION L0004307     VOLUME   579922.565 3723069.202 -38.61
LOCATION L0004308     VOLUME   579920.579 3723072.274 -38.62
LOCATION L0004309     VOLUME   579918.594 3723075.346 -38.63
LOCATION L0004310     VOLUME   579916.608 3723078.417 -38.59
LOCATION L0004311     VOLUME   579914.623 3723081.489 -38.55
LOCATION L0004312     VOLUME   579912.637 3723084.561 -38.51
LOCATION L0004313     VOLUME   579910.651 3723087.633 -38.46
LOCATION L0004314     VOLUME   579908.666 3723090.704 -38.37
LOCATION L0004315     VOLUME   579906.680 3723093.776 -38.27
LOCATION L0004316     VOLUME   579904.695 3723096.848 -38.17
LOCATION L0004317     VOLUME   579902.709 3723099.919 -38.07
LOCATION L0004318     VOLUME   579900.723 3723102.991 -37.96
LOCATION L0004319     VOLUME   579898.738 3723106.063 -37.85
LOCATION L0004320     VOLUME   579896.752 3723109.135 -37.76
LOCATION L0004321     VOLUME   579894.767 3723112.206 -37.68
LOCATION L0004322     VOLUME   579892.787 3723115.282 -37.60
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LOCATION L0004324     VOLUME   579889.136 3723121.621 -37.45
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** LINE VOLUME Source ID = RDONE
** DESCRSRC Onsite Road East
** PREFIX
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LOCATION L0004611     VOLUME   579969.213 3723261.743 -36.80
LOCATION L0004612     VOLUME   579967.346 3723264.888 -36.75
LOCATION L0004613     VOLUME   579965.479 3723268.033 -36.70
LOCATION L0004614     VOLUME   579963.612 3723271.178 -36.65
LOCATION L0004615     VOLUME   579961.745 3723274.324 -36.60
LOCATION L0004616     VOLUME   579959.879 3723277.469 -36.55
LOCATION L0004617     VOLUME   579958.012 3723280.614 -36.50
LOCATION L0004618     VOLUME   579956.145 3723283.759 -36.45
LOCATION L0004619     VOLUME   579954.278 3723286.904 -36.40
LOCATION L0004620     VOLUME   579952.411 3723290.050 -36.37
LOCATION L0004621     VOLUME   579950.544 3723293.195 -36.35
LOCATION L0004622     VOLUME   579948.677 3723296.340 -36.32
LOCATION L0004623     VOLUME   579946.810 3723299.485 -36.30
LOCATION L0004624     VOLUME   579944.943 3723302.631 -36.29
LOCATION L0004625     VOLUME   579943.076 3723305.776 -36.28
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LOCATION L0004626     VOLUME   579941.209 3723308.921 -36.27
LOCATION L0004627     VOLUME   579939.342 3723312.066 -36.27
LOCATION L0004628     VOLUME   579937.475 3723315.211 -36.27
LOCATION L0004629     VOLUME   579935.608 3723318.357 -36.27
LOCATION L0004630     VOLUME   579933.741 3723321.502 -36.27
LOCATION L0004631     VOLUME   579931.874 3723324.647 -36.27
LOCATION L0004632     VOLUME   579930.007 3723327.792 -36.27
LOCATION L0004633     VOLUME   579928.140 3723330.937 -36.27
LOCATION L0004634     VOLUME   579926.273 3723334.083 -36.27
LOCATION L0004635     VOLUME   579924.406 3723337.228 -36.27
LOCATION L0004636     VOLUME   579922.539 3723340.373 -36.27
LOCATION L0004637     VOLUME   579920.672 3723343.518 -36.27
LOCATION L0004638     VOLUME   579918.805 3723346.664 -36.27
LOCATION L0004639     VOLUME   579916.938 3723349.809 -36.27
LOCATION L0004640     VOLUME   579915.071 3723352.954 -36.27
LOCATION L0004641     VOLUME   579913.204 3723356.099 -36.27
LOCATION L0004642     VOLUME   579911.337 3723359.244 -36.27
LOCATION L0004643     VOLUME   579909.470 3723362.390 -36.27
LOCATION L0004644     VOLUME   579907.656 3723365.566 -36.27
LOCATION L0004645     VOLUME   579905.871 3723368.758 -36.27
LOCATION L0004646     VOLUME   579904.085 3723371.950 -36.27
LOCATION L0004647     VOLUME   579902.299 3723375.142 -36.27
LOCATION L0004648     VOLUME   579900.513 3723378.334 -36.27
LOCATION L0004649     VOLUME   579898.728 3723381.526 -36.27
LOCATION L0004650     VOLUME   579896.942 3723384.718 -36.27
LOCATION L0004651     VOLUME   579895.156 3723387.910 -36.27
LOCATION L0004652     VOLUME   579893.370 3723391.102 -36.27
LOCATION L0004653     VOLUME   579891.584 3723394.294 -36.27
LOCATION L0004654     VOLUME   579889.799 3723397.486 -36.27
LOCATION L0004655     VOLUME   579888.013 3723400.678 -36.27
LOCATION L0004656     VOLUME   579886.227 3723403.870 -36.27
LOCATION L0004657     VOLUME   579884.441 3723407.062 -36.27
LOCATION L0004658     VOLUME   579882.655 3723410.254 -36.27
LOCATION L0004659     VOLUME   579880.870 3723413.446 -36.27
LOCATION L0004660     VOLUME   579879.084 3723416.638 -36.26
LOCATION L0004661     VOLUME   579877.298 3723419.830 -36.24
LOCATION L0004662     VOLUME   579875.512 3723423.022 -36.22
LOCATION L0004663     VOLUME   579873.727 3723426.214 -36.20
LOCATION L0004664     VOLUME   579871.941 3723429.406 -36.18
LOCATION L0004665     VOLUME   579870.155 3723432.598 -36.17
LOCATION L0004666     VOLUME   579868.369 3723435.790 -36.15
LOCATION L0004667     VOLUME   579866.583 3723438.982 -36.13
LOCATION L0004668     VOLUME   579864.798 3723442.174 -36.11
LOCATION L0004669     VOLUME   579863.012 3723445.366 -36.09
LOCATION L0004670     VOLUME   579861.226 3723448.558 -36.07
LOCATION L0004671     VOLUME   579859.440 3723451.750 -36.06
LOCATION L0004672     VOLUME   579857.655 3723454.942 -36.04
LOCATION L0004673     VOLUME   579855.869 3723458.134 -36.02
LOCATION L0004674     VOLUME   579854.083 3723461.327 -36.00
LOCATION L0004675     VOLUME   579852.297 3723464.519 -35.98
LOCATION L0004676     VOLUME   579850.511 3723467.711 -35.99
LOCATION L0004677     VOLUME   579848.726 3723470.903 -36.04
LOCATION L0004678     VOLUME   579846.940 3723474.095 -36.08
LOCATION L0004679     VOLUME   579845.154 3723477.287 -36.12
LOCATION L0004680     VOLUME   579843.368 3723480.479 -36.16
LOCATION L0004681     VOLUME   579841.582 3723483.671 -36.19
LOCATION L0004682     VOLUME   579839.797 3723486.863 -36.22
LOCATION L0004683     VOLUME   579838.011 3723490.055 -36.24
LOCATION L0004684     VOLUME   579836.225 3723493.247 -36.26
LOCATION L0004685     VOLUME   579834.439 3723496.439 -36.26
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   LOCATION L0004686     VOLUME   579832.654 3723499.631 -36.23
   LOCATION L0004687     VOLUME   579830.868 3723502.823 -36.20
   LOCATION L0004688     VOLUME   579829.082 3723506.015 -36.16
   LOCATION L0004689     VOLUME   579827.296 3723509.207 -36.13
   LOCATION L0004690     VOLUME   579825.510 3723512.399 -36.10
   LOCATION L0004691     VOLUME   579823.725 3723515.591 -36.07
   LOCATION L0004692     VOLUME   579821.939 3723518.783 -36.03
   LOCATION L0004693     VOLUME   579820.153 3723521.975 -36.00
   LOCATION L0004694     VOLUME   579818.367 3723525.167 -35.97
   LOCATION L0004695     VOLUME   579816.581 3723528.359 -35.97
   LOCATION L0004696     VOLUME   579814.796 3723531.551 -35.97
   LOCATION L0004697     VOLUME   579813.010 3723534.743 -35.97
   LOCATION L0004698     VOLUME   579811.224 3723537.935 -35.97
   LOCATION L0004699     VOLUME   579809.438 3723541.127 -35.97
   LOCATION L0004700     VOLUME   579807.653 3723544.319 -35.97
   LOCATION L0004701     VOLUME   579805.867 3723547.511 -35.97
   LOCATION L0004702     VOLUME   579804.081 3723550.703 -35.97
   LOCATION L0004703     VOLUME   579802.295 3723553.895 -35.97
   LOCATION L0004704     VOLUME   579800.509 3723557.087 -35.97
   LOCATION L0004705     VOLUME   579798.724 3723560.279 -35.97
   LOCATION L0004706     VOLUME   579796.938 3723563.471 -35.97
   LOCATION L0004707     VOLUME   579795.152 3723566.663 -35.97
   LOCATION L0004708     VOLUME   579793.366 3723569.855 -35.97
   LOCATION L0004709     VOLUME   579791.580 3723573.047 -35.97
   LOCATION L0004710     VOLUME   579789.795 3723576.239 -35.97
   LOCATION L0004711     VOLUME   579788.009 3723579.431 -35.97
   LOCATION L0004712     VOLUME   579786.223 3723582.623 -35.97
   LOCATION L0004713     VOLUME   579784.437 3723585.815 -35.97
   LOCATION L0004714     VOLUME   579782.652 3723589.007 -35.97
   LOCATION L0004715     VOLUME   579780.866 3723592.199 -35.97
** End of LINE VOLUME Source ID = RDONE
** ----------------------------------------------------------------------
** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDAIRW
** DESCRSRC Airport Blvd west of Project Site
** PREFIX
** Length of Side = 12.19
** Configuration = Adjacent
** Emission Rate = 2.29E-06
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 7
** 580077.815, 3722811.474, -38.84, 0.00, 5.67
** 579930.520, 3722810.498, -38.31, 0.00, 5.67
** 579724.565, 3722817.970, -36.23, 0.00, 5.67
** 579657.572, 3722818.633, -36.01, 0.00, 5.67
** 579442.005, 3722818.125, -36.27, 0.00, 5.67
** 579336.736, 3722811.183, -36.27, 0.00, 5.67
** 579251.350, 3722810.179, -35.97, 0.00, 5.67
** ----------------------------------------------------------------------
   LOCATION L0004716     VOLUME   580071.719 3722811.433 -38.86
   LOCATION L0004717     VOLUME   580059.528 3722811.353 -38.96
   LOCATION L0004718     VOLUME   580047.336 3722811.272 -38.98
   LOCATION L0004719     VOLUME   580035.144 3722811.191 -39.01
   LOCATION L0004720     VOLUME   580022.952 3722811.110 -39.01
   LOCATION L0004721     VOLUME   580010.761 3722811.030 -39.01
   LOCATION L0004722     VOLUME   579998.569 3722810.949 -38.98
   LOCATION L0004723     VOLUME   579986.377 3722810.868 -38.75
   LOCATION L0004724     VOLUME   579974.185 3722810.787 -38.53
   LOCATION L0004725     VOLUME   579961.994 3722810.707 -38.44
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   LOCATION L0004726     VOLUME   579949.802 3722810.626 -38.42
   LOCATION L0004727     VOLUME   579937.610 3722810.545 -38.38
   LOCATION L0004728     VOLUME   579925.422 3722810.683 -38.28
   LOCATION L0004729     VOLUME   579913.238 3722811.125 -38.18
   LOCATION L0004730     VOLUME   579901.054 3722811.567 -38.07
   LOCATION L0004731     VOLUME   579888.870 3722812.009 -37.95
   LOCATION L0004732     VOLUME   579876.686 3722812.451 -37.79
   LOCATION L0004733     VOLUME   579864.502 3722812.893 -37.54
   LOCATION L0004734     VOLUME   579852.318 3722813.335 -37.30
   LOCATION L0004735     VOLUME   579840.134 3722813.777 -37.24
   LOCATION L0004736     VOLUME   579827.950 3722814.219 -37.21
   LOCATION L0004737     VOLUME   579815.766 3722814.661 -37.15
   LOCATION L0004738     VOLUME   579803.582 3722815.103 -37.07
   LOCATION L0004739     VOLUME   579791.398 3722815.545 -36.99
   LOCATION L0004740     VOLUME   579779.214 3722815.987 -36.83
   LOCATION L0004741     VOLUME   579767.030 3722816.429 -36.67
   LOCATION L0004742     VOLUME   579754.846 3722816.871 -36.52
   LOCATION L0004743     VOLUME   579742.662 3722817.313 -36.39
   LOCATION L0004744     VOLUME   579730.478 3722817.755 -36.27
   LOCATION L0004745     VOLUME   579718.290 3722818.032 -36.20
   LOCATION L0004746     VOLUME   579706.099 3722818.153 -36.13
   LOCATION L0004747     VOLUME   579693.907 3722818.273 -36.07
   LOCATION L0004748     VOLUME   579681.716 3722818.394 -36.02
   LOCATION L0004749     VOLUME   579669.525 3722818.515 -35.97
   LOCATION L0004750     VOLUME   579657.333 3722818.632 -35.97
   LOCATION L0004751     VOLUME   579645.141 3722818.604 -35.97
   LOCATION L0004752     VOLUME   579632.949 3722818.575 -36.01
   LOCATION L0004753     VOLUME   579620.757 3722818.546 -36.08
   LOCATION L0004754     VOLUME   579608.565 3722818.517 -36.14
   LOCATION L0004755     VOLUME   579596.373 3722818.489 -36.14
   LOCATION L0004756     VOLUME   579584.181 3722818.460 -36.14
   LOCATION L0004757     VOLUME   579571.989 3722818.431 -36.14
   LOCATION L0004758     VOLUME   579559.797 3722818.402 -36.14
   LOCATION L0004759     VOLUME   579547.605 3722818.374 -36.14
   LOCATION L0004760     VOLUME   579535.413 3722818.345 -36.14
   LOCATION L0004761     VOLUME   579523.222 3722818.316 -36.14
   LOCATION L0004762     VOLUME   579511.030 3722818.287 -36.14
   LOCATION L0004763     VOLUME   579498.838 3722818.259 -36.14
   LOCATION L0004764     VOLUME   579486.646 3722818.230 -36.14
   LOCATION L0004765     VOLUME   579474.454 3722818.201 -36.14
   LOCATION L0004766     VOLUME   579462.262 3722818.172 -36.14
   LOCATION L0004767     VOLUME   579450.070 3722818.144 -36.19
   LOCATION L0004768     VOLUME   579437.887 3722817.853 -36.24
   LOCATION L0004769     VOLUME   579425.721 3722817.051 -36.27
   LOCATION L0004770     VOLUME   579413.556 3722816.249 -36.27
   LOCATION L0004771     VOLUME   579401.390 3722815.446 -36.27
   LOCATION L0004772     VOLUME   579389.224 3722814.644 -36.27
   LOCATION L0004773     VOLUME   579377.059 3722813.842 -36.27
   LOCATION L0004774     VOLUME   579364.893 3722813.040 -36.27
   LOCATION L0004775     VOLUME   579352.728 3722812.238 -36.27
   LOCATION L0004776     VOLUME   579340.562 3722811.436 -36.27
   LOCATION L0004777     VOLUME   579328.379 3722811.085 -36.25
   LOCATION L0004778     VOLUME   579316.188 3722810.942 -36.23
   LOCATION L0004779     VOLUME   579303.997 3722810.798 -36.22
   LOCATION L0004780     VOLUME   579291.805 3722810.655 -36.22
   LOCATION L0004781     VOLUME   579279.614 3722810.511 -36.21
   LOCATION L0004782     VOLUME   579267.423 3722810.368 -36.11
   LOCATION L0004783     VOLUME   579255.232 3722810.225 -36.01
** End of LINE VOLUME Source ID = RDAIRW
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** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDAIRE
** DESCRSRC Airport Blvd east of Project Site
** PREFIX
** Length of Side = 12.19
** Configuration = Adjacent
** Emission Rate = 5.36E-06
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 3
** 580086.549, 3722811.395, -38.73, 0.00, 5.67
** 580220.964, 3722809.641, -38.34, 0.00, 5.67
** 580570.484, 3722812.421, -37.19, 0.00, 5.67
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   LOCATION L0004784     VOLUME   580092.645 3722811.316 -38.71
   LOCATION L0004785     VOLUME   580104.836 3722811.157 -38.71
   LOCATION L0004786     VOLUME   580117.026 3722810.998 -38.71
   LOCATION L0004787     VOLUME   580129.217 3722810.838 -38.62
   LOCATION L0004788     VOLUME   580141.408 3722810.679 -38.50
   LOCATION L0004789     VOLUME   580153.599 3722810.520 -38.40
   LOCATION L0004790     VOLUME   580165.790 3722810.361 -38.40
   LOCATION L0004791     VOLUME   580177.981 3722810.202 -38.40
   LOCATION L0004792     VOLUME   580190.172 3722810.043 -38.39
   LOCATION L0004793     VOLUME   580202.363 3722809.884 -38.37
   LOCATION L0004794     VOLUME   580214.554 3722809.725 -38.33
   LOCATION L0004795     VOLUME   580226.745 3722809.687 -38.22
   LOCATION L0004796     VOLUME   580238.937 3722809.784 -38.11
   LOCATION L0004797     VOLUME   580251.129 3722809.881 -38.10
   LOCATION L0004798     VOLUME   580263.320 3722809.978 -38.10
   LOCATION L0004799     VOLUME   580275.512 3722810.075 -38.09
   LOCATION L0004800     VOLUME   580287.704 3722810.172 -38.07
   LOCATION L0004801     VOLUME   580299.895 3722810.269 -38.05
   LOCATION L0004802     VOLUME   580312.087 3722810.366 -37.85
   LOCATION L0004803     VOLUME   580324.278 3722810.463 -37.65
   LOCATION L0004804     VOLUME   580336.470 3722810.560 -37.53
   LOCATION L0004805     VOLUME   580348.662 3722810.657 -37.51
   LOCATION L0004806     VOLUME   580360.853 3722810.754 -37.49
   LOCATION L0004807     VOLUME   580373.045 3722810.851 -37.49
   LOCATION L0004808     VOLUME   580385.236 3722810.947 -37.49
   LOCATION L0004809     VOLUME   580397.428 3722811.044 -37.41
   LOCATION L0004810     VOLUME   580409.620 3722811.141 -37.26
   LOCATION L0004811     VOLUME   580421.811 3722811.238 -37.12
   LOCATION L0004812     VOLUME   580434.003 3722811.335 -37.02
   LOCATION L0004813     VOLUME   580446.195 3722811.432 -36.92
   LOCATION L0004814     VOLUME   580458.386 3722811.529 -36.88
   LOCATION L0004815     VOLUME   580470.578 3722811.626 -36.88
   LOCATION L0004816     VOLUME   580482.769 3722811.723 -36.88
   LOCATION L0004817     VOLUME   580494.961 3722811.820 -36.88
   LOCATION L0004818     VOLUME   580507.153 3722811.917 -36.88
   LOCATION L0004819     VOLUME   580519.344 3722812.014 -36.97
   LOCATION L0004820     VOLUME   580531.536 3722812.111 -37.09
   LOCATION L0004821     VOLUME   580543.727 3722812.208 -37.19
   LOCATION L0004822     VOLUME   580555.919 3722812.305 -37.19
   LOCATION L0004823     VOLUME   580568.111 3722812.402 -37.19
** End of LINE VOLUME Source ID = RDAIRE
   LOCATION IDLING1      POINT      579805.150  3723587.850      -35.970
** DESCRSRC Truck Idling at LW-1A
   LOCATION IDLING2      POINT      579874.040  3723475.220      -36.230
** DESCRSRC Truck Idling at LW-1B
   LOCATION IDLING3      POINT      579883.560  3723455.580      -36.270
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** DESCRSRC Truck Idling at LW-2
   LOCATION IDLING4      POINT      579760.060  3723570.450      -35.970
** DESCRSRC Truck Idling at LW-3A
   LOCATION IDLING5      POINT      579788.530  3723421.660      -36.120
** DESCRSRC Truck Idling at LW-3B
   LOCATION IDLING6      POINT      579808.320  3723334.150      -35.850
** DESCRSRC Truck Idling at LW-4
** Source Parameters **
** LINE VOLUME Source ID = RDONW
   SRCPARAM L0004227     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004228     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004229     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004230     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004231     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004232     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004233     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004234     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004235     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004236     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004237     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004238     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004239     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004240     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004241     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004242     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004243     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004244     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004245     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004246     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004247     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004248     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004249     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004250     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004251     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004252     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004253     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004254     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004255     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004256     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004257     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004258     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004259     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004260     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004261     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004262     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004263     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004264     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004265     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004266     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004267     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004268     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004269     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004270     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004271     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004272     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004273     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004274     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004275     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004276     0.00000004701      0.00      1.70      0.85
   SRCPARAM L0004277     0.00000004701      0.00      1.70      0.85
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SRCPARAM L0004457     0.00000004701      0.00      1.70      0.85
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SRCPARAM L0004571     0.00000004667      0.00      1.70      0.85
SRCPARAM L0004572     0.00000004667      0.00      1.70      0.85
SRCPARAM L0004573     0.00000004667      0.00      1.70      0.85
SRCPARAM L0004574     0.00000004667      0.00      1.70      0.85
SRCPARAM L0004575     0.00000004667      0.00      1.70      0.85
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SRCPARAM	L0004576	0.00000004667	0.00	1.70	0.85
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SRCPARAM	L0004584	0.00000004667	0.00	1.70	0.85
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SRCPARAM	L0004590	0.00000004667	0.00	1.70	0.85
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SRCPARAM	L0004592	0.00000004667	0.00	1.70	0.85
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SRCPARAM	L0004599	0.00000004667	0.00	1.70	0.85
SRCPARAM	L0004600	0.00000004667	0.00	1.70	0.85
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SRCPARAM	L0004602	0.00000004667	0.00	1.70	0.85
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SRCPARAM	L0004609	0.00000004667	0.00	1.70	0.85
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SRCPARAM	L0004635	0.00000004667	0.00	1.70	0.85

SRCPARAM	L0004636	0.00000004667	0.00	1.70	0.85
SRCPARAM	L0004637	0.00000004667	0.00	1.70	0.85
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SRCPARAM	L0004648	0.00000004667	0.00	1.70	0.85
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SRCPARAM	L0004659	0.00000004667	0.00	1.70	0.85
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SRCPARAM	L0004666	0.00000004667	0.00	1.70	0.85
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SRCPARAM	L0004675	0.00000004667	0.00	1.70	0.85
SRCPARAM	L0004676	0.00000004667	0.00	1.70	0.85
SRCPARAM	L0004677	0.00000004667	0.00	1.70	0.85
SRCPARAM	L0004678	0.00000004667	0.00	1.70	0.85
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SRCPARAM	L0004680	0.00000004667	0.00	1.70	0.85
SRCPARAM	L0004681	0.00000004667	0.00	1.70	0.85
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SRCPARAM	L0004685	0.00000004667	0.00	1.70	0.85
SRCPARAM	L0004686	0.00000004667	0.00	1.70	0.85
SRCPARAM	L0004687	0.00000004667	0.00	1.70	0.85
SRCPARAM	L0004688	0.00000004667	0.00	1.70	0.85
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SRCPARAM	L0004690	0.00000004667	0.00	1.70	0.85
SRCPARAM	L0004691	0.00000004667	0.00	1.70	0.85
SRCPARAM	L0004692	0.00000004667	0.00	1.70	0.85
SRCPARAM	L0004693	0.00000004667	0.00	1.70	0.85
SRCPARAM	L0004694	0.00000004667	0.00	1.70	0.85
SRCPARAM	L0004695	0.00000004667	0.00	1.70	0.85

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   SRCPARAM L0004698     0.00000004667      0.00      1.70      0.85
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   SRCPARAM L0004701     0.00000004667      0.00      1.70      0.85
   SRCPARAM L0004702     0.00000004667      0.00      1.70      0.85
   SRCPARAM L0004703     0.00000004667      0.00      1.70      0.85
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   SRCPARAM L0004705     0.00000004667      0.00      1.70      0.85
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   SRCPARAM L0004707     0.00000004667      0.00      1.70      0.85
   SRCPARAM L0004708     0.00000004667      0.00      1.70      0.85
   SRCPARAM L0004709     0.00000004667      0.00      1.70      0.85
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   SRCPARAM L0004711     0.00000004667      0.00      1.70      0.85
   SRCPARAM L0004712     0.00000004667      0.00      1.70      0.85
   SRCPARAM L0004713     0.00000004667      0.00      1.70      0.85
   SRCPARAM L0004714     0.00000004667      0.00      1.70      0.85
   SRCPARAM L0004715     0.00000004667      0.00      1.70      0.85
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** LINE VOLUME Source ID = RDAIRW
   SRCPARAM L0004716     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004717     0.00000003368      0.00      5.67      0.85
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   SRCPARAM L0004719     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004720     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004721     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004722     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004723     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004724     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004725     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004726     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004727     0.00000003368      0.00      5.67      0.85
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   SRCPARAM L0004729     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004730     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004731     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004732     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004733     0.00000003368      0.00      5.67      0.85
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   SRCPARAM L0004737     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004738     0.00000003368      0.00      5.67      0.85
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   SRCPARAM L0004745     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004746     0.00000003368      0.00      5.67      0.85
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   SRCPARAM L0004750     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004751     0.00000003368      0.00      5.67      0.85
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   SRCPARAM L0004753     0.00000003368      0.00      5.67      0.85
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   SRCPARAM L0004761     0.00000003368      0.00      5.67      0.85
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   SRCPARAM L0004769     0.00000003368      0.00      5.67      0.85
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   SRCPARAM L0004774     0.00000003368      0.00      5.67      0.85
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   SRCPARAM L0004776     0.00000003368      0.00      5.67      0.85
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   SRCPARAM L0004782     0.00000003368      0.00      5.67      0.85
   SRCPARAM L0004783     0.00000003368      0.00      5.67      0.85
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** LINE VOLUME Source ID = RDAIRE
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   SRCPARAM L0004785     0.000000134      0.00      5.67      0.85
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   SRCPARAM L0004801     0.000000134      0.00      5.67      0.85
   SRCPARAM L0004802     0.000000134      0.00      5.67      0.85
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   SRCPARAM L0004807     0.000000134      0.00      5.67      0.85
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   SRCPARAM L0004814     0.000000134      0.00      5.67      0.85
   SRCPARAM L0004815     0.000000134      0.00      5.67      0.85
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   SRCPARAM L0004821     0.000000134      0.00      5.67      0.85
   SRCPARAM L0004822     0.000000134      0.00      5.67      0.85
   SRCPARAM L0004823     0.000000134      0.00      5.67      0.85
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   SRCPARAM IDLING1      0.0000172     3.840   366.000        50       0.1
   SRCPARAM IDLING2      0.0000172     3.840   366.000        50       0.1
   SRCPARAM IDLING3      0.0000172     3.840   366.000        50       0.1
   SRCPARAM IDLING4      0.0000172     3.840   366.000        50       0.1
   SRCPARAM IDLING5      0.0000172     3.840   366.000        50       0.1
   SRCPARAM IDLING6      0.0000172     3.840   366.000        50       0.1

** Building Downwash **
   BUILDHGT IDLING1         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING1         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING1         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING1          0.00     0.00     0.00    14.94    14.94    14.94
   BUILDHGT IDLING1         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING1         14.94    14.94    14.94    14.94    14.94    14.94

   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94
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   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94
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   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94
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   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94
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   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94

   BUILDHGT IDLING4         14.94    14.94    14.94    14.94    14.94     0.00
   BUILDHGT IDLING4          0.00     0.00     0.00    14.94    14.94    14.94
   BUILDHGT IDLING4         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING4         14.94    14.94    14.94    14.94    14.94     0.00
   BUILDHGT IDLING4         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING4         14.94    14.94    14.94    14.94    14.94    14.94

   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94

   BUILDHGT IDLING6         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING6         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING6         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING6         14.94    14.94    14.94    14.94    14.94    14.94
```

BUILDHGT IDLING6	14.94	14.94	14.94	14.94	14.94	14.94
BUILDHGT IDLING6	14.94	14.94	14.94	14.94	14.94	14.94
BUILDWID IDLING1	110.05	125.30	136.75	138.75	139.85	136.71
BUILDWID IDLING1	133.41	126.74	118.94	115.88	109.29	99.39
BUILDWID IDLING1	86.46	70.91	53.20	67.65	86.09	101.90
BUILDWID IDLING1	0.00	0.00	0.00	138.75	139.85	136.71
BUILDWID IDLING1	133.41	126.74	118.94	115.88	109.29	99.39
BUILDWID IDLING1	86.46	70.91	53.20	67.65	86.09	101.90
BUILDWID IDLING2	99.31	97.41	92.56	84.90	139.85	136.71
BUILDWID IDLING2	133.41	126.74	118.94	115.88	109.29	99.39
BUILDWID IDLING2	86.46	70.91	53.20	67.65	86.09	101.90
BUILDWID IDLING2	114.62	124.05	133.42	138.75	139.85	136.71
BUILDWID IDLING2	133.41	126.74	118.94	115.88	109.29	99.39
BUILDWID IDLING2	86.46	70.91	53.20	67.65	86.09	98.18
BUILDWID IDLING3	99.31	97.41	92.56	84.90	74.65	235.52
BUILDWID IDLING3	235.02	228.26	214.76	201.15	181.42	99.39
BUILDWID IDLING3	86.46	70.91	53.20	67.65	86.09	101.90
BUILDWID IDLING3	114.62	124.05	133.42	138.75	236.70	235.52
BUILDWID IDLING3	235.02	228.26	214.76	201.15	181.42	99.39
BUILDWID IDLING3	86.46	70.91	53.20	67.65	86.09	98.18
BUILDWID IDLING4	110.05	125.30	136.75	144.03	146.95	0.00
BUILDWID IDLING4	0.00	0.00	0.00	136.59	131.11	121.66
BUILDWID IDLING4	86.46	92.38	72.81	71.83	71.93	91.46
BUILDWID IDLING4	110.05	125.30	136.75	144.03	146.95	0.00
BUILDWID IDLING4	133.41	126.74	118.94	115.88	109.29	99.39
BUILDWID IDLING4	86.46	92.38	72.81	71.83	71.93	91.46
BUILDWID IDLING5	99.31	125.30	136.75	144.03	146.95	145.39
BUILDWID IDLING5	146.45	144.22	91.25	96.68	99.17	98.64
BUILDWID IDLING5	95.12	92.06	72.81	87.10	94.07	98.18
BUILDWID IDLING5	99.31	125.30	136.75	144.03	146.95	145.39
BUILDWID IDLING5	146.45	144.22	91.25	96.68	99.17	98.64
BUILDWID IDLING5	95.12	88.71	79.61	87.10	94.07	98.18
BUILDWID IDLING6	99.31	97.41	92.56	84.90	74.65	62.14
BUILDWID IDLING6	72.33	83.05	91.25	96.68	99.17	98.64
BUILDWID IDLING6	95.12	88.71	79.61	87.10	94.07	98.18
BUILDWID IDLING6	99.31	97.41	92.56	84.90	74.65	62.14
BUILDWID IDLING6	72.33	83.05	91.25	96.68	99.17	98.64
BUILDWID IDLING6	95.12	88.71	79.61	87.10	94.07	98.18
BUILDLEN IDLING1	136.59	131.11	121.66	86.46	70.91	53.20
BUILDLEN IDLING1	67.65	86.09	101.90	114.62	124.05	133.42
BUILDLEN IDLING1	138.75	139.85	136.71	133.41	126.74	118.94
BUILDLEN IDLING1	0.00	0.00	0.00	86.46	70.91	53.20
BUILDLEN IDLING1	67.65	86.09	101.90	114.62	124.05	133.42
BUILDLEN IDLING1	138.75	139.85	136.71	133.41	126.74	118.94
BUILDLEN IDLING2	96.68	99.17	98.64	95.12	70.91	53.20
BUILDLEN IDLING2	67.65	86.09	101.90	114.62	124.05	133.42
BUILDLEN IDLING2	138.75	139.85	136.71	133.41	126.74	118.94
BUILDLEN IDLING2	115.88	109.29	99.39	86.46	70.91	53.20
BUILDLEN IDLING2	67.65	86.09	101.90	114.62	124.05	133.42
BUILDLEN IDLING2	138.75	139.85	136.71	133.41	126.74	91.25
BUILDLEN IDLING3	96.68	99.17	98.64	95.12	88.71	55.76

BUILDLEN	IDLING3	82.18	117.37	148.99	176.09	198.02	133.42
BUILDLEN	IDLING3	138.75	139.85	136.71	133.41	126.74	118.94
BUILDLEN	IDLING3	115.88	109.29	99.39	86.46	92.38	55.76
BUILDLEN	IDLING3	82.18	117.37	148.99	176.09	198.02	133.42
BUILDLEN	IDLING3	138.75	139.85	136.71	133.41	126.74	91.25
BUILDLEN	IDLING4	136.59	131.11	121.66	108.51	92.06	0.00
BUILDLEN	IDLING4	0.00	0.00	0.00	110.05	125.30	136.75
BUILDLEN	IDLING4	138.75	236.70	145.39	146.45	144.22	142.10
BUILDLEN	IDLING4	136.59	131.11	121.66	108.51	92.06	0.00
BUILDLEN	IDLING4	67.65	86.09	101.90	114.62	124.05	133.42
BUILDLEN	IDLING4	138.75	236.70	145.39	146.45	144.22	142.10
BUILDLEN	IDLING5	96.68	131.11	121.66	108.51	92.06	72.81
BUILDLEN	IDLING5	71.83	71.93	98.18	99.31	97.41	92.56
BUILDLEN	IDLING5	84.90	146.95	145.39	72.33	83.05	91.25
BUILDLEN	IDLING5	96.68	131.11	121.66	108.51	92.06	72.81
BUILDLEN	IDLING5	71.83	71.93	98.18	99.31	97.41	92.56
BUILDLEN	IDLING5	84.90	74.65	62.14	72.33	83.05	91.25
BUILDLEN	IDLING6	96.68	99.17	98.64	95.12	88.71	79.61
BUILDLEN	IDLING6	87.10	94.07	98.18	99.31	97.41	92.56
BUILDLEN	IDLING6	84.90	74.65	62.14	72.33	83.05	91.25
BUILDLEN	IDLING6	96.68	99.17	98.64	95.12	88.71	79.61
BUILDLEN	IDLING6	87.10	94.07	98.18	99.31	97.41	92.56
BUILDLEN	IDLING6	84.90	74.65	62.14	72.33	83.05	91.25
XBADJ	IDLING1	-166.84	-164.57	-157.29	-48.98	-27.99	-6.15
XBADJ	IDLING1	-0.37	2.37	5.04	7.56	9.65	7.73
XBADJ	IDLING1	5.58	3.26	0.85	-1.60	-4.00	-6.47
XBADJ	IDLING1	0.00	0.00	0.00	-37.47	-42.91	-47.05
XBADJ	IDLING1	-67.28	-88.46	-106.94	-122.17	-133.70	-141.16
XBADJ	IDLING1	-144.33	-143.11	-137.55	-131.81	-122.74	-112.47
XBADJ	IDLING2	-159.04	-162.04	-160.12	-153.33	-8.37	-9.50
XBADJ	IDLING2	-26.58	-45.91	-63.85	-79.85	-93.61	-108.24
XBADJ	IDLING2	-119.59	-127.30	-131.14	-131.00	-126.88	-119.10
XBADJ	IDLING2	-114.11	-105.66	-93.99	-79.47	-62.54	-43.70
XBADJ	IDLING2	-41.07	-40.17	-38.05	-34.77	-30.44	-25.18
XBADJ	IDLING2	-19.16	-12.55	-5.57	-2.41	0.14	-151.21
XBADJ	IDLING3	-141.35	-146.84	-147.87	-144.40	-136.55	-10.48
XBADJ	IDLING3	-28.81	-51.88	-73.37	-92.63	-109.27	-126.31
XBADJ	IDLING3	-139.50	-148.46	-152.91	-152.71	-147.87	-138.74
XBADJ	IDLING3	-131.80	-120.86	-106.24	-88.40	-67.87	-45.28
XBADJ	IDLING3	-53.37	-65.49	-75.62	-83.45	-88.75	-7.12
XBADJ	IDLING3	0.76	8.61	16.20	19.30	21.13	-131.57
XBADJ	IDLING4	-141.87	-132.79	-119.68	-102.93	-83.05	0.00
XBADJ	IDLING4	0.00	0.00	0.00	-4.55	-1.97	0.67
XBADJ	IDLING4	28.94	18.92	8.14	10.24	11.91	8.73
XBADJ	IDLING4	5.28	1.68	-1.98	-5.58	-9.00	0.00
XBADJ	IDLING4	-115.61	-135.88	-152.03	-163.56	-170.12	-171.51
XBADJ	IDLING4	-167.69	-255.61	-153.54	-156.69	-156.13	-150.83
XBADJ	IDLING5	-91.45	-2.71	-5.06	-7.25	-9.22	-10.91
XBADJ	IDLING5	-12.27	-13.26	-2.29	5.47	13.06	20.26
XBADJ	IDLING5	26.84	-126.48	-134.95	28.73	17.84	6.40
XBADJ	IDLING5	-5.23	-128.40	-116.60	-101.26	-82.84	-61.90
XBADJ	IDLING5	-59.56	-58.67	-95.89	-104.78	-110.48	-112.82

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   XBADJ    IDLING5       -111.74  -107.26   -99.53  -101.06  -100.89   -97.65

   XBADJ    IDLING6         -8.70    -7.00    -5.09    -3.02    -0.86     1.33
   XBADJ    IDLING6         -6.03   -14.27   -22.08   -29.21   -35.46   -40.63
   XBADJ    IDLING6        -44.57   -47.15   -48.30   -60.27   -71.78   -81.11
   XBADJ    IDLING6        -87.97   -92.17   -93.56   -92.11   -87.86   -80.94
   XBADJ    IDLING6        -81.07   -79.80   -76.10   -70.09   -61.95   -51.93
   XBADJ    IDLING6        -40.33   -27.51   -13.84   -12.06   -11.27   -10.14

   YBADJ    IDLING1         -9.09   -24.26   -38.69   -74.96   -73.19   -69.20
   YBADJ    IDLING1        -65.11   -59.37   -53.00   -42.78   -31.26   -18.79
   YBADJ    IDLING1         -5.75     7.46    20.45    33.46    45.41    55.99
   YBADJ    IDLING1          0.00     0.00     0.00    74.96    73.19    69.20
   YBADJ    IDLING1         65.10    59.37    53.00    42.78    31.26    18.79
   YBADJ    IDLING1          5.75    -7.46   -20.45   -33.46   -45.41   -55.99

   YBADJ    IDLING2         19.79     0.26   -19.27   -38.22    57.37    62.79
   YBADJ    IDLING2         64.29    63.51    59.63    56.17    51.01    44.30
   YBADJ    IDLING2         36.24    27.08    17.10     7.24    -2.87   -12.90
   YBADJ    IDLING2        -22.54   -31.58   -41.53   -50.21   -57.37   -62.79
   YBADJ    IDLING2        -64.29   -63.51   -59.63   -56.17   -51.01   -44.30
   YBADJ    IDLING2        -36.24   -27.08   -17.10    -7.24     2.87    38.71

   YBADJ    IDLING3         32.57    15.93    -1.20   -18.30   -34.84    35.15
   YBADJ    IDLING3         35.20    33.74    31.36    31.23    30.15    56.55
   YBADJ    IDLING3         45.17    32.42    18.68     5.01    -8.84   -22.42
   YBADJ    IDLING3        -35.32   -47.25   -59.59   -70.13   -30.11   -35.15
   YBADJ    IDLING3        -35.20   -33.74   -31.36   -31.23   -30.15   -56.55
   YBADJ    IDLING3        -45.17   -32.42   -18.68    -5.01     8.84    48.23

   YBADJ    IDLING4        -50.48   -60.68   -69.04   -75.30   -79.28     0.00
   YBADJ    IDLING4          0.00     0.00     0.00   -73.58   -67.24   -58.85
   YBADJ    IDLING4         36.56    42.45   -24.25    -0.49    24.91    38.74
   YBADJ    IDLING4         50.48    60.68    69.04    75.30    79.28     0.00
   YBADJ    IDLING4         64.18    50.07    35.60    17.82    -0.51   -18.82
   YBADJ    IDLING4        -36.56   -42.45    24.25     0.49   -24.91   -38.74

   YBADJ    IDLING5        -55.12    16.96    30.01    42.15    53.00    62.25
   YBADJ    IDLING5         66.09    67.45   -52.02   -43.11   -32.88   -21.65
   YBADJ    IDLING5         -9.77    36.81    25.49    26.18    37.05    46.80
   YBADJ    IDLING5         55.12   -16.96   -30.01   -42.15   -53.00   -62.25
   YBADJ    IDLING5        -66.09   -67.45    52.02    43.11    32.88    21.65
   YBADJ    IDLING5          9.77    -2.41   -14.52   -26.18   -37.06   -46.80

   YBADJ    IDLING6        -20.44   -13.24    -5.65     2.12     9.82    17.23
   YBADJ    IDLING6         24.11    30.26    35.48    39.64    42.58    44.24
   YBADJ    IDLING6         44.54    43.50    41.13    37.52    32.76    27.01
   YBADJ    IDLING6         20.44    13.24     5.65    -2.12    -9.82   -17.23
   YBADJ    IDLING6        -24.11   -30.26   -35.49   -39.64   -42.58   -44.24
   YBADJ    IDLING6        -44.54   -43.50   -41.13   -37.52   -32.76   -27.01

   URBANSRC ALL
   SRCGROUP ALL
SO FINISHED
**
**********************************
** AERMOD Receptor Pathway
**********************************
**
**
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RE STARTING
   INCLUDED DPM42-54.rou
RE FINISHED
**
**************************************
** AERMOD Meteorology Pathway
**************************************
**
**
ME STARTING
   SURFFILE ..\ktrm_sfc_pfl\KTRM_V11_trimmed.sfc
   PROFFILE ..\ktrm_sfc_pfl\KTRM_V11_trimmed.pfl
   SURFDATA 3104 2017
   UAIRDATA 3190 2017
   PROFBASE -36.0 METERS
ME FINISHED
**
**************************************
** AERMOD Output Pathway
**************************************
**
**
OU STARTING
   RECTABLE ALLAVE 1ST
   RECTABLE 1 1ST
** Auto-Generated Plotfiles
   PLOTFILE 1 ALL 1ST DPM42-54.AD\01H1GALL.PLT 31
   PLOTFILE PERIOD ALL DPM42-54.AD\PE00GALL.PLT 32
   SUMMFILE DPM42-54.sum
OU FINISHED
**
**************************************
** Project Parameters
**************************************
** PROJCTN  CoordinateSystemUTM
** DESCPTN  UTM: Universal Transverse Mercator
** DATUM    World Geodetic System 1984
** DTMRGN   Global Definition
** UNITS    m
** ZONE     11
** ZONEINX  0
**
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* MODELING OPTIONS USED: CONC ELEV URBAN ADJ_U*
* PLOT FILE OF PERIOD VALUES AVERAGED ACROSS 0 YEARS FOR SOURCE GROUP: ALL
* FOR A TOTAL OF 11 RECEPTORS.
* FORMAT: (3(1X,F13.5),3(1X,F8.2),2X,A6,2X,A8,2X,I8.8,2X,A8)

* X	Y	AVERAGE CONC	ZELEV	ZHILL	ZFLAG	AVE	GRP	NUM HRS	NET ID
580086.00000	3722773.00000	0.00129	-39.01	-39.01	0.00	PERIOD	ALL	00043800	
580122.00000	3722774.00000	0.00145	-38.71	-38.71	0.00	PERIOD	ALL	00043800	
580172.00000	3722775.00000	0.00135	-38.50	-38.50	0.00	PERIOD	ALL	00043800	
580242.00000	3722717.00000	0.00077	-38.40	-38.40	0.00	PERIOD	ALL	00043800	
580289.00000	3722738.00000	0.00081	-37.99	-37.99	0.00	PERIOD	ALL	00043800	
580337.00000	3722732.00000	0.00072	-37.80	-37.80	0.00	PERIOD	ALL	00043800	
579963.00000	3722704.00000	0.00065	-36.08	-36.08	0.00	PERIOD	ALL	00043800	
579927.00000	3722644.00000	0.00050	-36.33	-36.33	0.00	PERIOD	ALL	00043800	
579519.00000	3722783.00000	0.00035	-36.27	-36.27	0.00	PERIOD	ALL	00043800	
579466.00000	3722781.00000	0.00031	-36.27	-36.27	0.00	PERIOD	ALL	00043800	
579393.00000	3722779.00000	0.00028	-36.27	-36.27	0.00	PERIOD	ALL	00043800	

** CONCUNIT ug/m^3
** DEPUNIT g/m^2

APPENDIX H

AERMOD Model Site Preparation PM2.5 Emissions Printouts

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**
**************************************
**
** AERMOD Input Produced by:
** AERMOD View Ver. 13.0.0
** Lakes Environmental Software Inc.
** Date: 10/1/2025
** File: C:\Vista Env\2019\19039 Coachella\AERMOD\Constr24All\Constr24All.ADI
**
**************************************
**
**
**************************************
** AERMOD Control Pathway
**************************************
**
**
CO STARTING
   TITLEONE Coachella Airport Business Park-Site Preparation DPM+Fugitive Dust
   TITLETWO PM2.5
   MODELOPT DFAULT CONC
   AVERTIME 1 24 PERIOD
   URBANOPT 2189641 Riverside_Co
   POLLUTID PM_2.5
   RUNORNOT RUN
   ERRORFIL Constr24All.err
CO FINISHED
**
**************************************
** AERMOD Source Pathway
**************************************
**
**
SO STARTING
** Source Location **
** Source ID - Type - X Coord. - Y Coord. **
** ------------------------------------------------------------------------
** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDONW
** DESCRSRC Onsite Road West
** PREFIX
** Length of Side = 3.66
** Configuration = Adjacent
** Emission Rate = 6.35E-06
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 12
** 580077.130, 3722819.702, -38.87, 0.00, 1.70
** 580075.723, 3722829.973, -38.77, 0.00, 1.70
** 580054.577, 3722864.362, -38.73, 0.00, 1.70
** 580045.833, 3722877.181, -38.88, 0.00, 1.70
** 579930.018, 3723057.672, -38.69, 0.00, 1.70
** 579892.856, 3723115.163, -37.71, 0.00, 1.70
** 579849.461, 3723190.506, -36.29, 0.00, 1.70
** 579823.082, 3723246.755, -36.03, 0.00, 1.70
** 579796.274, 3723323.282, -35.97, 0.00, 1.70
** 579782.061, 3723364.922, -35.95, 0.00, 1.70
** 579768.794, 3723424.825, -36.02, 0.00, 1.70
** 579741.158, 3723594.651, -35.95, 0.00, 1.70
** ------------------------------------------------------------------------
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LOCATION L0004227     VOLUME   580076.882 3722821.514 -38.85
LOCATION L0004228     VOLUME   580076.385 3722825.138 -38.82
LOCATION L0004229     VOLUME   580075.889 3722828.761 -38.78
LOCATION L0004230     VOLUME   580074.448 3722832.047 -38.77
LOCATION L0004231     VOLUME   580072.532 3722835.163 -38.76
LOCATION L0004232     VOLUME   580070.616 3722838.278 -38.76
LOCATION L0004233     VOLUME   580068.700 3722841.394 -38.76
LOCATION L0004234     VOLUME   580066.784 3722844.510 -38.75
LOCATION L0004235     VOLUME   580064.868 3722847.625 -38.75
LOCATION L0004236     VOLUME   580062.953 3722850.741 -38.75
LOCATION L0004237     VOLUME   580061.037 3722853.857 -38.74
LOCATION L0004238     VOLUME   580059.121 3722856.973 -38.74
LOCATION L0004239     VOLUME   580057.205 3722860.088 -38.73
LOCATION L0004240     VOLUME   580055.289 3722863.204 -38.73
LOCATION L0004241     VOLUME   580053.282 3722866.261 -38.75
LOCATION L0004242     VOLUME   580051.221 3722869.282 -38.79
LOCATION L0004243     VOLUME   580049.160 3722872.303 -38.82
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** LINE VOLUME Source ID = RDONE
** DESCRSRC Onsite Road East
** PREFIX
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LOCATION L0004532     VOLUME   580113.943 3723011.663 -38.01
LOCATION L0004533     VOLUME   580112.130 3723014.839 -38.01
LOCATION L0004534     VOLUME   580110.318 3723018.016 -38.00
LOCATION L0004535     VOLUME   580108.505 3723021.193 -38.00
LOCATION L0004536     VOLUME   580106.693 3723024.370 -37.99
LOCATION L0004537     VOLUME   580104.880 3723027.547 -37.98
LOCATION L0004538     VOLUME   580103.068 3723030.724 -37.98
LOCATION L0004539     VOLUME   580101.255 3723033.901 -37.97
LOCATION L0004540     VOLUME   580099.443 3723037.078 -37.97
LOCATION L0004541     VOLUME   580097.630 3723040.255 -37.96
LOCATION L0004542     VOLUME   580095.818 3723043.432 -37.96
LOCATION L0004543     VOLUME   580094.005 3723046.609 -37.95
LOCATION L0004544     VOLUME   580092.193 3723049.786 -37.95
LOCATION L0004545     VOLUME   580090.381 3723052.963 -37.94
LOCATION L0004546     VOLUME   580088.568 3723056.140 -37.93
LOCATION L0004547     VOLUME   580086.756 3723059.317 -37.93
LOCATION L0004548     VOLUME   580084.943 3723062.494 -37.92
LOCATION L0004549     VOLUME   580083.131 3723065.671 -37.92
LOCATION L0004550     VOLUME   580081.318 3723068.848 -37.91
LOCATION L0004551     VOLUME   580079.506 3723072.025 -37.91
LOCATION L0004552     VOLUME   580077.693 3723075.202 -37.90
LOCATION L0004553     VOLUME   580075.881 3723078.378 -37.90
LOCATION L0004554     VOLUME   580074.068 3723081.555 -37.89
LOCATION L0004555     VOLUME   580072.256 3723084.732 -37.88
LOCATION L0004556     VOLUME   580070.443 3723087.909 -37.88
LOCATION L0004557     VOLUME   580068.631 3723091.086 -37.87
LOCATION L0004558     VOLUME   580066.818 3723094.263 -37.87
LOCATION L0004559     VOLUME   580065.006 3723097.440 -37.86
LOCATION L0004560     VOLUME   580063.194 3723100.617 -37.86
LOCATION L0004561     VOLUME   580061.381 3723103.794 -37.85
LOCATION L0004562     VOLUME   580059.569 3723106.971 -37.85
LOCATION L0004563     VOLUME   580057.756 3723110.148 -37.84
LOCATION L0004564     VOLUME   580055.944 3723113.325 -37.83
LOCATION L0004565     VOLUME   580054.131 3723116.502 -37.83
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LOCATION L0004566     VOLUME   580052.319 3723119.679 -37.82
LOCATION L0004567     VOLUME   580050.506 3723122.856 -37.82
LOCATION L0004568     VOLUME   580048.694 3723126.033 -37.81
LOCATION L0004569     VOLUME   580046.881 3723129.210 -37.81
LOCATION L0004570     VOLUME   580045.069 3723132.387 -37.80
LOCATION L0004571     VOLUME   580043.256 3723135.564 -37.79
LOCATION L0004572     VOLUME   580041.444 3723138.741 -37.79
LOCATION L0004573     VOLUME   580039.632 3723141.917 -37.78
LOCATION L0004574     VOLUME   580037.819 3723145.094 -37.78
LOCATION L0004575     VOLUME   580036.007 3723148.271 -37.77
LOCATION L0004576     VOLUME   580034.194 3723151.448 -37.77
LOCATION L0004577     VOLUME   580032.382 3723154.625 -37.76
LOCATION L0004578     VOLUME   580030.569 3723157.802 -37.76
LOCATION L0004579     VOLUME   580028.757 3723160.979 -37.75
LOCATION L0004580     VOLUME   580026.944 3723164.156 -37.74
LOCATION L0004581     VOLUME   580025.132 3723167.333 -37.74
LOCATION L0004582     VOLUME   580023.319 3723170.510 -37.73
LOCATION L0004583     VOLUME   580021.489 3723173.677 -37.72
LOCATION L0004584     VOLUME   580019.622 3723176.822 -37.70
LOCATION L0004585     VOLUME   580017.755 3723179.967 -37.67
LOCATION L0004586     VOLUME   580015.888 3723183.112 -37.65
LOCATION L0004587     VOLUME   580014.021 3723186.258 -37.63
LOCATION L0004588     VOLUME   580012.154 3723189.403 -37.60
LOCATION L0004589     VOLUME   580010.287 3723192.548 -37.58
LOCATION L0004590     VOLUME   580008.420 3723195.693 -37.55
LOCATION L0004591     VOLUME   580006.553 3723198.838 -37.53
LOCATION L0004592     VOLUME   580004.686 3723201.984 -37.51
LOCATION L0004593     VOLUME   580002.819 3723205.129 -37.48
LOCATION L0004594     VOLUME   580000.952 3723208.274 -37.46
LOCATION L0004595     VOLUME   579999.085 3723211.419 -37.43
LOCATION L0004596     VOLUME   579997.218 3723214.565 -37.41
LOCATION L0004597     VOLUME   579995.351 3723217.710 -37.39
LOCATION L0004598     VOLUME   579993.484 3723220.855 -37.36
LOCATION L0004599     VOLUME   579991.617 3723224.000 -37.34
LOCATION L0004600     VOLUME   579989.750 3723227.145 -37.31
LOCATION L0004601     VOLUME   579987.883 3723230.291 -37.29
LOCATION L0004602     VOLUME   579986.016 3723233.436 -37.26
LOCATION L0004603     VOLUME   579984.149 3723236.581 -37.24
LOCATION L0004604     VOLUME   579982.282 3723239.726 -37.22
LOCATION L0004605     VOLUME   579980.415 3723242.871 -37.19
LOCATION L0004606     VOLUME   579978.548 3723246.017 -37.17
LOCATION L0004607     VOLUME   579976.681 3723249.162 -37.14
LOCATION L0004608     VOLUME   579974.814 3723252.307 -37.12
LOCATION L0004609     VOLUME   579972.947 3723255.452 -37.10
LOCATION L0004610     VOLUME   579971.080 3723258.598 -37.07
LOCATION L0004611     VOLUME   579969.213 3723261.743 -37.05
LOCATION L0004612     VOLUME   579967.346 3723264.888 -37.02
LOCATION L0004613     VOLUME   579965.479 3723268.033 -37.00
LOCATION L0004614     VOLUME   579963.612 3723271.178 -36.98
LOCATION L0004615     VOLUME   579961.745 3723274.324 -36.95
LOCATION L0004616     VOLUME   579959.879 3723277.469 -36.93
LOCATION L0004617     VOLUME   579958.012 3723280.614 -36.90
LOCATION L0004618     VOLUME   579956.145 3723283.759 -36.88
LOCATION L0004619     VOLUME   579954.278 3723286.904 -36.86
LOCATION L0004620     VOLUME   579952.411 3723290.050 -36.83
LOCATION L0004621     VOLUME   579950.544 3723293.195 -36.81
LOCATION L0004622     VOLUME   579948.677 3723296.340 -36.78
LOCATION L0004623     VOLUME   579946.810 3723299.485 -36.76
LOCATION L0004624     VOLUME   579944.943 3723302.631 -36.74
LOCATION L0004625     VOLUME   579943.076 3723305.776 -36.71
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LOCATION L0004626     VOLUME   579941.209 3723308.921 -36.69
LOCATION L0004627     VOLUME   579939.342 3723312.066 -36.66
LOCATION L0004628     VOLUME   579937.475 3723315.211 -36.64
LOCATION L0004629     VOLUME   579935.608 3723318.357 -36.62
LOCATION L0004630     VOLUME   579933.741 3723321.502 -36.59
LOCATION L0004631     VOLUME   579931.874 3723324.647 -36.57
LOCATION L0004632     VOLUME   579930.007 3723327.792 -36.54
LOCATION L0004633     VOLUME   579928.140 3723330.937 -36.52
LOCATION L0004634     VOLUME   579926.273 3723334.083 -36.49
LOCATION L0004635     VOLUME   579924.406 3723337.228 -36.47
LOCATION L0004636     VOLUME   579922.539 3723340.373 -36.45
LOCATION L0004637     VOLUME   579920.672 3723343.518 -36.42
LOCATION L0004638     VOLUME   579918.805 3723346.664 -36.40
LOCATION L0004639     VOLUME   579916.938 3723349.809 -36.37
LOCATION L0004640     VOLUME   579915.071 3723352.954 -36.35
LOCATION L0004641     VOLUME   579913.204 3723356.099 -36.33
LOCATION L0004642     VOLUME   579911.337 3723359.244 -36.30
LOCATION L0004643     VOLUME   579909.470 3723362.390 -36.28
LOCATION L0004644     VOLUME   579907.656 3723365.566 -36.27
LOCATION L0004645     VOLUME   579905.871 3723368.758 -36.26
LOCATION L0004646     VOLUME   579904.085 3723371.950 -36.26
LOCATION L0004647     VOLUME   579902.299 3723375.142 -36.25
LOCATION L0004648     VOLUME   579900.513 3723378.334 -36.25
LOCATION L0004649     VOLUME   579898.728 3723381.526 -36.25
LOCATION L0004650     VOLUME   579896.942 3723384.718 -36.24
LOCATION L0004651     VOLUME   579895.156 3723387.910 -36.24
LOCATION L0004652     VOLUME   579893.370 3723391.102 -36.23
LOCATION L0004653     VOLUME   579891.584 3723394.294 -36.23
LOCATION L0004654     VOLUME   579889.799 3723397.486 -36.23
LOCATION L0004655     VOLUME   579888.013 3723400.678 -36.22
LOCATION L0004656     VOLUME   579886.227 3723403.870 -36.22
LOCATION L0004657     VOLUME   579884.441 3723407.062 -36.21
LOCATION L0004658     VOLUME   579882.655 3723410.254 -36.21
LOCATION L0004659     VOLUME   579880.870 3723413.446 -36.20
LOCATION L0004660     VOLUME   579879.084 3723416.638 -36.20
LOCATION L0004661     VOLUME   579877.298 3723419.830 -36.20
LOCATION L0004662     VOLUME   579875.512 3723423.022 -36.19
LOCATION L0004663     VOLUME   579873.727 3723426.214 -36.19
LOCATION L0004664     VOLUME   579871.941 3723429.406 -36.18
LOCATION L0004665     VOLUME   579870.155 3723432.598 -36.18
LOCATION L0004666     VOLUME   579868.369 3723435.790 -36.18
LOCATION L0004667     VOLUME   579866.583 3723438.982 -36.17
LOCATION L0004668     VOLUME   579864.798 3723442.174 -36.17
LOCATION L0004669     VOLUME   579863.012 3723445.366 -36.16
LOCATION L0004670     VOLUME   579861.226 3723448.558 -36.16
LOCATION L0004671     VOLUME   579859.440 3723451.750 -36.16
LOCATION L0004672     VOLUME   579857.655 3723454.942 -36.15
LOCATION L0004673     VOLUME   579855.869 3723458.134 -36.15
LOCATION L0004674     VOLUME   579854.083 3723461.327 -36.14
LOCATION L0004675     VOLUME   579852.297 3723464.519 -36.14
LOCATION L0004676     VOLUME   579850.511 3723467.711 -36.13
LOCATION L0004677     VOLUME   579848.726 3723470.903 -36.13
LOCATION L0004678     VOLUME   579846.940 3723474.095 -36.13
LOCATION L0004679     VOLUME   579845.154 3723477.287 -36.12
LOCATION L0004680     VOLUME   579843.368 3723480.479 -36.12
LOCATION L0004681     VOLUME   579841.582 3723483.671 -36.11
LOCATION L0004682     VOLUME   579839.797 3723486.863 -36.11
LOCATION L0004683     VOLUME   579838.011 3723490.055 -36.11
LOCATION L0004684     VOLUME   579836.225 3723493.247 -36.10
LOCATION L0004685     VOLUME   579834.439 3723496.439 -36.10
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   LOCATION L0004686     VOLUME   579832.654 3723499.631 -36.09
   LOCATION L0004687     VOLUME   579830.868 3723502.823 -36.09
   LOCATION L0004688     VOLUME   579829.082 3723506.015 -36.08
   LOCATION L0004689     VOLUME   579827.296 3723509.207 -36.08
   LOCATION L0004690     VOLUME   579825.510 3723512.399 -36.08
   LOCATION L0004691     VOLUME   579823.725 3723515.591 -36.07
   LOCATION L0004692     VOLUME   579821.939 3723518.783 -36.07
   LOCATION L0004693     VOLUME   579820.153 3723521.975 -36.06
   LOCATION L0004694     VOLUME   579818.367 3723525.167 -36.06
   LOCATION L0004695     VOLUME   579816.581 3723528.359 -36.06
   LOCATION L0004696     VOLUME   579814.796 3723531.551 -36.05
   LOCATION L0004697     VOLUME   579813.010 3723534.743 -36.05
   LOCATION L0004698     VOLUME   579811.224 3723537.935 -36.04
   LOCATION L0004699     VOLUME   579809.438 3723541.127 -36.04
   LOCATION L0004700     VOLUME   579807.653 3723544.319 -36.03
   LOCATION L0004701     VOLUME   579805.867 3723547.511 -36.03
   LOCATION L0004702     VOLUME   579804.081 3723550.703 -36.03
   LOCATION L0004703     VOLUME   579802.295 3723553.895 -36.02
   LOCATION L0004704     VOLUME   579800.509 3723557.087 -36.02
   LOCATION L0004705     VOLUME   579798.724 3723560.279 -36.01
   LOCATION L0004706     VOLUME   579796.938 3723563.471 -36.01
   LOCATION L0004707     VOLUME   579795.152 3723566.663 -36.01
   LOCATION L0004708     VOLUME   579793.366 3723569.855 -36.00
   LOCATION L0004709     VOLUME   579791.580 3723573.047 -36.00
   LOCATION L0004710     VOLUME   579789.795 3723576.239 -35.99
   LOCATION L0004711     VOLUME   579788.009 3723579.431 -35.99
   LOCATION L0004712     VOLUME   579786.223 3723582.623 -35.98
   LOCATION L0004713     VOLUME   579784.437 3723585.815 -35.98
   LOCATION L0004714     VOLUME   579782.652 3723589.007 -35.98
   LOCATION L0004715     VOLUME   579780.866 3723592.199 -35.97
** End of LINE VOLUME Source ID = RDONE
** ----------------------------------------------------------------------
** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDAIRW
** DESCRSRC Airport Blvd west of Project Site
** PREFIX
** Length of Side = 12.19
** Configuration = Adjacent
** Emission Rate = 2.45E-06
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 7
** 580077.815, 3722811.474, -38.84, 0.00, 5.67
** 579930.520, 3722810.498, -38.31, 0.00, 5.67
** 579724.565, 3722817.970, -36.23, 0.00, 5.67
** 579657.572, 3722818.633, -36.01, 0.00, 5.67
** 579442.005, 3722818.125, -36.27, 0.00, 5.67
** 579336.736, 3722811.183, -36.27, 0.00, 5.67
** 579251.350, 3722810.179, -35.97, 0.00, 5.67
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   LOCATION L0004716     VOLUME   580071.719 3722811.433 -38.82
   LOCATION L0004717     VOLUME   580059.528 3722811.353 -38.77
   LOCATION L0004718     VOLUME   580047.336 3722811.272 -38.73
   LOCATION L0004719     VOLUME   580035.144 3722811.191 -38.69
   LOCATION L0004720     VOLUME   580022.952 3722811.110 -38.64
   LOCATION L0004721     VOLUME   580010.761 3722811.030 -38.60
   LOCATION L0004722     VOLUME   579998.569 3722810.949 -38.55
   LOCATION L0004723     VOLUME   579986.377 3722810.868 -38.51
   LOCATION L0004724     VOLUME   579974.185 3722810.787 -38.47
   LOCATION L0004725     VOLUME   579961.994 3722810.707 -38.42
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   LOCATION L0004726     VOLUME   579949.802 3722810.626 -38.38
   LOCATION L0004727     VOLUME   579937.610 3722810.545 -38.34
   LOCATION L0004728     VOLUME   579925.422 3722810.683 -38.26
   LOCATION L0004729     VOLUME   579913.238 3722811.125 -38.14
   LOCATION L0004730     VOLUME   579901.054 3722811.567 -38.01
   LOCATION L0004731     VOLUME   579888.870 3722812.009 -37.89
   LOCATION L0004732     VOLUME   579876.686 3722812.451 -37.77
   LOCATION L0004733     VOLUME   579864.502 3722812.893 -37.64
   LOCATION L0004734     VOLUME   579852.318 3722813.335 -37.52
   LOCATION L0004735     VOLUME   579840.134 3722813.777 -37.40
   LOCATION L0004736     VOLUME   579827.950 3722814.219 -37.27
   LOCATION L0004737     VOLUME   579815.766 3722814.661 -37.15
   LOCATION L0004738     VOLUME   579803.582 3722815.103 -37.03
   LOCATION L0004739     VOLUME   579791.398 3722815.545 -36.90
   LOCATION L0004740     VOLUME   579779.214 3722815.987 -36.78
   LOCATION L0004741     VOLUME   579767.030 3722816.429 -36.66
   LOCATION L0004742     VOLUME   579754.846 3722816.871 -36.54
   LOCATION L0004743     VOLUME   579742.662 3722817.313 -36.41
   LOCATION L0004744     VOLUME   579730.478 3722817.755 -36.29
   LOCATION L0004745     VOLUME   579718.290 3722818.032 -36.21
   LOCATION L0004746     VOLUME   579706.099 3722818.153 -36.17
   LOCATION L0004747     VOLUME   579693.907 3722818.273 -36.13
   LOCATION L0004748     VOLUME   579681.716 3722818.394 -36.09
   LOCATION L0004749     VOLUME   579669.525 3722818.515 -36.05
   LOCATION L0004750     VOLUME   579657.333 3722818.632 -36.01
   LOCATION L0004751     VOLUME   579645.141 3722818.604 -36.02
   LOCATION L0004752     VOLUME   579632.949 3722818.575 -36.04
   LOCATION L0004753     VOLUME   579620.757 3722818.546 -36.05
   LOCATION L0004754     VOLUME   579608.565 3722818.517 -36.07
   LOCATION L0004755     VOLUME   579596.373 3722818.489 -36.08
   LOCATION L0004756     VOLUME   579584.181 3722818.460 -36.10
   LOCATION L0004757     VOLUME   579571.989 3722818.431 -36.11
   LOCATION L0004758     VOLUME   579559.797 3722818.402 -36.13
   LOCATION L0004759     VOLUME   579547.605 3722818.374 -36.14
   LOCATION L0004760     VOLUME   579535.413 3722818.345 -36.16
   LOCATION L0004761     VOLUME   579523.222 3722818.316 -36.17
   LOCATION L0004762     VOLUME   579511.030 3722818.287 -36.19
   LOCATION L0004763     VOLUME   579498.838 3722818.259 -36.20
   LOCATION L0004764     VOLUME   579486.646 3722818.230 -36.22
   LOCATION L0004765     VOLUME   579474.454 3722818.201 -36.23
   LOCATION L0004766     VOLUME   579462.262 3722818.172 -36.25
   LOCATION L0004767     VOLUME   579450.070 3722818.144 -36.26
   LOCATION L0004768     VOLUME   579437.887 3722817.853 -36.27
   LOCATION L0004769     VOLUME   579425.721 3722817.051 -36.27
   LOCATION L0004770     VOLUME   579413.556 3722816.249 -36.27
   LOCATION L0004771     VOLUME   579401.390 3722815.446 -36.27
   LOCATION L0004772     VOLUME   579389.224 3722814.644 -36.27
   LOCATION L0004773     VOLUME   579377.059 3722813.842 -36.27
   LOCATION L0004774     VOLUME   579364.893 3722813.040 -36.27
   LOCATION L0004775     VOLUME   579352.728 3722812.238 -36.27
   LOCATION L0004776     VOLUME   579340.562 3722811.436 -36.27
   LOCATION L0004777     VOLUME   579328.379 3722811.085 -36.24
   LOCATION L0004778     VOLUME   579316.188 3722810.942 -36.20
   LOCATION L0004779     VOLUME   579303.997 3722810.798 -36.15
   LOCATION L0004780     VOLUME   579291.805 3722810.655 -36.11
   LOCATION L0004781     VOLUME   579279.614 3722810.511 -36.07
   LOCATION L0004782     VOLUME   579267.423 3722810.368 -36.03
   LOCATION L0004783     VOLUME   579255.232 3722810.225 -35.98
** End of LINE VOLUME Source ID = RDAIRW
** ----------------------------------------------------------------------
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** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDAIRE
** DESCRSRC Airport Blvd east of Project Site
** PREFIX
** Length of Side = 12.19
** Configuration = Adjacent
** Emission Rate = 5.74E-06
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 3
** 580086.549, 3722811.395, -38.73, 0.00, 5.67
** 580220.964, 3722809.641, -38.34, 0.00, 5.67
** 580570.484, 3722812.421, -37.19, 0.00, 5.67
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   LOCATION L0004784     VOLUME   580092.645 3722811.316 -38.71
   LOCATION L0004785     VOLUME   580104.836 3722811.157 -38.68
   LOCATION L0004786     VOLUME   580117.026 3722810.998 -38.64
   LOCATION L0004787     VOLUME   580129.217 3722810.838 -38.61
   LOCATION L0004788     VOLUME   580141.408 3722810.679 -38.57
   LOCATION L0004789     VOLUME   580153.599 3722810.520 -38.54
   LOCATION L0004790     VOLUME   580165.790 3722810.361 -38.50
   LOCATION L0004791     VOLUME   580177.981 3722810.202 -38.46
   LOCATION L0004792     VOLUME   580190.172 3722810.043 -38.43
   LOCATION L0004793     VOLUME   580202.363 3722809.884 -38.39
   LOCATION L0004794     VOLUME   580214.554 3722809.725 -38.36
   LOCATION L0004795     VOLUME   580226.745 3722809.687 -38.32
   LOCATION L0004796     VOLUME   580238.937 3722809.784 -38.28
   LOCATION L0004797     VOLUME   580251.129 3722809.881 -38.24
   LOCATION L0004798     VOLUME   580263.320 3722809.978 -38.20
   LOCATION L0004799     VOLUME   580275.512 3722810.075 -38.16
   LOCATION L0004800     VOLUME   580287.704 3722810.172 -38.12
   LOCATION L0004801     VOLUME   580299.895 3722810.269 -38.08
   LOCATION L0004802     VOLUME   580312.087 3722810.366 -38.04
   LOCATION L0004803     VOLUME   580324.278 3722810.463 -38.00
   LOCATION L0004804     VOLUME   580336.470 3722810.560 -37.96
   LOCATION L0004805     VOLUME   580348.662 3722810.657 -37.92
   LOCATION L0004806     VOLUME   580360.853 3722810.754 -37.88
   LOCATION L0004807     VOLUME   580373.045 3722810.851 -37.84
   LOCATION L0004808     VOLUME   580385.236 3722810.947 -37.80
   LOCATION L0004809     VOLUME   580397.428 3722811.044 -37.76
   LOCATION L0004810     VOLUME   580409.620 3722811.141 -37.72
   LOCATION L0004811     VOLUME   580421.811 3722811.238 -37.68
   LOCATION L0004812     VOLUME   580434.003 3722811.335 -37.64
   LOCATION L0004813     VOLUME   580446.195 3722811.432 -37.60
   LOCATION L0004814     VOLUME   580458.386 3722811.529 -37.56
   LOCATION L0004815     VOLUME   580470.578 3722811.626 -37.52
   LOCATION L0004816     VOLUME   580482.769 3722811.723 -37.48
   LOCATION L0004817     VOLUME   580494.961 3722811.820 -37.44
   LOCATION L0004818     VOLUME   580507.153 3722811.917 -37.40
   LOCATION L0004819     VOLUME   580519.344 3722812.014 -37.36
   LOCATION L0004820     VOLUME   580531.536 3722812.111 -37.32
   LOCATION L0004821     VOLUME   580543.727 3722812.208 -37.28
   LOCATION L0004822     VOLUME   580555.919 3722812.305 -37.24
   LOCATION L0004823     VOLUME   580568.111 3722812.402 -37.20
** End of LINE VOLUME Source ID = RDAIRE
   LOCATION IDLING       POINT      579913.113  3723302.270      -36.270
** DESCRSRC Construction Truck Idling
   LOCATION OFFRDEQ      POINT      579932.850  3723278.650      -36.320
** DESCRSRC Offroad Construction Equipment
** Source Parameters **
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SRCPARAM L0004499     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004511     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004512     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004513     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004514     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004515     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004516     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004517     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004518     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004519     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004520     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004521     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004522     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004523     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004524     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004525     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004526     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004527     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004528     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004529     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004530     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004531     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004532     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004533     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004534     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004535     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004536     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004537     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004538     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004539     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004540     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004549     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004550     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004552     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004554     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004580     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004581     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004583     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004591     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004592     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004599     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004601     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004612     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004613     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004615     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004620     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004623     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004624     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004626     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004629     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004632     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004633     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004637     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004638     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004639     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004641     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004643     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004668     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004669     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004675     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004676     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004677     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004678     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004679     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004680     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004682     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004683     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004684     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004685     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004687     0.0000000271      0.00      1.70      0.85
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SRCPARAM L0004700     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004701     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004702     0.0000000271      0.00      1.70      0.85
SRCPARAM L0004703     0.0000000271      0.00      1.70      0.85
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   SRCPARAM L0004704     0.0000000271      0.00      1.70      0.85
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   SRCPARAM L0004706     0.0000000271      0.00      1.70      0.85
   SRCPARAM L0004707     0.0000000271      0.00      1.70      0.85
   SRCPARAM L0004708     0.0000000271      0.00      1.70      0.85
   SRCPARAM L0004709     0.0000000271      0.00      1.70      0.85
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   SRCPARAM L0004711     0.0000000271      0.00      1.70      0.85
   SRCPARAM L0004712     0.0000000271      0.00      1.70      0.85
   SRCPARAM L0004713     0.0000000271      0.00      1.70      0.85
   SRCPARAM L0004714     0.0000000271      0.00      1.70      0.85
   SRCPARAM L0004715     0.0000000271      0.00      1.70      0.85
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** LINE VOLUME Source ID = RDAIRW
   SRCPARAM L0004716     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004717     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004718     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004719     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004720     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004721     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004722     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004723     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004724     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004725     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004726     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004727     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004728     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004729     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004730     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004731     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004732     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004733     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004734     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004735     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004736     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004737     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004738     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004739     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004740     0.00000003603      0.00      5.67      0.85
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   SRCPARAM L0004742     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004743     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004744     0.00000003603      0.00      5.67      0.85
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   SRCPARAM L0004748     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004749     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004750     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004751     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004752     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004753     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004754     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004755     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004756     0.00000003603      0.00      5.67      0.85
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   SRCPARAM L0004759     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004760     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004761     0.00000003603      0.00      5.67      0.85
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   SRCPARAM L0004762     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004763     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004764     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004765     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004766     0.00000003603      0.00      5.67      0.85
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   SRCPARAM L0004769     0.00000003603      0.00      5.67      0.85
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   SRCPARAM L0004771     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004772     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004773     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004774     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004775     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004776     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004777     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004778     0.00000003603      0.00      5.67      0.85
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   SRCPARAM L0004781     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004782     0.00000003603      0.00      5.67      0.85
   SRCPARAM L0004783     0.00000003603      0.00      5.67      0.85
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** LINE VOLUME Source ID = RDAIRE
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   SRCPARAM L0004785     0.0000001435       0.00      5.67      0.85
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   SRCPARAM L0004787     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004788     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004789     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004790     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004791     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004792     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004793     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004794     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004795     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004796     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004797     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004798     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004799     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004800     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004801     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004802     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004803     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004804     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004805     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004806     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004807     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004808     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004809     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004810     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004811     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004812     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004813     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004814     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004815     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004816     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004817     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004818     0.0000001435       0.00      5.67      0.85
   SRCPARAM L0004819     0.0000001435       0.00      5.67      0.85
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   SRCPARAM L0004820     0.0000001435      0.00      5.67      0.85
   SRCPARAM L0004821     0.0000001435      0.00      5.67      0.85
   SRCPARAM L0004822     0.0000001435      0.00      5.67      0.85
   SRCPARAM L0004823     0.0000001435      0.00      5.67      0.85
** ------------------------------------------------------------------
   SRCPARAM IDLING        2.15E-06     3.840   366.000        50       0.1
   SRCPARAM OFFRDEQ         0.0584     3.962   366.000        50       0.1
   URBANSRC ALL

** Variable Emissions Type: "By Hour-of-Day (HROFDY)"
** Variable Emission Scenario: "Scenario 2"
   EMISFACT OFFRDEQ      HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT OFFRDEQ      HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT OFFRDEQ      HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT OFFRDEQ      HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT IDLING       HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT IDLING       HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT IDLING       HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT IDLING       HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004784     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004784     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
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   EMISFACT L0004785     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0004730     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0004731     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0004368     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0004369     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0004430     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0004430     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0004431     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0004431     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0004431     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0004432     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
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EMISFACT L0004435     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
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EMISFACT L0004439     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
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EMISFACT L0004444     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
```

```
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EMISFACT L0004456     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
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EMISFACT L0004457     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0004457     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0004457     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0004457     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0004458     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0004458     HROFDY 0.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0004458     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
EMISFACT L0004458     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0004459     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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   EMISFACT L0004459     HROFDY 1.0 1.0 1.0 1.0 0.0 0.0
   EMISFACT L0004459     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0004460     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
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   EMISFACT L0004460     HROFDY 0.0 0.0 0.0 0.0 0.0 0.0
   SRCGROUP ALL
SO FINISHED
**
**************************************
** AERMOD Receptor Pathway
**************************************
**
**
RE STARTING
   INCLUDED Constr24All.rou
RE FINISHED
**
**************************************
** AERMOD Meteorology Pathway
**************************************
**
**
ME STARTING
   SURFFILE ..\ktrm_sfc_pfl\KTRM_V11_trimmed.sfc
   PROFFILE ..\ktrm_sfc_pfl\KTRM_V11_trimmed.pfl
   SURFDATA 3104 2017
   UAIRDATA 3190 2017
   PROFBASE -36.0 METERS
ME FINISHED
**
**************************************
** AERMOD Output Pathway
**************************************
**
**
OU STARTING
   RECTABLE ALLAVE 1ST
   RECTABLE 1 1ST
   RECTABLE 24 1ST
** Auto-Generated Plotfiles
   PLOTFILE 1 ALL 1ST CONSTR24ALL.AD\01H1GALL.PLT 31
   PLOTFILE 24 ALL 1ST CONSTR24ALL.AD\24H1GALL.PLT 32
   PLOTFILE PERIOD ALL CONSTR24ALL.AD\PE00GALL.PLT 33
   SUMMFILE Constr24All.sum
OU FINISHED
**
**************************************
** Project Parameters
**************************************
** PROJCTN  CoordinateSystemUTM
** DESCPTN  UTM: Universal Transverse Mercator
** DATUM    World Geodetic System 1984
** DTMRGN   Global Definition
** UNITS    m
** ZONE     11
** ZONEINX  0
**
```

* MODELING OPTIONS USED: RegDFAULT CONC ELEV URBAN ADJ_U*
* PLOT FILE OF HIGH 1ST HIGH 24-HR VALUES FOR SOURCE GROUP: ALL
* FOR A TOTAL OF 11 RECEPTORS.
* FORMAT: (3(1X,F13.5),3(1X,F8.2),3X,A5,2X,A8,2X,A5,5X,A8,2X,I8)

X	Y	AVERAGE CONC	ZELEV	ZHILL	ZFLAG	AVE	GRP	RANK	NET ID	DATE(CONC)
580086.00000	3722773.00000	0.16633	-39.01	-39.01	0.00	24-HR	ALL	1ST		18120524
580122.00000	3722774.00000	0.18340	-38.71	-38.71	0.00	24-HR	ALL	1ST		18120524
580172.00000	3722775.00000	0.19223	-38.50	-38.50	0.00	24-HR	ALL	1ST		18120524
580242.00000	3722717.00000	0.15387	-38.40	-38.40	0.00	24-HR	ALL	1ST		18120524
580289.00000	3722738.00000	0.14988	-37.99	-37.99	0.00	24-HR	ALL	1ST		22122824
580337.00000	3722732.00000	0.13707	-37.80	-37.80	0.00	24-HR	ALL	1ST		22122824
579963.00000	3722704.00000	0.08943	-36.08	-36.08	0.00	24-HR	ALL	1ST		21012024
579927.00000	3722644.00000	0.07696	-36.33	-36.33	0.00	24-HR	ALL	1ST		21012024
579519.00000	3722783.00000	0.06392	-36.27	-36.27	0.00	24-HR	ALL	1ST		19120424
579466.00000	3722781.00000	0.06056	-36.27	-36.27	0.00	24-HR	ALL	1ST		19120424
579393.00000	3722779.00000	0.06198	-36.27	-36.27	0.00	24-HR	ALL	1ST		17123024

** CONCUNIT ug/m^3
** DEPUNIT g/m^2

APPENDIX I

AERMOD Model Operational Year 2028 PM2.5 Emissions Printouts

```
**
**************************************
**
** AERMOD Input Produced by:
** AERMOD View Ver. 13.0.0
** Lakes Environmental Software Inc.
** Date: 1/6/2026
** File: C:\Vista Env\2019\19039 Coachella\AERMOD\DPM28All\DPM28All.ADI
**
**************************************
**
**
**************************************
** AERMOD Control Pathway
**************************************
**
**
CO STARTING
   TITLEONE Coachella Airport Business Park-Operations 2028 DPM+Brakes+Tire Wear
   TITLETWO PM2.5
   MODELOPT CONC
   AVERTIME 1 24 PERIOD
   URBANOPT 2189641 Riverside_Co
   POLLUTID PM_2.5
   RUNORNOT RUN
   ERRORFIL DPM28All.err
CO FINISHED
**
**************************************
** AERMOD Source Pathway
**************************************
**
**
SO STARTING
** Source Location **
** Source ID - Type - X Coord. - Y Coord. **
** ------------------------------------------------------------------------
** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDONW
** DESCRSRC Onsite Road West
** PREFIX
** Length of Side = 3.66
** Configuration = Adjacent
** Emission Rate = 0.000111
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 12
** 580077.130, 3722819.702, -38.87, 0.00, 1.70
** 580075.723, 3722829.973, -38.77, 0.00, 1.70
** 580054.577, 3722864.362, -38.73, 0.00, 1.70
** 580045.833, 3722877.181, -38.88, 0.00, 1.70
** 579930.018, 3723057.672, -38.69, 0.00, 1.70
** 579892.856, 3723115.163, -37.71, 0.00, 1.70
** 579849.461, 3723190.506, -36.29, 0.00, 1.70
** 579823.082, 3723246.755, -36.03, 0.00, 1.70
** 579796.274, 3723323.282, -35.97, 0.00, 1.70
** 579782.061, 3723364.922, -35.95, 0.00, 1.70
** 579768.794, 3723424.825, -36.02, 0.00, 1.70
** 579741.158, 3723594.651, -35.95, 0.00, 1.70
** ------------------------------------------------------------------------
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LOCATION L0004227     VOLUME   580076.882 3722821.514 -38.77
LOCATION L0004228     VOLUME   580076.385 3722825.138 -38.76
LOCATION L0004229     VOLUME   580075.889 3722828.761 -38.74
LOCATION L0004230     VOLUME   580074.448 3722832.047 -38.73
LOCATION L0004231     VOLUME   580072.532 3722835.163 -38.71
LOCATION L0004232     VOLUME   580070.616 3722838.278 -38.71
LOCATION L0004233     VOLUME   580068.700 3722841.394 -38.71
LOCATION L0004234     VOLUME   580066.784 3722844.510 -38.71
LOCATION L0004235     VOLUME   580064.868 3722847.625 -38.71
LOCATION L0004236     VOLUME   580062.953 3722850.741 -38.71
LOCATION L0004237     VOLUME   580061.037 3722853.857 -38.71
LOCATION L0004238     VOLUME   580059.121 3722856.973 -38.72
LOCATION L0004239     VOLUME   580057.205 3722860.088 -38.74
LOCATION L0004240     VOLUME   580055.289 3722863.204 -38.76
LOCATION L0004241     VOLUME   580053.282 3722866.261 -38.78
LOCATION L0004242     VOLUME   580051.221 3722869.282 -38.79
LOCATION L0004243     VOLUME   580049.160 3722872.303 -38.80
LOCATION L0004244     VOLUME   580047.098 3722875.325 -38.80
LOCATION L0004245     VOLUME   580045.070 3722878.368 -38.80
LOCATION L0004246     VOLUME   580043.095 3722881.447 -38.79
LOCATION L0004247     VOLUME   580041.120 3722884.525 -38.78
LOCATION L0004248     VOLUME   580039.145 3722887.604 -38.77
LOCATION L0004249     VOLUME   580037.169 3722890.682 -38.75
LOCATION L0004250     VOLUME   580035.194 3722893.760 -38.72
LOCATION L0004251     VOLUME   580033.219 3722896.839 -38.71
LOCATION L0004252     VOLUME   580031.243 3722899.917 -38.71
LOCATION L0004253     VOLUME   580029.268 3722902.995 -38.72
LOCATION L0004254     VOLUME   580027.293 3722906.074 -38.73
LOCATION L0004255     VOLUME   580025.318 3722909.152 -38.74
LOCATION L0004256     VOLUME   580023.342 3722912.230 -38.74
LOCATION L0004257     VOLUME   580021.367 3722915.309 -38.74
LOCATION L0004258     VOLUME   580019.392 3722918.387 -38.74
LOCATION L0004259     VOLUME   580017.417 3722921.466 -38.73
LOCATION L0004260     VOLUME   580015.441 3722924.544 -38.71
LOCATION L0004261     VOLUME   580013.466 3722927.622 -38.71
LOCATION L0004262     VOLUME   580011.491 3722930.701 -38.71
LOCATION L0004263     VOLUME   580009.515 3722933.779 -38.71
LOCATION L0004264     VOLUME   580007.540 3722936.857 -38.71
LOCATION L0004265     VOLUME   580005.565 3722939.936 -38.71
LOCATION L0004266     VOLUME   580003.590 3722943.014 -38.71
LOCATION L0004267     VOLUME   580001.614 3722946.092 -38.71
LOCATION L0004268     VOLUME   579999.639 3722949.171 -38.71
LOCATION L0004269     VOLUME   579997.664 3722952.249 -38.71
LOCATION L0004270     VOLUME   579995.689 3722955.328 -38.71
LOCATION L0004271     VOLUME   579993.713 3722958.406 -38.71
LOCATION L0004272     VOLUME   579991.738 3722961.484 -38.71
LOCATION L0004273     VOLUME   579989.763 3722964.563 -38.71
LOCATION L0004274     VOLUME   579987.788 3722967.641 -38.71
LOCATION L0004275     VOLUME   579985.812 3722970.719 -38.71
LOCATION L0004276     VOLUME   579983.837 3722973.798 -38.71
LOCATION L0004277     VOLUME   579981.862 3722976.876 -38.71
LOCATION L0004278     VOLUME   579979.886 3722979.955 -38.71
LOCATION L0004279     VOLUME   579977.911 3722983.033 -38.71
LOCATION L0004280     VOLUME   579975.936 3722986.111 -38.71
LOCATION L0004281     VOLUME   579973.961 3722989.190 -38.71
LOCATION L0004282     VOLUME   579971.985 3722992.268 -38.71
LOCATION L0004283     VOLUME   579970.010 3722995.346 -38.71
LOCATION L0004284     VOLUME   579968.035 3722998.425 -38.71
LOCATION L0004285     VOLUME   579966.060 3723001.503 -38.71
LOCATION L0004286     VOLUME   579964.084 3723004.581 -38.71
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LOCATION L0004287     VOLUME   579962.109 3723007.660 -38.71
LOCATION L0004288     VOLUME   579960.134 3723010.738 -38.71
LOCATION L0004289     VOLUME   579958.158 3723013.817 -38.71
LOCATION L0004290     VOLUME   579956.183 3723016.895 -38.70
LOCATION L0004291     VOLUME   579954.208 3723019.973 -38.69
LOCATION L0004292     VOLUME   579952.233 3723023.052 -38.68
LOCATION L0004293     VOLUME   579950.257 3723026.130 -38.67
LOCATION L0004294     VOLUME   579948.282 3723029.208 -38.67
LOCATION L0004295     VOLUME   579946.307 3723032.287 -38.68
LOCATION L0004296     VOLUME   579944.332 3723035.365 -38.68
LOCATION L0004297     VOLUME   579942.356 3723038.443 -38.70
LOCATION L0004298     VOLUME   579940.381 3723041.522 -38.71
LOCATION L0004299     VOLUME   579938.406 3723044.600 -38.71
LOCATION L0004300     VOLUME   579936.430 3723047.679 -38.69
LOCATION L0004301     VOLUME   579934.455 3723050.757 -38.67
LOCATION L0004302     VOLUME   579932.480 3723053.835 -38.65
LOCATION L0004303     VOLUME   579930.505 3723056.914 -38.63
LOCATION L0004304     VOLUME   579928.522 3723059.987 -38.62
LOCATION L0004305     VOLUME   579926.536 3723063.059 -38.61
LOCATION L0004306     VOLUME   579924.550 3723066.130 -38.61
LOCATION L0004307     VOLUME   579922.565 3723069.202 -38.61
LOCATION L0004308     VOLUME   579920.579 3723072.274 -38.62
LOCATION L0004309     VOLUME   579918.594 3723075.346 -38.63
LOCATION L0004310     VOLUME   579916.608 3723078.417 -38.59
LOCATION L0004311     VOLUME   579914.623 3723081.489 -38.55
LOCATION L0004312     VOLUME   579912.637 3723084.561 -38.51
LOCATION L0004313     VOLUME   579910.651 3723087.633 -38.46
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** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDONE
** DESCRSRC Onsite Road East
** PREFIX
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LOCATION L0004602     VOLUME   579986.016 3723233.436 -36.99
LOCATION L0004603     VOLUME   579984.149 3723236.581 -36.99
LOCATION L0004604     VOLUME   579982.282 3723239.726 -36.98
LOCATION L0004605     VOLUME   579980.415 3723242.871 -36.97
LOCATION L0004606     VOLUME   579978.548 3723246.017 -36.95
LOCATION L0004607     VOLUME   579976.681 3723249.162 -36.93
LOCATION L0004608     VOLUME   579974.814 3723252.307 -36.91
LOCATION L0004609     VOLUME   579972.947 3723255.452 -36.88
LOCATION L0004610     VOLUME   579971.080 3723258.598 -36.85
LOCATION L0004611     VOLUME   579969.213 3723261.743 -36.80
LOCATION L0004612     VOLUME   579967.346 3723264.888 -36.75
LOCATION L0004613     VOLUME   579965.479 3723268.033 -36.70
LOCATION L0004614     VOLUME   579963.612 3723271.178 -36.65
LOCATION L0004615     VOLUME   579961.745 3723274.324 -36.60
LOCATION L0004616     VOLUME   579959.879 3723277.469 -36.55
LOCATION L0004617     VOLUME   579958.012 3723280.614 -36.50
LOCATION L0004618     VOLUME   579956.145 3723283.759 -36.45
LOCATION L0004619     VOLUME   579954.278 3723286.904 -36.40
LOCATION L0004620     VOLUME   579952.411 3723290.050 -36.37
LOCATION L0004621     VOLUME   579950.544 3723293.195 -36.35
LOCATION L0004622     VOLUME   579948.677 3723296.340 -36.32
LOCATION L0004623     VOLUME   579946.810 3723299.485 -36.30
LOCATION L0004624     VOLUME   579944.943 3723302.631 -36.29
LOCATION L0004625     VOLUME   579943.076 3723305.776 -36.28
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LOCATION L0004626     VOLUME   579941.209 3723308.921 -36.27
LOCATION L0004627     VOLUME   579939.342 3723312.066 -36.27
LOCATION L0004628     VOLUME   579937.475 3723315.211 -36.27
LOCATION L0004629     VOLUME   579935.608 3723318.357 -36.27
LOCATION L0004630     VOLUME   579933.741 3723321.502 -36.27
LOCATION L0004631     VOLUME   579931.874 3723324.647 -36.27
LOCATION L0004632     VOLUME   579930.007 3723327.792 -36.27
LOCATION L0004633     VOLUME   579928.140 3723330.937 -36.27
LOCATION L0004634     VOLUME   579926.273 3723334.083 -36.27
LOCATION L0004635     VOLUME   579924.406 3723337.228 -36.27
LOCATION L0004636     VOLUME   579922.539 3723340.373 -36.27
LOCATION L0004637     VOLUME   579920.672 3723343.518 -36.27
LOCATION L0004638     VOLUME   579918.805 3723346.664 -36.27
LOCATION L0004639     VOLUME   579916.938 3723349.809 -36.27
LOCATION L0004640     VOLUME   579915.071 3723352.954 -36.27
LOCATION L0004641     VOLUME   579913.204 3723356.099 -36.27
LOCATION L0004642     VOLUME   579911.337 3723359.244 -36.27
LOCATION L0004643     VOLUME   579909.470 3723362.390 -36.27
LOCATION L0004644     VOLUME   579907.656 3723365.566 -36.27
LOCATION L0004645     VOLUME   579905.871 3723368.758 -36.27
LOCATION L0004646     VOLUME   579904.085 3723371.950 -36.27
LOCATION L0004647     VOLUME   579902.299 3723375.142 -36.27
LOCATION L0004648     VOLUME   579900.513 3723378.334 -36.27
LOCATION L0004649     VOLUME   579898.728 3723381.526 -36.27
LOCATION L0004650     VOLUME   579896.942 3723384.718 -36.27
LOCATION L0004651     VOLUME   579895.156 3723387.910 -36.27
LOCATION L0004652     VOLUME   579893.370 3723391.102 -36.27
LOCATION L0004653     VOLUME   579891.584 3723394.294 -36.27
LOCATION L0004654     VOLUME   579889.799 3723397.486 -36.27
LOCATION L0004655     VOLUME   579888.013 3723400.678 -36.27
LOCATION L0004656     VOLUME   579886.227 3723403.870 -36.27
LOCATION L0004657     VOLUME   579884.441 3723407.062 -36.27
LOCATION L0004658     VOLUME   579882.655 3723410.254 -36.27
LOCATION L0004659     VOLUME   579880.870 3723413.446 -36.27
LOCATION L0004660     VOLUME   579879.084 3723416.638 -36.26
LOCATION L0004661     VOLUME   579877.298 3723419.830 -36.24
LOCATION L0004662     VOLUME   579875.512 3723423.022 -36.22
LOCATION L0004663     VOLUME   579873.727 3723426.214 -36.20
LOCATION L0004664     VOLUME   579871.941 3723429.406 -36.18
LOCATION L0004665     VOLUME   579870.155 3723432.598 -36.17
LOCATION L0004666     VOLUME   579868.369 3723435.790 -36.15
LOCATION L0004667     VOLUME   579866.583 3723438.982 -36.13
LOCATION L0004668     VOLUME   579864.798 3723442.174 -36.11
LOCATION L0004669     VOLUME   579863.012 3723445.366 -36.09
LOCATION L0004670     VOLUME   579861.226 3723448.558 -36.07
LOCATION L0004671     VOLUME   579859.440 3723451.750 -36.06
LOCATION L0004672     VOLUME   579857.655 3723454.942 -36.04
LOCATION L0004673     VOLUME   579855.869 3723458.134 -36.02
LOCATION L0004674     VOLUME   579854.083 3723461.327 -36.00
LOCATION L0004675     VOLUME   579852.297 3723464.519 -35.98
LOCATION L0004676     VOLUME   579850.511 3723467.711 -35.99
LOCATION L0004677     VOLUME   579848.726 3723470.903 -36.04
LOCATION L0004678     VOLUME   579846.940 3723474.095 -36.08
LOCATION L0004679     VOLUME   579845.154 3723477.287 -36.12
LOCATION L0004680     VOLUME   579843.368 3723480.479 -36.16
LOCATION L0004681     VOLUME   579841.582 3723483.671 -36.19
LOCATION L0004682     VOLUME   579839.797 3723486.863 -36.22
LOCATION L0004683     VOLUME   579838.011 3723490.055 -36.24
LOCATION L0004684     VOLUME   579836.225 3723493.247 -36.26
LOCATION L0004685     VOLUME   579834.439 3723496.439 -36.26
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   LOCATION L0004686     VOLUME   579832.654 3723499.631 -36.23
   LOCATION L0004687     VOLUME   579830.868 3723502.823 -36.20
   LOCATION L0004688     VOLUME   579829.082 3723506.015 -36.16
   LOCATION L0004689     VOLUME   579827.296 3723509.207 -36.13
   LOCATION L0004690     VOLUME   579825.510 3723512.399 -36.10
   LOCATION L0004691     VOLUME   579823.725 3723515.591 -36.07
   LOCATION L0004692     VOLUME   579821.939 3723518.783 -36.03
   LOCATION L0004693     VOLUME   579820.153 3723521.975 -36.00
   LOCATION L0004694     VOLUME   579818.367 3723525.167 -35.97
   LOCATION L0004695     VOLUME   579816.581 3723528.359 -35.97
   LOCATION L0004696     VOLUME   579814.796 3723531.551 -35.97
   LOCATION L0004697     VOLUME   579813.010 3723534.743 -35.97
   LOCATION L0004698     VOLUME   579811.224 3723537.935 -35.97
   LOCATION L0004699     VOLUME   579809.438 3723541.127 -35.97
   LOCATION L0004700     VOLUME   579807.653 3723544.319 -35.97
   LOCATION L0004701     VOLUME   579805.867 3723547.511 -35.97
   LOCATION L0004702     VOLUME   579804.081 3723550.703 -35.97
   LOCATION L0004703     VOLUME   579802.295 3723553.895 -35.97
   LOCATION L0004704     VOLUME   579800.509 3723557.087 -35.97
   LOCATION L0004705     VOLUME   579798.724 3723560.279 -35.97
   LOCATION L0004706     VOLUME   579796.938 3723563.471 -35.97
   LOCATION L0004707     VOLUME   579795.152 3723566.663 -35.97
   LOCATION L0004708     VOLUME   579793.366 3723569.855 -35.97
   LOCATION L0004709     VOLUME   579791.580 3723573.047 -35.97
   LOCATION L0004710     VOLUME   579789.795 3723576.239 -35.97
   LOCATION L0004711     VOLUME   579788.009 3723579.431 -35.97
   LOCATION L0004712     VOLUME   579786.223 3723582.623 -35.97
   LOCATION L0004713     VOLUME   579784.437 3723585.815 -35.97
   LOCATION L0004714     VOLUME   579782.652 3723589.007 -35.97
   LOCATION L0004715     VOLUME   579780.866 3723592.199 -35.97
** End of LINE VOLUME Source ID = RDONE
** ----------------------------------------------------------------------
** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDAIRW
** DESCRSRC Airport Blvd west of Project Site
** PREFIX
** Length of Side = 12.19
** Configuration = Adjacent
** Emission Rate = 0.0000361
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 7
** 580077.815, 3722811.474, -38.84, 0.00, 5.67
** 579930.520, 3722810.498, -38.31, 0.00, 5.67
** 579724.565, 3722817.970, -36.23, 0.00, 5.67
** 579657.572, 3722818.633, -36.01, 0.00, 5.67
** 579442.005, 3722818.125, -36.27, 0.00, 5.67
** 579336.736, 3722811.183, -36.27, 0.00, 5.67
** 579251.350, 3722810.179, -35.97, 0.00, 5.67
** ----------------------------------------------------------------------
   LOCATION L0004716     VOLUME   580071.719 3722811.433 -38.86
   LOCATION L0004717     VOLUME   580059.528 3722811.353 -38.96
   LOCATION L0004718     VOLUME   580047.336 3722811.272 -38.98
   LOCATION L0004719     VOLUME   580035.144 3722811.191 -39.01
   LOCATION L0004720     VOLUME   580022.952 3722811.110 -39.01
   LOCATION L0004721     VOLUME   580010.761 3722811.030 -39.01
   LOCATION L0004722     VOLUME   579998.569 3722810.949 -38.98
   LOCATION L0004723     VOLUME   579986.377 3722810.868 -38.75
   LOCATION L0004724     VOLUME   579974.185 3722810.787 -38.53
   LOCATION L0004725     VOLUME   579961.994 3722810.707 -38.44
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   LOCATION L0004726     VOLUME   579949.802 3722810.626 -38.42
   LOCATION L0004727     VOLUME   579937.610 3722810.545 -38.38
   LOCATION L0004728     VOLUME   579925.422 3722810.683 -38.28
   LOCATION L0004729     VOLUME   579913.238 3722811.125 -38.18
   LOCATION L0004730     VOLUME   579901.054 3722811.567 -38.07
   LOCATION L0004731     VOLUME   579888.870 3722812.009 -37.95
   LOCATION L0004732     VOLUME   579876.686 3722812.451 -37.79
   LOCATION L0004733     VOLUME   579864.502 3722812.893 -37.54
   LOCATION L0004734     VOLUME   579852.318 3722813.335 -37.30
   LOCATION L0004735     VOLUME   579840.134 3722813.777 -37.24
   LOCATION L0004736     VOLUME   579827.950 3722814.219 -37.21
   LOCATION L0004737     VOLUME   579815.766 3722814.661 -37.15
   LOCATION L0004738     VOLUME   579803.582 3722815.103 -37.07
   LOCATION L0004739     VOLUME   579791.398 3722815.545 -36.99
   LOCATION L0004740     VOLUME   579779.214 3722815.987 -36.83
   LOCATION L0004741     VOLUME   579767.030 3722816.429 -36.67
   LOCATION L0004742     VOLUME   579754.846 3722816.871 -36.52
   LOCATION L0004743     VOLUME   579742.662 3722817.313 -36.39
   LOCATION L0004744     VOLUME   579730.478 3722817.755 -36.27
   LOCATION L0004745     VOLUME   579718.290 3722818.032 -36.20
   LOCATION L0004746     VOLUME   579706.099 3722818.153 -36.13
   LOCATION L0004747     VOLUME   579693.907 3722818.273 -36.07
   LOCATION L0004748     VOLUME   579681.716 3722818.394 -36.02
   LOCATION L0004749     VOLUME   579669.525 3722818.515 -35.97
   LOCATION L0004750     VOLUME   579657.333 3722818.632 -35.97
   LOCATION L0004751     VOLUME   579645.141 3722818.604 -35.97
   LOCATION L0004752     VOLUME   579632.949 3722818.575 -36.01
   LOCATION L0004753     VOLUME   579620.757 3722818.546 -36.08
   LOCATION L0004754     VOLUME   579608.565 3722818.517 -36.14
   LOCATION L0004755     VOLUME   579596.373 3722818.489 -36.14
   LOCATION L0004756     VOLUME   579584.181 3722818.460 -36.14
   LOCATION L0004757     VOLUME   579571.989 3722818.431 -36.14
   LOCATION L0004758     VOLUME   579559.797 3722818.402 -36.14
   LOCATION L0004759     VOLUME   579547.605 3722818.374 -36.14
   LOCATION L0004760     VOLUME   579535.413 3722818.345 -36.14
   LOCATION L0004761     VOLUME   579523.222 3722818.316 -36.14
   LOCATION L0004762     VOLUME   579511.030 3722818.287 -36.14
   LOCATION L0004763     VOLUME   579498.838 3722818.259 -36.14
   LOCATION L0004764     VOLUME   579486.646 3722818.230 -36.14
   LOCATION L0004765     VOLUME   579474.454 3722818.201 -36.14
   LOCATION L0004766     VOLUME   579462.262 3722818.172 -36.14
   LOCATION L0004767     VOLUME   579450.070 3722818.144 -36.19
   LOCATION L0004768     VOLUME   579437.887 3722817.853 -36.24
   LOCATION L0004769     VOLUME   579425.721 3722817.051 -36.27
   LOCATION L0004770     VOLUME   579413.556 3722816.249 -36.27
   LOCATION L0004771     VOLUME   579401.390 3722815.446 -36.27
   LOCATION L0004772     VOLUME   579389.224 3722814.644 -36.27
   LOCATION L0004773     VOLUME   579377.059 3722813.842 -36.27
   LOCATION L0004774     VOLUME   579364.893 3722813.040 -36.27
   LOCATION L0004775     VOLUME   579352.728 3722812.238 -36.27
   LOCATION L0004776     VOLUME   579340.562 3722811.436 -36.27
   LOCATION L0004777     VOLUME   579328.379 3722811.085 -36.25
   LOCATION L0004778     VOLUME   579316.188 3722810.942 -36.23
   LOCATION L0004779     VOLUME   579303.997 3722810.798 -36.22
   LOCATION L0004780     VOLUME   579291.805 3722810.655 -36.22
   LOCATION L0004781     VOLUME   579279.614 3722810.511 -36.21
   LOCATION L0004782     VOLUME   579267.423 3722810.368 -36.11
   LOCATION L0004783     VOLUME   579255.232 3722810.225 -36.01
** End of LINE VOLUME Source ID = RDAIRW
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** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDAIRE
** DESCRSRC Airport Blvd east of Project Site
** PREFIX
** Length of Side = 12.19
** Configuration = Adjacent
** Emission Rate = 0.0000844
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 3
** 580086.549, 3722811.395, -38.73, 0.00, 5.67
** 580220.964, 3722809.641, -38.34, 0.00, 5.67
** 580570.484, 3722812.421, -37.19, 0.00, 5.67
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   LOCATION L0004784     VOLUME   580092.645 3722811.316 -38.71
   LOCATION L0004785     VOLUME   580104.836 3722811.157 -38.71
   LOCATION L0004786     VOLUME   580117.026 3722810.998 -38.71
   LOCATION L0004787     VOLUME   580129.217 3722810.838 -38.62
   LOCATION L0004788     VOLUME   580141.408 3722810.679 -38.50
   LOCATION L0004789     VOLUME   580153.599 3722810.520 -38.40
   LOCATION L0004790     VOLUME   580165.790 3722810.361 -38.40
   LOCATION L0004791     VOLUME   580177.981 3722810.202 -38.40
   LOCATION L0004792     VOLUME   580190.172 3722810.043 -38.39
   LOCATION L0004793     VOLUME   580202.363 3722809.884 -38.37
   LOCATION L0004794     VOLUME   580214.554 3722809.725 -38.33
   LOCATION L0004795     VOLUME   580226.745 3722809.687 -38.22
   LOCATION L0004796     VOLUME   580238.937 3722809.784 -38.11
   LOCATION L0004797     VOLUME   580251.129 3722809.881 -38.10
   LOCATION L0004798     VOLUME   580263.320 3722809.978 -38.10
   LOCATION L0004799     VOLUME   580275.512 3722810.075 -38.09
   LOCATION L0004800     VOLUME   580287.704 3722810.172 -38.07
   LOCATION L0004801     VOLUME   580299.895 3722810.269 -38.05
   LOCATION L0004802     VOLUME   580312.087 3722810.366 -37.85
   LOCATION L0004803     VOLUME   580324.278 3722810.463 -37.65
   LOCATION L0004804     VOLUME   580336.470 3722810.560 -37.53
   LOCATION L0004805     VOLUME   580348.662 3722810.657 -37.51
   LOCATION L0004806     VOLUME   580360.853 3722810.754 -37.49
   LOCATION L0004807     VOLUME   580373.045 3722810.851 -37.49
   LOCATION L0004808     VOLUME   580385.236 3722810.947 -37.49
   LOCATION L0004809     VOLUME   580397.428 3722811.044 -37.41
   LOCATION L0004810     VOLUME   580409.620 3722811.141 -37.26
   LOCATION L0004811     VOLUME   580421.811 3722811.238 -37.12
   LOCATION L0004812     VOLUME   580434.003 3722811.335 -37.02
   LOCATION L0004813     VOLUME   580446.195 3722811.432 -36.92
   LOCATION L0004814     VOLUME   580458.386 3722811.529 -36.88
   LOCATION L0004815     VOLUME   580470.578 3722811.626 -36.88
   LOCATION L0004816     VOLUME   580482.769 3722811.723 -36.88
   LOCATION L0004817     VOLUME   580494.961 3722811.820 -36.88
   LOCATION L0004818     VOLUME   580507.153 3722811.917 -36.88
   LOCATION L0004819     VOLUME   580519.344 3722812.014 -36.97
   LOCATION L0004820     VOLUME   580531.536 3722812.111 -37.09
   LOCATION L0004821     VOLUME   580543.727 3722812.208 -37.19
   LOCATION L0004822     VOLUME   580555.919 3722812.305 -37.19
   LOCATION L0004823     VOLUME   580568.111 3722812.402 -37.19
** End of LINE VOLUME Source ID = RDAIRE
   LOCATION IDLING1      POINT      579805.150  3723587.850      -35.970
** DESCRSRC Truck Idling at LW-1A
   LOCATION IDLING2      POINT      579874.040  3723475.220      -36.230
** DESCRSRC Truck Idling at LW-1B
   LOCATION IDLING3      POINT      579883.560  3723455.580      -36.270
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** DESCRSRC Truck Idling at LW-2
   LOCATION IDLING4      POINT      579760.060  3723570.450      -35.970
** DESCRSRC Truck Idling at LW-3A
   LOCATION IDLING5      POINT      579788.530  3723421.660      -36.120
** DESCRSRC Truck Idling at LW-3B
   LOCATION IDLING6      POINT      579808.320  3723334.150      -35.850
** DESCRSRC Truck Idling at LW-4
** Source Parameters **
** LINE VOLUME Source ID = RDONW
   SRCPARAM L0004227     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004228     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004229     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004230     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004231     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004232     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004233     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004234     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004235     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004236     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004237     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004238     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004239     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004240     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004241     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004242     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004243     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004244     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004245     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004246     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004247     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004248     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004249     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004250     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004251     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004252     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004253     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004254     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004255     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004256     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004257     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004258     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004259     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004260     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004261     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004262     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004263     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004264     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004265     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004266     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004267     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004268     0.0000004744      0.00      1.70      0.85
   SRCPARAM L0004269     0.0000004744      0.00      1.70      0.85
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SRCPARAM L0004561     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004562     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004563     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004564     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004565     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004566     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004567     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004568     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004569     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004570     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004571     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004572     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004573     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004574     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004575     0.0000004745      0.00      1.70      0.85
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SRCPARAM L0004580     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004581     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004582     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004583     0.0000004745      0.00      1.70      0.85
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SRCPARAM L0004585     0.0000004745      0.00      1.70      0.85
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SRCPARAM L0004590     0.0000004745      0.00      1.70      0.85
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SRCPARAM L0004592     0.0000004745      0.00      1.70      0.85
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SRCPARAM L0004598     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004599     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004600     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004601     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004602     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004603     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004604     0.0000004745      0.00      1.70      0.85
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SRCPARAM L0004618     0.0000004745      0.00      1.70      0.85
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SRCPARAM L0004620     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004621     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004622     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004623     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004624     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004625     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004626     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004627     0.0000004745      0.00      1.70      0.85
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SRCPARAM L0004629     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004630     0.0000004745      0.00      1.70      0.85
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SRCPARAM L0004632     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004633     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004634     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004635     0.0000004745      0.00      1.70      0.85
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SRCPARAM L0004636     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004637     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004638     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004639     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004640     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004641     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004642     0.0000004745      0.00      1.70      0.85
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SRCPARAM L0004658     0.0000004745      0.00      1.70      0.85
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SRCPARAM L0004681     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004682     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004683     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004684     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004685     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004686     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004687     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004688     0.0000004745      0.00      1.70      0.85
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SRCPARAM L0004690     0.0000004745      0.00      1.70      0.85
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SRCPARAM L0004692     0.0000004745      0.00      1.70      0.85
SRCPARAM L0004693     0.0000004745      0.00      1.70      0.85
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SRCPARAM L0004695     0.0000004745      0.00      1.70      0.85
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   SRCPARAM L0004698     0.0000004745      0.00      1.70      0.85
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   SRCPARAM L0004700     0.0000004745      0.00      1.70      0.85
   SRCPARAM L0004701     0.0000004745      0.00      1.70      0.85
   SRCPARAM L0004702     0.0000004745      0.00      1.70      0.85
   SRCPARAM L0004703     0.0000004745      0.00      1.70      0.85
   SRCPARAM L0004704     0.0000004745      0.00      1.70      0.85
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   SRCPARAM L0004711     0.0000004745      0.00      1.70      0.85
   SRCPARAM L0004712     0.0000004745      0.00      1.70      0.85
   SRCPARAM L0004713     0.0000004745      0.00      1.70      0.85
   SRCPARAM L0004714     0.0000004745      0.00      1.70      0.85
   SRCPARAM L0004715     0.0000004745      0.00      1.70      0.85
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** LINE VOLUME Source ID = RDAIRW
   SRCPARAM L0004716     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004717     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004718     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004719     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004720     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004721     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004722     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004723     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004724     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004725     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004726     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004727     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004728     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004729     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004730     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004731     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004732     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004733     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004734     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004735     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004736     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004737     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004738     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004739     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004740     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004741     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004742     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004743     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004744     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004745     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004746     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004747     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004748     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004749     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004750     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004751     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004752     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004753     0.0000005309      0.00      5.67      0.85
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   SRCPARAM L0004754     0.0000005309      0.00      5.67      0.85
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   SRCPARAM L0004761     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004762     0.0000005309      0.00      5.67      0.85
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   SRCPARAM L0004777     0.0000005309      0.00      5.67      0.85
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   SRCPARAM L0004779     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004780     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004781     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004782     0.0000005309      0.00      5.67      0.85
   SRCPARAM L0004783     0.0000005309      0.00      5.67      0.85
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** LINE VOLUME Source ID = RDAIRE
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   SRCPARAM L0004785     0.00000211      0.00      5.67      0.85
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   SRCPARAM L0004788     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004789     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004790     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004791     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004792     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004793     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004794     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004795     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004796     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004797     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004798     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004799     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004800     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004801     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004802     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004803     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004804     0.00000211      0.00      5.67      0.85
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   SRCPARAM L0004807     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004808     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004809     0.00000211      0.00      5.67      0.85
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   SRCPARAM L0004811     0.00000211      0.00      5.67      0.85
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   SRCPARAM L0004812     0.00000211      0.00      5.67      0.85
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   SRCPARAM L0004814     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004815     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004816     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004817     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004818     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004819     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004820     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004821     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004822     0.00000211      0.00      5.67      0.85
   SRCPARAM L0004823     0.00000211      0.00      5.67      0.85
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   SRCPARAM IDLING1      0.0000173     3.840   366.000        50       0.1
   SRCPARAM IDLING2      0.0000173     3.840   366.000        50       0.1
   SRCPARAM IDLING3      0.0000173     3.840   366.000        50       0.1
   SRCPARAM IDLING4      0.0000173     3.840   366.000        50       0.1
   SRCPARAM IDLING5      0.0000173     3.840   366.000        50       0.1
   SRCPARAM IDLING6      0.0000173     3.840   366.000        50       0.1

** Building Downwash **
   BUILDHGT IDLING1         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING1         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING1         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING1          0.00     0.00     0.00    14.94    14.94    14.94
   BUILDHGT IDLING1         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING1         14.94    14.94    14.94    14.94    14.94    14.94

   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING2         14.94    14.94    14.94    14.94    14.94    14.94

   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING3         14.94    14.94    14.94    14.94    14.94    14.94

   BUILDHGT IDLING4         14.94    14.94    14.94    14.94    14.94     0.00
   BUILDHGT IDLING4          0.00     0.00     0.00    14.94    14.94    14.94
   BUILDHGT IDLING4         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING4         14.94    14.94    14.94    14.94    14.94     0.00
   BUILDHGT IDLING4         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING4         14.94    14.94    14.94    14.94    14.94    14.94

   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING5         14.94    14.94    14.94    14.94    14.94    14.94

   BUILDHGT IDLING6         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING6         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING6         14.94    14.94    14.94    14.94    14.94    14.94
   BUILDHGT IDLING6         14.94    14.94    14.94    14.94    14.94    14.94
```

BUILDHGT IDLING6	14.94	14.94	14.94	14.94	14.94	14.94
BUILDHGT IDLING6	14.94	14.94	14.94	14.94	14.94	14.94
BUILDWID IDLING1	110.05	125.30	136.75	138.75	139.85	136.71
BUILDWID IDLING1	133.41	126.74	118.94	115.88	109.29	99.39
BUILDWID IDLING1	86.46	70.91	53.20	67.65	86.09	101.90
BUILDWID IDLING1	0.00	0.00	0.00	138.75	139.85	136.71
BUILDWID IDLING1	133.41	126.74	118.94	115.88	109.29	99.39
BUILDWID IDLING1	86.46	70.91	53.20	67.65	86.09	101.90
BUILDWID IDLING2	99.31	97.41	92.56	84.90	139.85	136.71
BUILDWID IDLING2	133.41	126.74	118.94	115.88	109.29	99.39
BUILDWID IDLING2	86.46	70.91	53.20	67.65	86.09	101.90
BUILDWID IDLING2	114.62	124.05	133.42	138.75	139.85	136.71
BUILDWID IDLING2	133.41	126.74	118.94	115.88	109.29	99.39
BUILDWID IDLING2	86.46	70.91	53.20	67.65	86.09	98.18
BUILDWID IDLING3	99.31	97.41	92.56	84.90	74.65	235.52
BUILDWID IDLING3	235.02	228.26	214.76	201.15	181.42	99.39
BUILDWID IDLING3	86.46	70.91	53.20	67.65	86.09	101.90
BUILDWID IDLING3	114.62	124.05	133.42	138.75	236.70	235.52
BUILDWID IDLING3	235.02	228.26	214.76	201.15	181.42	99.39
BUILDWID IDLING3	86.46	70.91	53.20	67.65	86.09	98.18
BUILDWID IDLING4	110.05	125.30	136.75	144.03	146.95	0.00
BUILDWID IDLING4	0.00	0.00	0.00	136.59	131.11	121.66
BUILDWID IDLING4	86.46	92.38	72.81	71.83	71.93	91.46
BUILDWID IDLING4	110.05	125.30	136.75	144.03	146.95	0.00
BUILDWID IDLING4	133.41	126.74	118.94	115.88	109.29	99.39
BUILDWID IDLING4	86.46	92.38	72.81	71.83	71.93	91.46
BUILDWID IDLING5	99.31	125.30	136.75	144.03	146.95	145.39
BUILDWID IDLING5	146.45	144.22	91.25	96.68	99.17	98.64
BUILDWID IDLING5	95.12	92.06	72.81	87.10	94.07	98.18
BUILDWID IDLING5	99.31	125.30	136.75	144.03	146.95	145.39
BUILDWID IDLING5	146.45	144.22	91.25	96.68	99.17	98.64
BUILDWID IDLING5	95.12	88.71	79.61	87.10	94.07	98.18
BUILDWID IDLING6	99.31	97.41	92.56	84.90	74.65	62.14
BUILDWID IDLING6	72.33	83.05	91.25	96.68	99.17	98.64
BUILDWID IDLING6	95.12	88.71	79.61	87.10	94.07	98.18
BUILDWID IDLING6	99.31	97.41	92.56	84.90	74.65	62.14
BUILDWID IDLING6	72.33	83.05	91.25	96.68	99.17	98.64
BUILDWID IDLING6	95.12	88.71	79.61	87.10	94.07	98.18
BUILDLEN IDLING1	136.59	131.11	121.66	86.46	70.91	53.20
BUILDLEN IDLING1	67.65	86.09	101.90	114.62	124.05	133.42
BUILDLEN IDLING1	138.75	139.85	136.71	133.41	126.74	118.94
BUILDLEN IDLING1	0.00	0.00	0.00	86.46	70.91	53.20
BUILDLEN IDLING1	67.65	86.09	101.90	114.62	124.05	133.42
BUILDLEN IDLING1	138.75	139.85	136.71	133.41	126.74	118.94
BUILDLEN IDLING2	96.68	99.17	98.64	95.12	70.91	53.20
BUILDLEN IDLING2	67.65	86.09	101.90	114.62	124.05	133.42
BUILDLEN IDLING2	138.75	139.85	136.71	133.41	126.74	118.94
BUILDLEN IDLING2	115.88	109.29	99.39	86.46	70.91	53.20
BUILDLEN IDLING2	67.65	86.09	101.90	114.62	124.05	133.42
BUILDLEN IDLING2	138.75	139.85	136.71	133.41	126.74	91.25
BUILDLEN IDLING3	96.68	99.17	98.64	95.12	88.71	55.76

BUILDLEN	IDLING3	82.18	117.37	148.99	176.09	198.02	133.42
BUILDLEN	IDLING3	138.75	139.85	136.71	133.41	126.74	118.94
BUILDLEN	IDLING3	115.88	109.29	99.39	86.46	92.38	55.76
BUILDLEN	IDLING3	82.18	117.37	148.99	176.09	198.02	133.42
BUILDLEN	IDLING3	138.75	139.85	136.71	133.41	126.74	91.25
BUILDLEN	IDLING4	136.59	131.11	121.66	108.51	92.06	0.00
BUILDLEN	IDLING4	0.00	0.00	0.00	110.05	125.30	136.75
BUILDLEN	IDLING4	138.75	236.70	145.39	146.45	144.22	142.10
BUILDLEN	IDLING4	136.59	131.11	121.66	108.51	92.06	0.00
BUILDLEN	IDLING4	67.65	86.09	101.90	114.62	124.05	133.42
BUILDLEN	IDLING4	138.75	236.70	145.39	146.45	144.22	142.10
BUILDLEN	IDLING5	96.68	131.11	121.66	108.51	92.06	72.81
BUILDLEN	IDLING5	71.83	71.93	98.18	99.31	97.41	92.56
BUILDLEN	IDLING5	84.90	146.95	145.39	72.33	83.05	91.25
BUILDLEN	IDLING5	96.68	131.11	121.66	108.51	92.06	72.81
BUILDLEN	IDLING5	71.83	71.93	98.18	99.31	97.41	92.56
BUILDLEN	IDLING5	84.90	74.65	62.14	72.33	83.05	91.25
BUILDLEN	IDLING6	96.68	99.17	98.64	95.12	88.71	79.61
BUILDLEN	IDLING6	87.10	94.07	98.18	99.31	97.41	92.56
BUILDLEN	IDLING6	84.90	74.65	62.14	72.33	83.05	91.25
BUILDLEN	IDLING6	96.68	99.17	98.64	95.12	88.71	79.61
BUILDLEN	IDLING6	87.10	94.07	98.18	99.31	97.41	92.56
BUILDLEN	IDLING6	84.90	74.65	62.14	72.33	83.05	91.25
XBADJ	IDLING1	-166.84	-164.57	-157.29	-48.98	-27.99	-6.15
XBADJ	IDLING1	-0.37	2.37	5.04	7.56	9.65	7.73
XBADJ	IDLING1	5.58	3.26	0.85	-1.60	-4.00	-6.47
XBADJ	IDLING1	0.00	0.00	0.00	-37.47	-42.91	-47.05
XBADJ	IDLING1	-67.28	-88.46	-106.94	-122.17	-133.70	-141.16
XBADJ	IDLING1	-144.33	-143.11	-137.55	-131.81	-122.74	-112.47
XBADJ	IDLING2	-159.04	-162.04	-160.12	-153.33	-8.37	-9.50
XBADJ	IDLING2	-26.58	-45.91	-63.85	-79.85	-93.61	-108.24
XBADJ	IDLING2	-119.59	-127.30	-131.14	-131.00	-126.88	-119.10
XBADJ	IDLING2	-114.11	-105.66	-93.99	-79.47	-62.54	-43.70
XBADJ	IDLING2	-41.07	-40.17	-38.05	-34.77	-30.44	-25.18
XBADJ	IDLING2	-19.16	-12.55	-5.57	-2.41	0.14	-151.21
XBADJ	IDLING3	-141.35	-146.84	-147.87	-144.40	-136.55	-10.48
XBADJ	IDLING3	-28.81	-51.88	-73.37	-92.63	-109.27	-126.31
XBADJ	IDLING3	-139.50	-148.46	-152.91	-152.71	-147.87	-138.74
XBADJ	IDLING3	-131.80	-120.86	-106.24	-88.40	-67.87	-45.28
XBADJ	IDLING3	-53.37	-65.49	-75.62	-83.45	-88.75	-7.12
XBADJ	IDLING3	0.76	8.61	16.20	19.30	21.13	-131.57
XBADJ	IDLING4	-141.87	-132.79	-119.68	-102.93	-83.05	0.00
XBADJ	IDLING4	0.00	0.00	0.00	-4.55	-1.97	0.67
XBADJ	IDLING4	28.94	18.92	8.14	10.24	11.91	8.73
XBADJ	IDLING4	5.28	1.68	-1.98	-5.58	-9.00	0.00
XBADJ	IDLING4	-115.61	-135.88	-152.03	-163.56	-170.12	-171.51
XBADJ	IDLING4	-167.69	-255.61	-153.54	-156.69	-156.13	-150.83
XBADJ	IDLING5	-91.45	-2.71	-5.06	-7.25	-9.22	-10.91
XBADJ	IDLING5	-12.27	-13.26	-2.29	5.47	13.06	20.26
XBADJ	IDLING5	26.84	-126.48	-134.95	28.73	17.84	6.40
XBADJ	IDLING5	-5.23	-128.40	-116.60	-101.26	-82.84	-61.90
XBADJ	IDLING5	-59.56	-58.67	-95.89	-104.78	-110.48	-112.82

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   XBADJ    IDLING5       -111.74  -107.26   -99.53  -101.06  -100.89   -97.65

   XBADJ    IDLING6         -8.70    -7.00    -5.09    -3.02    -0.86     1.33
   XBADJ    IDLING6         -6.03   -14.27   -22.08   -29.21   -35.46   -40.63
   XBADJ    IDLING6        -44.57   -47.15   -48.30   -60.27   -71.78   -81.11
   XBADJ    IDLING6        -87.97   -92.17   -93.56   -92.11   -87.86   -80.94
   XBADJ    IDLING6        -81.07   -79.80   -76.10   -70.09   -61.95   -51.93
   XBADJ    IDLING6        -40.33   -27.51   -13.84   -12.06   -11.27   -10.14

   YBADJ    IDLING1         -9.09   -24.26   -38.69   -74.96   -73.19   -69.20
   YBADJ    IDLING1        -65.11   -59.37   -53.00   -42.78   -31.26   -18.79
   YBADJ    IDLING1         -5.75     7.46    20.45    33.46    45.41    55.99
   YBADJ    IDLING1          0.00     0.00     0.00    74.96    73.19    69.20
   YBADJ    IDLING1         65.10    59.37    53.00    42.78    31.26    18.79
   YBADJ    IDLING1          5.75    -7.46   -20.45   -33.46   -45.41   -55.99

   YBADJ    IDLING2         19.79     0.26   -19.27   -38.22    57.37    62.79
   YBADJ    IDLING2         64.29    63.51    59.63    56.17    51.01    44.30
   YBADJ    IDLING2         36.24    27.08    17.10     7.24    -2.87   -12.90
   YBADJ    IDLING2        -22.54   -31.58   -41.53   -50.21   -57.37   -62.79
   YBADJ    IDLING2        -64.29   -63.51   -59.63   -56.17   -51.01   -44.30
   YBADJ    IDLING2        -36.24   -27.08   -17.10    -7.24     2.87    38.71

   YBADJ    IDLING3         32.57    15.93    -1.20   -18.30   -34.84    35.15
   YBADJ    IDLING3         35.20    33.74    31.36    31.23    30.15    56.55
   YBADJ    IDLING3         45.17    32.42    18.68     5.01    -8.84   -22.42
   YBADJ    IDLING3        -35.32   -47.25   -59.59   -70.13   -30.11   -35.15
   YBADJ    IDLING3        -35.20   -33.74   -31.36   -31.23   -30.15   -56.55
   YBADJ    IDLING3        -45.17   -32.42   -18.68    -5.01     8.84    48.23

   YBADJ    IDLING4        -50.48   -60.68   -69.04   -75.30   -79.28     0.00
   YBADJ    IDLING4          0.00     0.00     0.00   -73.58   -67.24   -58.85
   YBADJ    IDLING4         36.56    42.45   -24.25    -0.49    24.91    38.74
   YBADJ    IDLING4         50.48    60.68    69.04    75.30    79.28     0.00
   YBADJ    IDLING4         64.18    50.07    35.60    17.82    -0.51   -18.82
   YBADJ    IDLING4        -36.56   -42.45    24.25     0.49   -24.91   -38.74

   YBADJ    IDLING5        -55.12    16.96    30.01    42.15    53.00    62.25
   YBADJ    IDLING5         66.09    67.45   -52.02   -43.11   -32.88   -21.65
   YBADJ    IDLING5         -9.77    36.81    25.49    26.18    37.05    46.80
   YBADJ    IDLING5         55.12   -16.96   -30.01   -42.15   -53.00   -62.25
   YBADJ    IDLING5        -66.09   -67.45    52.02    43.11    32.88    21.65
   YBADJ    IDLING5          9.77    -2.41   -14.52   -26.18   -37.06   -46.80

   YBADJ    IDLING6        -20.44   -13.24    -5.65     2.12     9.82    17.23
   YBADJ    IDLING6         24.11    30.26    35.48    39.64    42.58    44.24
   YBADJ    IDLING6         44.54    43.50    41.13    37.52    32.76    27.01
   YBADJ    IDLING6         20.44    13.24     5.65    -2.12    -9.82   -17.23
   YBADJ    IDLING6        -24.11   -30.26   -35.49   -39.64   -42.58   -44.24
   YBADJ    IDLING6        -44.54   -43.50   -41.13   -37.52   -32.76   -27.01

   URBANSRC ALL
   SRCGROUP ALL
SO FINISHED
**
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** AERMOD Receptor Pathway
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**
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RE STARTING
   INCLUDED DPM28All.rou
RE FINISHED
**
**************************************
** AERMOD Meteorology Pathway
**************************************
**
**
ME STARTING
   SURFFILE ..\ktrm_sfc_pfl\KTRM_V11_trimmed.sfc
   PROFFILE ..\ktrm_sfc_pfl\KTRM_V11_trimmed.pfl
   SURFDATA 3104 2017
   UAIRDATA 3190 2017
   PROFBASE -36.0 METERS
ME FINISHED
**
**************************************
** AERMOD Output Pathway
**************************************
**
**
OU STARTING
   RECTABLE ALLAVE 1ST
   RECTABLE 1 1ST
   RECTABLE 24 1ST
** Auto-Generated Plotfiles
   PLOTFILE 1 ALL 1ST DPM28ALL.AD\01H1GALL.PLT 31
   PLOTFILE 24 ALL 1ST DPM28ALL.AD\24H1GALL.PLT 32
   PLOTFILE PERIOD ALL DPM28ALL.AD\PE00GALL.PLT 33
   SUMMFILE DPM28All.sum
OU FINISHED
**
**************************************
** Project Parameters
**************************************
** PROJCTN  CoordinateSystemUTM
** DESCPTN  UTM: Universal Transverse Mercator
** DATUM    World Geodetic System 1984
** DTMRGN   Global Definition
** UNITS    m
** ZONE     11
** ZONEINX  0
**
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* MODELING OPTIONS USED: CONC ELEV URBAN ADJ_U*
* PLOT FILE OF HIGH 1ST HIGH 24-HR VALUES FOR SOURCE GROUP: ALL
* FOR A TOTAL OF 11 RECEPTORS.
* FORMAT: (3(1X,F13.5),3(1X,F8.2),3X,A5,2X,A8,2X,A5,5X,A8,2X,I8)

X	Y	AVERAGE CONC	ZELEV	ZHILL	ZFLAG	AVE	GRP	RANK	NET ID	DATE(CONC)
580086.00000	3722773.00000	0.01873	-39.01	-39.01	0.00	24-HR	ALL	1ST		22011024
580122.00000	3722774.00000	0.02442	-38.71	-38.71	0.00	24-HR	ALL	1ST		21122124
580172.00000	3722775.00000	0.02293	-38.50	-38.50	0.00	24-HR	ALL	1ST		21122124
580242.00000	3722717.00000	0.01168	-38.40	-38.40	0.00	24-HR	ALL	1ST		21122124
580289.00000	3722738.00000	0.01320	-37.99	-37.99	0.00	24-HR	ALL	1ST		21122124
580337.00000	3722732.00000	0.01184	-37.80	-37.80	0.00	24-HR	ALL	1ST		21122124
579963.00000	3722704.00000	0.00580	-36.08	-36.08	0.00	24-HR	ALL	1ST		19021224
579927.00000	3722644.00000	0.00422	-36.33	-36.33	0.00	24-HR	ALL	1ST		21011024
579519.00000	3722783.00000	0.00533	-36.27	-36.27	0.00	24-HR	ALL	1ST		21120524
579466.00000	3722781.00000	0.00500	-36.27	-36.27	0.00	24-HR	ALL	1ST		21120524
579393.00000	3722779.00000	0.00475	-36.27	-36.27	0.00	24-HR	ALL	1ST		21120524

** CONCUNIT ug/m^3
** DEPUNIT g/m^2

Rincon Consultants, Inc.
777 E Tahquitz Canyon Way
Palm Springs, California 92262
760-203-5120

January 23, 2026
Project No: 21-10929

The Altum Group
44-600 Village Court, Suite 100
Palm Desert, CA 92260

Subject: Responses to Draft Environmental Impact Report Comments for the Coachella Airport Business Park in Coachella, Riverside County, California

Dear Mr. Larson:

This letter provides our expert opinions and conclusions to assist in the responses to comments received during public circulation of the Draft Environmental Impact Report (DEIR) prepared for the Coachella Airport Business Park Project (project). The DEIR was circulated for a 30-day public review period which began on July 21, 2025, and ended on August 20, 2025. The City of Coachella (City) Development Services, Planning Division, received 16 comment letters on the DEIR. This letter focuses only on responses to letters from the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW). The commenters and the page number on which each comment letter appear are listed below in Table 1.

Table 1 Comment Letters Received

Letter No. and Commenter		Page Nos.
4	Mary Woulfe, United States Fish and Wildlife Service	13 - 16
2	Kim Freeburn, California Department of Fish and Wildlife	76 - 105

The comments and responses follow on the subsequent pages. The comment letters are numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, then the number assigned to each issue (Response 4.1, for example, indicates the response is for the first issue raised in Comment Letter 4).

Rincon Consultants (Rincon) has summarized each comment and provided a response. Each response is followed by recommendations regarding how to address the comment for consideration, and the supporting rationale. New text is shown with an <u>underline</u> and replaced or deleted text is shown in ~~strikethrough~~. We recommend confirming the recommended approach with the City before finalizing the responses to comments.

Letter 4

COMMENTER: Mary Woulfe, USFWS

DATE: September 2, 2025

Response 4.1

The commenter summarizes the regulatory role of USFWS with regards to reviewing the project DEIR. This comment does not warrant changes to the DEIR.

Response 4.2

This commenter summarizes the project description. This comment does not warrant changes to the DEIR.

Response 4.3

The commenter notes that black-tailed gnatcatcher (*Polioptila melanura*) was observed within the northern portion of the Study Area. The commenter notes that the DEIR states the black-tailed gnatcatcher is listed as a Covered Species under the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP); however, this species is not currently covered under the CVMSHCP. The DEIR will be revised per this comment. It should be noted that the discussion regarding black-tailed gnatcatcher will remain in DEIR Section 4.4, Biological Resources, p. 4.4-24 under the discussion of "Avian Species," given that potential impacts to nesting birds and common passerine species protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC), including black-tailed gnatcatcher, could occur if nests are located within the Project Area and/or in the immediate vicinity during construction activities.

The commenter agrees that burrowing owl (*Athene cunicularia*, CVMSHCP-Covered Species, CDFW Species of Special Concern [SSC], and California Endangered Species Act [CESA] Candidate Endangered), crissal thrasher (*Toxostoma crissale*, CVMSHCP-Covered Species), and loggerhead shrike (*Lanius ludovicianus*) have potential to occur within the Study Area. The commenter further states that the presence of sparse vegetation, particularly cover of shrubs, is suitable habitat for ground-nesting birds. Moreover, bare ground or sparse vegetation cover also constitutes suitable nesting habitat for some ground-nesting birds. Therefore, the proposed ground disturbance has the potential to impact nesting birds. The commenter notes that the DEIR does not indicate that focused nesting bird surveys were completed, likely contributing to the lack of nesting bird observations during the field survey. The commenter recommends focused nesting bird surveys, both within and outside of nesting season, to accurately confirm nesting birds presence or absence. The commentor notes that a complete assessment of the biological resources within the project area is required to assess the project's potential impacts to nesting birds, and requests that the DEIR be revised to include a complete assessment of the project's potential impacts to nesting bird habitat, including completion of nesting bird surveys during the appropriate time of year, to determine the extent of nesting birds on the project site.

Pages 23 and 28 of the Biological Resources Assessment (BRA) and page 4.4-24 of the DEIR state that multiple nesting birds and raptors have the potential to nest in shrubs and trees and/or burrow on bare ground throughout and near the Study Area, and that numerous avian nests including verdins (*Auriparus flaviceps*) nesting in the mesquite (*Prosopis glandulosa*) and arrow weed (*Pluchea sericea*) thickets were observed within the Substation development area. The DEIR further states that no special status birds or raptors were observed, with the exception of black-tailed gnatcatcher, but

suitable open habitats, trees, shrubs, and other vegetation provide the micro habitats for these species to occur throughout the project area. These observations further demonstrate that the Study Area is used by nesting birds.

The DEIR also states (page 4.4-24) that vegetation and open areas within and surrounding the project area have the potential to provide refuge cover from predators, perching sites, and favorable conditions for avian nesting that could be affected by the proposed project. The DEIR further states (page 4.4-24) that potential impacts to nesting birds could occur if nests are located on the project area and/or in the immediate vicinity during construction activities. Direct impacts could occur to avian special-status species if active nests are disturbed during vegetation removal or ground disturbing activities. Direct impacts may also occur if active nests are located within close proximity to the project area and are abandoned due to visual and/or acoustic project-related actions such as construction noise, lighting, and fugitive dust. These impacts could lead to individual mortality and/or harassment that might reduce nesting success. Therefore, as stated in the DEIR, impacts to special-status birds and raptors would be potentially significant without mitigation.

The assessment of potential project impacts to nesting birds within the Study Area included in both the BRA and DEIR is adequate because no federally listed threatened or endangered birds were detected within the Study Area; and as prescribed in Mitigation Measure (MM) BIO-1, implementation of a pre-construction nesting bird survey prior to commencement of any vegetation removal or ground disturbance, and establishment of appropriate avoidance buffers if any active nests are detected during the survey until a qualified biologist has determined that nestlings have fledged or the nest is no longer active, are sufficient in order to avoid/minimize impacts to nesting birds.

Additionally, the commenter notes that MM BIO-1 in the DEIR states that project-related activities shall not occur during the bird breeding season, from January 15 through August 31, unless pre-construction surveys are conducted within seven days prior to ground disturbance. USFWS generally considers peak nesting season to be February 1 through September 15. The commenter also recommends that MM BIO-1 be revised to require nesting bird surveys throughout construction, both within and outside of nesting season, to account for variation in the timing of the nesting bird season and avoid any potential adverse effects to nesting.

Recommendations

It is typically not necessary to conduct nesting bird surveys outside of the bird nesting season, as birds are not typically nesting during that time of year. It is not appropriate to extend the bird breeding season date into September as USFWS suggests considering the earlier end of nesting due to the desert heat and other extreme weather conditions. We suggest keeping the start of the breeding season as January 15 because raptors are known to nest as early as January. Rincon recommends modifying and adding language to MM BIO-1 with some of CDFW's suggested MM BIO-1 as described below in Response 14.11 in order to clarify and amplify this MM and facilitate it's adequacy in protecting nesting birds with implementation. The recommended updated MM BIO-1 Nesting Bird Avoidance/Pre-construction Surveys is as follows:

"Prior to issuance of the Project's grading permit, the following measures shall be implemented:

To avoid disturbance of nesting and special-status bird species protected by the MBTA and CFGC, activities related to the Project, including but not limited to, vegetation removal, ground disturbance, and construction shall not occur during the bird breeding season (January 15 through August 31) unless a pre-construction nesting bird survey is conducted within <u>three</u>~~seven~~ days prior to <u>vegetation removal or</u> ground disturbance.

A qualified biologist, who is familiar with the identification of avian species in the Coachella Valley, will conduct the preconstruction nesting bird survey within threeseven days prior to vegetation removal or ground disturbance to evaluate the presence/absence, location, and status of any active nests on or adjacent to the Project Area. The extent of the survey area surrounding the Project Area shall be determined by the qualified biologist to help ensure that direct and indirect effects to nesting birds are avoided. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist will make every effort to avoid potential nest predation as a result of survey efforts. If an active nest(s) is discovered, a suitable buffer shall be established around the active nests, as determined by the biologist, and construction activity will not occur within the buffer until the biologist has determined that the nest is no longer active. Buffer size shall consider the species involved and relevant level of tolerance to adjacent activity, the location of the nest relative to proposed activities, and site conditions that naturally buffer the location, such as vegetation screening, topography, etc. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged, the nest is no longer active, or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. If construction activities are delayed or paused for more than 14 days during the nesting season, the nest survey will be re-initiated for areas that still contain potential nesting habitat. No parking, storage of materials, or construction activities shall occur within this buffer until the qualified biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into this buffer shall occur only at the discretion of the qualified biologist, if it is determined that encroachment will not adversely impact the nesting birds."

Response 4.4

The commenter notes that the BRA states that burrowing owls or burrows were not observed during the field survey, although the California Natural Diversity Database (CNDDB) indicates that the species has previously been observed within five miles of the project site. The USFWS states that due to the presence of disturbed habitat within the project site, the proximity of the Whitewater River channel and berms, and the potential for Coachella Valley round-tailed ground squirrels to occur and create burrows within the project area, the project site is likely suitable habitat for burrowing owl, and burrowing owls have the potential to inhabit the site. The commenter notes that the DEIR does not indicate completion of focused burrowing owl surveys. The commenter recommends that the DEIR include an accurate assessment of the project's potential impacts to burrowing owl, including results from focused surveys during the breeding season and non-breeding season following the protocols outlines in CDFW's 2012 Staff Report on Burrowing Owl Mitigation.

Additionally, the commenter recommends that MM BIO-2 be revised to require burrowing owl pre-construction surveys by a qualified biologist in accordance with the protocols described in the Staff Report on Burrowing Owl Mitigation. The commenter also recommends that MM BIO-2 be revised to include burrowing owl surveys throughout the construction period. The commenter also recommends that MM BIO-2 be revised to require that, if the pre-construction surveys confirm burrowing owl presence, the project applicant shall submit a Burrowing Owl Plan that includes avoidance, minimization, and mitigation measures to the USFWS and CDFW (collectively, Wildlife Agencies) for review and approval prior to beginning project activities. The commenter notes that the project proponent should coordinate with the Wildlife Agencies on the appropriate avoidance, minimization, and mitigation measures to be included in the Burrowing Owl Plan. The commenter further notes that per Section 4.4 and Section 8.5.2 of the CVMSHCP, relocation of burrowing owls must follow protocols accepted by the Wildlife Agencies, and active relocation and eviction/passive relocation must be determined through coordination with the Wildlife Agencies for all Covered Species. The commenter

further requests that MM BIO-2 be revised to state that if avoidance of burrowing owl is not possible, the project applicant shall coordinate with the Wildlife Agencies on a burrowing owl relocation plan, and requests that the relocation plan be submitted to the Wildlife Agencies for review and approval.

Recommendations

Section 4.4 of the CVMSHCP requires burrowing owl surveys in CVMSHCP Conservation Areas. The project site is outside of a Conservation Area; therefore, focused burrowing owl surveys are not required by the CVMSHCP for the project. The biological resources field survey found no burrowing owl or their sign, and no burrows on the Project site. The commenter provides no evidence that the species occupies the site. The site is not located in a CVMSHCP Conservation Area. MM BIO-2 requires pre-construction surveys for the species. If the species were to occur on the site, the required pre-construction surveys would identify them, and cause Project activities, including grubbing prior to grading, to stop until such time as a mitigation program, including a relocation if needed, was reviewed and implemented by CDFW, thereby eliminating the potential for Take of the species on the Project site. The City is complying with the requirements of both the CVMSHCP and CESA by requiring MM BIO-2, and no change is required to assure protection of the species on the site. In order to provide clarity and direction, MM BIO-2 has been modified to explicitly cite the CDFW Staff Report as the correct protocol, and to prohibit Project activities until mitigation or avoidance measures are implemented, should the species be identified on site.

Therefore, MM BIO-2 will be revised as follows:

"BIO-2 Burrowing Owl Pre-construction Survey

In accordance with Section 4.4 Required Avoidance, Minimization, and Mitigation Measures of the CVMSHCP, pre-construction (i.e., Take Avoidance) burrowing owl surveys shall ~~will~~ be conducted by a qualified biologist no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the CDFW Staff Report on Burrowing Owl Mitigation (2012 or most recent version). Pre-construction surveys shall be conducted within and surrounding 500 feet of the Project disturbance footprint to identify burrows that could be utilized by burrowing owl. Potentially suitable burrows shall be checked by a qualified biologist to see if they are occupied or not. If the burrow is unoccupied, the burrow shall be made inaccessible to burrowing owl, and the Project may proceed. If a burrow is occupied, Project activities shall be immediately halted within 500 feet of the burrow (restricted area). The qualified biologist shall coordinate with CDFW and USFWS and prepare a Burrowing Owl Avoidance and Monitoring Plan that shall be submitted to the Wildlife Agencies for approval and must be approved prior to commencing or re-commencing Project activities within the restricted area~~the burrowing owl shall be relocated pursuant to accepted CDFW protocols~~. For ground-disturbing activities, pre-construction surveys should be repeated when there is a pause in construction of 30 days or more. ~~If there are no records for the site, surveys must be conducted to determine, prior to construction, if burrowing owl are present. Active burrows shall be avoided during the burrowing owl breeding season (January 15 to August 31) with an appropriate buffer zone as determined by a qualified biologist. If occupied burrows cannot be avoided, determination of the appropriate method of relocation, such as eviction/passive relocation or active relocation, shall be based on the specific site conditions (e.g., distance to nearest suitable habitat and presence of burrow) in coordination with CDFW and the City. Passive relocation may only occur in the non-breeding season (September to January).~~

Response 4.5

The commenter notes that bat species were not observed during the field survey, but agrees with the BRA's conclusion that there is moderate potential for western yellow bat (*Lasiurus xanthinus*,

CVMSHCP-Covered Species) to occur on the project site due to the presence of the California fan palm oasis north of the project site and the riparian woodland and scrub habitats within the northern portion of the Study Area. The commenter notes that the DEIR does not indicate completion of focused bat surveys. Additionally, the commenter states that the DEIR does not include an assessment of bat roosting habitat in the bridge on Airport Boulevard, adjacent to the southern portion of the project site and within the Study Area. The commenter recommends that the DEIR be revised to include a complete assessment of the project's potential impacts to bat habitat, including completion of focused bat surveys following accepted survey methods on the project site and the Airport Boulevard bridge crossing over the Whitewater River channel.

The CVMSHCP does not require focused bat surveys. MM BIO-3 requires a special-status bat species emergence survey if construction activities are to occur within 300 feet of the California fan palm oasis during the bat maternity season (April 1 through August 31). The emergence survey would be conducted in areas of suitable roosting habitat, which include the Airport Boulevard bridge, during the maternity season to document the presence of special-status bat species maternal roosting habitat. MM BIO-3 also requires that any special-status bat species observed during the maternity roosting season within or adjacent to the project area would be avoided and provided a minimum buffer as determined by the qualified biologist (a 100-foot to 300-foot buffer is recommended) prior to the commencement of construction.

Additionally, the commenter recommends that MM BIO-3 is revised to include detailed information regarding survey methods, including the number of days of acoustic monitoring, emergence roost counts, and number of roost count observers.

The commenter also recommends that MM BIO-3 be revised to require a minimum of two surveys during the maternity season, one during spring and one during summer. Further, the commenter recommends that MM BIO-3 also be revised to require a winter survey and migration period survey, and to require that, if bats are determined to be present at the project site, avoidance and buffers are established at all times of year, regardless of maternity roosting season.

The commenter recommends that MM BIO-3 be revised to require that, if bats are determined to be present at the project site, avoidance and buffers are established at all times of year, regardless of maternity roosting season.

Recommendations

Due to the fact that the CVMSHCP does not require focused bat surveys, a special-status bat species emergence survey is sufficient. Performance standards are included in the MM as written, and further detail is not required. MM BIO-3 as written would ensure avoidance of special-status bat species during the maternity roosting season with establishment of a 100-foot to 300-foot buffer should any special-status bat species be detected. However, MM BIO-3 will be slightly revised to include a mention of the Airport Boulevard bridge since it is included as an area of suitable roosting habitat, as follows:

"BIO-3 Emergence Bat Survey

A special-status bat species emergence survey shall be conducted if construction activities are to occur within 300 feet of the California fan palm oasis during the bat maternity season (April 1 through August 31). The emergence survey shall be conducted in areas of suitable roosting habitat, including the Airport Boulevard bridge, during the maternity season to document the presence or absence of special-status bat species maternal roosting habitat. The emergence survey shall be conducted 30 minutes before sunset and continue for up to two hours after sunset. Any special-status bat species observed during the survey within or adjacent to the Project Area shall be avoided and provided a minimum

buffer as determined by the qualified biologist (a 100-foot to 300-foot buffer is recommended) prior to the commencement of construction"

Response 4.6

The commenter thanks the City for the opportunity to provide comments for the DEIR. This comment does not warrant changes to the DEIR.

Letter 14

COMMENTER: Kim Freeburn, CDFW

DATE: September 4, 2025

Response 14.1

This comment includes a general introduction and does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

Response 14.2

This comment discusses CDFW's role as California's Trustee Agency and a Responsible Agency under CEQA. Comment noted that CDFW is submitting comments as a Responsible Agency under CEQA and may need to exercise regulatory authority as provided by the Fish and Game Code. The Comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines.

Response 14.3

This comment includes a general summary of the proposed Project, its objectives, location, and timeframe and does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. Therefore, no further response is warranted.

Response 14.4

The commenter asserts that the DEIR has not adequately identified and disclosed the Project direct, indirect, and cumulative impacts on biological resources. The commenter also concludes that the DEIR lacks sufficient information to facilitate a meaningful review by CDFW. The commenter requests that additional information and analyses be added to a revised DEIR.

The comment is overly broad and cannot be addressed in detail. Responses to individual issues raised by the commenter are addressed below in Responses 14.5 through 14.25.

Response 14.5

The commenter expresses a concern that the assessment of the existing environmental setting has not been adequately analyzed in the DEIR. The commenter states that the DEIR lacks a complete assessment of biological resources associated with nesting birds, burrowing owls, and bats within the Project site and surrounding areas.

The assessment of the existing environmental setting associated with the Project site is provided in Section 4.4.1 on pages 4.4-1 through 4.4-16 of the DEIR. The assessment is adequate as required by CEQA. These issues are discussed as individual comments further below.

Response 14.6

The commenter states that CDFW is concerned that the Mitigation Measures proposed in the DEIR are not adequate to avoid or reduce impacts to biological resources to below a level of significance. The comment is overly broad. Individual issues are discussed below in Responses 14.7 through 14.25.

Response 14.7

The commenter states that the DEIR and its supporting documents lack an adequate assessment of biological resources that may occupy the adjacent Whitewater River and the Airport Boulevard bridge. Specifically, the commenter states that the DEIR lacks 1) an analysis of the potential for the Airport Boulevard bridge to support nesting birds and bats, 2) the results of focused burrowing owl surveys within the project site and adjacent Whitewater River, 3) adequate analysis of the potential direct and indirect impacts of the project associated with lighting, and 4) adequate analysis of the potential direct and indirect impacts of the project associated with noise on wildlife using the Whitewater River, including the Airport Boulevard bridge, and the vacant, vegetated parcel to the north.

The DEIR contains an assessment of the Project's Study Area (Project site and a 300-foot surrounding buffer) that includes much of the width of the Whitewater River/Coachella Valley Stormwater Channel and the Airport Boulevard bridge. The Airport Boulevard bridge is outside of the Project site and would not be impacted by the Project. As stated on page 4.4-24 of the DEIR, direct impacts may occur if active nests are located near the Project site and are abandoned due to visual and/or acoustic project-related actions such as construction noise, lighting, and fugitive dust. These impacts could lead to individual mortality and/or harassment that might reduce nesting success. Additionally, as stated on page 4.4-25 of the DEIR, direct impacts to western yellow bat may occur if an active roost is located within the California fan palm oasis that occurs just north of the Project area, due to visual and/or acoustic Project-related disturbance. In addition, as discussed in Response 4.5, MM BIO-3 will be slightly revised to include a mention of the Airport Boulevard bridge given that it is included as an area of suitable roosting habitat and is within the Study Area. Therefore, as noted in the Project's BRA and DEIR, these potential impacts would be reduced to less than significant through implementation of MM BIO-1 (Nesting Bird Avoidance/Pre-construction Surveys), MM BIO-3 (Emergence Bat Survey), MM BIO-5 (Worker Environmental Awareness Program), and MM BIO-8 (Standard Construction Best Management Practices).

Additionally, the commenter recommends the DEIR be revised to include the findings of a complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including Special Species of Concern ("SSC") and California Fully Protected Species. The commenter recommends a biological inventory include a buffer area surrounding the Project including the Whitewater River and Airport Boulevard bridge. The commenter recommends the DEIR be revised to include an analysis of direct, indirect, and cumulative impacts to biological resources, including, but not limited to lighting and noise, and identification of appropriate avoidance, minimization, and Mitigation Measures.

As described in Section 2.5 Literature and Database Review of the BRA, the biological resources within a Study Area, comprising the Project site plus a 300-foot buffer were analyzed, which is standard practice for a biological reconnaissance survey. Figures 2, 4, 5, 6, and 7 of the BRA show that the Study Area included much of the width along the portion of the Whitewater River that is adjacent to the Project site as well as the Airport Boulevard bridge crossing over the Whitewater River. Therefore, the Study Area described in the BRA and DEIR is adequate. These issues are discussed further in the responses to individual comments below.

Recommendations

Project site conditions have not appreciably changed since the time of the field reconnaissance survey. The commenter provides no evidence to suggest any changes or any reason to believe that the inventory is inaccurate as to current conditions on the site, and an updated field reconnaissance survey would not likely result in substantial changes to the BRA's or DEIR's observed species lists, described vegetation communities, presence or absence of potentially jurisdictional waters, or

determination of habitat suitability for special-status species with at least some potential to occur on or adjacent to the Project site. Therefore, no further action is recommended.

Response 14.8

The commenter suggests adding the following Mitigation Measure addressing the assessment of Biological Resources to the DEIR:

"Prior to Project construction activities, a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas, including the Whitewater River, Airport Boulevard bridge, and the vacant, vegetated area to the north, with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511), will be completed. Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-species survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to 3 years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, of if surveys are completed during periods of drought."

Recommendations

As noted in Response 14.7, there is a low potential for findings from the July 7, 2023 field reconnaissance survey to appreciably change with an updated reconnaissance survey. Therefore, the addition of the Mitigation Measure suggested above is not warranted.

Response 14.9

The commenter quotes the relevant sections of the Fish and Game Code related to nesting birds, and summarizes Take authorization under the CVMSHCP. The commenter concurs that the Project site and surrounding areas, including the Whitewater River, contain suitable habitat for birds that nest on the ground and in shrubs and trees, as confirmed in the Draft EIR. However, the commenter considers Mitigation Measure BIO-1 to be inadequate in scope and timing to reduce impacts to nesting birds to a level less than significant. The commenter recommends the completion of nesting bird surveys regardless of the time of year to ensure that impacts to nesting birds and their nests and eggs are avoided.

Recommendations

As noted in Section 4.4, Biological Resources, of the DEIR, no state listed threatened or endangered birds were detected within the Study Area.

As discussed in Response 4.3 in response to a similar comment made by the USFWS, Rincon recommends revising MM BIO-1 in order to clarify and amplify this MM and facilitate its adequacy in protecting nesting birds with implementation. This comment is further addressed in Response 14.11 below.

Response 14.10

The commenter states that the DEIR lacks an adequate discussion of the Project's potential direct, indirect, and cumulative impacts to nesting birds located within the Project site and within the adjacent Whitewater River, including the Airport Boulevard bridge, which may provide suitable habitat for cliff swallow (*Petrochelidon pyrrhonota*), and requires additional mitigation.

The impact analysis in Section 4.4.3 of the DEIR contains an analysis of impacts to nesting birds within both the Project site and areas near the Project site, which include both the Whitewater River and the Airport Boulevard bridge. This comment is further addressed in Response 14.11 below.

Response 14.11

The commenter recommends that disturbance of occupied nests of migratory birds and raptors within the Project site and surrounding area be avoided any time birds are nesting on-site. The commenter recommends updates to Mitigation Measure BIO-1 (Nesting Birds).

Recommendations

As discussed in Response 4.3 in response to a similar comment made by the USFWS regarding the scope and timing to reduce impacts to nesting birds, Rincon recommends updating Mitigation Measure BIO-1 with some of the commenter's suggested language in order to clarify and amplify this Mitigation Measure and facilitate its adequacy in protecting nesting birds with implementation. The recommended updated Mitigation Measure BIO-1, Nesting Bird Avoidance/Pre-construction Surveys is as follows:

"Prior to issuance of the Project's grading permit, the following measures shall be implemented:

To avoid disturbance of nesting and special-status bird species protected by the MBTA and CFGC, activities related to the Project, including but not limited to, vegetation removal, ground disturbance, and construction shall not occur during the bird breeding season (January 15 through August 31) unless a pre-construction nesting bird survey is conducted within threeseven days prior to vegetation removal or ground disturbance.

A qualified biologist, who is familiar with the identification of avian species in the Coachella Valley, shall conduct the preconstruction nesting bird survey within threeseven days prior to vegetation removal or ground disturbance to evaluate the presence/absence, location, and status of any active nests on or adjacent to the Project Area. The extent of the survey area surrounding the Project Area shall be determined by the qualified biologist to help ensure that direct and indirect effects to nesting birds are avoided. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist shall make every effort to avoid potential nest predation as a result of survey efforts. If an active nest(s) is discovered, a suitable buffer shall be established around the active nests, as determined by the biologist, and construction activity shall not occur within the buffer until the biologist has determined that the nest is no longer active. Buffer size shall consider the species involved and relevant level of tolerance to adjacent activity, the location of the nest relative to proposed activities, and site conditions that naturally buffer the location, such as vegetation screening, topography, etc. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged, the nest is no longer active, or the Project has been completed. No activities shall occur within this nest avoidance buffer until the qualified biologist has confirmed that breeding/nesting is completed and/or the young have fledged the nest and are no longer reliant upon the nest. Encroachment into this buffer shall occur only at the discretion of the qualified biologist, if it is determined that encroachment will not adversely impact the nesting birds. The qualified biologist

has the authority to stop work if nesting birds exhibit signs of disturbance. If construction activities are delayed or paused for more than 14 days during the nesting season, the nest survey shall be re-initiated for areas that contain potential nesting habitat."

Response 14.12

The commenter summarizes the Fish and Game Commission's determination that western burrowing owl warrants protection as a candidate species under CESA, which affords the same protection as threatened and endangered species under CESA, and states if Project activities, including relocation, could result in take, appropriate CESA authorization (i.e., Incidental Take Permit under Fish and Game Code section 2081) should be obtained prior to commencement of Project activities.

The commenter further states that throughout the CVMSHCP area, Permittees must ensure that activities occurring within their jurisdictions do not result in the take, possession, or destruction of burrowing owl individuals, nests, or eggs, and that any such activity is unlawful and would not be a Covered Activity under the CVMSHCP.

The commenter concurs that the Project site and surrounding area including the Whitewater River contain suitable nesting and foraging habitat for burrowing owl.

Recommendations

As noted in Section 4.4, Biological Resources, of the DEIR, Section 4.4 of the CVMSHCP requires burrowing owl surveys in CVMSHCP Conservation Areas. The Project site is outside of a Conservation Area; therefore, focused burrowing owl surveys are not required by the CVMSHCP for the Project. Although the commenter notes that since the time of the field reconnaissance survey (July 7, 2023), and as described in CDFW's comment above, burrowing owl has been listed by the California Fish and Game Code Commission as a candidate species for listing under CESA, the potential listing does not change the provisions of the MSHCP. The City of Coachella will enforce the MSHCP provisions. In addition, there was no sign or burrows onsite during the biological resources field survey. This comment is further addressed in Response 14.13 below.

Response 14.13

The commenter notes the DEIR includes Mitigation Measure BIO-2, which generally aligns with Required Avoidance, Minimization, and Mitigation measures for burrowing owl under the CVMSHCP (Section 4.4). However, the commenter states these measures are outdated and do not ensure that impacts to burrowing owl individuals and their nests and eggs will be avoided.

The biological resource field survey found no burrowing owl or their sign, and no burrows on the Project site. The commenter provides no evidence that the species occupies the site. The site is not located in a CVMSHCP Conservation Area. MM BIO-2 requires pre-construction surveys for the species. If the species were to locate on the site, the required pre-construction surveys would identify them, and cause Project activities, including grubbing prior to grading, to stop until such time as a mitigation program, including a relocation if needed, was reviewed and approved by CDFW, thereby eliminating the potential for Take of the species by the Project. The City is complying with the requirements of both the CVMSHCP and CESA by requiring MM BIO-2, and no change is required to assure protection of the species on the site. In order to provide clarity and direction, MM BIO-2 has been modified to explicitly cite the CDFW Staff Report as the correct protocol, and to prohibit Project activities until mitigation or avoidance measures are implemented, should the species be identified on site.

Recommendations

Based on the comments provided, Rincon recommends that MM BIO-2 be revised as follows:

"BIO-2 Burrowing Owl Pre-construction Survey

In accordance with Section 4.4 Required Avoidance, Minimization, and Mitigation Measures of the CVMSHCP, pre-construction (i.e., Take Avoidance) burrowing owl surveys shall~~will~~ be conducted by a qualified biologist no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the CDFW Staff Report on Burrowing Owl Mitigation (2012 or most recent version). Pre-construction surveys shall be conducted within and surrounding 500 feet of the Project disturbance footprint to identify burrows that could be utilized by burrowing owl. Potentially suitable burrows shall be checked by a qualified biologist to see if they are occupied or not. If the burrow is unoccupied, the burrow shall be made inaccessible to burrowing owl, and the Project may proceed. If a burrow is occupied, Project activities shall be immediately halted within 500 feet of the burrow (restricted area). The qualified biologist shall coordinate with CDFW and USFWS and prepare a Burrowing Owl Avoidance and Monitoring Plan that shall be submitted to the Wildlife Agencies for approval and must be approved prior to commencing or re-commencing Project activities within the restricted area ~~the burrowing owl shall be relocated pursuant to accepted CDFW protocols~~. For ground-disturbing activities, pre-construction surveys should be repeated when there is a pause in construction of 30 days or more." ~~If there are no records for the site, surveys must be conducted to determine, prior to construction, if burrowing owl are present. Active burrows shall be avoided during the burrowing owl breeding season (January 15 to August 31) with an appropriate buffer zone as determined by a qualified biologist. If occupied burrows cannot be avoided, determination of the appropriate method of relocation, such as eviction/passive relocation or active relocation, shall be based on the specific site conditions (e.g., distance to nearest suitable habitat and presence of burrow) in coordination with CDFW and the City. Passive relocation may only occur in the non-breeding season (September to January).~~

Response 14.14

The commenter notes the BRA's language describing known roosting habitats of special-status bat species having potential to occur on-site, and concurs that the Airport Boulevard bridge may contain crevice habitat that is suitable roosting habitat for these and other bridge-roosting bat species. The commenter states that the DEIR lacks an assessment of potential roosting habitat for bats associated with the Airport Boulevard bridge, the findings of focused surveys associated with suitable bat roosting habitat, or an analysis and discussion of potential direct and indirect impacts of the Project, appropriate avoidance, minimization, and mitigation measures.

The commenter also suggests the DEIR also include focused surveys for western yellow bat (CVMSHCP-Covered Species, SSC), which has the potential to roost in the grove of fan palms (*Washingtonia* sp.) located just north of the Project site.

As noted on page 4.4-25 of the DEIR, western yellow bat is a covered species under the CVMSHCP, and the CVMSHCP does not require focused bat surveys. Mitigation Measure BIO-3 requires a special-status bat emergence survey if construction activities are to occur within 300 feet of the California fan palm oasis during the bat maternity season (April 1 through August 31). The emergence survey shall be conducted in areas of suitable roosting habitat, which includes the Airport Boulevard bridge, during the maternity season to document the presence of special-status bat species maternal roosting habitat. Mitigation Measure BIO-3 also requires that any special-status bat species observed during the maternity roosting season within or adjacent to the Project area should be avoided and provided a minimum buffer as determined by the qualified biologist (a 100-foot to 300-foot buffer is

recommended) prior to the commencement of construction. Implementation of Mitigation Measure BIO-3 adequately reduces potential impacts to special-status bat species to less than significant levels. Therefore, no revisions to the DEIR are warranted relative to this comment.

Response 14.15

The commenter recommends the DEIR be revised to include an analysis of Project impacts associated with artificial nighttime lighting on bats that may use the grove of fan palms and the Airport Boulevard bridge.

The Project site is located immediately west of SR 86, which produces significant existing light sources from travelers on that roadway. Potential project lighting impacts are described in Section 4.1, Aesthetics, on pages 4.1-22 and 4.1-23 of the DEIR. Specifically, page 4.1-23 of the DEIR states that all light sources in the Project site's parking areas, walkways and on the exterior of proposed buildings would be shielded downwards and use of building materials on the Project site would be required to minimize glare. As such, light spill would not be permitted to occur, and the Project's compliance with City regulations and standards including the Coachella Municipal Code (CMC) Chapters 16.28.150(L), *Improvements and Grading*, and Chapter 17.56.010(J)(2)(e), *Glare from Signs*, and lighting requirements in Chapter 17.60, *Development Standards*, would maintain appropriate and safe lighting levels onsite while minimizing light and glare on adjacent properties. Additionally, pages 4.4-24 and 4.4-25 of the DEIR include a description of potential Project impacts to nesting birds and bats due to visual (which includes lighting) and/or acoustic Project-related disturbance. Mitigation Measure AES-2 of the DEIR requires the construction contractor to locate and aim all construction-related nighttime security lighting away from adjacent uses, including both residential and non-residential areas neighboring the Project site. Additionally, Mitigation Measure BIO-8 requires, among other standard construction Best Management Practices, any construction lighting to be directed toward the work area and away from adjacent habitats. Therefore, no revisions to the DEIR are warranted relative to this comment.

Response 14.16

The commenter considers Mitigation Measure BIO-3 in the DEIR to be inadequate in scope and timing to avoid or reduce impacts to bats to a level less than significant, and recommends updates to the Mitigation Measure.

Recommendations

Please see Response 14-14. Mitigation Measure BIO-3 as written shall facilitate avoidance of special-status bat species during the maternity roosting season with establishment of a 100-foot to 300-foot buffer should any special-status bat species be detected. Additionally, the Project would not directly impact suitable habitat for special-status bat species. As shown on Figure 5 of the BRA and Exhibit 4.4-1 of the DEIR, the California fan palm oasis is located outside and north of the project site and the Airport Boulevard bridge is located outside and southwest of the project site. Therefore, the analysis and proposed MMs in the BRA and DEIR are adequate to reducing impacts to special-status bats to less than significant. No additional actions are recommended.

Response 14.17

The commenter states that the DEIR lacks an analysis of direct, indirect, and cumulative impacts of artificial nighttime lighting, including impacts associated with construction and long-term operations, on biological resources including migratory birds that fly at night, burrowing owls, bats, and other

nocturnal and crepuscular wildlife. The comment further states that the Project's proposed artificial nighttime lighting has the potential to significantly and adversely affect wildlife in vacant areas adjacent to the Project site.

Recommendations

See Response 14.15. Potential direct and indirect Project lighting impacts are described in Section 4.1, Aesthetics, on pages 4.1-22 and 4.1-23 of the DEIR and potential cumulative Project lighting impacts are described on pages 4.1-25 and 4.1-26. Project compliance with City regulations and standards related to artificial nighttime lighting and Mitigation Measures described above as well as in the DEIR would reduce any potential direct, indirect, and/or cumulative artificial nighttime lighting impacts to biological resources to less than significant. No additional analysis or Mitigation Measures are warranted.

Response 14.18

The commenter suggests the City add a new Mitigation Measure to potential artificial light impacts associated with the Project.

See Response 14.15. No additional analysis or Mitigation Measures are warranted.

Response 14.19

The commenter states that construction activities may result in substantial noise through road use, equipment, and other Project-related activities, which may adversely affect wildlife species in several ways as wildlife responses to noise can occur at exposure levels of only 55 to 60 decibels. The commenter further cites several studies that describe how noise can impact wildlife. Refer to Response 14.20, below. This comment does not warrant changes to the DEIR. The Comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines.

Response 14.20

The commenter acknowledges page 4.4-24 of the DEIR indicates that the noise associated with Project construction activities may result in direct impacts to nesting birds located near the Project site. CDFW notes that the Project may result in direct and indirect impacts associated with noise to biological resources occupying the adjacent Whitewater River, the Airport Boulevard bridge, and the vacant, vegetated parcel to the north of the Project area. The commenter states that the DEIR lacks additional analysis discussion of the potential impacts of noise on biological resources in areas surrounding the Project area. CDFW recommends the DEIR be revised to include an analysis of potential impacts to wildlife associated with construction noise and to incorporate appropriate avoidance, minimizations, and Mitigation Measures. Specifically, the commenter recommends the inclusion of Mitigation Measure BIO-[C]: Construction Noise, which would require the City to ensure the use of noise suppression devices for generators for temporary use in emergencies and to restrict the use of construction equipment to hours least likely to disrupt wildlife (e.g., not at night or in the early morning).

Recommendations

Pages 4.4-24 and 4.4-25 of the DEIR state that direct impacts may occur if active nests are located near the Project site and are abandoned due to visual and/or acoustic Project-related actions such as construction noise, lighting, and fugitive dust. These impacts could lead to individual mortality and/or

harassment that might reduce nesting success. Therefore, impacts to special-status birds and raptors would be potentially significant without mitigation. Additionally, page 4.4-25 of the DEIR states that direct impacts to western yellow bat may occur if an active roost is located within the California fan palm oasis that occurs just north of the Project site, due to visual and/or acoustic Project-related disturbance. Impacts to special-status bat species would be considered significant without mitigation. Section 4.13 Noise on pages 4.13-1 through 4.13-28 of the DEIR contains an analysis of potential noise impacts associated with the Project and Mitigation Measures that would reduce Project noise impacts to less than significant levels. Cumulatively, implementation of the revised Mitigation Measure BIO-1 and Mitigation Measure BIO-2 described above, the rest of the Mitigation Measures in Section 4.4, Biological Resources, of the DEIR, and the noise Mitigation Measures described within Section 4.13 of the DEIR would reduce noise impacts associated with the Project to biological resources to less than significant levels. Therefore, the existing analysis in the DEIR, the revised Mitigation Measure BIO-1 and Mitigation Measure BIO-2 described above, the rest of the Mitigation Measures in Section 4.4, and the Mitigation Measures in Section 4.13 of the DEIR are adequate to mitigate noise impacts to biological resources in accordance with CEQA. No additional analysis or Mitigation Measures, including Mitigation Measure BIO-[C] as proposed by the commenter, are warranted.

Response 14.21

The commenter lists a number of impacts to biological resources associated with cannabis cultivation, including pesticides, fertilizers/imported soils, water pollution, groundwater depletion, vegetation clearing, construction and other development in floodplains, fencing, roads, noise, artificial light, dams and stream crossings, water diversions, and pond construction, as applicable to the project. CDFW recommends that the DEIR includes an analysis of cannabis-specific impacts to biological resources that may result from Project activities. As referenced in Section 2.5.1 of the DEIR, the Project does not include or propose Commercial or Retail Cannabis uses. The Project includes several entitlement applications, of which include a Change of Zone from Heavy Industrial (M-H) (Chapter 17.32 of the CMC) to Manufacturing Service Zone (M-S) (Chapter 17.30) with an Industrial Business Park Overlay (IPOZ) (Chapter 17.46). The M-S zone prohibits Commercial and Retail Cannabis Operations; however, the IPOZ does authorize cannabis uses, with the approval of a Conditional Use Permit (CUP) (Section 17.46.023.A(1)), which states as follows: "Cannabis Cultivation, processing, testing, manufacturing, wholesale distribution and/or retail sale (including microbusinesses), subject to the regulatory requirements of Chapters 5.68 and 5.69 of the CMC.

The implementation and operations of a Conditionally Approved Cannabis operation is required to comply with the State and Local regulatory requirements that would avoid impacts to biological resources.

Public Resources Code (PRC) §1602 prohibits the diversion or obstruction of any bed, channel, or bank of, any river, stream or lake

1) PRC §5650 prohibits discharge of cannabis irrigation water into any Waters of the State
2) PRC §5652 prohibits disposal of cannabis waste near any body of water
3) Public Resources Code (PRC) §12029(b) establishes a watershed enforcement program

In addition to mandatory State regulations associated with Commercial or Retail Cannabis uses local regulations would include the following standard regulatory requirements preventing impacts to surface and groundwater, on-site native vegetation:

1) Cannabis waste material shall be handled separate of solid waste collection services (trash, recyclable, organics) unless alternative disposal method approved by the State Department of Cannabis Control (DCC)
2) Cannabis waste material shall be housed in a locking enclosure that is not accessible to unauthorized, individuals including the public.
3) Installation of a backflow device on all common-area buildings and at each irrigation water connection shall be required in order to prevent groundwater contamination. The backflow device must be in compliance with City of standards and specifications.

In addition to the aforementioned environmental impacts, the commenter lists additional impacts that are not applicable to the Project.

1) Fencing: The Project does not propose fencing that would obstruct or divert any river, stream, lake, or other body of water.
2) Roads: The Project would construct, and dedicate public Rights-of-Way, in accordance with the City's road standards. The Project would not construct any roads that obstructs or diverts any river, stream, lake, or other body of water.
3) The Project would not create sources of artificial lighting creating impacts to wildlife or wildlife corridors. Refer to Section 4.1 of the DEIR for a more detailed discussion of lighting impacts.
4) The Project is not located near any dams, stream crossing, or ponds. As such, no impact from any potential Retail or Commercial cannabis operations would occur. Refer to Section 4.4 of the DEIR for a more detailed discussion of impacts to wetlands or riparian features.

No additional analysis or Mitigation Measures are warranted.

Response 14.22

The commenter states the DEIR lacks a discussion of whether the Project's cultivation activities will involve pesticides such as fungicides, herbicides, insecticides, and rodenticides. Because of the potential for Project activities to involve the use of pesticides in cannabis cultivation and other cannabis-related activities, the commenter requests the addition of a mitigation measure specifically related to pesticides.

As referenced in Response 14.21, the Project does not propose any Retail or Commercial Cannabis use. In the event that a future Commercial Cannabis operation is approved, pursuant to a Condition Use Permit, a Cannabis Cultivator license would be required from the Department of Cannabis Control (DCC). Pursuant to Business and Professions Code (BPC) §26060(c), the DCC have developed guidelines and regulations for the use of pesticides in the cultivation of cannabis and residue in harvested cannabis.

In April 2025, the DCC adopted the Medicinal & Adult Use Cannabis Regulations which includes Article 5, §15719 requiring residual pesticide testing for all cultivated cannabis products. In addition, the Department of Pesticide Regulation requires that the application of pesticides or other pest control in connection with the indoor, outdoor, nursery, specialty cottage, or mixed-light cultivation of cannabis complies with Division 6, §11401 et. al of the Food and Agricultural Code and its implementing regulations.

Any future Cannabis Cultivation use shall be licensed by the State in order to operate and would be subject to the aforementioned regulatory requirements. As such, no specific mitigation measure is required and compliance with these requirements ensures that no impacts would occur from the use

of pesticides in conjunction with cannabis operations. No additional analysis or Mitigation Measures are warranted.

Response 14.23

The commenter notes that cannabis cultivation operations often use artificial lighting or "mixed-light" techniques in greenhouse structures and indoor operations to increase yields, and that they also employ exterior lighting for security. The commentor then describes common impacts associated with cannabis operations and states the DEIR does not specify whether artificial light will be used either indoors or outdoors for cannabis cultivation or whether building design will allow indoor light to escape. The commentor then suggests the DEIR be revised to include an analysis of cannabis-specific impacts of artificial light on biological resources and MM BIO-[B]: Artificial Nighttime Lighting.

Refer to Response 14.18, above. The Project does not propose greenhouse facilities. Any cannabis uses would be fully contained within building, and cannabis cultivation and manufacturing uses would not be viewable from public areas, in compliance with Section 5.68.130 of the City Municipal Code. As such, light spill would not be permitted to occur, and the Project's design features would maintain appropriate and safe lighting levels onsite while minimizing light and glare on adjacent properties. No additional analysis or Mitigation Measures are warranted.

Response 14.24

The commenter describes the role of the CDFW LSA Program in cannabis licensing and provides a link for additional information on permitting. This comment does not identify a specific concern with the adequacy of the DEIR or raise an issue or comment specifically related to the DEIR's environmental analysis. In addition, the Project is not anticipated to impact any river, stream, or lake. Therefore, no further response is warranted.

Response 14.25

The commenter notes that the DEIR states that "native plant materials and other drought-tolerant plants will be used in all non-turf areas of project landscaping. Large expanses of lawn and other water-intensive landscaped areas will be kept to the minimum necessary and consistent with the functional and aesthetic needs of the project, while providing soil stability to resist erosion". The commenter notes that the DEIR lacks additional information on landscaping plans, such as plant palette or planting locations. The commenter recommends the DEIR include recommendations regarding landscaping from Section 4.0 of the CVMSHCP Table 4-112. The commenter also recommends water-wise concepts in any project landscape designs.

Recommendations

The City and Project Applicant acknowledge that Table 4-112 in Section 4 of the CVMSHCP contains a list of Coachella Valley native plants that are recommended for landscaping, which the Project's landscaping plan would be in compliance with. Because the Project would meet the City's landscape requirements and invasive species are already addressed by MM BIO-7, the existing Mitigation Measure BIO-7 is sufficient to address the commenter's concerns regarding Project landscaping and no revisions to the measure are warranted.

Response 14.26

The commenter states that information developed in EIRs and negative declarations be incorporated into a database to be used for subsequent or supplemental environmental determinations. Comment

noted. The Comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines..

Response 14.27

The commenter states that environmental document filing fees are payable upon filing of the Notice of Determination and required for the Project approval to be final. Comment noted. The Comment does not request any further information nor assert any issue that must be addressed further pursuant to CEQA Guidelines.

Response 14.28

The commenter concludes by restating the assertions discussed above and provides contact information for CDFW (Jacob Skaggs).

See Responses 14.1 through 14.28. As described above, with minor modification to mitigation measures required for clarity, the DEIR comprehensively addresses impacts to biological resources, and provides mitigation measures which will assure that these impacts are reduced to less than significant levels.

Sincerely,
Rincon Consultants, Inc.

Jared Reed
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January 7, 2026

Stephen Nieto
Director of Urban Design + Land Development
The Altum Group
44-600 Village Court, Suite 100
Palm Desert, CA 92260
Transmitted via email to: stephen.nieto@thealtumgroup.com

RE: Cultural Resources Memorandum in support of the Final EIR Coachella Airport Business Park Project, Riverside, California

Dear Stephen Nieto,

This letter report is in response to comments and concerns raised by Native American tribal groups to a draft Environmental Impact Report (EIR) in support of the Coachella Airport Business Park Project (Project). Chronicle Heritage (formally Paleo West) completed a Phase 1 cultural resource assessment of the Project area in May 2020 (Thomas 2020). The assessment was conducted in compliance with the California Environmental Quality Act (CEQA). The City of Coachella (City) is the Lead Agency for the purposes of the CEQA. As part the 2020 assessment, Chronicle Heritage included a desktop cultural resource inventory that synthesized the natural and cultural setting of the Project, a records search review of internal literature and previously acquired resource data, communication with the Native American Heritage Commission (NAHC) and interested Native American tribal groups, and the results of a Phase 1 intensive pedestrian survey of the Project area and field methodologies. Chronicle Heritage then provided management recommendations for the treatment of cultural resources. In 2023, a 3-acre parcel was added to the original Project area surveyed for the 2020 study and therefore supplemental work was required (Vyhmeister 2023). As such, Chronicle Heritage completed an updated records search for the original and updated Project area of the California Historical Resources Information System at the Eastern Information Center (EIC). Additionally, Chronicle Heritage conducted a survey on the additional Project parcel, and prepared additional cultural resource documentation to support preparation of an Environmental Impact Report (EIR).

At the client's request, Chronicle Heritage addressed comments on the Draft EIR received from the Torres Martinez Desert Cahuilla Indians and the Agua Caliente Band of Cahuilla Indians. This document includes a summary of Project context, the history of cultural resource assessments, Native American communications and responses, and management recommendations.

Project Location

The proposed Project is located at the northwest corner of State Route (SR) 86 and Airport Boulevard and is comprised of three parcels totaling approximately 46 acres in size. The Project area is bordered by a vacant, undeveloped property to the north; to the west, the Project area is bordered by the Whitewater River Storm Channel; to the east, bordered by State Route 86; and to

the south, by Airport Boulevard. The Project area is situated within Section 15, Township 6 South, Range 18 East, San Bernardino Baseline and Meridian (SBBM), as depicted on the Indio, CA 7.5' U.S. Geological Survey (USGS) topographic quadrangle. The elevation of the Project area ranges between 110 and 120 feet below mean sea level (bmsl).

Previous Cultural Resource Investigations

Chronicle Heritage conducted an updated records search at the EIC housed at the University of California, Riverside in 2023. This records search included the updated Project area and a 1-mi buffer search area. The EIC records search identifies any known cultural resources that have been previously recorded within the records search area and immediate vicinity of the Project area. The search also included a review of the Office of Historic Preservation (OHP) Archaeological Determination of Eligibility (ADOE) and the OHP Built Environment Resources Directory (BERD).

The records search indicated that no fewer than 35 previous cultural resource studies have been conducted within 1-mi of the Project area since 1974. Of the 35 previous studies, at least 11 of these studies intersect or include the Project area.

The records search also indicated that no fewer than 36 cultural resources have been previously documented within 1-mi of the Project area. None of these resources are within or intersect the Project area.

2023 Cultural Resource Pedestrian Survey

Chronicle Heritage conducted a Phase 1 cultural resource survey of the Project area on December 7, 2023. The survey entailed an intensive pedestrian survey in which all landforms likely to contain or exhibit archaeological sites were carefully inspected. Chronicle Heritage field crew inspected the Project area for any visible, potentially important cultural resources as well as investigated the Project area for any unusual contours, soil changes, distinctive vegetation patterns, and features. The supplemental pedestrian survey was negative for any cultural resources, nor were any potential indicators observed.

Buried Sensitivity Study

An archaeological sensitivity model for the Whitewater River Stormwater Channel (or Coachella Valley Stormwater Channe) prepared by Applied EarthWorks in 2012 was consulted by Chronicle Heritage in 2023. The sensitivity model concluded that the potential for discovering surface cultural resources in this area, including historical and prehistoric resources, is low, and the potential for buried cultural resources is unknown (Mirro 2012). No previous studies have demonstrated either a presence or absence of buried cultural resources. However, the model did identify research that suggests the location of a village may be in the general vicinity and, if present, it is possibly buried by muds deposited during the most recent filling of the Salton Sea (Mirro 2012). Thus, the sensitivity of this area is low for surface prehistoric and historical archaeology and unknown for buried resources.

Native American Outreach and Responses

Chronicle Heritage (then PaleoWest) initially contacted the NAHC, as part of the cultural resource assessment, on March 18, 2020, for a review of the Sacred Lands File (SLF). The objective of the SLF search was to determine if the Native American Heritage Commission had any knowledge of Native American cultural resources (e.g., traditional use or gathering area, place of religious or sacred activity, etc.) within the immediate vicinity of the Project area. The NAHC responded on March 28, 2020, stating that the SLF was completed with negative results; however, the NAHC requested that 19 individuals representing 12 Native American tribal groups be contacted to elicit information regarding cultural resource issues related to the proposed Project. Chronicle Heritage sent outreach letters to the 12 recommended tribal groups on April 3 and April 6, 2020. Phone calls were also sent out to the various tribal groups by April 30, 2020.

Five responses were received from the list of tribal groups from the NAHC in 2020. The Quechan Tribe of the Fort Yuma Reservation and Santa Rosa Band of Cahuilla Indians stated the tribes do not have any comments for the Project. The Agua Caliente Band of Cahuilla Indians stated that the Project area is within their Traditional Use Area and made some requests for information as well as monitoring during ground disturbance. The Torres-Martinez Desert Cahuilla Indians indicated that the area is sensitive for cultural resources and, as such, they will provide information regarding the sensitivity of the area during the official Assembly Bill (AB) 52 consultation process. The Soboba Band of Luiseno Indians deferred to the Torres Martinez Desert Cahuilla Indians.

Gary Wayne Resvaloso Jr. responded on behalf of the Torres Martinez Cultural Committee on July 21, 2025, regarding concerns for the Coachella Airport Business Park.

The Torres Martinez Desert Cahuilla Indians identified three areas of concern for the proposed Project: 1) Tribes Prehistoric settlement pattern, 2) A main Indian trail, and 3) the Desert Cahuilla Cultural landuse area. Concerns are further explained below:

- Tribes' Prehistoric settlement pattern begins around Airport Boulevard/ 86 HWY. This is a continuous settlement pattern running south starting with prehistoric village La mesa site, then Roadrunner house, Martinez, Alamo, and Auga Dulce and Túva with many smaller extended village sites that run through the communities of Thermal, Mecca, and Oasis.
- A main Indian trail runs from the main village sites La Mesa to Túva with smaller branches of the trail breaking off and connecting other village sites that run through the communities of Thermal, Mecca, and Oasis.
- There are several main village sites located in this Desert with each village site having its own landuse area that can be spread out over several square miles. With these village sites being so close together, there are many overlapping areas depending on their relationships.

Furthermore, the Project area is located between the Village sites of Termal Wakhish, Awelpitcava, Palaiyil, and Puichekiva. Understanding that the area is disturbed due to Palm Groves, the tribe has found deep and intact archaeological features related to the tribe's mortuary practices underneath deep plow zones. As such, the Torres Martinez Cultural Committee asks, "is there any subsurface cultural content underneath the disturbed soil, or intact cultural or archaeological features?" The Committee recommends Phase II testing to determine if any cultural material is present in undisturbed sediments and to assist in mitigation of impact to any potential Tribal Cultural Resources. Lastly, the Committee comments that if the proposed Project is going to

require ground disturbance during construction efforts, the Tribe requires a Data Recovery Plan (monitoring plan / tribal monitoring) to address any cultural materials found during construction.

On July 23, 2024, Xitlaly Madrigal responded on behalf of the Agua Caliente Band of Cahuilla Indians regarding Mitigation Measures outlined in the Draft EIR. In the Cultural Resource section of the Draft EIR, Madrigal commented on the outlined Mitigation Measures and **suggests altering language** within CUL-1 that **specifies an Agua Caliente Band of Cahuilla Indians Tribal** Monitor be attained and present during any ground disturbing activities during the Project construction phase.

Management Recommendations

Chronicle Heritage responded to the concerns and questions raised by the tribes in response to the Draft EIR. This response was developed by integrating the findings of our recent technical studies with the tribe's suggestions. We have organized our response around the specific concerns from tribes and Chronicle Heritage recommendations.

Potential for Subsurface Cultural Content

Our comprehensive investigation, informed by both technical studies and the Committee's traditional cultural knowledge, leads to the following conclusion (s):

- Our 2023 records search, intensive Phase 1 survey, and consultation of the 2021 Archaeological Sensitivity Model all found **no documented or visible surface cultural resources** in the Project area. The sensitivity model concluded that **the potential for surface resources remains low**. Additionally, the intensive archaeological survey noted the Project area is relatively disturbed and is located within an active alluvial plain. As such, the **likelihood of identifying archaeological resources in original context is considered low**.

Based on the lack of surface evidence combined with the Tribal knowledge of subsurface risk to deeply buried sensitive cultural resource, Chronicle Heritage **recommends** in the event that potentially significant cultural materials are encountered during Project-related ground-disturbing activities, all work should be halted in the vicinity of the discovery until a qualified archaeologist can visit the site of discovery and assess the significance of the archaeological resource. In addition, Health and Safety Code 7050.5, CEQA 15064.5(e), and Public Resources Code 5097.98 mandate the process to be followed in the unlikely event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Chronicle Heritage **recommends** a qualified archaeologist and Tribal Monitor(s) from the Agua Caliente Band of Cahuilla Indians and the Torres Martinez Desert Cahuilla Indians be present during any ground disturbing activities. Additionally, Chronicle Heritage **recommends** specifying the tribes noted above, within Section 4.5 under the Mitigation Measures subsection (CUL-1), as the preferred Tribal Monitors in the Draft EIR.

Recommendation for Phase II Testing

Chronicle Heritage **does not recommend** any further cultural resource management for the current Project. While we greatly appreciate the recommendation for Phase II testing, and recognize its value, Mitigation Measure CUL-1 already provides for the establishment of all necessary protocols and procedures for the treatment of cultural resources prior to the initiation

of ground disturbing activities. As such, a formal Tribal Cultural Resources Monitoring Plan is not recommended.

It has been a pleasure working with you on this Project. If you have any questions, please do not hesitate to contact the Principal Investigator at cmahan@chronicleheritage.com.

Sincerely,
Chronicle Heritage



Chase M. Mahan, M.A., RPA | Senior Archaeologist/Principal Investigator

References

California Governor's Office of Planning and Research

2015 *CEQA: California Environmental Quality Act, Statutes and Guidelines*. State of California, Sacramento, California.

Mirro, Michael

2012 Archaeological Sensitivity Model for the Whitewater River Stormwater Channel, Riverside County, California. Prepared for the Coachella Valley Water District. Prepared by Applied EarthWorks, Inc., Hemet, California.

Thomas, Roberta

2020 Cultural Resource Investigation in Support of the Coachella Airport Business Park Project, Riverside County, California. Prepared for The Altum Group, Palm Desert, California. Prepared by PaleoWest LLC, Monrovia, California.

Vyhmeister, Joy

2023 Addendum Letter Report for the Cultural Resource Investigation in Support of the Coachella Airport Park Project, Riverside County, California.

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October 21, 2025

Madeline Luke
The Altum Group
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Subject: **City of Coachella – Coachella Airport Business Park Project – Responses to Noise Related Public Comments.**

Dear Ms. Luke:

AMBIENT Air Quality & Noise Consulting has reviewed the noise-related public comments received for the proposed Coachella Airport Business Park Project Draft Environmental Impact Report (DEIR). Responses to the noise-related public comments are provided, as follows:

Response to Comment 16-4.

Construction-generated noise levels were analyzed in accordance with commonly-applied recommended guidance. All modeling assumptions are noted in the methodology section of the analysis and included in the appendix of the report. As noted in the DEIR and with regard to residential land uses, increases in ambient noise levels during the more noise-sensitive evening and nighttime hours would be of particular concern with regard to residential land uses due to the potential for increased levels of annoyance and sleep disruption. Mitigation measures have been incorporated to reduce potentially significant impacts to nearby residential land uses. In addition, refer to Response to Comment 16-25.

Response to Comment 16-11.

Diesel-powered backup generators are quickly becoming obsolete in California, with the new Title 24 regulations that require solar PV systems to include battery storage systems that can also be utilized for backup power. Mitigation Measure GHG-1 requires the project to be designed to generate a minimum of 50% of the power onsite from renewable sources, which is likely to be at least partially met through the use of battery storage systems. In addition, the proposed warehouses are not being designed for cold storage or for 24-hour operations. As a result, the installation of back-up emergency generators are not anticipated to be required for this project.

Response to Comment 16-12.

As noted in Response to Comment 16-11, the proposed warehouses are not being designed for cold storage, as such cold storage would not be allowed under the current entitlement. As a result, the use of TRUs are not anticipated to be required.

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Response to Comment 16-25.

The commenter cites information and anticipated community reactions contained in the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual*[1] that relates to long-term noise exposure over a 24-hour period, based on an average-daily noise level. This information does not pertain to short-term noise exposure, such as the on average-hourly noise thresholds recommended by the FTA for the analysis of construction activities. With regard to the assessment of short-term construction related noise impacts, the FTA guidelines present recommended noise thresholds, taking into account the noise-sensitivity of the land use and ambient noise conditions. For residential land uses, the guidelines recommend thresholds of 80 dBA L_{eq} for the daytime hours and 70 dBA L_{eq} for the nighttime hours. With regard to these recommended short-term average-hourly construction noise thresholds noted in the guidelines, the guidelines state that "If these criteria are exceeded, there may be adverse community reaction."

As noted in the DEIR, the nearest noise-sensitive receptors are residential land uses located approximately 60 feet south of the project site. The analysis noted that predicted daytime and nighttime construction noise levels would exceed corresponding daytime and nighttime noise thresholds of 80 dBA L_{eq} for the daytime hours and 70 dBA L_{eq}. As noted in the DEIR, increases in ambient noise levels during the more noise-sensitive evening and nighttime hours would be of particular concern with regard to residential land uses due to the potential for increased levels of annoyance and sleep disruption.

With regard to daytime exposure to short-term construction noise, the nearest residential land uses are currently exposed to traffic noise emanating from the adjacent Airport Boulevard and nearby State Route 86. As noted in the DEIR, ambient daytime noise levels in the vicinity of these nearest residential land uses measured approximately 68 dBA L_{eq} with maximum instantaneous noise levels of approximately 79 dBA L_{max} primarily associated with vehicle traffic on Airport Boulevard. Generally speaking, residential land uses are often exposed to increases in daytime ambient noise levels from a variety of sources, such as vehicle traffic on area roadways, landscape maintenance activities, waste-collection activities, and outdoor recreation activities. These sources can result in significant increases in daytime ambient noise levels. For instance, the use of landscape maintenance equipment, such as leaf blowers, can generate noise levels in excess of 90 dBA. With mitigation, predicted construction noise levels at the nearest residential land uses would be approximately 79 dBA L_{eq}, or less. Predicted construction noise levels during the less noise-sensitive daytime hours would not be uncharacteristic of other existing short-term noise events (e.g., landscape maintenance activities, vehicle traffic on area roadways, waste collection activities, etc.) commonly associated with residential land uses. It is also important to note that the construction noise levels noted in the DEIR were conservatively calculated assuming that five pieces of heavy-duty offroad equipment would be located within 60 feet of the nearest residential property line. Given that transient and temporal nature of construction activities,

[1] FTA. *Transit Noise and Vibration Impact Assessment Manual*. Website url: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

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it is highly unlikely that five pieces of heavy-duty off-road construction equipment would be operating simultaneously within 60 feet of these nearest residential land uses. As a result, actual construction-generated noise levels would likely be substantially lower. In comparison to ambient daytime noise conditions and given that predicted construction-generated noise levels would not exceed applicable daytime thresholds, and adverse community reaction among nearby residents would not be anticipated to occur.

Response to Comment 16-26.

Refer to Response to Comment 16-25, above.

Response to Comment 16-27.

The commenter incorrectly implies that the use of mufflers are accounted for in FHWA's Road Construction Noise Model (RCNM). As noted in the DEIR, construction noise levels were conservatively calculated using the FHWA's RCNM based on equipment reference noise levels identified in FHWA's RCNM. These reference noise levels are based on measured data from railroad construction equipment taken during the *1976 Northeast Corridor Improvement Project* derived from *U.S. EPA report "Noise from Construction Equipment and Operations, Building Equipment and Home Appliances" (NTID300.1, 31 December 1971), and* measurements conducted in the early 1990's for the Central Artery/Tunnel (CA/T) project in Boston, Massachusetts.[2] Although this data is the most current and comprehensive data currently available for off-road construction equipment noise levels, the representative equipment noise levels contained in the FHWA's RCNM are now more than 20 years old and do not specifically account for the use of newer construction equipment fitted with mufflers. As noted in the DEIR, the use of mufflers would reduce equipment noise levels by approximately 10 dBA. With mitigation, predicted construction noise levels would not exceed the daytime noise threshold of 80 dBA L_{eq}. In addition, refer to Response to Comment 16-25, above.

Response to Comment 16-28.

To be conservative, the analysis of on-site operational noise levels included the simultaneous operation of all air conditioning (AC) units anticipated to be located on the project site. A total of 92 AC units were included, which were assigned to onsite structures based on the estimated area of conditioned floor area. Modeled AC unit locations and SoundPlan modeling assumptions are included in Appendix A of the Noise Impact Analysis prepared for this project. Modeling was conducted based on an AC unit sound power level of 77 dB LwA. This level is equivalent to an AC unit roughly 6 tons in size.[3] Based on a commonly-applied average of 1,000 square feet per ton of cooling capacity, taking into account current building code requirement for energy efficiency, each AC unit would cool an estimated temperature-controlled floor area of roughly 6,000 square feet. Based on this square-footage cooling area, the modeled AC unit noise levels would be representative of those anticipated to be required for this project.

[2] FHWA. *Road Construction Noise Model User Guide*. Available at website url: https://www.fhwa.dot.gov/ENVIRonment/noise/construction_noise/rcnm/rcnm.cfm.

[3] Rheem. Website url: https://files.myrheem.com/webpartners/ProductDocuments/DA8465B1-3B91-4FEF-B148-C1AA04DF26EA.pdf

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In addition, the 25-ton AC units noted by the commenter are more representative of what might be installed for large open-floor commercial retail buildings or refrigerated warehouses. None of the warehouses proposed for this project are being designed as refrigerated warehouses and no large open-floor commercial retail buildings are proposed as part of this project. It is also important to note that AC units typically operate in a cyclic manner and do not operate continuously over a one-hour period. However, to ensure a conservative analysis, all AC units on the project site were assumed to operate simultaneously over a one-hour period. As a result, actual average-hourly noise levels would likely be lower than estimated. Furthermore, as noted in the DEIR, ambient noise levels at the nearest residential land uses located south of the project site, across Airport Boulevard, are predominantly influenced by vehicle traffic on area roadways. Based on the noise measurements conducted, ambient average-hourly noise levels at the nearest residential land uses range from a nighttime low of 59 dBA L_{eq} to a daytime high of 68 dBA L_{eq}. In comparison to ambient noise conditions, operational noise levels attributable to the proposed project at these nearest residences would be approximately 44 dBA L_{eq} during the nighttime hours and 54 dBA L_{eq} during the daytime hours, more than 10-dB lower than ambient noise levels. Predicted operational noise levels would be substantially lower than ambient nighttime and daytime noise levels at the nearest residential land uses. As a result, operational on-site noise levels would not result in a substantial increase in ambient noise levels and would be largely masked by existing traffic noise levels.

It is also important to note that the analysis of on-site noise levels was conservatively conducted in comparison to the noise ordinance standards for Riverside County, within which the nearest residential land uses are located.[4] In accordance with the County's noise ordinance, the operation of air conditioning units are considered exempt from these noise standards.

Response to Comment 16-29.

Modeling was conducted based on the anticipated operational hours for the project. As previously noted, the proposed warehouses are not large cube-storage warehouse and are not being designed for 24-hour operations. Predicted operational noise levels would not exceed applicable noise standards. In addition, as noted in Response to Comment 16-28, predicted operational noise levels would be more than 10-dB lower than ambient noise levels at the nearest residential land uses and would be largely masked by existing ambient noise levels.

Response to Comment 16-30.

As previously noted, the nearest residential land uses are located south of the project site, adjacent to Airport Boulevard and west of State Route 86. As a result, ambient noise levels at these nearest residential land uses are largely influenced by vehicle traffic noise on Airport Boulevard and nearby State Route 86, which include existing

[4] Riverside County. *Code of Ordinances. Chapter 9.52, Noise Regulation*. Website url: https://library.municode.com/ca/riverside_county/codes/code_of_ordinances?nodeId=TIT9PUPEMOWE_CH9.52NORE_9.52.040GESOLEST.

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pass-by events associated with truck traffic on these roadways. Implementation of the proposed project would not result in a substantial increase in the number of heavy-duty truck volumes along Airport Boulevard or State Route 86. As a result, implementation of the project would not result in significant increases in traffic noise levels or the number of traffic-related noise events at the nearest residential land uses. In comparison to ambient noise levels measured at the nearest residential land uses, noise levels from on-site noise sources, including on-site truck travel, would be largely masked by existing traffic noise emanating from adjacent Airport Boulevard and the nearby State Route 86. In addition, the project is not anticipated to include nighttime operations associated with proposed onsite warehouses that would generate heavy-duty truck traffic.

In addition, on-road heavy-duty trucks traveling on the project site would be estimated to average approximately 25 mph, or less. At these low speeds, noise generated by on-site truck travel would be associated with the operation of the truck's engine and vehicle exhaust. These sources are not considered instantaneous noise sources and, therefore, are more appropriately evaluated based on an average-daily or average-hourly noise metric, consistent with methodologies currently recommended by federal and state agencies (i.e., Federal Highway Administration, California Department of Transportation) for the analysis of on-road traffic noise, as was done for this project. For reference, instantaneous noise events refer to sharp, sudden noise events of short duration, typically occurring over a period of seconds and at levels substantially higher than ambient noise levels. Examples of instantaneous noise events commonly associated with transportation noise sources typically include aircraft overflights and the sounding of train horns. Furthermore, it is noted that the commenter does not provide a basis for the reference noise level used for the calculation of L_{max} noise levels associated with a single truck. Based on the information presented in the comment, it appears that the calculation is based on noise levels derived from the FHWA's *Road Construction Noise Model* (RCNM) for off-road construction haul trucks. As noted in Response to Comment 16-27, the reference noise level data contained in the RCNM is more than 20 years old, does not specifically account for the use of mufflers (as is required for on-road vehicles); and, as a result, would not be representative of noise levels associated with the operation of modern on-road trucks.

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Date: October 14, 2025

To: Andrew Simmons, City Engineer, City of Coachella

From: George Ghossain, Principal Engineer, Integrated Engineering Group

Subject: COACHELLA AIRPORT BUSINESS PARK SUPPLEMENTAL TRANSPORTATION ANALYSIS

Integrated Engineering Group has prepared this supplemental transportation analysis to address Comment Letters 3 and 15 from the County of Riverside and California Department of Transportation, respectively. The letters were provided during the public review period for the Coachella Airport Business Park Draft Environmental Impact Report.

Comments 3-7 and 15-7(5) requested Project trip distribution to be shown by intersection movement to clarify Figure 1-2:
Attachment A includes new Figure 1-2a to show Project trip distribution by intersection movement.

Comment 3-7 requested pass-by trips to be added to the analyzed Project trips:
Attachment A includes updated intersection volume figures including new Figure 1-2b to show pass-by trip distribution and assignment. **Attachment B** includes updated intersection operation analysis for the Project driveway under all scenarios that include a Project phase.

Comments 15-7(4) requested that heavy vehicle share is consistent with Caltrans requirements for SR-86 ramps and Comment 15-7(5) requested discussion of Caltrans Truck Network:
Per the District 8 Truck Networks included in Attachment C, none of the study intersections or roadway segments are a designated truck route. However, for a conservative analysis, a 19% heavy vehicle share was applied to the Project trip movements at the SR-86 ramp intersections per the latest Truck Traffic data from the Caltrans Traffic Census Program. Truck Traffic data and updated intersection operation analysis for the SR-86 ramp intersections are also included in Attachment C.

The following tables from the TIA are updated to show the results of the supplemental intersection operation analysis that included either addition of pass-by trips or addition of Caltrans heavy vehicle share for all scenarios that include a Project phase. The analysis updates do not result in any additional deficient intersection locations.

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Table 4-1
Opening Year 2027 Scenario Intersection Operation Analysis

Intersection	Opening Year 2027 Baseline		Opening Year 2027 Plus Project	
	Delay (a)	LOS (b)	Delay (a)	LOS (b)
AM Peak/PM Peak				
2. Airport Boulevard and SR-86 Northbound Ramps	11.2/8.7	B/A	12.0/9.2	B/A
3. Airport Boulevard and SR-86 Southbound Ramps	17.9/12.0	B/B	30.6/23.5	C/C
10. Airport Boulevard and Project Driveway (Option A)[c]	Does not exist		7.6/10.2	A/B
10. Airport Boulevard and Project Driveway (Option B)	Does not exist		7.4/9.9	A/A

Notes:
(a) Delay refers to the average control delay, measured in seconds per vehicle for the entire signalized or all-way stop-controlled (AWSC) intersection. At side-street stop-controlled (SSSC) intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the Highway Capacity Manual 6th Edition and performed using Synchro 12
(c) Option A assumed 30% inbound traffic has entered from easterly driveway and 70% enters from this analyzed driveway.

Table 5-1
Opening Year 2030 Scenario Intersection Operation Analysis

Intersection	Opening Year 2030 Baseline		Opening Year 2030 Plus Project	
	Delay (a)	LOS (b)	Delay (a)	LOS (b)
AM Peak/PM Peak				
2. Airport Boulevard and SR-86 Northbound Ramps	11.6/9.1	B/A	11.8/9.0	B/A
3. Airport Boulevard and SR-86 Southbound Ramps	24.7/23.1	C/C	33.6/24.4	C/C
10. Airport Boulevard and Project Driveway (Option A)[c]	7.2/9.5	A/A	7.5/10.8	A/B
10. Airport Boulevard and Project Driveway (Option B)	6.9/9.2	A/A	7.2/10.5	A/B

Notes:
(a) Delay refers to the average control delay, measured in seconds per vehicle for the entire signalized or all-way stop-controlled (AWSC) intersection. At side-street stop-controlled (SSSC) intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the Highway Capacity Manual 6th Edition and performed using Synchro 12
(c) Option A assumed 30% inbound traffic has entered from easterly driveway and 70% enters from this analyzed driveway.

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Table 6-1
Opening Year 2033 Scenario Intersection Operation Analysis

Intersection	Opening Year 2033 Baseline		Opening Year 2033 Plus Project	
	Delay (a)	LOS (b)	Delay (a)	LOS (b)
AM Peak/PM Peak				
2. Airport Boulevard and SR-86 Northbound Ramps	11.8/9.6	B/A	11.3/9.1	B/A
3. Airport Boulevard and SR-86 Southbound Ramps	48.6/26.0	D/C	49.5/27.4	D/C
10. Airport Boulevard and Project Driveway (Option A)[c]	7.1/10.4	A/B	7.3/11.7	A/B
10. Airport Boulevard and Project Driveway (Option B)	6.8/10.1	A/B	7.0/11.4	A/B

Notes:
(a) Delay refers to the average control delay, measured in seconds per vehicle for the entire signalized or all-way stop-controlled (AWSC) intersection. At side-street stop-controlled (SSSC) intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the Highway Capacity Manual 6th Edition and performed using Synchro 12
(c) Option A assumed 30% inbound traffic has entered from easterly driveway and 70% enters from this analyzed driveway.

Table 7-1
Buildout 2045 Scenario Intersection Operation Analysis

Intersection	Buildout 2045 Baseline		Buildout 2045 Plus Project		Buildout 2045 With Improvement		Δ Delay (c)
	Delay (a)	LOS (b)	Delay (a)	LOS (b)	Delay (a)	LOS (b)	
AM Peak/PM Peak							
2. Airport Boulevard and SR-86 Northbound Ramps	17.2/18.3	B/B	17.8/18.8	B/B			
3. Airport Boulevard and SR-86 Southbound Ramps	54.3/41.6	D/D	55.8/43.6	**E**/D	54.5/36.6	D/D	0.2/2.0
10. Airport Boulevard and Project Driveway (Option A)[d]	8.7/10.0	A/B	9.4/11.5	A/B			
10. Airport Boulevard and Project Driveway (Option B)	7.1/9.8	A/A	7.4/11.2	A/A			

Notes:
***Bold** values indicate intersections operating at LOS E or F.*
(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At unsignalized intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the Highway Capacity Manual 6th Edition and performed using Synchro 12
(c) Change in delay between Buildout Year 2045 With Improvement and Buildout Year 2045 Baseline
(d) Option A assumed 30% inbound traffic has entered from easterly driveway and 70% enters from this analyzed driveway.

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Comment 15-7 requested that Figure 1-2 and Roadway Segment analysis tables be updated to include numbering: Attachment A includes updated Figure 1-2 to number roadway segments in the study area, consistent with TIA Executive Summary and Section 1.0 Project Description. Below are the updated Roadway Segment analysis tables.

Table 3-2
Existing Year 2024 Scenario Roadway Segment Capacity Analysis

Roadway Segment	Classification	LOS E Capacity	Existing Year 2024		
			ADT	v/c ratio	LOS
Airport Boulevard					
1. SR-86 SB Ramps to SR-86 NB Ramps	2-lane Arterial	18,000	5,760	0.320	A
2. SR-86 SB Ramps to Project Driveway	2-lane Arterial	18,000	7,615	0.423	A
3. Project Driveway to Palm Street	2-lane Arterial	18,000	7,778	0.432	A
4. Palm Street to Polk Street	4-lane Arterial	35,900	6,912	0.193	A
Grapefruit Boulevard					
5. Palm Street to Avenue 54	2-lane Arterial	18,000	11,004	0.611	B
6. Avenue 54 to Tyler Street	2-lane Arterial	18,000	9,629	0.535	A
7. Tyler Street to Sunset Drive	4-lane Arterial	35,900	14,656	0.408	A

Table 4-3
Opening Year 2027 Scenario Roadway Segment Capacity Analysis

Roadway Segment	Classification	LOS E Capacity	Opening Year 2027 Baseline			Opening Year 2027 Plus Project		
			ADT	v/c ratio	LOS	ADT	v/c ratio	LOS
Airport Boulevard								
1. SR-86 SB Ramps to SR-86 NB Ramps	2-lane Arterial	18,000	7,376	0.410	A	8,786	0.488	A
2. SR-86 SB Ramps to Project Driveway	2-lane Arterial	18,000	9,145	0.508	A	10,995	0.611	A
3. Project Driveway to Palm Street	2-lane Arterial	18,000	9,227	0.513	A	10,137	0.0563	A
4. Palm Street to Polk Street	4-lane Arterial	35,900	8,362	0.233	A	8,692	0.242	A
Grapefruit Boulevard								
5. Palm Street to Avenue 54	2-lane Arterial	18,000	15,390	0.855	D	15,920	0.884	D
6. Avenue 54 to Tyler Street	2-lane Arterial	18,000	16,419	0.912	**E**	16,779	0.932	**E**
7. Tyler Street to Sunset Drive	4-lane Arterial	35,900	18,854	0.525	A	19,134	0.533	A

Notes:
***Bold** indicates roadway segment capacity at LOS E or F.*

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Table 5-3
Opening Year 2030 Scenario Roadway Segment Capacity Analysis

Roadway Segment	Classification	LOS E Capacity	Opening Year 2030 Baseline			Opening Year 2030 Plus Project		
			ADT	v/c ratio	LOS	ADT	v/c ratio	LOS
Airport Boulevard								
1. SR-86 SB Ramps to SR-86 NB Ramps	2-lane Arterial	18,000	10,402	0.578	A	10,822	0.601	B
2. SR-86 SB Ramps to Project Driveway	2-lane Arterial	18,000	12,525	0.696	B	13,075	0.726	C
3. Project Driveway to Palm Street	2-lane Arterial	18,000	11,586	0.644	B	11,856	0.659	B
4. Palm Street to Polk Street	4-lane Arterial	35,900	10,142	0.283	A	10,242	0.285	A
Grapefruit Boulevard								
5. Palm Street to Avenue 54	2-lane Arterial	18,000	20,306	1.128	**F**	20,456	1.136	**F**
6. Avenue 54 to Tyler Street	2-lane Arterial	18,000	23,568	1.309	**F**	23,678	1.315	**F**
7. Tyler Street to Sunset Drive	4-lane Arterial	35,900	23,332	0.650	B	23,412	0.652	B

Notes:
***Bold** indicates roadway segment capacity at LOS E or F.*

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Table 6-3
Opening Year 2033 Scenario Roadway Segment Capacity Analysis

Roadway Segment	Classification	LOS E Capacity	Opening Year 2033 Baseline			Opening Year 2033 Plus Project		
			ADT	v/c ratio	LOS	ADT	v/c ratio	LOS
Airport Boulevard								
1. SR-86 SB Ramps to SR-86 NB Ramps	2-lane Arterial	18,000	12,438	0.691	B	12,788	0.710	C
2. SR-86 SB Ramps to Project Driveway	2-lane Arterial	18,000	14,604	0.811	D	15,074	0.837	D
3. Project Driveway to Palm Street	2-lane Arterial	18,000	13,305	0.739	C	13,535	0.752	C
4. Palm Street to Polk Street	4-lane Arterial	35,900	11,691	0.326	A	11,771	0.328	A
Grapefruit Boulevard								
5. Palm Street to Avenue 54	2-lane Arterial	18,000	24,841	1.380	**F**	24,971	1.387	**F**
6. Avenue 54 to Tyler Street	2-lane Arterial	18,000	30,468	1.693	**F**	30,558	1.698	**F**
7. Tyler Street to Sunset Drive	4-lane Arterial	35,900	27,610	0.769	C	27,680	0.771	C

Notes:
***Bold** indicates roadway segment capacity at LOS E or F.*

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Table 7-3
Buildout 2045 Scenario Roadway Segment Capacity Analysis

Roadway Segment	Classification	LOS E Capacity	Buildout Year 2045 Baseline			Buildout Year 2045 Plus Project		
			ADT	v/c ratio	LOS	ADT	v/c ratio	LOS
Airport Boulevard								
1. SR-86 SB Ramps to SR-86 NB Ramps	6-lane Arterial	53,900	12,438	0.231	A	12,788	0.237	A
2. SR-86 SB Ramps to Project Driveway	6-lane Arterial	53,900	14,604	0.271	A	15,074	0.280	A
3. Project Driveway to Palm Street	6-lane Arterial	53,900	13,305	0.247	A	13,535	0.251	A
4. Palm Street to Polk Street	6-lane Arterial	53,900	11,691	0.217	A	11,771	0.218	A
Grapefruit Boulevard								
5. Palm Street to Avenue 54	6-lane Arterial	53,900	24,841	0.461	A	24,971	0.463	A
6. Avenue 54 to Tyler Street	6-lane Arterial	53,900	30,468	0.565	A	30,558	0.567	A
7. Tyler Street to Sunset Drive	6-lane Arterial	53,900	27,610	0.512	A	27,680	0.514	A

ATTACHMENT A -

UPDATED INTERSECTION VOLUME FIGURES

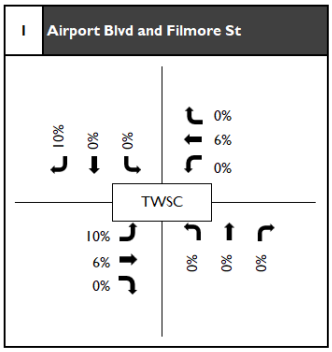


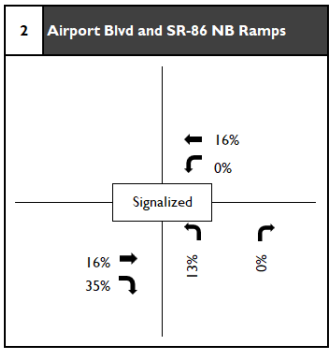
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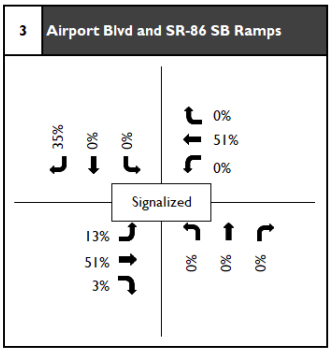
- # Intersections
- # Project Driveway
- # Roadway Segment

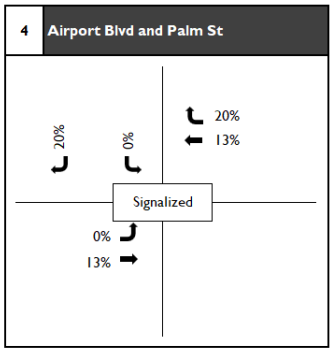
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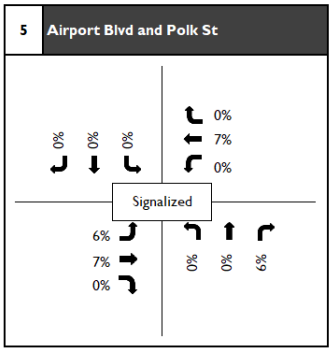
Coachella Airport Business Park
Project Study Area and Trip Distribution
Figure 1-2

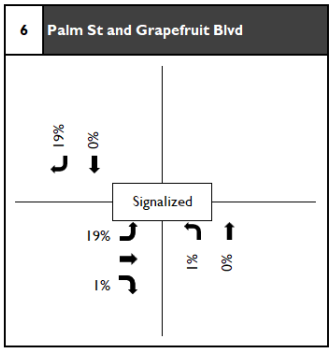


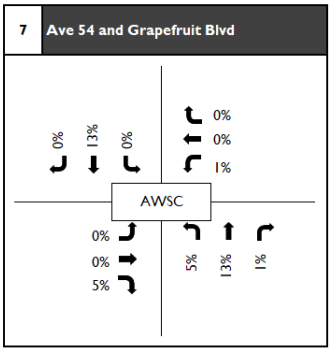


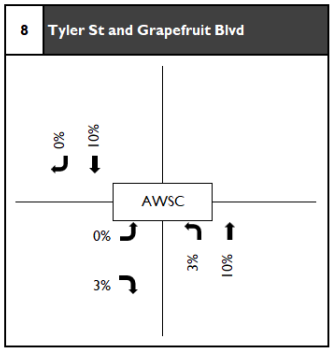


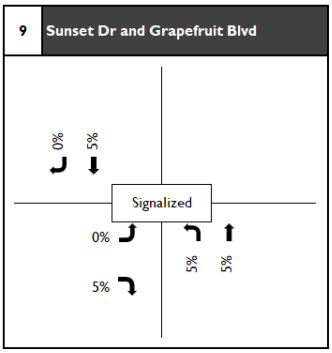


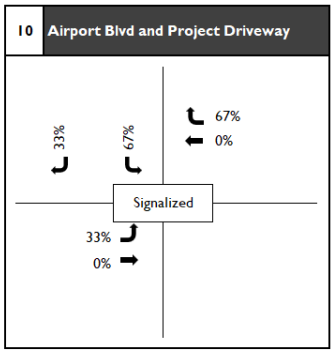






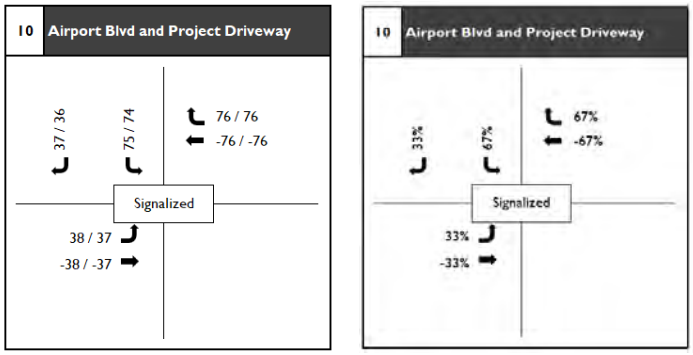






INTEGRATED ENGINEERING GROUP
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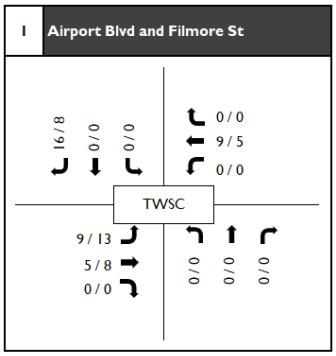
Coachella Airport Business Park
Project Distribution by Intersection Configuration
Figure 1-2a

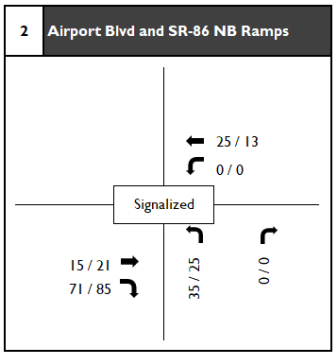


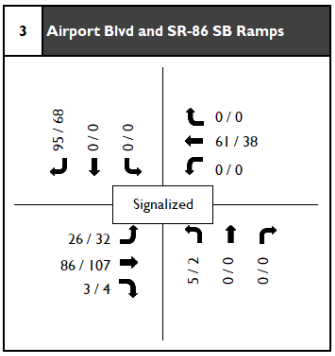
LEGEND
0/0 = (AM/PM) Peak Hour Volumes

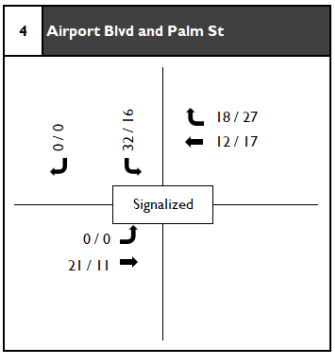
INTEGRATED ENGINEERING GROUP
TRANSPORTATION PLANNING AND ENGINEERING

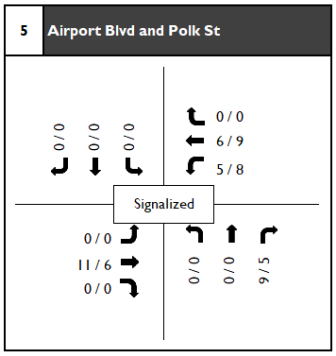
Coachella Airport Business Park
Pass-By AM/PM Peak Hour
Distribution and Intersection Volumes
Figure 1-2b

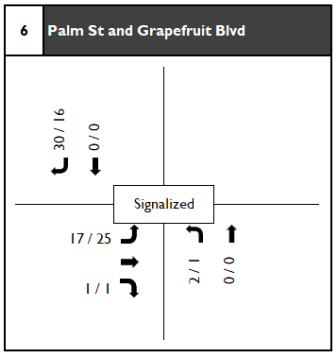


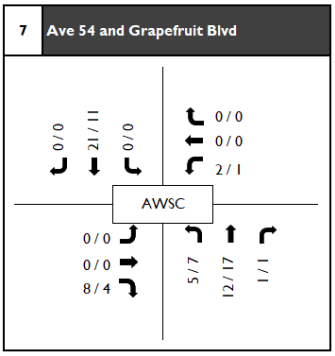


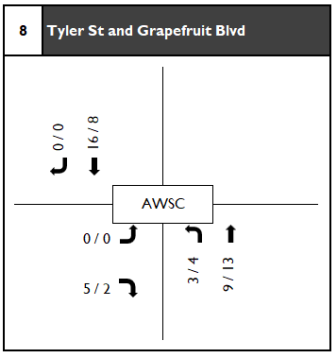


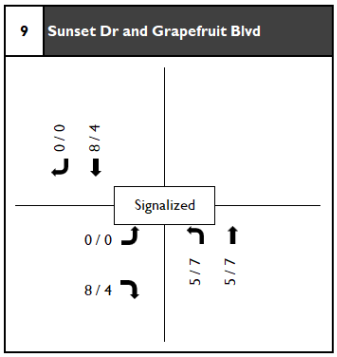


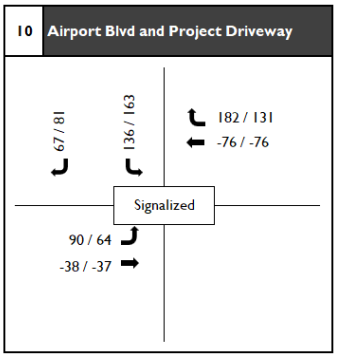












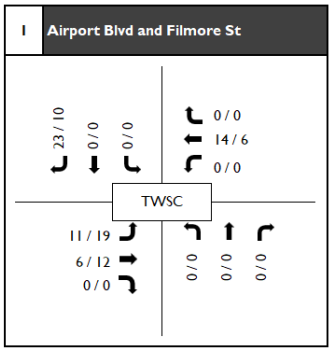
Roadway Segment	Phase I ADT
Airport Blvd	
SR-86 NB Ramps to SR-86 SB Ramps	1,410
SR-86 SB Ramps to Project Driveway	1,850
Project Driveway to Palm Street	910
Palm Street to Polk Street	330
Grapefruit Blvd	
Palm St to Ave 54	530
Ave 54 to Tyler St	360
Tyler St to Sunset Dr	280

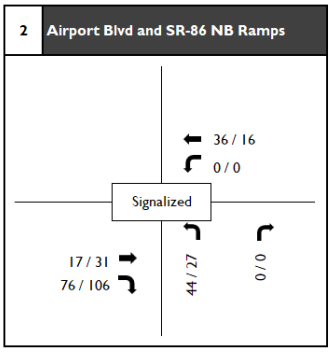
LEGEND

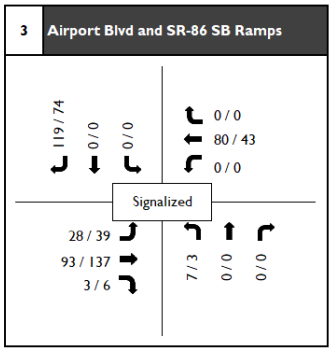
0/0 = (AM/PM) Peak Hour Volumes

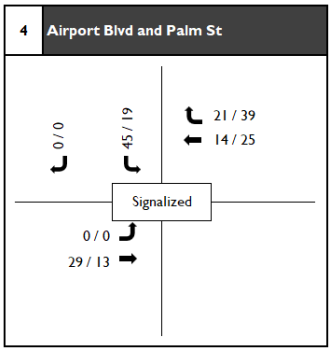
INTEGRATED ENGINEERING GROUP
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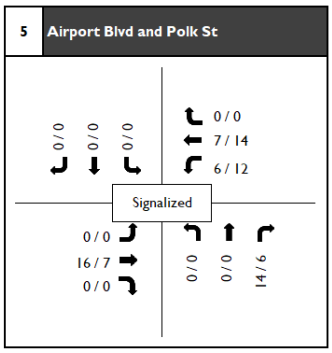
Coachella Airport Business Park
Project Phase I AM/PM Peak Hour Intersection Volumes
Figure 1-3

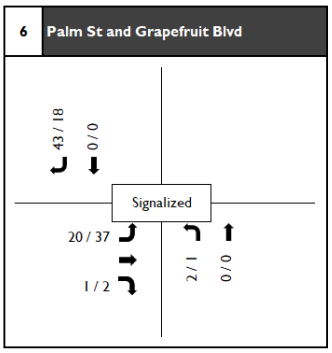


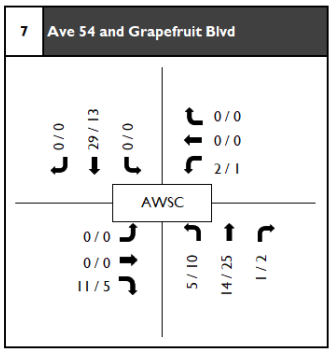


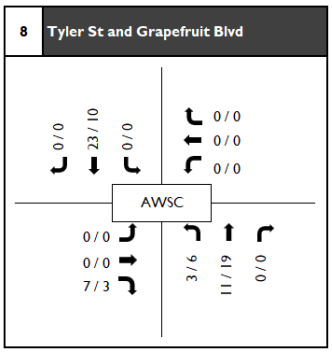


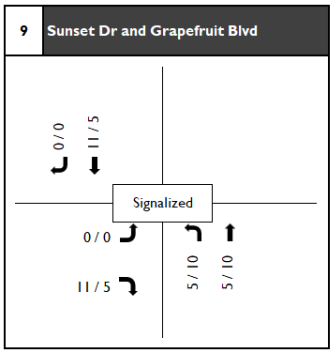


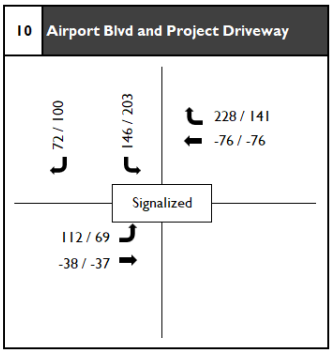












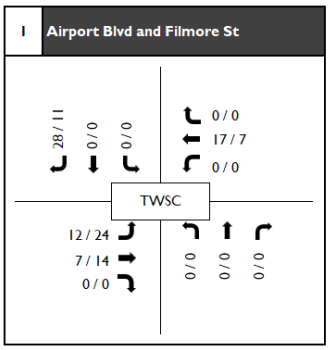
Roadway Segment	Phases I & II ADT
Airport Blvd	
SR-86 NB Ramps to SR-86 SB Ramps	1,830
SR-86 SB Ramps to Project Driveway	2,400
Project Driveway to Palm Street	1,180
Palm Street to Polk Street	430
Grapefruit Blvd	
Palm St to Ave 54	680
Ave 54 to Tyler St	470
Tyler St to Sunset Dr	360

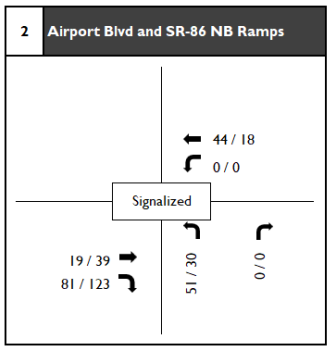
LEGEND

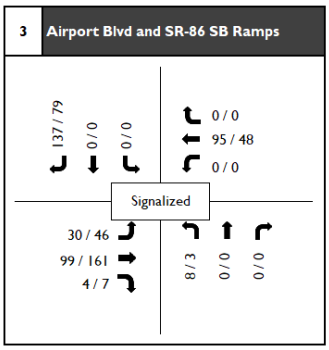
0/0 = (AM/PM) Peak Hour Volumes

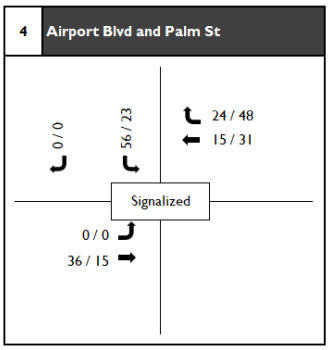
INTEGRATED ENGINEERING GROUP
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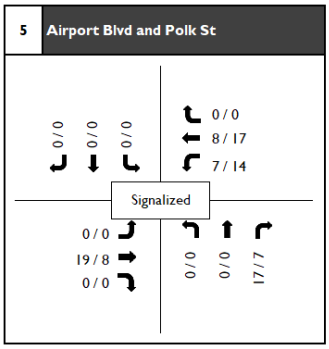
Coachella Airport Business Park
Project Phases I & II
AM/PM Peak Hour Intersection Volumes
Figure 1-4

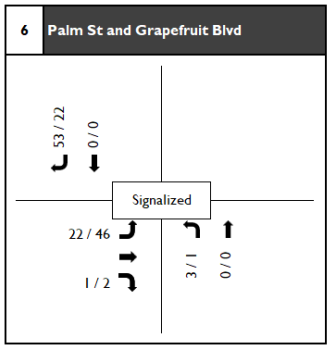


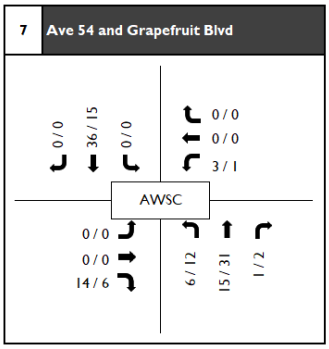


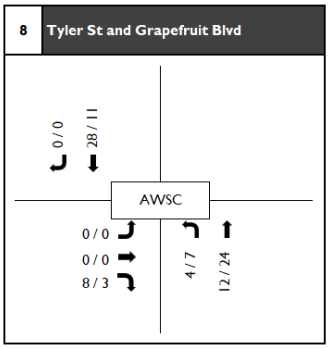


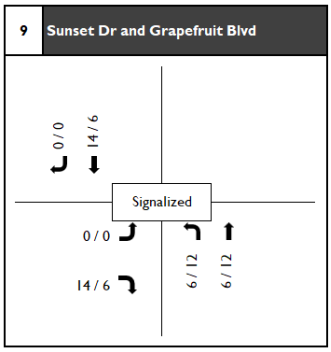


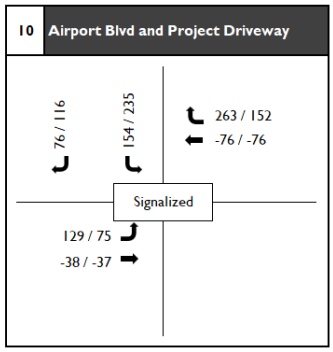












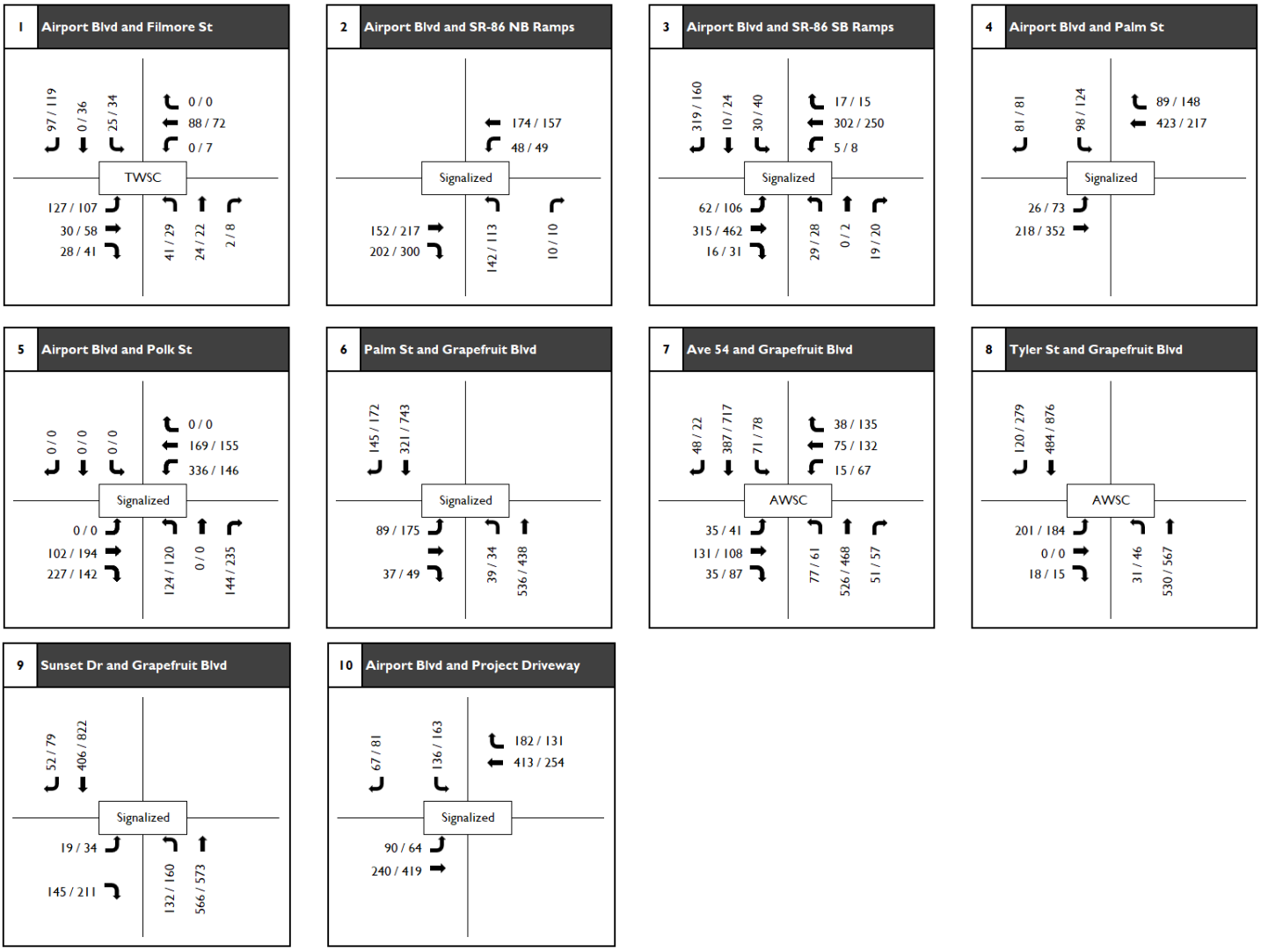
Roadway Segment	Phases I, II & III ADT
Airport Blvd	
SR-86 NB Ramps to SR-86 SB Ramps	2,180
SR-86 SB Ramps to Project Driveway	2,870
Project Driveway to Palm Street	1,410
Palm Street to Polk Street	510
Grapefruit Blvd	
Palm St to Ave 54	810
Ave 54 to Tyler St	560
Tyler St to Sunset Dr	430

LEGEND

0/0 = (AM/PM) Peak Hour Volumes

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TRANSPORTATION PLANNING AND ENGINEERING

Coachella Airport Business Park
Project Phases I, II & III
AM/PM Peak Hour Intersection Volumes
Figure 1-5

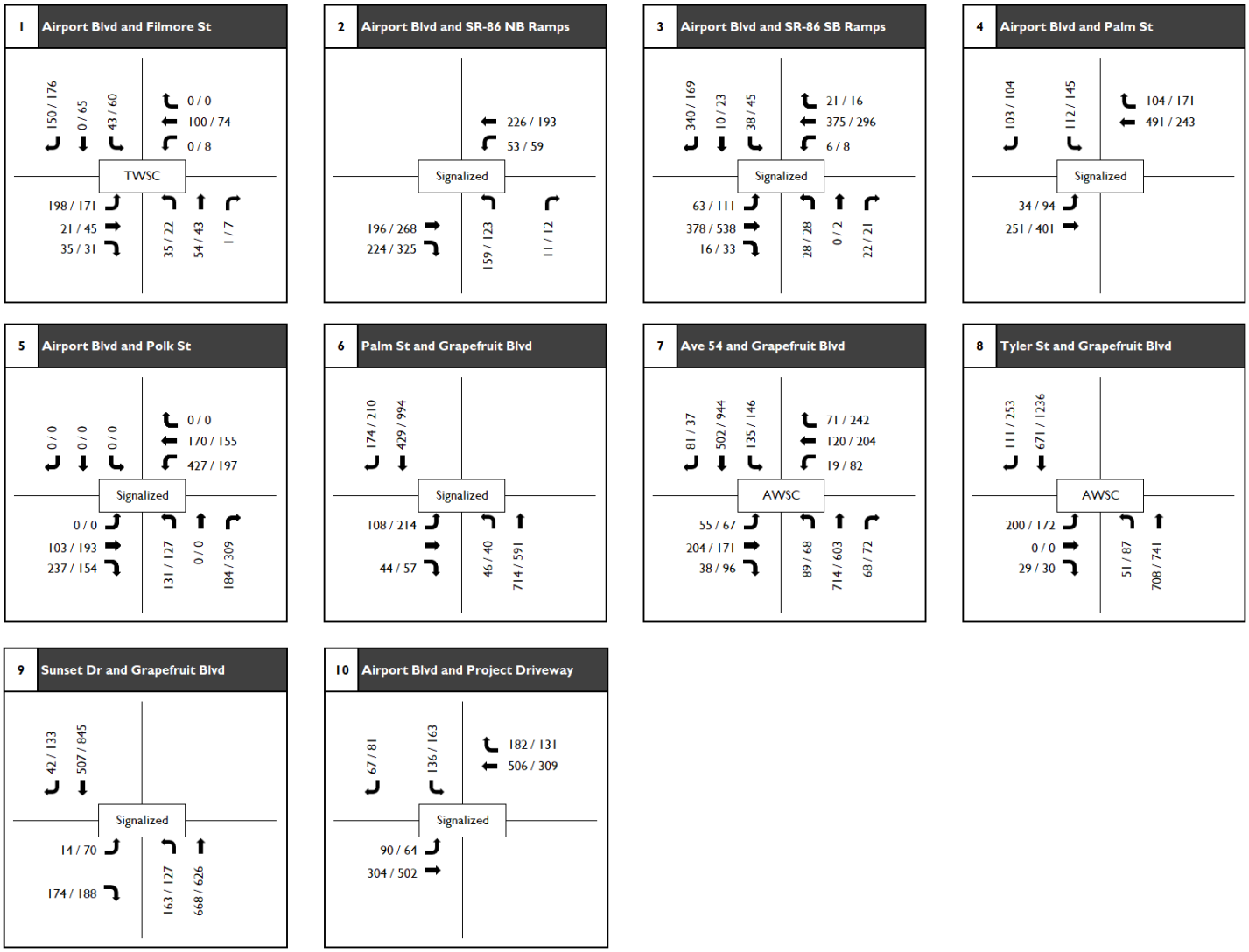


LEGEND

0/0 = (AM/PM) Peak Hour Volumes

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TRANSPORTATION PLANNING AND ENGINEERING

Coachella Airport Business Park
Opening Year 2027 Plus Project
AM/PM Peak Hour Intersection Volumes
Figure 4-2

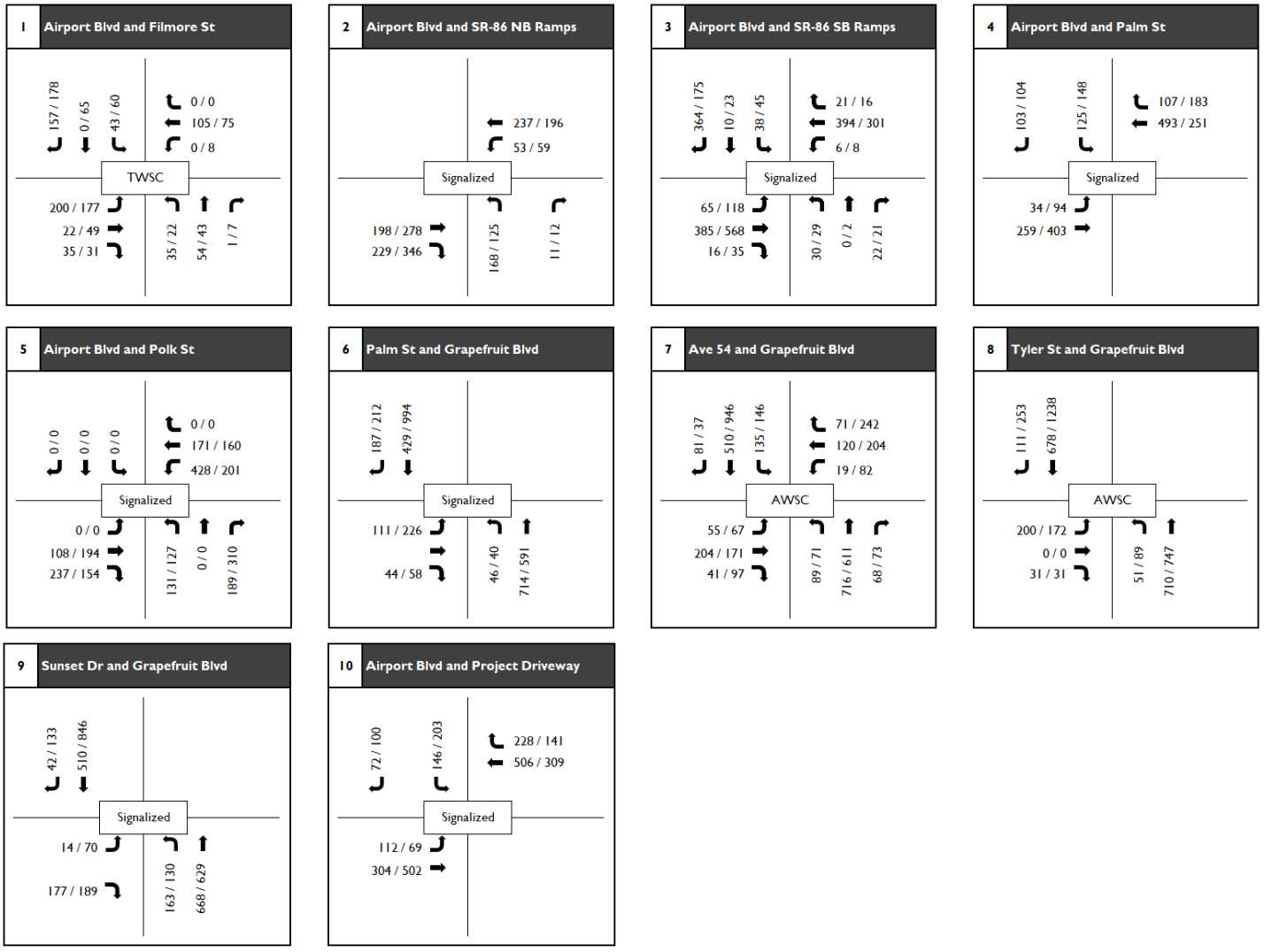


LEGEND

0/0 = (AM/PM) Peak Hour Volumes

INTEGRATED ENGINEERING GROUP
TRANSPORTATION PLANNING AND ENGINEERING

Coachella Airport Business Park
Opening Year 2030 Baseline
AM/PM Peak Hour Intersection Volumes
Figure 5-1

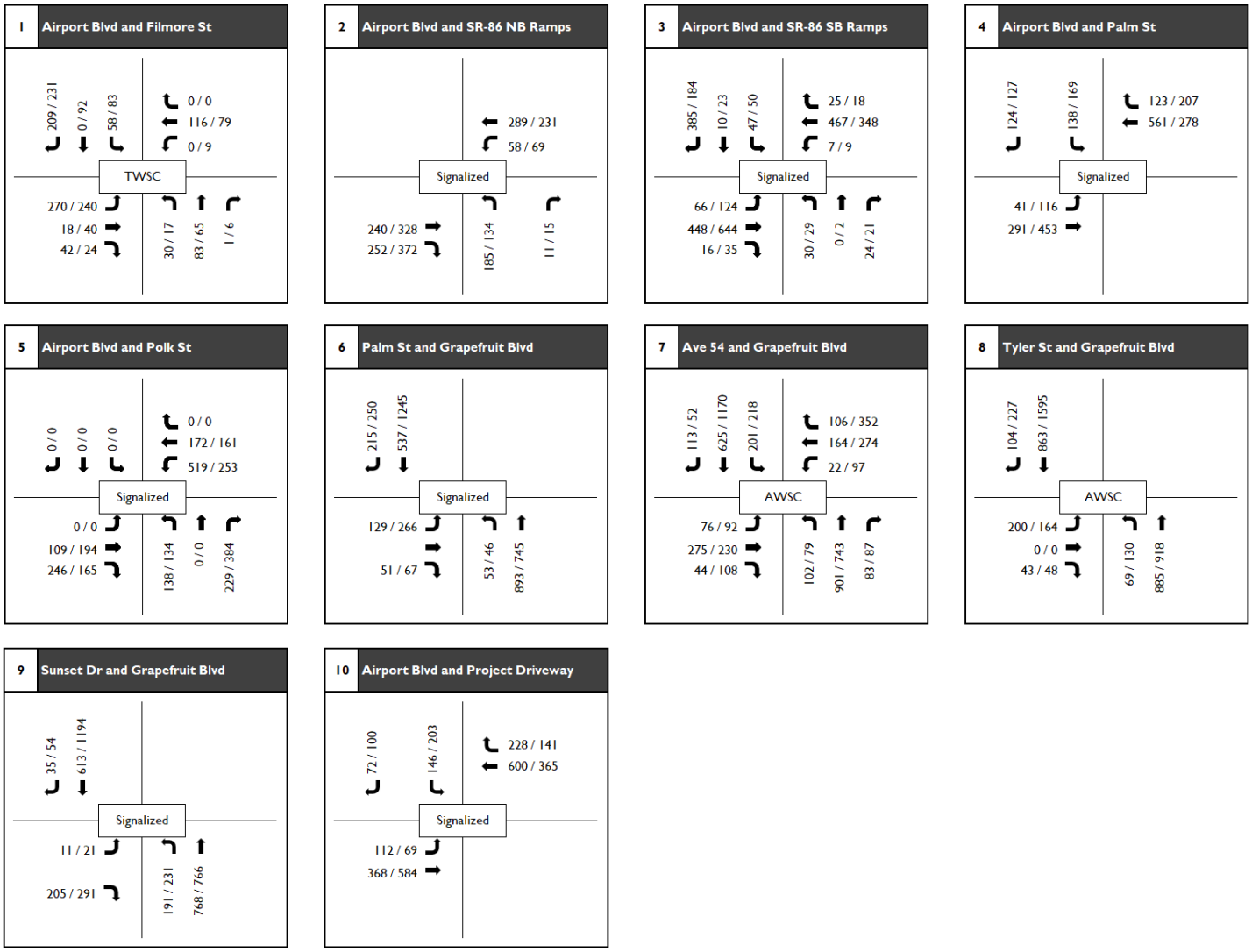


LEGEND

0/0 = (AM/PM) Peak Hour Volumes

INTEGRATED ENGINEERING GROUP
TRANSPORTATION PLANNING AND ENGINEERING

Coachella Airport Business Park
Opening Year 2030 Plus Project
AM/PM Peak Hour Intersection Volumes
Figure 5-2

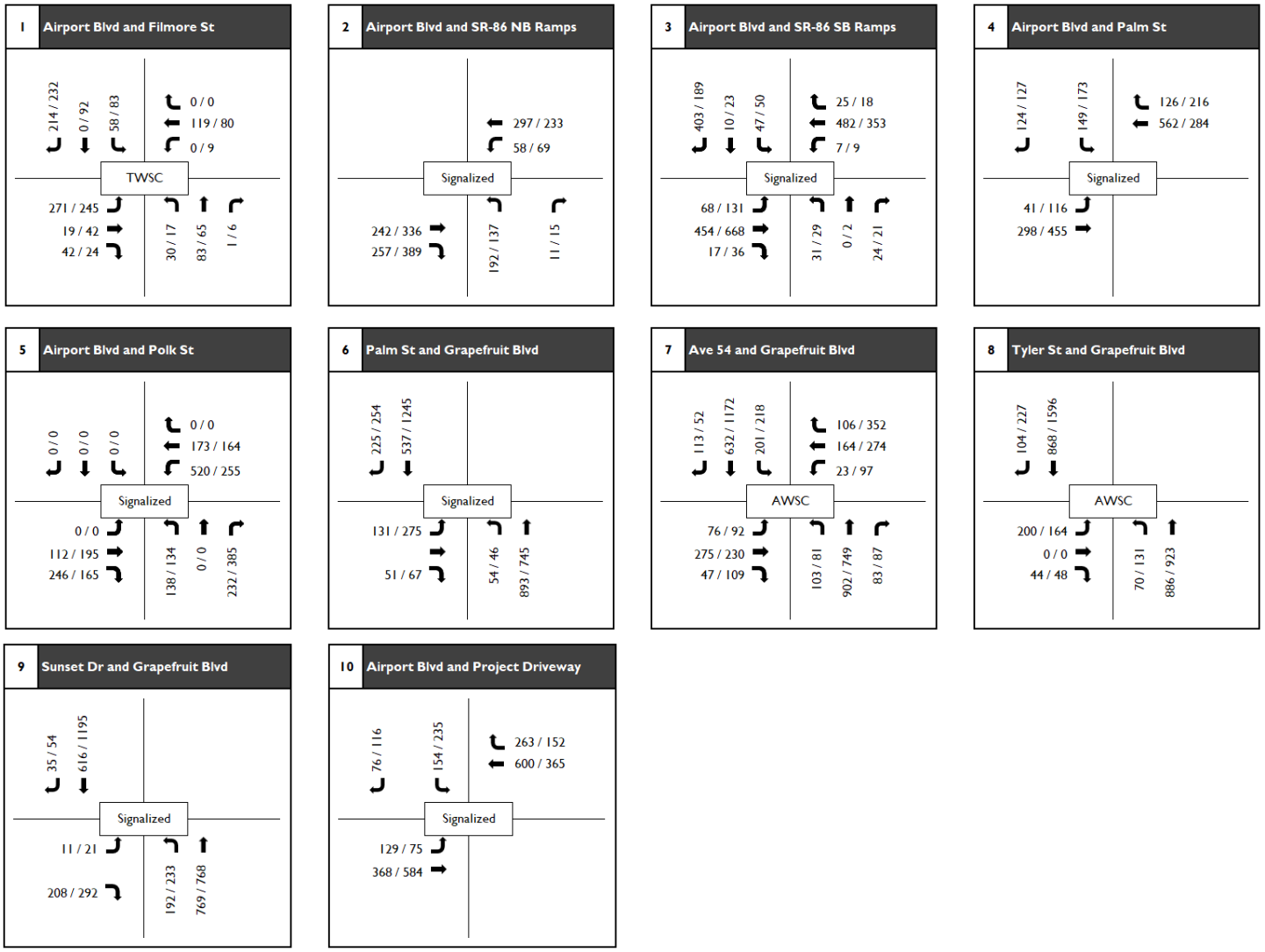


LEGEND

0/0 = (AM/PM) Peak Hour Volumes

INTEGRATED ENGINEERING GROUP
TRANSPORTATION PLANNING AND ENGINEERING

Coachella Airport Business Park
Opening Year 2033 Baseline
AM/PM Peak Hour Intersection Volumes
Figure 6-1

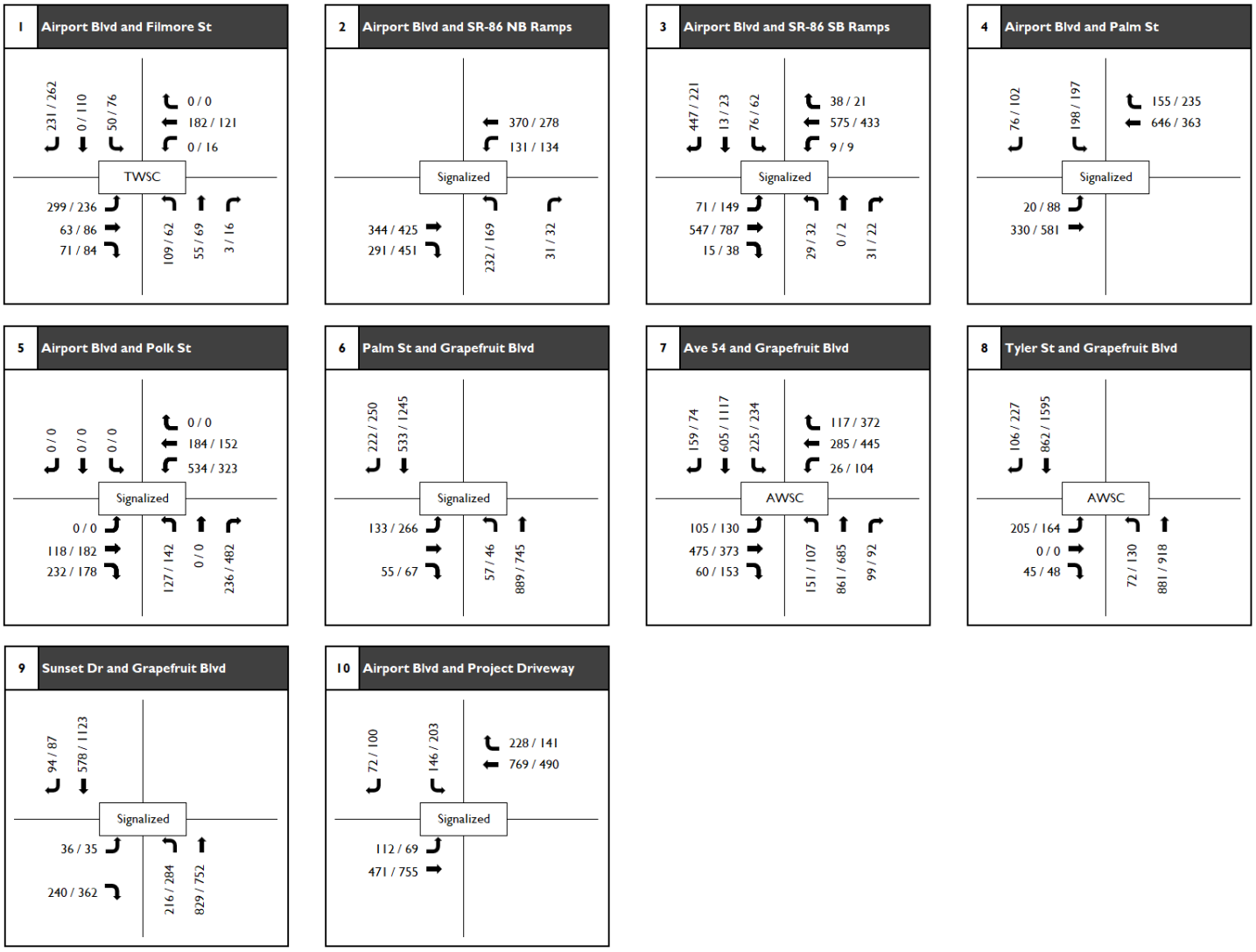


LEGEND

0/0 = (AM/PM) Peak Hour Volumes

INTEGRATED ENGINEERING GROUP
TRANSPORTATION PLANNING AND ENGINEERING

Coachella Airport Business Park
Opening Year 2033 Plus Project
AM/PM Peak Hour Intersection Volumes
Figure 6-2

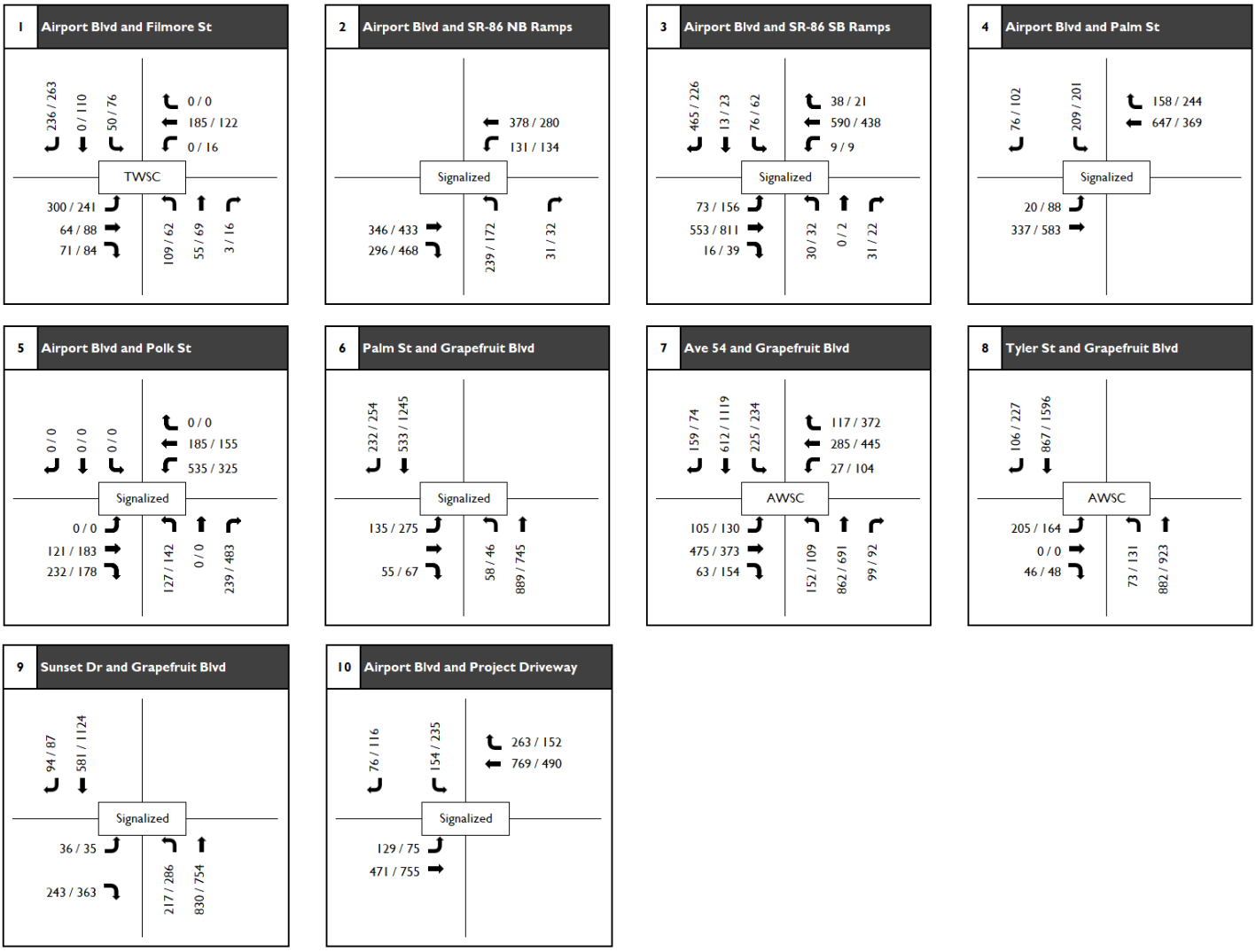


LEGEND

0/0 = (AM/PM) Peak Hour Volumes

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TRANSPORTATION PLANNING AND ENGINEERING

Coachella Airport Business Park
Buildout 2045 Baseline
AM/PM Peak Hour Intersection Volumes
Figure 7-1



LEGEND

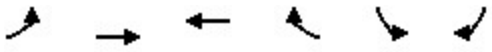
0/0 = (AM/PM) Peak Hour Volumes

INTEGRATED ENGINEERING GROUP
TRANSPORTATION PLANNING AND ENGINEERING

Coachella Airport Business Park
Buildout 2045 Plus Project
AM/PM Peak Hour Intersection Volumes
Figure 7-2

ATTACHMENT B -

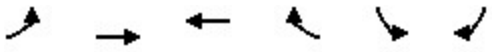
UPDATED INTERSECTION OPERATION ANALYSIS WITH PASS-BY TRIPS WORKSHEETS



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	90	240	413	127	136	67
Future Volume (veh/h)	90	240	413	127	136	67
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	95	253	435	134	143	71
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	312	793	1318	1117	288	257
Arrive On Green	0.70	0.70	0.70	0.70	0.16	0.16
Sat Flow, veh/h	334	1126	1870	1585	1781	1585
Grp Volume(v), veh/h	348	0	435	134	143	71
Grp Sat Flow(s),veh/h/ln	1460	0	1870	1585	1781	1585
Q Serve(g_s), s	0.0	0.0	5.4	1.6	4.4	2.4
Cycle Q Clear(g_c), s	5.4	0.0	5.4	1.6	4.4	2.4
Prop In Lane	0.27			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1105	0	1318	1117	288	257
V/C Ratio(X)	0.31	0.00	0.33	0.12	0.50	0.28
Avail Cap(c_a), veh/h	1105	0	1318	1117	594	528
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.85	0.85	1.00	1.00
Uniform Delay (d), s/veh	3.2	0.0	3.4	2.9	22.9	22.1
Incr Delay (d2), s/veh	0.7	0.0	0.6	0.2	1.3	0.6
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.1	0.0	1.4	0.4	1.8	0.9
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	4.0	0.0	4.0	3.0	24.2	22.6
LnGrp LOS	A		A	A	C	C
Approach Vol, veh/h		348	569		214	
Approach Delay, s/veh		4.0	3.8		23.7	
Approach LOS		A	A		C	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			46.3		13.7	46.3
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			32.0		20.0	32.0
Max Q Clear Time (g_c+I1), s			7.4		6.4	7.4
Green Ext Time (p_c), s			2.6		0.5	3.3

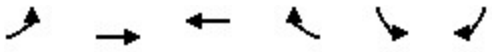
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		7.6
HCM 6th LOS		A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	90	240	413	182	136	67
Future Volume (veh/h)	90	240	413	182	136	67
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	95	253	435	192	143	71
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	306	778	1318	1117	288	257
Arrive On Green	0.70	0.70	0.70	0.70	0.16	0.16
Sat Flow, veh/h	326	1104	1870	1585	1781	1585
Grp Volume(v), veh/h	348	0	435	192	143	71
Grp Sat Flow(s),veh/h/ln	1430	0	1870	1585	1781	1585
Q Serve(g_s), s	0.0	0.0	5.4	2.4	4.4	2.4
Cycle Q Clear(g_c), s	5.4	0.0	5.4	2.4	4.4	2.4
Prop In Lane	0.27			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1084	0	1318	1117	288	257
V/C Ratio(X)	0.32	0.00	0.33	0.17	0.50	0.28
Avail Cap(c_a), veh/h	1084	0	1318	1117	594	528
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.85	0.85	1.00	1.00
Uniform Delay (d), s/veh	3.2	0.0	3.4	3.0	22.9	22.1
Incr Delay (d2), s/veh	0.8	0.0	0.6	0.3	1.3	0.6
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.1	0.0	1.4	0.5	1.8	0.9
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	4.0	0.0	4.0	3.3	24.2	22.6
LnGrp LOS	A		A	A	C	C
Approach Vol, veh/h		348	627		214	
Approach Delay, s/veh		4.0	3.8		23.7	
Approach LOS		A	A		C	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			46.3		13.7	46.3
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			32.0		20.0	32.0
Max Q Clear Time (g_c+I1), s			7.4		6.4	7.4
Green Ext Time (p_c), s			2.6		0.5	3.5

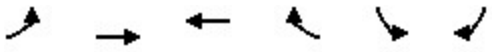
Intersection Summary		
HCM 6th Ctrl Delay, s/veh	7.4	
HCM 6th LOS	A	



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	64	419	254	92	163	81
Future Volume (veh/h)	64	419	254	92	163	81
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	70	455	276	100	177	88
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	188	1189	1443	1223	229	203
Arrive On Green	0.77	0.77	1.00	1.00	0.13	0.13
Sat Flow, veh/h	177	1541	1870	1585	1781	1585
Grp Volume(v), veh/h	525	0	276	100	177	88
Grp Sat Flow(s),veh/h/ln	1718	0	1870	1585	1781	1585
Q Serve(g_s), s	0.0	0.0	0.0	0.0	7.7	4.1
Cycle Q Clear(g_c), s	7.1	0.0	0.0	0.0	7.7	4.1
Prop In Lane	0.13			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1377	0	1443	1223	229	203
V/C Ratio(X)	0.38	0.00	0.19	0.08	0.77	0.43
Avail Cap(c_a), veh/h	1377	0	1443	1223	468	416
HCM Platoon Ratio	1.00	1.00	1.33	1.33	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.92	0.92	1.00	1.00
Uniform Delay (d), s/veh	2.9	0.0	0.0	0.0	33.7	32.2
Incr Delay (d2), s/veh	0.8	0.0	0.3	0.1	5.5	1.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.9	0.0	0.1	0.0	3.6	1.6
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	3.7	0.0	0.3	0.1	39.3	33.6
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		525	376		265	
Approach Delay, s/veh		3.7	0.2		37.4	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			65.7		14.3	65.7
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			51.0		21.0	51.0
Max Q Clear Time (g_c+I1), s			9.1		9.7	2.0
Green Ext Time (p_c), s			4.1		0.6	2.1

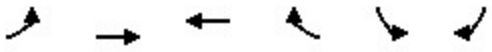
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		10.2
HCM 6th LOS		B



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	64	419	254	131	163	81
Future Volume (veh/h)	64	419	254	131	163	81
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	70	455	276	142	177	88
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	187	1182	1443	1223	229	203
Arrive On Green	0.77	0.77	1.00	1.00	0.13	0.13
Sat Flow, veh/h	176	1531	1870	1585	1781	1585
Grp Volume(v), veh/h	525	0	276	142	177	88
Grp Sat Flow(s),veh/h/ln	1707	0	1870	1585	1781	1585
Q Serve(g_s), s	0.0	0.0	0.0	0.0	7.7	4.1
Cycle Q Clear(g_c), s	7.1	0.0	0.0	0.0	7.7	4.1
Prop In Lane	0.13			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1368	0	1443	1223	229	203
V/C Ratio(X)	0.38	0.00	0.19	0.12	0.77	0.43
Avail Cap(c_a), veh/h	1368	0	1443	1223	468	416
HCM Platoon Ratio	1.00	1.00	1.33	1.33	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.92	0.92	1.00	1.00
Uniform Delay (d), s/veh	2.9	0.0	0.0	0.0	33.7	32.2
Incr Delay (d2), s/veh	0.8	0.0	0.3	0.2	5.5	1.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.9	0.0	0.1	0.1	3.6	1.6
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	3.7	0.0	0.3	0.2	39.3	33.6
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		525	418		265	
Approach Delay, s/veh		3.7	0.2		37.4	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			65.7		14.3	65.7
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			51.0		21.0	51.0
Max Q Clear Time (g_c+I1), s			9.1		9.7	2.0
Green Ext Time (p_c), s			4.2		0.6	2.3

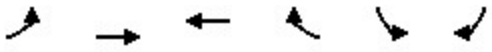
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		9.9
HCM 6th LOS		A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	90	304	506	127	136	67
Future Volume (veh/h)	90	304	506	127	136	67
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	95	320	533	134	143	71
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	278	909	1452	1230	221	196
Arrive On Green	0.78	0.78	1.00	1.00	0.12	0.12
Sat Flow, veh/h	288	1171	1870	1585	1781	1585
Grp Volume(v), veh/h	415	0	533	134	143	71
Grp Sat Flow(s),veh/h/ln	1459	0	1870	1585	1781	1585
Q Serve(g_s), s	0.0	0.0	0.0	0.0	6.1	3.3
Cycle Q Clear(g_c), s	5.1	0.0	0.0	0.0	6.1	3.3
Prop In Lane	0.23			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1188	0	1452	1230	221	196
V/C Ratio(X)	0.35	0.00	0.37	0.11	0.65	0.36
Avail Cap(c_a), veh/h	1188	0	1452	1230	490	436
HCM Platoon Ratio	1.00	1.00	2.00	2.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.82	0.82	1.00	1.00
Uniform Delay (d), s/veh	2.6	0.0	0.0	0.0	33.4	32.1
Incr Delay (d2), s/veh	0.8	0.0	0.6	0.1	3.2	1.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.4	0.0	0.2	0.1	2.8	1.3
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	3.4	0.0	0.6	0.1	36.6	33.3
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		415	667		214	
Approach Delay, s/veh		3.4	0.5		35.5	
Approach LOS		A	A		D	

Timer - Assigned Phs		4		6	8
Phs Duration (G+Y+Rc), s		66.1		13.9	66.1
Change Period (Y+Rc), s		4.0		4.0	4.0
Max Green Setting (Gmax), s		50.0		22.0	50.0
Max Q Clear Time (g_c+I1), s		7.1		8.1	2.0
Green Ext Time (p_c), s		3.5		0.5	4.5

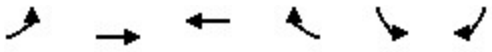
Intersection Summary	
HCM 6th Ctrl Delay, s/veh	7.2
HCM 6th LOS	A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	90	304	506	182	136	67
Future Volume (veh/h)	90	304	506	182	136	67
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	95	320	533	192	143	71
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	273	892	1452	1230	221	196
Arrive On Green	0.78	0.78	1.00	1.00	0.12	0.12
Sat Flow, veh/h	281	1149	1870	1585	1781	1585
Grp Volume(v), veh/h	415	0	533	192	143	71
Grp Sat Flow(s),veh/h/ln	1430	0	1870	1585	1781	1585
Q Serve(g_s), s	0.0	0.0	0.0	0.0	6.1	3.3
Cycle Q Clear(g_c), s	5.1	0.0	0.0	0.0	6.1	3.3
Prop In Lane	0.23			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1165	0	1452	1230	221	196
V/C Ratio(X)	0.36	0.00	0.37	0.16	0.65	0.36
Avail Cap(c_a), veh/h	1165	0	1452	1230	490	436
HCM Platoon Ratio	1.00	1.00	2.00	2.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.82	0.82	1.00	1.00
Uniform Delay (d), s/veh	2.6	0.0	0.0	0.0	33.4	32.1
Incr Delay (d2), s/veh	0.9	0.0	0.6	0.2	3.2	1.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.4	0.0	0.2	0.1	2.8	1.3
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	3.4	0.0	0.6	0.2	36.6	33.3
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		415	725		214	
Approach Delay, s/veh		3.4	0.5		35.5	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			66.1		13.9	66.1
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			50.0		22.0	50.0
Max Q Clear Time (g_c+I1), s			7.1		8.1	2.0
Green Ext Time (p_c), s			3.6		0.5	4.7

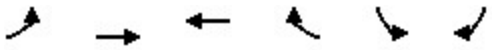
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		6.9
HCM 6th LOS		A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	64	502	309	92	163	81
Future Volume (veh/h)	64	502	309	92	163	81
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	67	528	325	97	172	85
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	161	1233	1448	1227	224	199
Arrive On Green	0.77	0.77	1.00	1.00	0.13	0.13
Sat Flow, veh/h	143	1593	1870	1585	1781	1585
Grp Volume(v), veh/h	595	0	325	97	172	85
Grp Sat Flow(s),veh/h/ln	1736	0	1870	1585	1781	1585
Q Serve(g_s), s	0.0	0.0	0.0	0.0	7.5	4.0
Cycle Q Clear(g_c), s	8.4	0.0	0.0	0.0	7.5	4.0
Prop In Lane	0.11			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1394	0	1448	1227	224	199
V/C Ratio(X)	0.43	0.00	0.22	0.08	0.77	0.43
Avail Cap(c_a), veh/h	1394	0	1448	1227	490	436
HCM Platoon Ratio	1.00	1.00	1.33	1.33	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.91	0.91	1.00	1.00
Uniform Delay (d), s/veh	3.0	0.0	0.0	0.0	33.9	32.3
Incr Delay (d2), s/veh	1.0	0.0	0.3	0.1	5.5	1.4
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.2	0.0	0.1	0.0	3.5	1.6
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	3.9	0.0	0.3	0.1	39.3	33.8
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		595	422		257	
Approach Delay, s/veh		3.9	0.3		37.5	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			66.0		14.0	66.0
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			50.0		22.0	50.0
Max Q Clear Time (g_c+I1), s			10.4		9.5	2.0
Green Ext Time (p_c), s			4.9		0.6	2.5

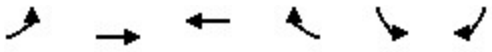
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		9.5
HCM 6th LOS		A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	64	502	309	131	163	81
Future Volume (veh/h)	64	502	309	131	163	81
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	67	528	325	138	172	85
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	160	1227	1448	1227	224	199
Arrive On Green	0.77	0.77	1.00	1.00	0.13	0.13
Sat Flow, veh/h	142	1584	1870	1585	1781	1585
Grp Volume(v), veh/h	595	0	325	138	172	85
Grp Sat Flow(s),veh/h/ln	1726	0	1870	1585	1781	1585
Q Serve(g_s), s	0.0	0.0	0.0	0.0	7.5	4.0
Cycle Q Clear(g_c), s	8.4	0.0	0.0	0.0	7.5	4.0
Prop In Lane	0.11			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1387	0	1448	1227	224	199
V/C Ratio(X)	0.43	0.00	0.22	0.11	0.77	0.43
Avail Cap(c_a), veh/h	1387	0	1448	1227	490	436
HCM Platoon Ratio	1.00	1.00	1.33	1.33	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.91	0.91	1.00	1.00
Uniform Delay (d), s/veh	3.0	0.0	0.0	0.0	33.9	32.3
Incr Delay (d2), s/veh	1.0	0.0	0.3	0.2	5.5	1.4
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.2	0.0	0.1	0.1	3.5	1.6
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	4.0	0.0	0.3	0.2	39.3	33.8
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		595	463		257	
Approach Delay, s/veh		4.0	0.3		37.5	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			66.0		14.0	66.0
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			50.0		22.0	50.0
Max Q Clear Time (g_c+I1), s			10.4		9.5	2.0
Green Ext Time (p_c), s			4.9		0.6	2.6

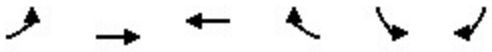
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		9.2
HCM 6th LOS		A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	112	304	506	160	146	72
Future Volume (veh/h)	112	304	506	160	146	72
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	118	320	533	168	154	76
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	311	815	1451	1230	221	197
Arrive On Green	0.78	0.78	1.00	1.00	0.12	0.12
Sat Flow, veh/h	327	1050	1870	1585	1781	1585
Grp Volume(v), veh/h	438	0	533	168	154	76
Grp Sat Flow(s),veh/h/ln	1377	0	1870	1585	1781	1585
Q Serve(g_s), s	0.1	0.0	0.0	0.0	6.6	3.5
Cycle Q Clear(g_c), s	5.5	0.0	0.0	0.0	6.6	3.5
Prop In Lane	0.27			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1125	0	1451	1230	221	197
V/C Ratio(X)	0.39	0.00	0.37	0.14	0.70	0.39
Avail Cap(c_a), veh/h	1125	0	1451	1230	468	416
HCM Platoon Ratio	1.00	1.00	2.00	2.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.79	0.79	1.00	1.00
Uniform Delay (d), s/veh	2.6	0.0	0.0	0.0	33.6	32.2
Incr Delay (d2), s/veh	1.0	0.0	0.6	0.2	3.9	1.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.5	0.0	0.2	0.1	3.0	1.4
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	3.6	0.0	0.6	0.2	37.5	33.5
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		438	701		230	
Approach Delay, s/veh		3.6	0.5		36.2	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			66.1		13.9	66.1
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			51.0		21.0	51.0
Max Q Clear Time (g_c+I1), s			7.5		8.6	2.0
Green Ext Time (p_c), s			4.0		0.5	4.6

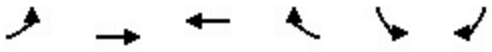
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		7.5
HCM 6th LOS		A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	112	304	506	228	146	72
Future Volume (veh/h)	112	304	506	228	146	72
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	118	320	533	240	154	76
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	303	792	1451	1230	221	197
Arrive On Green	0.78	0.78	1.00	1.00	0.12	0.12
Sat Flow, veh/h	316	1021	1870	1585	1781	1585
Grp Volume(v), veh/h	438	0	533	240	154	76
Grp Sat Flow(s),veh/h/ln	1338	0	1870	1585	1781	1585
Q Serve(g_s), s	0.1	0.0	0.0	0.0	6.6	3.5
Cycle Q Clear(g_c), s	5.5	0.0	0.0	0.0	6.6	3.5
Prop In Lane	0.27			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1095	0	1451	1230	221	197
V/C Ratio(X)	0.40	0.00	0.37	0.20	0.70	0.39
Avail Cap(c_a), veh/h	1095	0	1451	1230	468	416
HCM Platoon Ratio	1.00	1.00	2.00	2.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.80	0.80	1.00	1.00
Uniform Delay (d), s/veh	2.6	0.0	0.0	0.0	33.6	32.2
Incr Delay (d2), s/veh	1.1	0.0	0.6	0.3	3.9	1.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.5	0.0	0.2	0.1	3.0	1.4
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	3.7	0.0	0.6	0.3	37.5	33.5
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		438	773		230	
Approach Delay, s/veh		3.7	0.5		36.2	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			66.1		13.9	66.1
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			51.0		21.0	51.0
Max Q Clear Time (g_c+I1), s			7.5		8.6	2.0
Green Ext Time (p_c), s			4.1		0.5	5.0

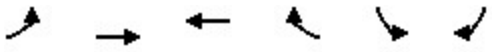
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		7.2
HCM 6th LOS		A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	69	502	309	99	203	100
Future Volume (veh/h)	69	502	309	99	203	100
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	73	528	325	104	214	105
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	167	1176	1403	1189	267	237
Arrive On Green	0.75	0.75	1.00	1.00	0.15	0.15
Sat Flow, veh/h	156	1567	1870	1585	1781	1585
Grp Volume(v), veh/h	601	0	325	104	214	105
Grp Sat Flow(s),veh/h/ln	1722	0	1870	1585	1781	1585
Q Serve(g_s), s	0.0	0.0	0.0	0.0	9.3	4.8
Cycle Q Clear(g_c), s	9.5	0.0	0.0	0.0	9.3	4.8
Prop In Lane	0.12			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1343	0	1403	1189	267	237
V/C Ratio(X)	0.45	0.00	0.23	0.09	0.80	0.44
Avail Cap(c_a), veh/h	1343	0	1403	1189	468	416
HCM Platoon Ratio	1.00	1.00	1.33	1.33	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.89	0.89	1.00	1.00
Uniform Delay (d), s/veh	3.7	0.0	0.0	0.0	32.9	31.0
Incr Delay (d2), s/veh	1.1	0.0	0.3	0.1	5.6	1.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.8	0.0	0.1	0.0	4.3	1.9
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	4.8	0.0	0.4	0.1	38.4	32.3
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		601	429		319	
Approach Delay, s/veh		4.8	0.3		36.4	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			64.0		16.0	64.0
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			51.0		21.0	51.0
Max Q Clear Time (g_c+I1), s			11.5		11.3	2.0
Green Ext Time (p_c), s			5.0		0.7	2.5

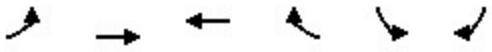
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		10.8
HCM 6th LOS		B



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	69	502	309	141	203	100
Future Volume (veh/h)	69	502	309	141	203	100
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	73	528	325	148	214	105
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	166	1169	1404	1190	266	237
Arrive On Green	0.75	0.75	1.00	1.00	0.15	0.15
Sat Flow, veh/h	154	1557	1870	1585	1781	1585
Grp Volume(v), veh/h	601	0	325	148	214	105
Grp Sat Flow(s),veh/h/ln	1711	0	1870	1585	1781	1585
Q Serve(g_s), s	0.0	0.0	0.0	0.0	9.3	4.8
Cycle Q Clear(g_c), s	9.4	0.0	0.0	0.0	9.3	4.8
Prop In Lane	0.12			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1335	0	1404	1190	266	237
V/C Ratio(X)	0.45	0.00	0.23	0.12	0.80	0.44
Avail Cap(c_a), veh/h	1335	0	1404	1190	445	396
HCM Platoon Ratio	1.00	1.00	1.33	1.33	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.89	0.89	1.00	1.00
Uniform Delay (d), s/veh	3.7	0.0	0.0	0.0	32.9	31.0
Incr Delay (d2), s/veh	1.1	0.0	0.3	0.2	5.7	1.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.8	0.0	0.1	0.1	4.3	1.9
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	4.8	0.0	0.4	0.2	38.6	32.3
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		601	473		319	
Approach Delay, s/veh		4.8	0.3		36.5	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			64.1		15.9	64.1
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			52.0		20.0	52.0
Max Q Clear Time (g_c+I1), s			11.4		11.3	2.0
Green Ext Time (p_c), s			5.0		0.7	2.7

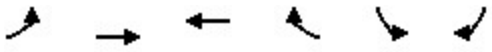
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		10.5
HCM 6th LOS		B



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	112	368	600	160	146	72
Future Volume (veh/h)	112	368	600	160	146	72
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	118	387	632	168	154	76
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	271	859	1451	1230	221	197
Arrive On Green	0.78	0.78	1.00	1.00	0.12	0.12
Sat Flow, veh/h	277	1107	1870	1585	1781	1585
Grp Volume(v), veh/h	505	0	632	168	154	76
Grp Sat Flow(s),veh/h/ln	1385	0	1870	1585	1781	1585
Q Serve(g_s), s	0.1	0.0	0.0	0.0	6.6	3.5
Cycle Q Clear(g_c), s	6.7	0.0	0.0	0.0	6.6	3.5
Prop In Lane	0.23			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1130	0	1451	1230	221	197
V/C Ratio(X)	0.45	0.00	0.44	0.14	0.70	0.39
Avail Cap(c_a), veh/h	1130	0	1451	1230	423	376
HCM Platoon Ratio	1.00	1.00	2.00	2.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.77	0.77	1.00	1.00
Uniform Delay (d), s/veh	2.8	0.0	0.0	0.0	33.6	32.2
Incr Delay (d2), s/veh	1.3	0.0	0.7	0.2	3.9	1.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.9	0.0	0.3	0.1	3.0	1.4
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	4.0	0.0	0.7	0.2	37.5	33.5
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		505	800		230	
Approach Delay, s/veh		4.0	0.6		36.2	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			66.1		13.9	66.1
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			53.0		19.0	53.0
Max Q Clear Time (g_c+I1), s			8.7		8.6	2.0
Green Ext Time (p_c), s			4.8		0.5	5.8

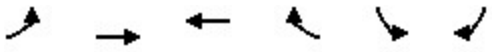
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		7.1
HCM 6th LOS		A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	112	368	600	228	146	72
Future Volume (veh/h)	112	368	600	228	146	72
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	118	387	632	240	154	76
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	264	837	1451	1230	221	197
Arrive On Green	0.78	0.78	1.00	1.00	0.12	0.12
Sat Flow, veh/h	269	1079	1870	1585	1781	1585
Grp Volume(v), veh/h	505	0	632	240	154	76
Grp Sat Flow(s),veh/h/ln	1348	0	1870	1585	1781	1585
Q Serve(g_s), s	0.1	0.0	0.0	0.0	6.6	3.5
Cycle Q Clear(g_c), s	6.7	0.0	0.0	0.0	6.6	3.5
Prop In Lane	0.23			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1101	0	1451	1230	221	197
V/C Ratio(X)	0.46	0.00	0.44	0.20	0.70	0.39
Avail Cap(c_a), veh/h	1101	0	1451	1230	423	376
HCM Platoon Ratio	1.00	1.00	2.00	2.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.74	0.74	1.00	1.00
Uniform Delay (d), s/veh	2.8	0.0	0.0	0.0	33.6	32.2
Incr Delay (d2), s/veh	1.4	0.0	0.7	0.3	3.9	1.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.9	0.0	0.3	0.1	3.0	1.4
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	4.1	0.0	0.7	0.3	37.5	33.5
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		505	872		230	
Approach Delay, s/veh		4.1	0.6		36.2	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			66.1		13.9	66.1
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			53.0		19.0	53.0
Max Q Clear Time (g_c+I1), s			8.7		8.6	2.0
Green Ext Time (p_c), s			5.0		0.5	6.1

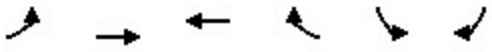
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		6.8
HCM 6th LOS		A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	69	584	365	99	203	100
Future Volume (veh/h)	69	584	365	99	203	100
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	73	615	384	104	214	105
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	147	1203	1404	1190	266	237
Arrive On Green	0.75	0.75	1.00	1.00	0.15	0.15
Sat Flow, veh/h	130	1602	1870	1585	1781	1585
Grp Volume(v), veh/h	688	0	384	104	214	105
Grp Sat Flow(s),veh/h/ln	1733	0	1870	1585	1781	1585
Q Serve(g_s), s	0.0	0.0	0.0	0.0	9.3	4.8
Cycle Q Clear(g_c), s	11.6	0.0	0.0	0.0	9.3	4.8
Prop In Lane	0.11			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1350	0	1404	1190	266	237
V/C Ratio(X)	0.51	0.00	0.27	0.09	0.80	0.44
Avail Cap(c_a), veh/h	1350	0	1404	1190	445	396
HCM Platoon Ratio	1.00	1.00	1.33	1.33	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.87	0.87	1.00	1.00
Uniform Delay (d), s/veh	3.9	0.0	0.0	0.0	32.9	31.0
Incr Delay (d2), s/veh	1.4	0.0	0.4	0.1	5.7	1.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.4	0.0	0.2	0.0	4.3	1.9
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	5.3	0.0	0.4	0.1	38.6	32.3
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		688	488		319	
Approach Delay, s/veh		5.3	0.4		36.5	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			64.1		15.9	64.1
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			52.0		20.0	52.0
Max Q Clear Time (g_c+I1), s			13.6		11.3	2.0
Green Ext Time (p_c), s			6.0		0.7	3.0

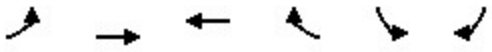
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		10.4
HCM 6th LOS		B



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	69	584	365	141	203	100
Future Volume (veh/h)	69	584	365	141	203	100
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	73	615	384	148	214	105
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	147	1196	1404	1190	266	237
Arrive On Green	0.75	0.75	1.00	1.00	0.15	0.15
Sat Flow, veh/h	129	1594	1870	1585	1781	1585
Grp Volume(v), veh/h	688	0	384	148	214	105
Grp Sat Flow(s),veh/h/ln	1723	0	1870	1585	1781	1585
Q Serve(g_s), s	0.0	0.0	0.0	0.0	9.3	4.8
Cycle Q Clear(g_c), s	11.6	0.0	0.0	0.0	9.3	4.8
Prop In Lane	0.11			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1343	0	1404	1190	266	237
V/C Ratio(X)	0.51	0.00	0.27	0.12	0.80	0.44
Avail Cap(c_a), veh/h	1343	0	1404	1190	445	396
HCM Platoon Ratio	1.00	1.00	1.33	1.33	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.87	0.87	1.00	1.00
Uniform Delay (d), s/veh	3.9	0.0	0.0	0.0	32.9	31.0
Incr Delay (d2), s/veh	1.4	0.0	0.4	0.2	5.7	1.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.4	0.0	0.2	0.1	4.3	1.9
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	5.3	0.0	0.4	0.2	38.6	32.3
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		688	532		319	
Approach Delay, s/veh		5.3	0.4		36.5	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			64.1		15.9	64.1
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			52.0		20.0	52.0
Max Q Clear Time (g_c+I1), s			13.6		11.3	2.0
Green Ext Time (p_c), s			6.1		0.7	3.2

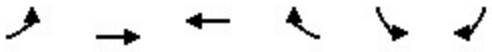
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		10.1
HCM 6th LOS		B



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	129	368	600	184	154	76
Future Volume (veh/h)	129	368	600	184	154	76
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	136	387	632	194	162	80
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	289	795	1451	1229	222	197
Arrive On Green	0.78	0.78	1.00	1.00	0.12	0.12
Sat Flow, veh/h	300	1025	1870	1585	1781	1585
Grp Volume(v), veh/h	523	0	632	194	162	80
Grp Sat Flow(s),veh/h/ln	1325	0	1870	1585	1781	1585
Q Serve(g_s), s	2.3	0.0	0.0	0.0	7.0	3.7
Cycle Q Clear(g_c), s	8.0	0.0	0.0	0.0	7.0	3.7
Prop In Lane	0.26			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1084	0	1451	1229	222	197
V/C Ratio(X)	0.48	0.00	0.44	0.16	0.73	0.41
Avail Cap(c_a), veh/h	1084	0	1451	1229	423	376
HCM Platoon Ratio	1.00	1.00	2.00	2.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.71	0.71	1.00	1.00
Uniform Delay (d), s/veh	2.8	0.0	0.0	0.0	33.7	32.3
Incr Delay (d2), s/veh	1.5	0.0	0.7	0.2	4.6	1.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.0	0.0	0.3	0.1	3.2	1.5
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	4.4	0.0	0.7	0.2	38.3	33.6
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		523	826		242	
Approach Delay, s/veh		4.4	0.6		36.8	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			66.0		14.0	66.0
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			53.0		19.0	53.0
Max Q Clear Time (g_c+I1), s			10.0		9.0	2.0
Green Ext Time (p_c), s			5.2		0.5	5.9

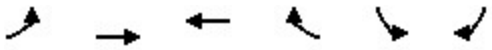
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		7.3
HCM 6th LOS		A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	129	368	600	263	154	76
Future Volume (veh/h)	129	368	600	263	154	76
Initial Q (Qb), veh	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	136	387	632	277	162	80
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	280	769	1451	1229	222	197
Arrive On Green	0.78	0.78	1.00	1.00	0.12	0.12
Sat Flow, veh/h	288	992	1870	1585	1781	1585
Grp Volume(v), veh/h	523	0	632	277	162	80
Grp Sat Flow(s),veh/h/ln	1280	0	1870	1585	1781	1585
Q Serve(g_s), s	2.5	0.0	0.0	0.0	7.0	3.7
Cycle Q Clear(g_c), s	8.2	0.0	0.0	0.0	7.0	3.7
Prop In Lane	0.26			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1050	0	1451	1229	222	197
V/C Ratio(X)	0.50	0.00	0.44	0.23	0.73	0.41
Avail Cap(c_a), veh/h	1050	0	1451	1229	423	376
HCM Platoon Ratio	1.00	1.00	2.00	2.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.71	0.71	1.00	1.00
Uniform Delay (d), s/veh	2.8	0.0	0.0	0.0	33.7	32.3
Incr Delay (d2), s/veh	1.7	0.0	0.7	0.3	4.6	1.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.0	0.0	0.3	0.1	3.2	1.5
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	4.5	0.0	0.7	0.3	38.3	33.6
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		523	909		242	
Approach Delay, s/veh		4.5	0.6		36.8	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			66.0		14.0	66.0
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			53.0		19.0	53.0
Max Q Clear Time (g_c+I1), s			10.2		9.0	2.0
Green Ext Time (p_c), s			5.5		0.5	6.3

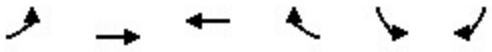
Intersection Summary		
HCM 7th Control Delay, s/veh	7.0	
HCM 7th LOS	A	



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	75	584	365	106	235	116
Future Volume (veh/h)	75	584	365	106	235	116
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	79	615	384	112	247	122
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	153	1156	1369	1161	299	266
Arrive On Green	0.73	0.73	0.97	0.97	0.17	0.17
Sat Flow, veh/h	141	1578	1870	1585	1781	1585
Grp Volume(v), veh/h	694	0	384	112	247	122
Grp Sat Flow(s),veh/h/ln	1719	0	1870	1585	1781	1585
Q Serve(g_s), s	0.0	0.0	0.6	0.2	10.7	5.6
Cycle Q Clear(g_c), s	12.6	0.0	0.6	0.2	10.7	5.6
Prop In Lane	0.11			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1309	0	1369	1161	299	266
V/C Ratio(X)	0.53	0.00	0.28	0.10	0.83	0.46
Avail Cap(c_a), veh/h	1309	0	1369	1161	445	396
HCM Platoon Ratio	1.00	1.00	1.33	1.33	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.84	0.84	1.00	1.00
Uniform Delay (d), s/veh	4.6	0.0	0.3	0.3	32.2	30.0
Incr Delay (d2), s/veh	1.5	0.0	0.4	0.1	7.9	1.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.0	0.0	0.3	0.1	5.1	2.2
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	6.1	0.0	0.7	0.4	40.0	31.2
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		694	496		369	
Approach Delay, s/veh		6.1	0.7		37.1	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			62.6		17.4	62.6
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			52.0		20.0	52.0
Max Q Clear Time (g_c+I1), s			14.6		12.7	2.6
Green Ext Time (p_c), s			6.1		0.7	3.0

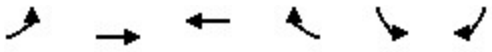
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		11.7
HCM 6th LOS		B



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	75	584	365	152	235	116
Future Volume (veh/h)	75	584	365	152	235	116
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	79	615	384	160	247	122
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	152	1148	1369	1161	299	266
Arrive On Green	0.73	0.73	0.97	0.97	0.17	0.17
Sat Flow, veh/h	139	1568	1870	1585	1781	1585
Grp Volume(v), veh/h	694	0	384	160	247	122
Grp Sat Flow(s),veh/h/ln	1707	0	1870	1585	1781	1585
Q Serve(g_s), s	0.0	0.0	0.6	0.2	10.7	5.6
Cycle Q Clear(g_c), s	12.6	0.0	0.6	0.2	10.7	5.6
Prop In Lane	0.11			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1300	0	1369	1161	299	266
V/C Ratio(X)	0.53	0.00	0.28	0.14	0.83	0.46
Avail Cap(c_a), veh/h	1300	0	1369	1161	445	396
HCM Platoon Ratio	1.00	1.00	1.33	1.33	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.84	0.84	1.00	1.00
Uniform Delay (d), s/veh	4.6	0.0	0.3	0.3	32.2	30.0
Incr Delay (d2), s/veh	1.6	0.0	0.4	0.2	7.9	1.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.0	0.0	0.3	0.1	5.1	2.2
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	6.1	0.0	0.7	0.5	40.0	31.2
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		694	544		369	
Approach Delay, s/veh		6.1	0.7		37.1	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			62.6		17.4	62.6
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			52.0		20.0	52.0
Max Q Clear Time (g_c+I1), s			14.6		12.7	2.6
Green Ext Time (p_c), s			6.2		0.7	3.2

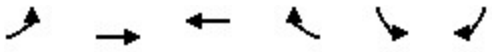
Intersection Summary		
HCM 6th Ctrl Delay, s/veh	11.4	
HCM 6th LOS	B	



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	112	471	769	160	146	72
Future Volume (veh/h)	112	471	769	160	146	72
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	118	496	809	168	154	76
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	205	834	1451	1230	221	197
Arrive On Green	0.78	0.78	0.78	0.78	0.12	0.12
Sat Flow, veh/h	196	1076	1870	1585	1781	1585
Grp Volume(v), veh/h	614	0	809	168	154	76
Grp Sat Flow(s),veh/h/ln	1271	0	1870	1585	1781	1585
Q Serve(g_s), s	5.4	0.0	13.7	2.1	6.6	3.5
Cycle Q Clear(g_c), s	19.0	0.0	13.7	2.1	6.6	3.5
Prop In Lane	0.19			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1040	0	1451	1230	221	197
V/C Ratio(X)	0.59	0.00	0.56	0.14	0.70	0.39
Avail Cap(c_a), veh/h	1040	0	1451	1230	423	376
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.55	0.55	1.00	1.00
Uniform Delay (d), s/veh	3.4	0.0	3.5	2.2	33.6	32.2
Incr Delay (d2), s/veh	2.5	0.0	0.9	0.1	3.9	1.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.6	0.0	3.3	0.4	3.0	1.4
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	5.9	0.0	4.4	2.4	37.5	33.5
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		614	977		230	
Approach Delay, s/veh		5.9	4.1		36.2	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			66.1		13.9	66.1
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			53.0		19.0	53.0
Max Q Clear Time (g_c+I1), s			21.0		8.6	15.7
Green Ext Time (p_c), s			6.1		0.5	8.0

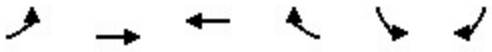
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		8.7
HCM 6th LOS		A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	112	471	769	228	146	72
Future Volume (veh/h)	112	471	769	228	146	72
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	118	496	809	240	154	76
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	220	898	1496	1268	198	176
Arrive On Green	0.80	0.80	1.00	1.00	0.11	0.11
Sat Flow, veh/h	215	1122	1870	1585	1781	1585
Grp Volume(v), veh/h	614	0	809	240	154	76
Grp Sat Flow(s),veh/h/ln	1338	0	1870	1585	1781	1585
Q Serve(g_s), s	0.7	0.0	0.0	0.0	7.6	4.0
Cycle Q Clear(g_c), s	9.2	0.0	0.0	0.0	7.6	4.0
Prop In Lane	0.19			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1118	0	1496	1268	198	176
V/C Ratio(X)	0.55	0.00	0.54	0.19	0.78	0.43
Avail Cap(c_a), veh/h	1118	0	1496	1268	376	335
HCM Platoon Ratio	1.00	1.00	2.00	2.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.54	0.54	1.00	1.00
Uniform Delay (d), s/veh	2.7	0.0	0.0	0.0	38.9	37.4
Incr Delay (d2), s/veh	1.9	0.0	0.8	0.2	6.5	1.7
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.5	0.0	0.3	0.1	3.6	1.6
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	4.6	0.0	0.8	0.2	45.4	39.0
LnGrp LOS	A		A	A	D	D
Approach Vol, veh/h		614	1049		230	
Approach Delay, s/veh		4.6	0.6		43.3	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			76.0		14.0	76.0
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			63.0		19.0	63.0
Max Q Clear Time (g_c+I1), s			11.2		9.6	2.0
Green Ext Time (p_c), s			6.8		0.5	8.9

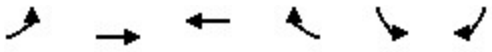
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		7.1
HCM 6th LOS		A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	69	755	490	99	203	100
Future Volume (veh/h)	69	755	490	99	203	100
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	73	795	516	104	214	105
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	125	1227	1405	1191	265	236
Arrive On Green	0.75	0.75	1.00	1.00	0.15	0.15
Sat Flow, veh/h	102	1633	1870	1585	1781	1585
Grp Volume(v), veh/h	868	0	516	104	214	105
Grp Sat Flow(s),veh/h/ln	1735	0	1870	1585	1781	1585
Q Serve(g_s), s	0.6	0.0	0.0	0.0	9.3	4.8
Cycle Q Clear(g_c), s	17.3	0.0	0.0	0.0	9.3	4.8
Prop In Lane	0.08			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1352	0	1405	1191	265	236
V/C Ratio(X)	0.64	0.00	0.37	0.09	0.81	0.45
Avail Cap(c_a), veh/h	1352	0	1405	1191	423	376
HCM Platoon Ratio	1.00	1.00	2.00	2.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.77	0.77	1.00	1.00
Uniform Delay (d), s/veh	4.6	0.0	0.0	0.0	32.9	31.0
Incr Delay (d2), s/veh	2.4	0.0	0.6	0.1	6.0	1.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	5.2	0.0	0.2	0.0	4.3	1.9
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	7.0	0.0	0.6	0.1	39.0	32.4
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		868	620		319	
Approach Delay, s/veh		7.0	0.5		36.8	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			64.1		15.9	64.1
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			53.0		19.0	53.0
Max Q Clear Time (g_c+I1), s			19.3		11.3	2.0
Green Ext Time (p_c), s			8.6		0.6	4.2

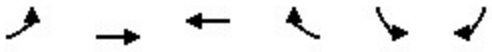
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		10.0
HCM 6th LOS		B



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	69	755	490	141	203	100
Future Volume (veh/h)	69	755	490	141	203	100
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	73	795	516	148	214	105
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	125	1221	1405	1191	265	236
Arrive On Green	0.75	0.75	1.00	1.00	0.15	0.15
Sat Flow, veh/h	101	1625	1870	1585	1781	1585
Grp Volume(v), veh/h	868	0	516	148	214	105
Grp Sat Flow(s),veh/h/ln	1726	0	1870	1585	1781	1585
Q Serve(g_s), s	0.6	0.0	0.0	0.0	9.3	4.8
Cycle Q Clear(g_c), s	17.4	0.0	0.0	0.0	9.3	4.8
Prop In Lane	0.08			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1345	0	1405	1191	265	236
V/C Ratio(X)	0.65	0.00	0.37	0.12	0.81	0.45
Avail Cap(c_a), veh/h	1345	0	1405	1191	423	376
HCM Platoon Ratio	1.00	1.00	2.00	2.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.77	0.77	1.00	1.00
Uniform Delay (d), s/veh	4.6	0.0	0.0	0.0	32.9	31.0
Incr Delay (d2), s/veh	2.4	0.0	0.6	0.2	6.0	1.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	5.2	0.0	0.2	0.1	4.3	1.9
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	7.0	0.0	0.6	0.2	39.0	32.4
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		868	664		319	
Approach Delay, s/veh		7.0	0.5		36.8	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			64.1		15.9	64.1
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			53.0		19.0	53.0
Max Q Clear Time (g_c+I1), s			19.4		11.3	2.0
Green Ext Time (p_c), s			8.7		0.6	4.4

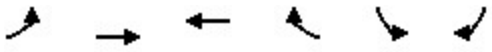
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		9.8
HCM 6th LOS		A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	129	471	769	184	154	76
Future Volume (veh/h)	129	471	769	184	154	76
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	136	496	809	194	162	80
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	217	762	1451	1229	222	197
Arrive On Green	0.78	0.78	0.78	0.78	0.12	0.12
Sat Flow, veh/h	209	982	1870	1585	1781	1585
Grp Volume(v), veh/h	632	0	809	194	162	80
Grp Sat Flow(s),veh/h/ln	1191	0	1870	1585	1781	1585
Q Serve(g_s), s	10.4	0.0	13.7	2.5	7.0	3.7
Cycle Q Clear(g_c), s	24.0	0.0	13.7	2.5	7.0	3.7
Prop In Lane	0.22			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	978	0	1451	1229	222	197
V/C Ratio(X)	0.65	0.00	0.56	0.16	0.73	0.41
Avail Cap(c_a), veh/h	978	0	1451	1229	423	376
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.50	0.50	1.00	1.00
Uniform Delay (d), s/veh	4.2	0.0	3.6	2.3	33.7	32.3
Incr Delay (d2), s/veh	3.3	0.0	0.8	0.1	4.6	1.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.9	0.0	3.3	0.5	3.2	1.5
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	7.5	0.0	4.3	2.4	38.3	33.6
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		632	1003		242	
Approach Delay, s/veh		7.5	4.0		36.8	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			66.0		14.0	66.0
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			53.0		19.0	53.0
Max Q Clear Time (g_c+I1), s			26.0		9.0	15.7
Green Ext Time (p_c), s			6.3		0.5	8.2

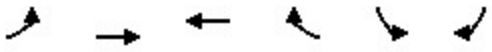
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		9.4
HCM 6th LOS		A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	129	471	769	263	154	76
Future Volume (veh/h)	129	471	769	263	154	76
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	136	496	809	277	162	80
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	233	824	1488	1261	206	183
Arrive On Green	0.80	0.80	1.00	1.00	0.12	0.12
Sat Flow, veh/h	232	1036	1870	1585	1781	1585
Grp Volume(v), veh/h	632	0	809	277	162	80
Grp Sat Flow(s),veh/h/ln	1268	0	1870	1585	1781	1585
Q Serve(g_s), s	4.6	0.0	0.0	0.0	8.0	4.2
Cycle Q Clear(g_c), s	11.9	0.0	0.0	0.0	8.0	4.2
Prop In Lane	0.22			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1057	0	1488	1261	206	183
V/C Ratio(X)	0.60	0.00	0.54	0.22	0.79	0.44
Avail Cap(c_a), veh/h	1057	0	1488	1261	376	335
HCM Platoon Ratio	1.00	1.00	2.00	2.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.50	0.50	1.00	1.00
Uniform Delay (d), s/veh	2.9	0.0	0.0	0.0	38.7	37.1
Incr Delay (d2), s/veh	2.5	0.0	0.7	0.2	6.5	1.6
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.9	0.0	0.3	0.1	3.8	1.7
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	5.4	0.0	0.7	0.2	45.2	38.7
LnGrp LOS	A		A	A	D	D
Approach Vol, veh/h		632	1086		242	
Approach Delay, s/veh		5.4	0.6		43.1	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			75.6		14.4	75.6
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			63.0		19.0	63.0
Max Q Clear Time (g_c+I1), s			13.9		10.0	2.0
Green Ext Time (p_c), s			7.5		0.5	9.1

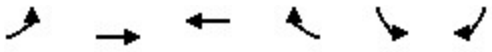
Intersection Summary		
HCM 6th Ctrl Delay, s/veh		7.4
HCM 6th LOS		A



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	75	755	490	106	235	116
Future Volume (veh/h)	75	755	490	106	235	116
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	79	795	516	112	247	122
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	131	1179	1371	1162	298	265
Arrive On Green	0.73	0.73	1.00	1.00	0.17	0.17
Sat Flow, veh/h	112	1609	1870	1585	1781	1585
Grp Volume(v), veh/h	874	0	516	112	247	122
Grp Sat Flow(s),veh/h/ln	1720	0	1870	1585	1781	1585
Q Serve(g_s), s	4.4	0.0	0.0	0.0	10.7	5.6
Cycle Q Clear(g_c), s	19.6	0.0	0.0	0.0	10.7	5.6
Prop In Lane	0.09			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1310	0	1371	1162	298	265
V/C Ratio(X)	0.67	0.00	0.38	0.10	0.83	0.46
Avail Cap(c_a), veh/h	1310	0	1371	1162	423	376
HCM Platoon Ratio	1.00	1.00	2.00	2.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.77	0.77	1.00	1.00
Uniform Delay (d), s/veh	5.4	0.0	0.0	0.0	32.2	30.1
Incr Delay (d2), s/veh	2.7	0.0	0.6	0.1	9.1	1.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	6.0	0.0	0.2	0.0	5.2	2.2
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	8.1	0.0	0.6	0.1	41.4	31.3
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		874	628		369	
Approach Delay, s/veh		8.1	0.5		38.0	
Approach LOS		A	A		D	

Timer - Assigned Phs	4	6	8
Phs Duration (G+Y+Rc), s	62.6	17.4	62.6
Change Period (Y+Rc), s	4.0	4.0	4.0
Max Green Setting (Gmax), s	53.0	19.0	53.0
Max Q Clear Time (g_c+I1), s	21.6	12.7	2.0
Green Ext Time (p_c), s	8.6	0.6	4.2

Intersection Summary	
HCM 6th Ctrl Delay, s/veh	11.5
HCM 6th LOS	B



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	75	755	490	152	235	116
Future Volume (veh/h)	75	755	490	152	235	116
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			1.00	1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	79	795	516	160	247	122
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	130	1172	1371	1162	298	265
Arrive On Green	0.73	0.73	1.00	1.00	0.17	0.17
Sat Flow, veh/h	111	1599	1870	1585	1781	1585
Grp Volume(v), veh/h	874	0	516	160	247	122
Grp Sat Flow(s),veh/h/ln	1710	0	1870	1585	1781	1585
Q Serve(g_s), s	4.5	0.0	0.0	0.0	10.7	5.6
Cycle Q Clear(g_c), s	19.7	0.0	0.0	0.0	10.7	5.6
Prop In Lane	0.09			1.00	1.00	1.00
Lane Grp Cap(c), veh/h	1302	0	1371	1162	298	265
V/C Ratio(X)	0.67	0.00	0.38	0.14	0.83	0.46
Avail Cap(c_a), veh/h	1302	0	1371	1162	423	376
HCM Platoon Ratio	1.00	1.00	2.00	2.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.77	0.77	1.00	1.00
Uniform Delay (d), s/veh	5.4	0.0	0.0	0.0	32.2	30.1
Incr Delay (d2), s/veh	2.8	0.0	0.6	0.2	9.1	1.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	6.0	0.0	0.2	0.1	5.2	2.2
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	8.2	0.0	0.6	0.2	41.4	31.3
LnGrp LOS	A		A	A	D	C
Approach Vol, veh/h		874	676		369	
Approach Delay, s/veh		8.2	0.5		38.0	
Approach LOS		A	A		D	

Timer - Assigned Phs			4		6	8
Phs Duration (G+Y+Rc), s			62.6		17.4	62.6
Change Period (Y+Rc), s			4.0		4.0	4.0
Max Green Setting (Gmax), s			53.0		19.0	53.0
Max Q Clear Time (g_c+I1), s			21.7		12.7	2.0
Green Ext Time (p_c), s			8.7		0.6	4.4

Intersection Summary		
HCM 6th Ctrl Delay, s/veh		11.2
HCM 6th LOS		B

ATTACHMENT C -

TRUCK TRAFFIC INFORMATION AND UPDATED INTERSECTION OPERATION ANALYSIS

WITH HEAVY VEHICLE SHARE WORKSHEETS

TRUCK NETWORKS on California State Highways

DISTRICT 8

Map 8 of 12

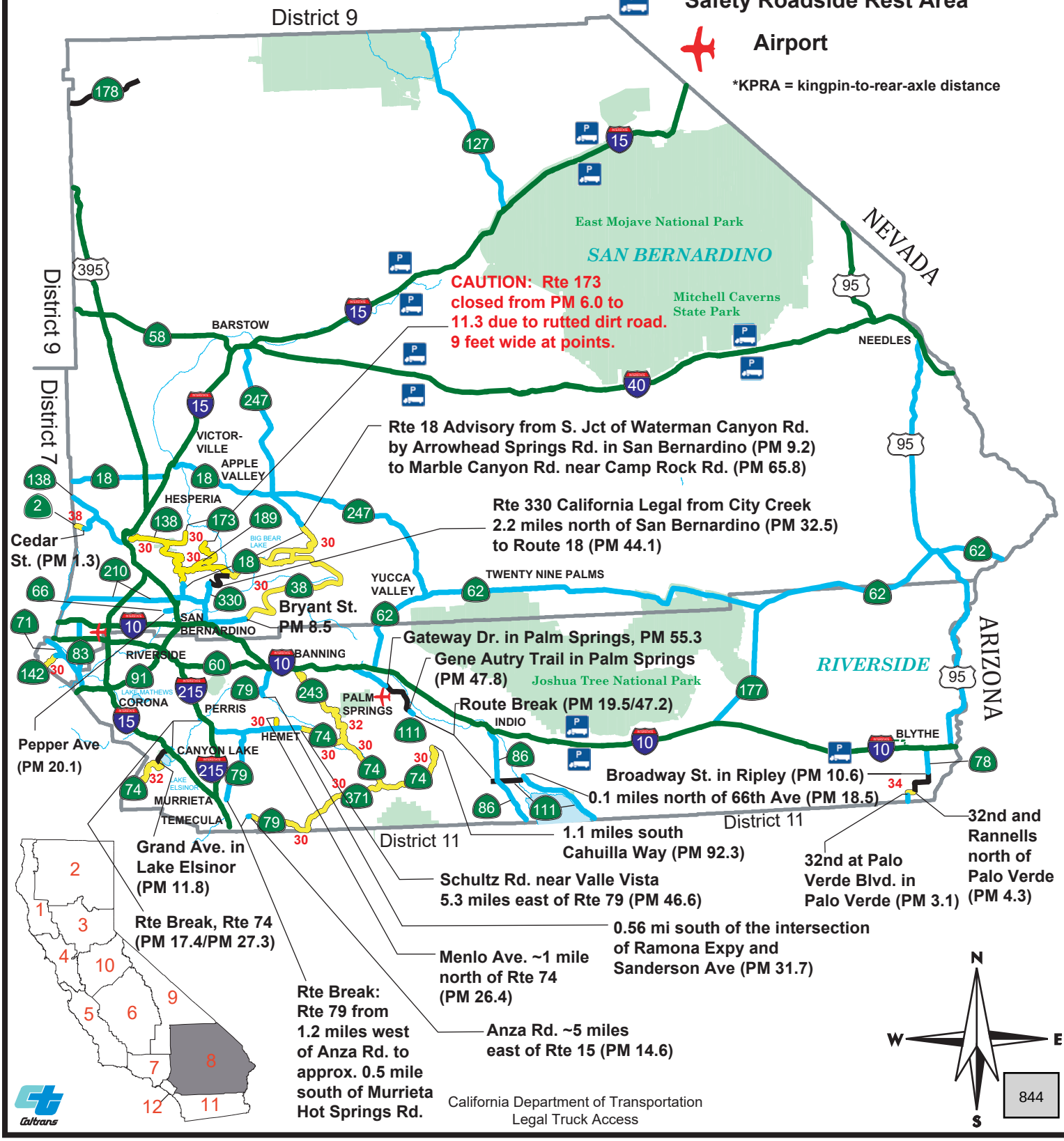
Not to scale

Last revised March 2, 2023

LEGEND (CLICK HERE FOR MORE DETAILED LEGEND)

- National Network (STAA)
- Terminal Access (STAA)
- 65' California Legal Route
- 65' Ca Legal *KPRA Advisory
- 30 *KPRA Advisory
- Safety Roadside Rest Area
- Airport

*KPRA = kingpin-to-rear-axle distance



California Department of Transportation
Legal Truck Access

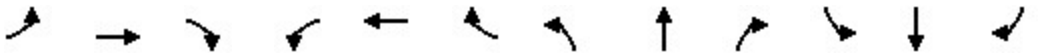
RTE	RTE_SFX	DIST	CNTY	PM_PFX	POSTMILE	PM_SFX	LEG	DESCRIPTION	VEHICLE_AADT_TOTAL	TOT_TRK_AADT	TRK_PERCENT_TOT	TRK_2_AXLE	TRK_2_AXLE_PCT	TRK_3_AXLE	TRK_3_AXLE_PCT	TRK_4_AXLE	TRK_4_AXLE_PCT	TRK_5_AXLE	TRK_5_AXLE_PCT	EAL	EST_YEAR	EST_CODE
086		08	RIV	R	16.74	B		AIRPORT BLVD	28000	5387	19.24	1119	20.77	219	4.07	90	1.67	3959	73.49	1438	18	V



Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Volume (veh/h)	152	202	48	174	142	10
Future Volume (veh/h)	152	202	48	174	142	10
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1618	1870	1870	1618	1870
Adj Flow Rate, veh/h	160	213	51	183	149	11
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	19	2	2	19	2
Cap, veh/h	421	560	119	1331	239	246
Arrive On Green	0.58	0.58	0.07	0.71	0.16	0.16
Sat Flow, veh/h	728	969	1781	1870	1541	1585
Grp Volume(v), veh/h	0	373	51	183	149	11
Grp Sat Flow(s),veh/h/ln	0	1696	1781	1870	1541	1585
Q Serve(g_s), s	0.0	7.1	1.7	1.9	5.4	0.4
Cycle Q Clear(g_c), s	0.0	7.1	1.7	1.9	5.4	0.4
Prop In Lane		0.57	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	0	980	119	1331	239	246
V/C Ratio(X)	0.00	0.38	0.43	0.14	0.62	0.04
Avail Cap(c_a), veh/h	0	980	208	1331	308	317
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.00	0.97	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	6.8	26.9	2.8	23.7	21.6
Incr Delay (d2), s/veh	0.0	1.1	2.4	0.2	2.7	0.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	2.0	0.7	0.3	2.0	0.1
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	0.0	7.9	29.3	3.0	26.4	21.6
LnGrp LOS		A	C	A	C	C
Approach Vol, veh/h	373			234	160	
Approach Delay, s/veh	7.9			8.7	26.0	
Approach LOS	A			A	C	

Timer - Assigned Phs		2	3	4		8
Phs Duration (G+Y+Rc), s		13.3	8.0	38.7		46.7
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0
Max Green Setting (Gmax), s		12.0	7.0	29.0		40.0
Max Q Clear Time (g_c+I1), s		7.4	3.7	9.1		3.9
Green Ext Time (p_c), s		0.2	0.0	2.1		0.9

Intersection Summary	
HCM 6th Ctrl Delay, s/veh	12.0
HCM 6th LOS	B



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	62	315	16	5	302	17	29	0	19	30	10	319
Future Volume (veh/h)	62	315	16	5	302	17	29	0	19	30	10	319
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	65	332	17	5	318	18	31	0	20	32	11	336
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	79	824	42	12	741	42	61	0	40	358	123	366
Arrive On Green	0.05	0.47	0.47	0.01	0.42	0.42	0.06	0.00	0.06	0.27	0.27	0.27
Sat Flow, veh/h	1541	1764	90	1781	1753	99	1033	0	666	1342	461	1372
Grp Volume(v), veh/h	65	0	349	5	0	336	51	0	0	43	0	336
Grp Sat Flow(s),veh/h/ln	1541	0	1854	1781	0	1852	1699	0	0	1803	0	1372
Q Serve(g_s), s	3.3	0.0	9.9	0.2	0.0	10.2	2.3	0.0	0.0	1.4	0.0	19.0
Cycle Q Clear(g_c), s	3.3	0.0	9.9	0.2	0.0	10.2	2.3	0.0	0.0	1.4	0.0	19.0
Prop In Lane	1.00		0.05	1.00		0.05	0.61		0.39	0.74		1.00
Lane Grp Cap(c), veh/h	79	0	866	12	0	783	101	0	0	481	0	366
V/C Ratio(X)	0.82	0.00	0.40	0.43	0.00	0.43	0.51	0.00	0.00	0.09	0.00	0.92
Avail Cap(c_a), veh/h	154	0	866	111	0	783	149	0	0	518	0	394
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.95	0.00	0.95	0.96	0.00	0.96	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	37.6	0.0	14.0	39.6	0.0	16.3	36.5	0.0	0.0	22.0	0.0	28.5
Incr Delay (d2), s/veh	17.7	0.0	1.3	21.9	0.0	1.6	3.9	0.0	0.0	0.1	0.0	25.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.6	0.0	4.2	0.2	0.0	4.2	1.0	0.0	0.0	0.6	0.0	8.2
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	55.3	0.0	15.3	61.5	0.0	17.9	40.4	0.0	0.0	22.1	0.0	53.7
LnGrp LOS	E		B	E		B	D			C		D
Approach Vol, veh/h		414			341			51			379	
Approach Delay, s/veh		21.6			18.6			40.4			50.1	
Approach LOS		C			B			D			D	

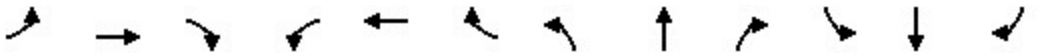
Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		8.7	4.5	41.4		25.3	8.1	37.8				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		7.0	5.0	29.0		23.0	8.0	26.0				
Max Q Clear Time (g_c+I1), s		4.3	2.2	11.9		21.0	5.3	12.2				
Green Ext Time (p_c), s		0.0	0.0	1.9		0.3	0.0	1.5				

Intersection Summary												
HCM 6th Ctrl Delay, s/veh			30.6									
HCM 6th LOS			C									

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Volume (veh/h)	217	300	49	157	113	10
Future Volume (veh/h)	217	300	49	157	113	10
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1618	1870	1870	1618	1870
Adj Flow Rate, veh/h	247	341	56	178	128	11
Peak Hour Factor	0.88	0.88	0.88	0.88	0.88	0.88
Percent Heavy Veh, %	2	19	2	2	19	2
Cap, veh/h	475	656	111	1460	184	189
Arrive On Green	1.00	1.00	0.06	0.78	0.12	0.12
Sat Flow, veh/h	711	982	1781	1870	1541	1585
Grp Volume(v), veh/h	0	588	56	178	128	11
Grp Sat Flow(s),veh/h/ln	0	1693	1781	1870	1541	1585
Q Serve(g_s), s	0.0	0.0	2.4	1.8	6.4	0.5
Cycle Q Clear(g_c), s	0.0	0.0	2.4	1.8	6.4	0.5
Prop In Lane		0.58	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	0	1131	111	1460	184	189
V/C Ratio(X)	0.00	0.52	0.50	0.12	0.70	0.06
Avail Cap(c_a), veh/h	0	1131	156	1460	270	277
HCM Platoon Ratio	1.67	1.67	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.00	0.88	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	0.0	36.3	2.1	33.8	31.2
Incr Delay (d2), s/veh	0.0	1.5	3.5	0.2	4.7	0.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.5	1.1	0.3	2.6	0.2
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	0.0	1.5	39.8	2.3	38.5	31.4
LnGrp LOS		A	D	A	D	C
Approach Vol, veh/h	588			234	139	
Approach Delay, s/veh	1.5			11.3	38.0	
Approach LOS	A			B	D	

Timer - Assigned Phs	2	3	4	8
Phs Duration (G+Y+Rc), s	13.5	9.0	57.5	66.5
Change Period (Y+Rc), s	4.0	4.0	4.0	4.0
Max Green Setting (Gmax), s	14.0	7.0	47.0	58.0
Max Q Clear Time (g_c+I1), s	8.4	4.4	2.0	3.8
Green Ext Time (p_c), s	0.2	0.0	4.3	1.0

Intersection Summary	
HCM 6th Ctrl Delay, s/veh	9.2
HCM 6th LOS	A



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	106	462	31	8	250	15	28	2	20	40	24	160
Future Volume (veh/h)	106	462	31	8	250	15	28	2	20	40	24	160
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	115	502	34	9	272	16	30	2	22	43	26	174
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	140	990	67	28	869	51	82	5	60	141	85	171
Arrive On Green	0.18	1.00	1.00	0.03	0.99	0.99	0.09	0.09	0.09	0.13	0.13	0.13
Sat Flow, veh/h	1541	1732	117	1781	1749	103	944	63	692	1130	683	1372
Grp Volume(v), veh/h	115	0	536	9	0	288	54	0	0	69	0	174
Grp Sat Flow(s),veh/h/ln	1541	0	1849	1781	0	1852	1699	0	0	1814	0	1372
Q Serve(g_s), s	5.7	0.0	0.0	0.4	0.0	0.1	2.4	0.0	0.0	2.8	0.0	10.0
Cycle Q Clear(g_c), s	5.7	0.0	0.0	0.4	0.0	0.1	2.4	0.0	0.0	2.8	0.0	10.0
Prop In Lane	1.00		0.06	1.00		0.06	0.56		0.41	0.62		1.00
Lane Grp Cap(c), veh/h	140	0	1057	28	0	920	148	0	0	227	0	171
V/C Ratio(X)	0.82	0.00	0.51	0.32	0.00	0.31	0.36	0.00	0.00	0.30	0.00	1.01
Avail Cap(c_a), veh/h	250	0	1057	156	0	920	318	0	0	227	0	171
HCM Platoon Ratio	2.00	2.00	2.00	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.89	0.00	0.89	0.96	0.00	0.96	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	32.1	0.0	0.0	38.3	0.0	0.1	34.4	0.0	0.0	31.8	0.0	35.0
Incr Delay (d2), s/veh	10.2	0.0	1.5	6.1	0.0	0.9	1.5	0.0	0.0	0.7	0.0	72.7
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.3	0.0	0.5	0.2	0.0	0.2	1.0	0.0	0.0	1.2	0.0	6.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	42.4	0.0	1.5	44.4	0.0	1.0	35.9	0.0	0.0	32.6	0.0	107.7
LnGrp LOS	D		A	D		A	D			C		F
Approach Vol, veh/h		651			297			54			243	
Approach Delay, s/veh		8.8			2.3			35.9			86.4	
Approach LOS		A			A			D			F	

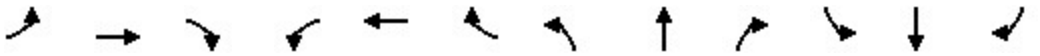
Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		11.0	5.3	49.7		14.0	11.2	43.8				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		15.0	7.0	32.0		10.0	13.0	26.0				
Max Q Clear Time (g_c+I1), s		4.4	2.4	2.0		12.0	7.7	2.1				
Green Ext Time (p_c), s		0.1	0.0	3.9		0.0	0.1	1.5				

Intersection Summary	
HCM 6th Ctrl Delay, s/veh	23.5
HCM 6th LOS	C

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Volume (veh/h)	196	224	53	226	159	11
Future Volume (veh/h)	196	224	53	226	159	11
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1618	1870	1870	1618	1870
Adj Flow Rate, veh/h	206	236	56	238	167	12
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	19	2	2	19	2
Cap, veh/h	521	597	111	1436	204	209
Arrive On Green	1.00	1.00	0.06	0.77	0.13	0.13
Sat Flow, veh/h	795	911	1781	1870	1541	1585
Grp Volume(v), veh/h	0	442	56	238	167	12
Grp Sat Flow(s),veh/h/ln	0	1706	1781	1870	1541	1585
Q Serve(g_s), s	0.0	0.0	2.4	2.7	8.4	0.5
Cycle Q Clear(g_c), s	0.0	0.0	2.4	2.7	8.4	0.5
Prop In Lane		0.53	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	0	1119	111	1436	204	209
V/C Ratio(X)	0.00	0.40	0.50	0.17	0.82	0.06
Avail Cap(c_a), veh/h	0	1119	178	1436	385	396
HCM Platoon Ratio	1.67	1.67	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.00	0.94	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	0.0	36.3	2.5	33.8	30.4
Incr Delay (d2), s/veh	0.0	1.0	3.5	0.2	7.9	0.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.3	1.1	0.5	3.5	0.2
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	0.0	1.0	39.8	2.7	41.7	30.5
LnGrp LOS		A	D	A	D	C
Approach Vol, veh/h	442			294	179	
Approach Delay, s/veh	1.0			9.8	41.0	
Approach LOS	A			A	D	

Timer - Assigned Phs		2	3	4		8
Phs Duration (G+Y+Rc), s		14.6	9.0	56.5		65.4
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0
Max Green Setting (Gmax), s		20.0	8.0	40.0		52.0
Max Q Clear Time (g_c+I1), s		10.4	4.4	2.0		4.7
Green Ext Time (p_c), s		0.3	0.0	2.9		1.3

Intersection Summary	
HCM 6th Ctrl Delay, s/veh	11.6
HCM 6th LOS	B



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	63	378	16	6	375	21	28	0	22	38	10	340
Future Volume (veh/h)	63	378	16	6	375	21	28	0	22	38	10	340
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	66	398	17	6	395	22	29	0	23	40	11	358
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	80	814	35	14	725	40	56	0	45	388	107	377
Arrive On Green	0.10	0.91	0.91	0.02	0.83	0.83	0.06	0.00	0.06	0.28	0.28	0.28
Sat Flow, veh/h	1541	1780	76	1781	1755	98	942	0	747	1412	388	1372
Grp Volume(v), veh/h	66	0	415	6	0	417	52	0	0	51	0	358
Grp Sat Flow(s),veh/h/ln	1541	0	1856	1781	0	1852	1689	0	0	1800	0	1372
Q Serve(g_s), s	3.4	0.0	2.8	0.3	0.0	5.7	2.4	0.0	0.0	1.7	0.0	20.5
Cycle Q Clear(g_c), s	3.4	0.0	2.8	0.3	0.0	5.7	2.4	0.0	0.0	1.7	0.0	20.5
Prop In Lane	1.00		0.04	1.00		0.05	0.56		0.44	0.78		1.00
Lane Grp Cap(c), veh/h	80	0	849	14	0	766	101	0	0	495	0	377
V/C Ratio(X)	0.83	0.00	0.49	0.43	0.00	0.54	0.51	0.00	0.00	0.10	0.00	0.95
Avail Cap(c_a), veh/h	135	0	849	111	0	766	148	0	0	495	0	377
HCM Platoon Ratio	2.00	2.00	2.00	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.92	0.00	0.92	0.94	0.00	0.94	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	35.5	0.0	2.0	39.2	0.0	4.6	36.5	0.0	0.0	21.6	0.0	28.5
Incr Delay (d2), s/veh	17.6	0.0	1.9	18.6	0.0	2.6	4.0	0.0	0.0	0.1	0.0	33.4
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.6	0.0	1.1	0.2	0.0	1.8	1.0	0.0	0.0	0.7	0.0	9.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	53.2	0.0	3.8	57.8	0.0	7.2	40.5	0.0	0.0	21.7	0.0	61.8
LnGrp LOS	D		A	E		A	D			C		E
Approach Vol, veh/h		481			423			52			409	
Approach Delay, s/veh		10.6			7.9			40.5			56.8	
Approach LOS		B			A			D			E	

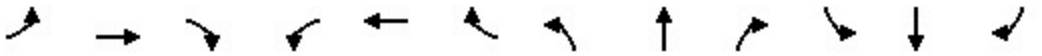
Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		8.8	4.6	40.6		26.0	8.1	37.1				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		7.0	5.0	30.0		22.0	7.0	28.0				
Max Q Clear Time (g_c+I1), s		4.4	2.3	4.8		22.5	5.4	7.7				
Green Ext Time (p_c), s		0.0	0.0	2.7		0.0	0.0	2.2				

Intersection Summary												
HCM 6th Ctrl Delay, s/veh			24.7									
HCM 6th LOS			C									

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Volume (veh/h)	268	325	59	193	123	12
Future Volume (veh/h)	268	325	59	193	123	12
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1618	1870	1870	1618	1870
Adj Flow Rate, veh/h	282	342	62	203	129	13
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	19	2	2	19	2
Cap, veh/h	512	620	117	1459	184	190
Arrive On Green	1.00	1.00	0.07	0.78	0.12	0.12
Sat Flow, veh/h	769	933	1781	1870	1541	1585
Grp Volume(v), veh/h	0	624	62	203	129	13
Grp Sat Flow(s),veh/h/ln	0	1702	1781	1870	1541	1585
Q Serve(g_s), s	0.0	0.0	2.7	2.1	6.4	0.6
Cycle Q Clear(g_c), s	0.0	0.0	2.7	2.1	6.4	0.6
Prop In Lane		0.55	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	0	1132	117	1459	184	190
V/C Ratio(X)	0.00	0.55	0.53	0.14	0.70	0.07
Avail Cap(c_a), veh/h	0	1132	156	1459	270	277
HCM Platoon Ratio	1.67	1.67	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.00	0.83	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	0.0	36.2	2.2	33.8	31.3
Incr Delay (d2), s/veh	0.0	1.6	3.7	0.2	4.7	0.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.5	1.2	0.4	2.6	0.2
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	0.0	1.6	39.9	2.4	38.6	31.4
LnGrp LOS		A	D	A	D	C
Approach Vol, veh/h	624			265	142	
Approach Delay, s/veh	1.6			11.2	37.9	
Approach LOS	A			B	D	

Timer - Assigned Phs		2	3	4		8
Phs Duration (G+Y+Rc), s		13.6	9.2	57.2		66.4
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0
Max Green Setting (Gmax), s		14.0	7.0	47.0		58.0
Max Q Clear Time (g_c+I1), s		8.4	4.7	2.0		4.1
Green Ext Time (p_c), s		0.2	0.0	4.6		1.1

Intersection Summary	
HCM 6th Ctrl Delay, s/veh	9.1
HCM 6th LOS	A



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	111	538	33	8	296	16	28	2	21	45	23	169
Future Volume (veh/h)	111	538	33	8	296	16	28	2	21	45	23	169
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	117	566	35	8	312	17	29	2	22	47	24	178
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	142	1001	62	25	872	48	80	6	61	150	76	171
Arrive On Green	0.18	1.00	1.00	0.03	0.99	0.99	0.09	0.09	0.09	0.13	0.13	0.13
Sat Flow, veh/h	1541	1743	108	1781	1757	96	929	64	704	1198	612	1372
Grp Volume(v), veh/h	117	0	601	8	0	329	53	0	0	71	0	178
Grp Sat Flow(s),veh/h/ln	1541	0	1851	1781	0	1853	1697	0	0	1810	0	1372
Q Serve(g_s), s	5.8	0.0	0.0	0.4	0.0	0.2	2.4	0.0	0.0	2.9	0.0	10.0
Cycle Q Clear(g_c), s	5.8	0.0	0.0	0.4	0.0	0.2	2.4	0.0	0.0	2.9	0.0	10.0
Prop In Lane	1.00		0.06	1.00		0.05	0.55		0.42	0.66		1.00
Lane Grp Cap(c), veh/h	142	0	1063	25	0	920	147	0	0	226	0	171
V/C Ratio(X)	0.82	0.00	0.57	0.32	0.00	0.36	0.36	0.00	0.00	0.31	0.00	1.04
Avail Cap(c_a), veh/h	250	0	1063	156	0	920	297	0	0	226	0	171
HCM Platoon Ratio	2.00	2.00	2.00	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.86	0.00	0.86	0.96	0.00	0.96	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	32.0	0.0	0.0	38.5	0.0	0.1	34.5	0.0	0.0	31.9	0.0	35.0
Incr Delay (d2), s/veh	9.9	0.0	1.9	6.6	0.0	1.0	1.5	0.0	0.0	0.8	0.0	79.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.3	0.0	0.6	0.2	0.0	0.3	1.0	0.0	0.0	1.3	0.0	6.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	41.9	0.0	1.9	45.1	0.0	1.2	35.9	0.0	0.0	32.7	0.0	114.2
LnGrp LOS	D		A	D		A	D			C		F
Approach Vol, veh/h		718			337			53			249	
Approach Delay, s/veh		8.4			2.2			35.9			90.9	
Approach LOS		A			A			D			F	

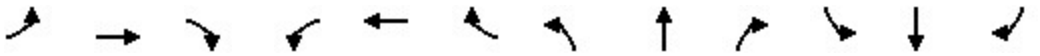
Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		10.9	5.1	49.9		14.0	11.4	43.7				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		14.0	7.0	33.0		10.0	13.0	27.0				
Max Q Clear Time (g_c+I1), s		4.4	2.4	2.0		12.0	7.8	2.2				
Green Ext Time (p_c), s		0.1	0.0	4.5		0.0	0.1	1.8				

Intersection Summary												
HCM 6th Ctrl Delay, s/veh			23.1									
HCM 6th LOS			C									

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Volume (veh/h)	198	229	53	237	168	11
Future Volume (veh/h)	198	229	53	237	168	11
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1618	1870	1870	1618	1870
Adj Flow Rate, veh/h	208	241	56	249	177	12
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	19	2	2	19	2
Cap, veh/h	513	594	111	1424	214	220
Arrive On Green	1.00	1.00	0.06	0.76	0.14	0.14
Sat Flow, veh/h	790	915	1781	1870	1541	1585
Grp Volume(v), veh/h	0	449	56	249	177	12
Grp Sat Flow(s),veh/h/ln	0	1706	1781	1870	1541	1585
Q Serve(g_s), s	0.0	0.0	2.4	2.9	8.9	0.5
Cycle Q Clear(g_c), s	0.0	0.0	2.4	2.9	8.9	0.5
Prop In Lane		0.54	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	0	1107	111	1424	214	220
V/C Ratio(X)	0.00	0.41	0.50	0.17	0.83	0.05
Avail Cap(c_a), veh/h	0	1107	156	1424	385	396
HCM Platoon Ratio	1.67	1.67	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.00	0.94	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	0.0	36.3	2.6	33.5	29.9
Incr Delay (d2), s/veh	0.0	1.0	3.5	0.3	7.9	0.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.3	1.1	0.6	3.7	0.2
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	0.0	1.0	39.8	2.9	41.4	30.0
LnGrp LOS		A	D	A	D	C
Approach Vol, veh/h	449			305	189	
Approach Delay, s/veh	1.0			9.7	40.7	
Approach LOS	A			A	D	

Timer - Assigned Phs	2	3	4		8
Phs Duration (G+Y+Rc), s	15.1	9.0	55.9		64.9
Change Period (Y+Rc), s	4.0	4.0	4.0		4.0
Max Green Setting (Gmax), s	20.0	7.0	41.0		52.0
Max Q Clear Time (g_c+I1), s	10.9	4.4	2.0		4.9
Green Ext Time (p_c), s	0.3	0.0	3.0		1.4

Intersection Summary	
HCM 6th Ctrl Delay, s/veh	11.8
HCM 6th LOS	B



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	65	385	16	6	394	21	30	0	22	38	10	364
Future Volume (veh/h)	65	385	16	6	394	21	30	0	22	38	10	364
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	68	405	17	6	415	22	32	0	23	40	11	383
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	82	834	35	14	743	39	61	0	44	371	102	360
Arrive On Green	0.11	0.94	0.94	0.02	0.84	0.84	0.06	0.00	0.06	0.26	0.26	0.26
Sat Flow, veh/h	1541	1782	75	1781	1760	93	985	0	708	1412	388	1372
Grp Volume(v), veh/h	68	0	422	6	0	437	55	0	0	51	0	383
Grp Sat Flow(s),veh/h/ln	1541	0	1857	1781	0	1853	1694	0	0	1800	0	1372
Q Serve(g_s), s	3.5	0.0	2.1	0.3	0.0	5.5	2.5	0.0	0.0	1.7	0.0	21.0
Cycle Q Clear(g_c), s	3.5	0.0	2.1	0.3	0.0	5.5	2.5	0.0	0.0	1.7	0.0	21.0
Prop In Lane	1.00		0.04	1.00		0.05	0.58		0.42	0.78		1.00
Lane Grp Cap(c), veh/h	82	0	869	14	0	783	105	0	0	472	0	360
V/C Ratio(X)	0.83	0.00	0.49	0.43	0.00	0.56	0.53	0.00	0.00	0.11	0.00	1.06
Avail Cap(c_a), veh/h	154	0	869	111	0	783	148	0	0	472	0	360
HCM Platoon Ratio	2.00	2.00	2.00	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.89	0.00	0.89	0.93	0.00	0.93	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	35.4	0.0	1.4	39.2	0.0	4.0	36.4	0.0	0.0	22.4	0.0	29.5
Incr Delay (d2), s/veh	16.5	0.0	1.7	18.4	0.0	2.7	4.1	0.0	0.0	0.1	0.0	65.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.6	0.0	0.9	0.2	0.0	1.7	1.1	0.0	0.0	0.7	0.0	12.8
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	51.8	0.0	3.2	57.6	0.0	6.7	40.4	0.0	0.0	22.5	0.0	94.8
LnGrp LOS	D		A	E		A	D			C		F
Approach Vol, veh/h		490			443			55			434	
Approach Delay, s/veh		9.9			7.4			40.4			86.3	
Approach LOS		A			A			D			F	

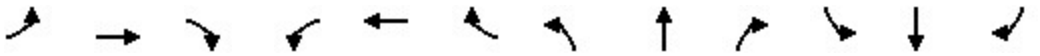
Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		8.9	4.6	41.4		25.0	8.3	37.8				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		7.0	5.0	31.0		21.0	8.0	28.0				
Max Q Clear Time (g_c+I1), s		4.5	2.3	4.1		23.0	5.5	7.5				
Green Ext Time (p_c), s		0.0	0.0	2.8		0.0	0.0	2.4				

Intersection Summary												
HCM 6th Ctrl Delay, s/veh			33.6									
HCM 6th LOS			C									

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Volume (veh/h)	278	346	59	196	125	12
Future Volume (veh/h)	278	346	59	196	125	12
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1618	1870	1870	1618	1870
Adj Flow Rate, veh/h	293	364	62	206	132	13
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	19	2	2	19	2
Cap, veh/h	504	626	117	1459	185	190
Arrive On Green	1.00	1.00	0.07	0.78	0.12	0.12
Sat Flow, veh/h	758	942	1781	1870	1541	1585
Grp Volume(v), veh/h	0	657	62	206	132	13
Grp Sat Flow(s),veh/h/ln	0	1701	1781	1870	1541	1585
Q Serve(g_s), s	0.0	0.0	2.7	2.2	6.6	0.6
Cycle Q Clear(g_c), s	0.0	0.0	2.7	2.2	6.6	0.6
Prop In Lane		0.55	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	0	1130	117	1459	185	190
V/C Ratio(X)	0.00	0.58	0.53	0.14	0.71	0.07
Avail Cap(c_a), veh/h	0	1130	156	1459	270	277
HCM Platoon Ratio	1.67	1.67	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.00	0.79	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	0.0	36.2	2.2	33.9	31.2
Incr Delay (d2), s/veh	0.0	1.7	3.7	0.2	5.0	0.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.5	1.2	0.4	2.7	0.2
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	0.0	1.7	39.9	2.4	38.9	31.4
LnGrp LOS		A	D	A	D	C
Approach Vol, veh/h	657			268	145	
Approach Delay, s/veh	1.7			11.1	38.2	
Approach LOS	A			B	D	

Timer - Assigned Phs	2	3	4	8
Phs Duration (G+Y+Rc), s	13.6	9.2	57.2	66.4
Change Period (Y+Rc), s	4.0	4.0	4.0	4.0
Max Green Setting (Gmax), s	14.0	7.0	47.0	58.0
Max Q Clear Time (g_c+I1), s	8.6	4.7	2.0	4.2
Green Ext Time (p_c), s	0.2	0.0	5.0	1.1

Intersection Summary	
HCM 6th Ctrl Delay, s/veh	9.0
HCM 6th LOS	A



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	118	568	35	8	301	16	29	2	21	45	23	175
Future Volume (veh/h)	118	568	35	8	301	16	29	2	21	45	23	175
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	124	598	37	8	317	17	31	2	22	47	24	184
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	150	998	62	25	861	46	84	5	60	150	76	171
Arrive On Green	0.19	1.00	1.00	0.03	0.98	0.98	0.09	0.09	0.09	0.13	0.13	0.13
Sat Flow, veh/h	1541	1743	108	1781	1759	94	958	62	680	1198	612	1372
Grp Volume(v), veh/h	124	0	635	8	0	334	55	0	0	71	0	184
Grp Sat Flow(s),veh/h/ln	1541	0	1851	1781	0	1853	1700	0	0	1810	0	1372
Q Serve(g_s), s	6.2	0.0	0.0	0.4	0.0	0.5	2.4	0.0	0.0	2.9	0.0	10.0
Cycle Q Clear(g_c), s	6.2	0.0	0.0	0.4	0.0	0.5	2.4	0.0	0.0	2.9	0.0	10.0
Prop In Lane	1.00		0.06	1.00		0.05	0.56		0.40	0.66		1.00
Lane Grp Cap(c), veh/h	150	0	1060	25	0	907	150	0	0	226	0	171
V/C Ratio(X)	0.83	0.00	0.60	0.32	0.00	0.37	0.37	0.00	0.00	0.31	0.00	1.07
Avail Cap(c_a), veh/h	270	0	1060	156	0	907	255	0	0	226	0	171
HCM Platoon Ratio	2.00	2.00	2.00	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.83	0.00	0.83	0.96	0.00	0.96	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	31.6	0.0	0.0	38.5	0.0	0.4	34.4	0.0	0.0	31.9	0.0	35.0
Incr Delay (d2), s/veh	9.2	0.0	2.1	6.6	0.0	1.1	1.5	0.0	0.0	0.8	0.0	89.6
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.4	0.0	0.6	0.2	0.0	0.4	1.0	0.0	0.0	1.3	0.0	7.4
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	40.7	0.0	2.1	45.1	0.0	1.5	35.9	0.0	0.0	32.7	0.0	124.6
LnGrp LOS	D		A	D		A	D			C		F
Approach Vol, veh/h		759			342			55			255	
Approach Delay, s/veh		8.4			2.6			35.9			99.0	
Approach LOS		A			A			D			F	

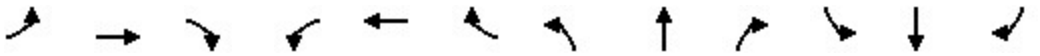
Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		11.1	5.1	49.8		14.0	11.8	43.2				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		12.0	7.0	35.0		10.0	14.0	28.0				
Max Q Clear Time (g_c+I1), s		4.4	2.4	2.0		12.0	8.2	2.5				
Green Ext Time (p_c), s		0.1	0.0	5.0		0.0	0.1	1.8				

Intersection Summary												
HCM 6th Ctrl Delay, s/veh			24.4									
HCM 6th LOS			C									

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Volume (veh/h)	240	252	58	289	185	11
Future Volume (veh/h)	240	252	58	289	185	11
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1618	1870	1870	1618	1870
Adj Flow Rate, veh/h	253	265	61	304	195	12
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	19	2	2	19	2
Cap, veh/h	531	556	116	1402	232	239
Arrive On Green	1.00	1.00	0.06	0.75	0.15	0.15
Sat Flow, veh/h	836	876	1781	1870	1541	1585
Grp Volume(v), veh/h	0	518	61	304	195	12
Grp Sat Flow(s),veh/h/ln	0	1713	1781	1870	1541	1585
Q Serve(g_s), s	0.0	0.0	2.7	3.9	9.8	0.5
Cycle Q Clear(g_c), s	0.0	0.0	2.7	3.9	9.8	0.5
Prop In Lane		0.51	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	0	1087	116	1402	232	239
V/C Ratio(X)	0.00	0.48	0.53	0.22	0.84	0.05
Avail Cap(c_a), veh/h	0	1087	156	1402	366	376
HCM Platoon Ratio	1.67	1.67	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.00	0.91	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	0.0	36.2	3.0	33.0	29.1
Incr Delay (d2), s/veh	0.0	1.4	3.7	0.4	9.6	0.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.4	1.2	0.9	4.2	0.2
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	0.0	1.4	39.9	3.4	42.6	29.2
LnGrp LOS		A	D	A	D	C
Approach Vol, veh/h	518			365	207	
Approach Delay, s/veh	1.4			9.5	41.8	
Approach LOS	A			A	D	

Timer - Assigned Phs		2	3	4		8
Phs Duration (G+Y+Rc), s		16.1	9.2	54.8		63.9
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0
Max Green Setting (Gmax), s		19.0	7.0	42.0		53.0
Max Q Clear Time (g_c+I1), s		11.8	4.7	2.0		5.9
Green Ext Time (p_c), s		0.3	0.0	3.5		1.7

Intersection Summary	
HCM 6th Ctrl Delay, s/veh	11.8
HCM 6th LOS	B



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	66	448	16	7	467	25	30	0	24	47	10	385
Future Volume (veh/h)	66	448	16	7	467	25	30	0	24	47	10	385
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	69	472	17	7	492	26	32	0	25	49	11	405
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	84	880	32	16	784	41	60	0	47	349	78	326
Arrive On Green	0.11	0.98	0.98	0.02	0.89	0.89	0.06	0.00	0.06	0.24	0.24	0.24
Sat Flow, veh/h	1541	1794	65	1781	1760	93	949	0	741	1468	329	1372
Grp Volume(v), veh/h	69	0	489	7	0	518	57	0	0	60	0	405
Grp Sat Flow(s),veh/h/ln	1541	0	1859	1781	0	1853	1690	0	0	1797	0	1372
Q Serve(g_s), s	3.5	0.0	0.8	0.3	0.0	5.5	2.6	0.0	0.0	2.1	0.0	19.0
Cycle Q Clear(g_c), s	3.5	0.0	0.8	0.3	0.0	5.5	2.6	0.0	0.0	2.1	0.0	19.0
Prop In Lane	1.00		0.03	1.00		0.05	0.56		0.44	0.82		1.00
Lane Grp Cap(c), veh/h	84	0	912	16	0	826	106	0	0	427	0	326
V/C Ratio(X)	0.83	0.00	0.54	0.44	0.00	0.63	0.54	0.00	0.00	0.14	0.00	1.24
Avail Cap(c_a), veh/h	154	0	912	111	0	826	148	0	0	427	0	326
HCM Platoon Ratio	2.00	2.00	2.00	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.86	0.00	0.86	0.92	0.00	0.92	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	35.3	0.0	0.4	39.1	0.0	2.7	36.4	0.0	0.0	24.1	0.0	30.5
Incr Delay (d2), s/veh	15.8	0.0	1.9	16.2	0.0	3.3	4.2	0.0	0.0	0.1	0.0	132.8
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.6	0.0	0.6	0.2	0.0	1.7	1.1	0.0	0.0	0.9	0.0	17.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	51.0	0.0	2.3	55.3	0.0	6.0	40.5	0.0	0.0	24.2	0.0	163.3
LnGrp LOS	D		A	E		A	D			C		F
Approach Vol, veh/h		558			525			57			465	
Approach Delay, s/veh		8.4			6.7			40.5			145.3	
Approach LOS		A			A			D			F	

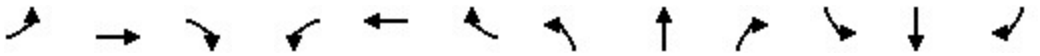
Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		9.0	4.7	43.3		23.0	8.3	39.6				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		7.0	5.0	33.0		19.0	8.0	30.0				
Max Q Clear Time (g_c+I1), s		4.6	2.3	2.8		21.0	5.5	7.5				
Green Ext Time (p_c), s		0.0	0.0	3.4		0.0	0.0	3.0				

Intersection Summary												
HCM 6th Ctrl Delay, s/veh			48.6									
HCM 6th LOS			D									

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Volume (veh/h)	328	372	69	231	134	15
Future Volume (veh/h)	328	372	69	231	134	15
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1618	1870	1870	1618	1870
Adj Flow Rate, veh/h	345	392	73	243	141	16
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	19	2	2	19	2
Cap, veh/h	526	598	125	1457	187	192
Arrive On Green	1.00	1.00	0.07	0.78	0.12	0.12
Sat Flow, veh/h	799	908	1781	1870	1541	1585
Grp Volume(v), veh/h	0	737	73	243	141	16
Grp Sat Flow(s),veh/h/ln	0	1707	1781	1870	1541	1585
Q Serve(g_s), s	0.0	0.0	3.2	2.6	7.1	0.7
Cycle Q Clear(g_c), s	0.0	0.0	3.2	2.6	7.1	0.7
Prop In Lane		0.53	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	0	1124	125	1457	187	192
V/C Ratio(X)	0.00	0.66	0.58	0.17	0.75	0.08
Avail Cap(c_a), veh/h	0	1124	156	1457	250	258
HCM Platoon Ratio	1.67	1.67	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.00	0.72	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	0.0	36.1	2.2	34.0	31.2
Incr Delay (d2), s/veh	0.0	2.2	4.3	0.2	8.7	0.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.7	1.4	0.5	3.0	0.3
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	0.0	2.2	40.3	2.5	42.7	31.4
LnGrp LOS		A	D	A	D	C
Approach Vol, veh/h	737			316	157	
Approach Delay, s/veh	2.2			11.2	41.5	
Approach LOS	A			B	D	

Timer - Assigned Phs		2	3	4		8
Phs Duration (G+Y+Rc), s		13.7	9.6	56.7		66.3
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0
Max Green Setting (Gmax), s		13.0	7.0	48.0		59.0
Max Q Clear Time (g_c+I1), s		9.1	5.2	2.0		4.6
Green Ext Time (p_c), s		0.1	0.0	6.0		1.3

Intersection Summary	
HCM 6th Ctrl Delay, s/veh	9.6
HCM 6th LOS	A



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	124	644	35	9	348	18	29	2	21	50	23	184
Future Volume (veh/h)	124	644	35	9	348	18	29	2	21	50	23	184
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	131	678	37	9	366	19	31	2	22	53	24	194
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	158	1003	55	28	854	44	84	5	60	156	70	171
Arrive On Green	0.20	1.00	1.00	0.03	0.97	0.97	0.09	0.09	0.09	0.13	0.13	0.13
Sat Flow, veh/h	1541	1757	96	1781	1762	91	958	62	680	1245	564	1372
Grp Volume(v), veh/h	131	0	715	9	0	385	55	0	0	77	0	194
Grp Sat Flow(s),veh/h/ln	1541	0	1853	1781	0	1854	1700	0	0	1808	0	1372
Q Serve(g_s), s	6.5	0.0	0.0	0.4	0.0	0.9	2.4	0.0	0.0	3.1	0.0	10.0
Cycle Q Clear(g_c), s	6.5	0.0	0.0	0.4	0.0	0.9	2.4	0.0	0.0	3.1	0.0	10.0
Prop In Lane	1.00		0.05	1.00		0.05	0.56		0.40	0.69		1.00
Lane Grp Cap(c), veh/h	158	0	1058	28	0	898	150	0	0	226	0	171
V/C Ratio(X)	0.83	0.00	0.68	0.32	0.00	0.43	0.37	0.00	0.00	0.34	0.00	1.13
Avail Cap(c_a), veh/h	270	0	1058	156	0	898	234	0	0	226	0	171
HCM Platoon Ratio	2.00	2.00	2.00	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.79	0.00	0.79	0.95	0.00	0.95	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	31.1	0.0	0.0	38.3	0.0	0.7	34.4	0.0	0.0	32.0	0.0	35.0
Incr Delay (d2), s/veh	8.6	0.0	2.8	6.0	0.0	1.4	1.5	0.0	0.0	0.9	0.0	108.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.5	0.0	0.8	0.2	0.0	0.5	1.0	0.0	0.0	1.4	0.0	8.3
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	39.7	0.0	2.8	44.3	0.0	2.1	35.9	0.0	0.0	32.9	0.0	143.5
LnGrp LOS	D		A	D		A	D			C		F
Approach Vol, veh/h		846			394			55			271	
Approach Delay, s/veh		8.5			3.0			35.9			112.1	
Approach LOS		A			A			D			F	

Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		11.1	5.3	49.7		14.0	12.2	42.8				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		11.0	7.0	36.0		10.0	14.0	29.0				
Max Q Clear Time (g_c+I1), s		4.4	2.4	2.0		12.0	8.5	2.9				
Green Ext Time (p_c), s		0.1	0.0	5.9		0.0	0.1	2.1				

Intersection Summary												
HCM 6th Ctrl Delay, s/veh			26.0									
HCM 6th LOS			C									

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Volume (veh/h)	242	257	58	297	192	11
Future Volume (veh/h)	242	257	58	297	192	11
Initial Q (Qb), veh	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	255	271	61	313	202	12
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	537	570	116	1425	246	219
Arrive On Green	1.00	1.00	0.06	0.76	0.14	0.14
Sat Flow, veh/h	830	882	1781	1870	1781	1585
Grp Volume(v), veh/h	0	526	61	313	202	12
Grp Sat Flow(s),veh/h/ln	0	1712	1781	1870	1781	1585
Q Serve(g_s), s	0.0	0.0	2.7	3.8	8.8	0.5
Cycle Q Clear(g_c), s	0.0	0.0	2.7	3.8	8.8	0.5
Prop In Lane		0.52	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	0	1107	116	1425	246	219
V/C Ratio(X)	0.00	0.48	0.53	0.22	0.82	0.05
Avail Cap(c_a), veh/h	0	1107	156	1425	401	357
HCM Platoon Ratio	1.67	1.67	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.00	0.91	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	0.0	36.2	2.7	33.5	29.9
Incr Delay (d2), s/veh	0.0	1.3	3.7	0.4	6.8	0.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.4	1.2	0.8	4.2	0.2
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	0.0	1.3	39.9	3.1	40.3	30.0
LnGrp LOS		A	D	A	D	C
Approach Vol, veh/h	526			374	214	
Approach Delay, s/veh	1.3			9.1	39.8	
Approach LOS	A			A	D	

Timer - Assigned Phs		2	3	4		8
Phs Duration (G+Y+Rc), s		15.1	9.2	55.7		64.9
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0
Max Green Setting (Gmax), s		18.0	7.0	43.0		54.0
Max Q Clear Time (g_c+I1), s		10.8	4.7	2.0		5.8
Green Ext Time (p_c), s		0.3	0.0	3.6		1.8

Intersection Summary	
HCM 7th Control Delay, s/veh	11.3
HCM 7th LOS	B

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	68	454	17	7	482	25	31	0	24	47	10	403
Future Volume (veh/h)	68	454	17	7	482	25	31	0	24	47	10	403
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	72	478	18	7	507	26	33	0	25	49	11	424
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	87	855	32	16	759	39	61	0	46	367	82	343
Arrive On Green	0.11	0.96	0.96	0.02	0.86	0.86	0.06	0.00	0.06	0.25	0.25	0.25
Sat Flow, veh/h	1541	1791	67	1781	1763	90	962	0	729	1468	329	1372
Grp Volume(v), veh/h	72	0	496	7	0	533	58	0	0	60	0	424
Grp Sat Flow(s),veh/h/ln	1541	0	1858	1781	0	1854	1691	0	0	1797	0	1372
Q Serve(g_s), s	3.7	0.0	2.1	0.3	0.0	7.6	2.7	0.0	0.0	2.1	0.0	20.0
Cycle Q Clear(g_c), s	3.7	0.0	2.1	0.3	0.0	7.6	2.7	0.0	0.0	2.1	0.0	20.0
Prop In Lane	1.00		0.04	1.00		0.05	0.57		0.43	0.82		1.00
Lane Grp Cap(c), veh/h	87	0	887	16	0	797	107	0	0	449	0	343
V/C Ratio(X)	0.83	0.00	0.56	0.44	0.00	0.67	0.54	0.00	0.00	0.13	0.00	1.24
Avail Cap(c_a), veh/h	116	0	887	111	0	797	148	0	0	449	0	343
HCM Platoon Ratio	2.00	2.00	2.00	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.83	0.00	0.83	0.92	0.00	0.92	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	35.1	0.0	1.0	39.1	0.0	3.7	36.3	0.0	0.0	23.3	0.0	30.0
Incr Delay (d2), s/veh	25.3	0.0	2.1	16.2	0.0	4.1	4.2	0.0	0.0	0.1	0.0	129.1
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.9	0.0	0.9	0.2	0.0	2.2	1.2	0.0	0.0	0.9	0.0	18.3
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	60.4	0.0	3.1	55.3	0.0	7.8	40.5	0.0	0.0	23.4	0.0	159.1
LnGrp LOS	E		A	E		A	D			C		F
Approach Vol, veh/h		568			540			58			484	
Approach Delay, s/veh		10.4			8.4			40.5			142.3	
Approach LOS		B			A			D			F	

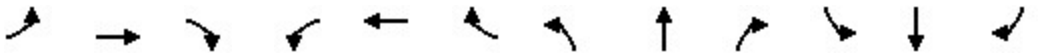
Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		9.1	4.7	42.2		24.0	8.5	38.4				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		7.0	5.0	32.0		20.0	6.0	31.0				
Max Q Clear Time (g_c+I1), s		4.7	2.3	4.1		22.0	5.7	9.6				
Green Ext Time (p_c), s		0.0	0.0	3.4		0.0	0.0	3.1				

Intersection Summary	
HCM 7th Control Delay, s/veh	49.5
HCM 7th LOS	D

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Volume (veh/h)	336	389	69	233	137	15
Future Volume (veh/h)	336	389	69	233	137	15
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	354	409	73	245	144	16
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2
Cap, veh/h	521	602	125	1456	216	192
Arrive On Green	1.00	1.00	0.07	0.78	0.12	0.12
Sat Flow, veh/h	791	914	1781	1870	1781	1585
Grp Volume(v), veh/h	0	763	73	245	144	16
Grp Sat Flow(s),veh/h/ln	0	1706	1781	1870	1781	1585
Q Serve(g_s), s	0.0	0.0	3.2	2.7	6.2	0.7
Cycle Q Clear(g_c), s	0.0	0.0	3.2	2.7	6.2	0.7
Prop In Lane		0.54	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	0	1123	125	1456	216	192
V/C Ratio(X)	0.00	0.68	0.58	0.17	0.67	0.08
Avail Cap(c_a), veh/h	0	1123	178	1456	267	238
HCM Platoon Ratio	1.67	1.67	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.00	0.69	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	0.0	36.1	2.3	33.6	31.2
Incr Delay (d2), s/veh	0.0	2.3	4.3	0.2	4.5	0.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.7	1.4	0.5	2.9	0.3
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	0.0	2.3	40.3	2.5	38.1	31.4
LnGrp LOS		A	D	A	D	C
Approach Vol, veh/h	763			318	160	
Approach Delay, s/veh	2.3			11.2	37.4	
Approach LOS	A			B	D	

Timer - Assigned Phs		2	3	4		8
Phs Duration (G+Y+Rc), s		13.7	9.6	56.7		66.3
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0
Max Green Setting (Gmax), s		12.0	8.0	48.0		60.0
Max Q Clear Time (g_c+I1), s		8.2	5.2	2.0		4.7
Green Ext Time (p_c), s		0.1	0.0	6.3		1.4

Intersection Summary	
HCM 6th Ctrl Delay, s/veh	9.1
HCM 6th LOS	A



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	131	668	36	9	353	18	29	2	21	50	23	189
Future Volume (veh/h)	131	668	36	9	353	18	29	2	21	50	23	189
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	138	703	38	9	372	19	31	2	22	53	24	199
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	165	1004	54	28	846	43	84	5	60	156	70	171
Arrive On Green	0.21	1.00	1.00	0.03	0.96	0.96	0.09	0.09	0.09	0.13	0.13	0.13
Sat Flow, veh/h	1541	1758	95	1781	1764	90	958	62	680	1245	564	1372
Grp Volume(v), veh/h	138	0	741	9	0	391	55	0	0	77	0	199
Grp Sat Flow(s),veh/h/ln	1541	0	1853	1781	0	1854	1700	0	0	1808	0	1372
Q Serve(g_s), s	6.9	0.0	0.0	0.4	0.0	1.2	2.4	0.0	0.0	3.1	0.0	10.0
Cycle Q Clear(g_c), s	6.9	0.0	0.0	0.4	0.0	1.2	2.4	0.0	0.0	3.1	0.0	10.0
Prop In Lane	1.00		0.05	1.00		0.05	0.56		0.40	0.69		1.00
Lane Grp Cap(c), veh/h	165	0	1058	28	0	889	150	0	0	226	0	171
V/C Ratio(X)	0.83	0.00	0.70	0.32	0.00	0.44	0.37	0.00	0.00	0.34	0.00	1.16
Avail Cap(c_a), veh/h	270	0	1058	156	0	889	234	0	0	226	0	171
HCM Platoon Ratio	2.00	2.00	2.00	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.76	0.00	0.76	0.96	0.00	0.96	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	30.7	0.0	0.0	38.3	0.0	0.9	34.4	0.0	0.0	32.0	0.0	35.0
Incr Delay (d2), s/veh	8.8	0.0	3.0	6.1	0.0	1.5	1.5	0.0	0.0	0.9	0.0	118.6
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.6	0.0	0.9	0.2	0.0	0.6	1.0	0.0	0.0	1.4	0.0	8.8
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	39.5	0.0	3.0	44.4	0.0	2.4	35.9	0.0	0.0	32.9	0.0	153.6
LnGrp LOS	D		A	D		A	D			C		F
Approach Vol, veh/h		879			400			55			276	
Approach Delay, s/veh		8.7			3.3			35.9			119.9	
Approach LOS		A			A			D			F	

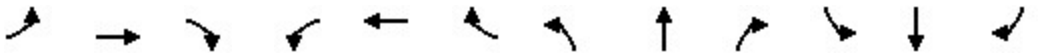
Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		11.1	5.3	49.7		14.0	12.6	42.4				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		11.0	7.0	36.0		10.0	14.0	29.0				
Max Q Clear Time (g_c+I1), s		4.4	2.4	2.0		12.0	8.9	3.2				
Green Ext Time (p_c), s		0.1	0.0	6.3		0.0	0.1	2.2				

Intersection Summary												
HCM 6th Ctrl Delay, s/veh			27.4									
HCM 6th LOS			C									

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Volume (veh/h)	344	291	131	370	232	31
Future Volume (veh/h)	344	291	131	370	232	31
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1618	1870	1870	1618	1870
Adj Flow Rate, veh/h	362	306	138	389	244	33
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	19	2	2	19	2
Cap, veh/h	553	467	171	1366	278	286
Arrive On Green	1.00	1.00	0.10	0.73	0.18	0.18
Sat Flow, veh/h	936	792	1781	1870	1541	1585
Grp Volume(v), veh/h	0	668	138	389	244	33
Grp Sat Flow(s),veh/h/ln	0	1728	1781	1870	1541	1585
Q Serve(g_s), s	0.0	0.0	6.8	6.4	13.9	1.6
Cycle Q Clear(g_c), s	0.0	0.0	6.8	6.4	13.9	1.6
Prop In Lane		0.46	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	0	1020	171	1366	278	286
V/C Ratio(X)	0.00	0.65	0.81	0.28	0.88	0.12
Avail Cap(c_a), veh/h	0	1020	218	1366	360	370
HCM Platoon Ratio	2.00	2.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.00	0.82	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	0.0	39.9	4.1	35.9	30.9
Incr Delay (d2), s/veh	0.0	2.7	16.1	0.5	17.4	0.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.8	3.6	1.8	6.4	0.6
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	0.0	2.7	56.0	4.6	53.3	31.0
LnGrp LOS		A	E	A	D	C
Approach Vol, veh/h	668			527	277	
Approach Delay, s/veh	2.7			18.1	50.6	
Approach LOS	A			B	D	

Timer - Assigned Phs		2	3	4		8
Phs Duration (G+Y+Rc), s		20.2	12.6	57.1		69.8
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0
Max Green Setting (Gmax), s		21.0	11.0	46.0		61.0
Max Q Clear Time (g_c+I1), s		15.9	8.8	2.0		8.4
Green Ext Time (p_c), s		0.4	0.1	5.0		2.3

Intersection Summary	
HCM 6th Ctrl Delay, s/veh	17.2
HCM 6th LOS	B



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	71	547	15	9	575	38	29	0	31	76	13	447
Future Volume (veh/h)	71	547	15	9	575	38	29	0	31	76	13	447
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	75	576	16	9	605	40	31	0	33	80	14	471
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	91	873	24	20	753	50	50	0	54	407	71	366
Arrive On Green	0.12	0.96	0.96	0.02	0.87	0.87	0.06	0.00	0.06	0.27	0.27	0.27
Sat Flow, veh/h	1541	1811	50	1781	1735	115	811	0	863	1527	267	1372
Grp Volume(v), veh/h	75	0	592	9	0	645	64	0	0	94	0	471
Grp Sat Flow(s),veh/h/ln	1541	0	1861	1781	0	1849	1674	0	0	1794	0	1372
Q Serve(g_s), s	4.3	0.0	2.8	0.4	0.0	13.6	3.4	0.0	0.0	3.6	0.0	24.0
Cycle Q Clear(g_c), s	4.3	0.0	2.8	0.4	0.0	13.6	3.4	0.0	0.0	3.6	0.0	24.0
Prop In Lane	1.00		0.03	1.00		0.06	0.48		0.52	0.85		1.00
Lane Grp Cap(c), veh/h	91	0	898	20	0	803	104	0	0	478	0	366
V/C Ratio(X)	0.82	0.00	0.66	0.45	0.00	0.80	0.62	0.00	0.00	0.20	0.00	1.29
Avail Cap(c_a), veh/h	120	0	898	99	0	803	130	0	0	478	0	366
HCM Platoon Ratio	2.00	2.00	2.00	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.75	0.00	0.75	0.87	0.00	0.87	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	39.2	0.0	0.9	43.7	0.0	4.2	41.2	0.0	0.0	25.5	0.0	33.0
Incr Delay (d2), s/veh	22.2	0.0	2.9	13.3	0.0	7.3	5.8	0.0	0.0	0.2	0.0	148.7
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.1	0.0	1.1	0.3	0.0	3.4	1.5	0.0	0.0	1.6	0.0	22.5
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	61.4	0.0	3.7	57.0	0.0	11.6	47.0	0.0	0.0	25.7	0.0	181.7
LnGrp LOS	E		A	E		B	D			C		F
Approach Vol, veh/h		667			654			64			565	
Approach Delay, s/veh		10.2			12.2			47.0			155.7	
Approach LOS		B			B			D			F	

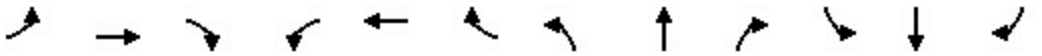
Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		9.6	5.0	47.4		28.0	9.3	43.1				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		7.0	5.0	38.0		24.0	7.0	36.0				
Max Q Clear Time (g_c+I1), s		5.4	2.4	4.8		26.0	6.3	15.6				
Green Ext Time (p_c), s		0.0	0.0	4.5		0.0	0.0	3.9				

Intersection Summary												
HCM 6th Ctrl Delay, s/veh			54.3									
HCM 6th LOS			D									

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Volume (veh/h)	425	451	134	278	169	32
Future Volume (veh/h)	425	451	134	278	169	32
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1618	1870	1870	1618	1870
Adj Flow Rate, veh/h	447	475	141	293	178	34
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	19	2	2	19	2
Cap, veh/h	519	552	156	1428	210	216
Arrive On Green	1.00	1.00	0.09	0.76	0.14	0.14
Sat Flow, veh/h	830	882	1781	1870	1541	1585
Grp Volume(v), veh/h	0	922	141	293	178	34
Grp Sat Flow(s),veh/h/ln	0	1712	1781	1870	1541	1585
Q Serve(g_s), s	0.0	0.0	6.3	3.5	9.0	1.5
Cycle Q Clear(g_c), s	0.0	0.0	6.3	3.5	9.0	1.5
Prop In Lane		0.52	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	0	1071	156	1428	210	216
V/C Ratio(X)	0.00	0.86	0.90	0.21	0.85	0.16
Avail Cap(c_a), veh/h	0	1071	156	1428	212	218
HCM Platoon Ratio	1.67	1.67	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.00	0.54	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	0.0	36.2	2.7	33.7	30.5
Incr Delay (d2), s/veh	0.0	5.2	45.3	0.3	25.7	0.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	1.5	4.5	0.7	4.8	0.6
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	0.0	5.2	81.5	3.0	59.4	30.8
LnGrp LOS		A	F	A	E	C
Approach Vol, veh/h	922			434	212	
Approach Delay, s/veh	5.2			28.5	54.8	
Approach LOS	A			C	D	

Timer - Assigned Phs	2	3	4	8
Phs Duration (G+Y+Rc), s	14.9	11.0	54.1	65.1
Change Period (Y+Rc), s	4.0	4.0	4.0	4.0
Max Green Setting (Gmax), s	11.0	7.0	50.0	61.0
Max Q Clear Time (g_c+I1), s	11.0	8.3	2.0	5.5
Green Ext Time (p_c), s	0.0	0.0	8.9	1.7

Intersection Summary	
HCM 6th Ctrl Delay, s/veh	18.3
HCM 6th LOS	B



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	149	787	38	9	433	21	32	2	22	62	23	221
Future Volume (veh/h)	149	787	38	9	433	21	32	2	22	62	23	221
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	157	828	40	9	456	22	34	2	23	65	24	233
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	187	1005	49	28	819	39	90	5	61	165	61	171
Arrive On Green	0.16	0.76	0.76	0.03	0.93	0.93	0.09	0.09	0.09	0.13	0.13	0.13
Sat Flow, veh/h	1541	1769	85	1781	1769	85	981	58	663	1318	487	1372
Grp Volume(v), veh/h	157	0	868	9	0	478	59	0	0	89	0	233
Grp Sat Flow(s),veh/h/ln	1541	0	1855	1781	0	1855	1702	0	0	1804	0	1372
Q Serve(g_s), s	7.9	0.0	24.3	0.4	0.0	3.2	2.6	0.0	0.0	3.6	0.0	10.0
Cycle Q Clear(g_c), s	7.9	0.0	24.3	0.4	0.0	3.2	2.6	0.0	0.0	3.6	0.0	10.0
Prop In Lane	1.00		0.05	1.00		0.05	0.58		0.39	0.73		1.00
Lane Grp Cap(c), veh/h	187	0	1053	28	0	858	155	0	0	226	0	171
V/C Ratio(X)	0.84	0.00	0.82	0.32	0.00	0.56	0.38	0.00	0.00	0.39	0.00	1.36
Avail Cap(c_a), veh/h	231	0	1053	156	0	858	213	0	0	226	0	171
HCM Platoon Ratio	1.33	1.33	1.33	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.66	0.00	0.66	0.89	0.00	0.89	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	32.8	0.0	7.2	38.3	0.0	1.7	34.2	0.0	0.0	32.2	0.0	35.0
Incr Delay (d2), s/veh	14.0	0.0	5.0	5.6	0.0	2.3	1.5	0.0	0.0	1.1	0.0	194.6
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.5	0.0	5.9	0.2	0.0	1.1	1.1	0.0	0.0	1.6	0.0	12.4
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	46.8	0.0	12.2	43.9	0.0	4.0	35.7	0.0	0.0	33.3	0.0	229.6
LnGrp LOS	D		B	D		A	D			C		F
Approach Vol, veh/h		1025			487			59			322	
Approach Delay, s/veh		17.5			4.8			35.7			175.3	
Approach LOS		B			A			D			F	

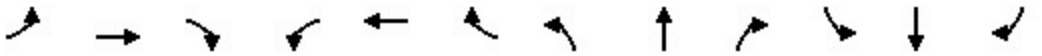
Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		11.3	5.3	49.4		14.0	13.7	41.0				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		10.0	7.0	37.0		10.0	12.0	32.0				
Max Q Clear Time (g_c+I1), s		4.6	2.4	26.3		12.0	9.9	5.2				
Green Ext Time (p_c), s		0.1	0.0	4.8		0.0	0.1	2.8				

Intersection Summary												
HCM 6th Ctrl Delay, s/veh			41.6									
HCM 6th LOS			D									

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Volume (veh/h)	346	296	131	378	239	31
Future Volume (veh/h)	346	296	131	378	239	31
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1618	1870	1870	1618	1870
Adj Flow Rate, veh/h	364	312	138	398	252	33
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	19	2	2	19	2
Cap, veh/h	545	467	170	1357	286	294
Arrive On Green	1.00	1.00	0.10	0.73	0.19	0.19
Sat Flow, veh/h	930	797	1781	1870	1541	1585
Grp Volume(v), veh/h	0	676	138	398	252	33
Grp Sat Flow(s),veh/h/ln	0	1727	1781	1870	1541	1585
Q Serve(g_s), s	0.0	0.0	6.8	6.7	14.3	1.6
Cycle Q Clear(g_c), s	0.0	0.0	6.8	6.7	14.3	1.6
Prop In Lane		0.46	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	0	1011	170	1357	286	294
V/C Ratio(X)	0.00	0.67	0.81	0.29	0.88	0.11
Avail Cap(c_a), veh/h	0	1011	198	1357	360	370
HCM Platoon Ratio	2.00	2.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.00	0.80	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	0.0	39.9	4.3	35.7	30.5
Incr Delay (d2), s/veh	0.0	2.8	19.5	0.5	18.4	0.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.8	3.8	1.9	6.7	0.6
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	0.0	2.8	59.4	4.9	54.1	30.7
LnGrp LOS		A	E	A	D	C
Approach Vol, veh/h	676			536	285	
Approach Delay, s/veh	2.8			18.9	51.4	
Approach LOS	A			B	D	

Timer - Assigned Phs	2	3	4	8
Phs Duration (G+Y+Rc), s	20.7	12.6	56.7	69.3
Change Period (Y+Rc), s	4.0	4.0	4.0	4.0
Max Green Setting (Gmax), s	21.0	10.0	47.0	61.0
Max Q Clear Time (g_c+I1), s	16.3	8.8	2.0	8.7
Green Ext Time (p_c), s	0.4	0.0	5.1	2.4

Intersection Summary	
HCM 6th Ctrl Delay, s/veh	17.8
HCM 6th LOS	B



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	73	553	16	9	590	38	30	0	31	76	13	465
Future Volume (veh/h)	73	553	16	9	590	38	30	0	31	76	13	465
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	77	582	17	9	621	40	32	0	33	80	14	489
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	93	851	25	20	732	47	52	0	53	424	74	381
Arrive On Green	0.12	0.94	0.94	0.02	0.84	0.84	0.06	0.00	0.06	0.28	0.28	0.28
Sat Flow, veh/h	1541	1808	53	1781	1738	112	825	0	851	1527	267	1372
Grp Volume(v), veh/h	77	0	599	9	0	661	65	0	0	94	0	489
Grp Sat Flow(s),veh/h/ln	1541	0	1861	1781	0	1850	1676	0	0	1794	0	1372
Q Serve(g_s), s	4.4	0.0	4.8	0.4	0.0	17.7	3.4	0.0	0.0	3.6	0.0	25.0
Cycle Q Clear(g_c), s	4.4	0.0	4.8	0.4	0.0	17.7	3.4	0.0	0.0	3.6	0.0	25.0
Prop In Lane	1.00		0.03	1.00		0.06	0.49		0.51	0.85		1.00
Lane Grp Cap(c), veh/h	93	0	876	20	0	779	105	0	0	498	0	381
V/C Ratio(X)	0.82	0.00	0.68	0.45	0.00	0.85	0.62	0.00	0.00	0.19	0.00	1.28
Avail Cap(c_a), veh/h	103	0	876	99	0	779	130	0	0	498	0	381
HCM Platoon Ratio	2.00	2.00	2.00	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.68	0.00	0.68	0.86	0.00	0.86	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	39.1	0.0	1.5	43.7	0.0	5.5	41.1	0.0	0.0	24.8	0.0	32.5
Incr Delay (d2), s/veh	27.6	0.0	3.0	13.1	0.0	9.7	5.9	0.0	0.0	0.2	0.0	146.2
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.3	0.0	1.4	0.3	0.0	4.3	1.5	0.0	0.0	1.5	0.0	23.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	66.7	0.0	4.5	56.8	0.0	15.2	47.0	0.0	0.0	25.0	0.0	178.7
LnGrp LOS	E		A	E		B	D			C		F
Approach Vol, veh/h		676			670			65			583	
Approach Delay, s/veh		11.6			15.8			47.0			153.9	
Approach LOS		B			B			D			F	

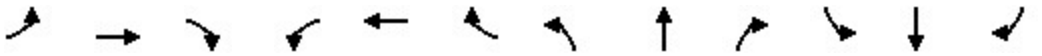
Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		9.6	5.0	46.4		29.0	9.5	41.9				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		7.0	5.0	37.0		25.0	6.0	36.0				
Max Q Clear Time (g_c+I1), s		5.4	2.4	6.8		27.0	6.4	19.7				
Green Ext Time (p_c), s		0.0	0.0	4.5		0.0	0.0	3.7				

Intersection Summary												
HCM 6th Ctrl Delay, s/veh			55.8									
HCM 6th LOS			E									

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Volume (veh/h)	433	468	134	280	172	32
Future Volume (veh/h)	433	468	134	280	172	32
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1870	1618	1870	1870	1618	1870
Adj Flow Rate, veh/h	456	493	141	295	181	34
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	19	2	2	19	2
Cap, veh/h	514	555	156	1426	212	218
Arrive On Green	1.00	1.00	0.09	0.76	0.14	0.14
Sat Flow, veh/h	822	889	1781	1870	1541	1585
Grp Volume(v), veh/h	0	949	141	295	181	34
Grp Sat Flow(s),veh/h/ln	0	1710	1781	1870	1541	1585
Q Serve(g_s), s	0.0	0.0	6.3	3.6	9.2	1.5
Cycle Q Clear(g_c), s	0.0	0.0	6.3	3.6	9.2	1.5
Prop In Lane		0.52	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	0	1069	156	1426	212	218
V/C Ratio(X)	0.00	0.89	0.90	0.21	0.85	0.16
Avail Cap(c_a), veh/h	0	1069	156	1426	212	218
HCM Platoon Ratio	1.67	1.67	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.00	0.50	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	0.0	0.0	36.2	2.7	33.7	30.4
Incr Delay (d2), s/veh	0.0	6.0	45.3	0.3	27.1	0.3
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	1.8	4.5	0.7	4.9	0.6
Unsig. Movement Delay, s/veh						
LnGrp Delay(d), s/veh	0.0	6.0	81.5	3.0	60.8	30.7
LnGrp LOS		A	F	A	E	C
Approach Vol, veh/h	949			436	215	
Approach Delay, s/veh	6.0			28.4	56.1	
Approach LOS	A			C	E	

Timer - Assigned Phs	2	3	4		8
Phs Duration (G+Y+Rc), s	15.0	11.0	54.0		65.0
Change Period (Y+Rc), s	4.0	4.0	4.0		4.0
Max Green Setting (Gmax), s	11.0	7.0	50.0		61.0
Max Q Clear Time (g_c+I1), s	11.2	8.3	2.0		5.6
Green Ext Time (p_c), s	0.0	0.0	9.4		1.7

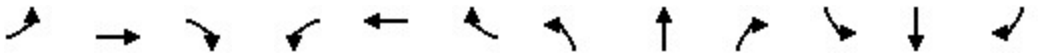
Intersection Summary	
HCM 6th Ctrl Delay, s/veh	18.8
HCM 6th LOS	B



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	156	811	39	9	438	21	32	2	22	62	23	226
Future Volume (veh/h)	156	811	39	9	438	21	32	2	22	62	23	226
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	164	854	41	9	461	22	34	2	23	65	24	238
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	194	1005	48	28	811	39	90	5	61	165	61	171
Arrive On Green	0.17	0.76	0.76	0.03	0.92	0.92	0.09	0.09	0.09	0.13	0.13	0.13
Sat Flow, veh/h	1541	1770	85	1781	1770	84	981	58	663	1318	487	1372
Grp Volume(v), veh/h	164	0	895	9	0	483	59	0	0	89	0	238
Grp Sat Flow(s),veh/h/ln	1541	0	1855	1781	0	1855	1702	0	0	1804	0	1372
Q Serve(g_s), s	8.3	0.0	26.4	0.4	0.0	3.7	2.6	0.0	0.0	3.6	0.0	10.0
Cycle Q Clear(g_c), s	8.3	0.0	26.4	0.4	0.0	3.7	2.6	0.0	0.0	3.6	0.0	10.0
Prop In Lane	1.00		0.05	1.00		0.05	0.58		0.39	0.73		1.00
Lane Grp Cap(c), veh/h	194	0	1053	28	0	849	155	0	0	226	0	171
V/C Ratio(X)	0.85	0.00	0.85	0.32	0.00	0.57	0.38	0.00	0.00	0.39	0.00	1.39
Avail Cap(c_a), veh/h	231	0	1053	156	0	849	213	0	0	226	0	171
HCM Platoon Ratio	1.33	1.33	1.33	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.62	0.00	0.62	0.89	0.00	0.89	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	32.6	0.0	7.5	38.3	0.0	2.0	34.2	0.0	0.0	32.2	0.0	35.0
Incr Delay (d2), s/veh	14.3	0.0	5.5	5.6	0.0	2.5	1.5	0.0	0.0	1.1	0.0	206.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.6	0.0	6.3	0.2	0.0	1.2	1.1	0.0	0.0	1.6	0.0	12.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	46.8	0.0	13.0	43.9	0.0	4.4	35.7	0.0	0.0	33.3	0.0	241.5
LnGrp LOS	D		B	D		A	D			C		F
Approach Vol, veh/h		1059			492			59			327	
Approach Delay, s/veh		18.2			5.2			35.7			184.8	
Approach LOS		B			A			D			F	

Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		11.3	5.3	49.4		14.0	14.1	40.6				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		10.0	7.0	37.0		10.0	12.0	32.0				
Max Q Clear Time (g_c+I1), s		4.6	2.4	28.4		12.0	10.3	5.7				
Green Ext Time (p_c), s		0.1	0.0	4.3		0.0	0.1	2.8				

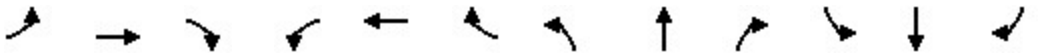
Intersection Summary												
HCM 6th Ctrl Delay, s/veh			43.6									
HCM 6th LOS			D									



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	73	553	16	9	590	38	30	0	31	76	13	465
Future Volume (veh/h)	73	553	16	9	590	38	30	0	31	76	13	465
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	77	582	17	9	621	40	32	0	33	80	14	489
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	99	852	25	28	735	47	50	0	51	101	532	390
Arrive On Green	0.13	0.94	0.94	0.03	0.85	0.85	0.06	0.00	0.06	0.28	0.28	0.28
Sat Flow, veh/h	1541	1808	53	1781	1738	112	825	0	851	356	1870	1372
Grp Volume(v), veh/h	77	0	599	9	0	661	65	0	0	80	14	489
Grp Sat Flow(s),veh/h/ln	1541	0	1861	1781	0	1850	1676	0	0	356	1870	1372
Q Serve(g_s), s	4.6	0.0	4.9	0.5	0.0	18.3	3.6	0.0	0.0	19.7	0.5	27.0
Cycle Q Clear(g_c), s	4.6	0.0	4.9	0.5	0.0	18.3	3.6	0.0	0.0	19.7	0.5	27.0
Prop In Lane	1.00		0.03	1.00		0.06	0.49		0.51	1.00		1.00
Lane Grp Cap(c), veh/h	99	0	877	28	0	782	101	0	0	101	532	390
V/C Ratio(X)	0.78	0.00	0.68	0.32	0.00	0.84	0.64	0.00	0.00	0.79	0.03	1.25
Avail Cap(c_a), veh/h	114	0	877	131	0	782	123	0	0	101	532	390
HCM Platoon Ratio	2.00	2.00	2.00	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.69	0.00	0.69	0.86	0.00	0.86	1.00	0.00	0.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	40.8	0.0	1.6	45.5	0.0	5.6	43.6	0.0	0.0	31.4	24.5	34.0
Incr Delay (d2), s/veh	18.6	0.0	3.0	5.7	0.0	9.5	7.8	0.0	0.0	33.2	0.0	134.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.2	0.0	1.5	0.2	0.0	4.3	1.7	0.0	0.0	2.6	0.2	22.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	59.4	0.0	4.6	51.2	0.0	15.1	51.4	0.0	0.0	64.6	24.5	168.0
LnGrp LOS	E		A	D		B	D			E	C	F
Approach Vol, veh/h		676			670			65			583	
Approach Delay, s/veh		10.8			15.6			51.4			150.3	
Approach LOS		B			B			D			F	

Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		9.7	5.5	48.8		31.0	10.1	44.2				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		7.0	7.0	38.0		27.0	7.0	38.0				
Max Q Clear Time (g_c+I1), s		5.6	2.5	6.9		29.0	6.6	20.3				
Green Ext Time (p_c), s		0.0	0.0	4.5		0.0	0.0	3.9				

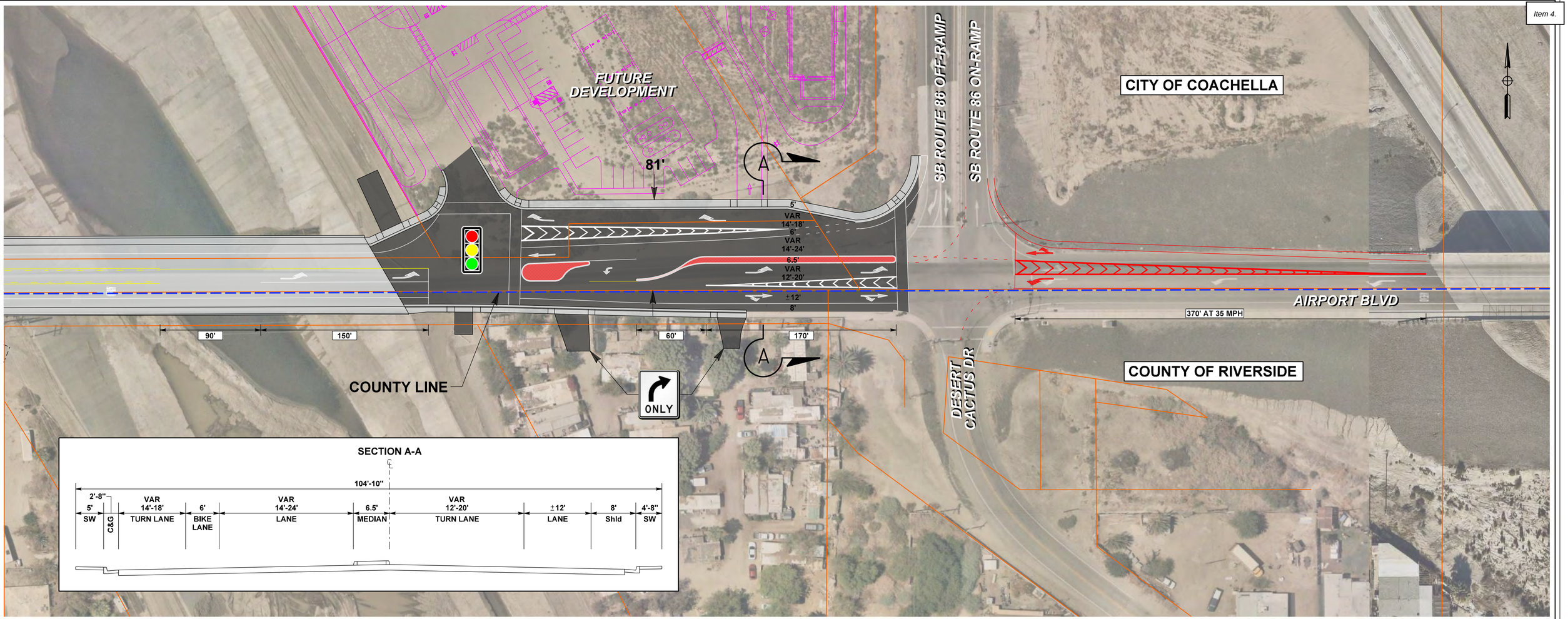
Intersection Summary												
HCM 6th Ctrl Delay, s/veh			54.5									
HCM 6th LOS			D									



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	156	811	39	9	438	21	32	2	22	62	23	226
Future Volume (veh/h)	156	811	39	9	438	21	32	2	22	62	23	226
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1618	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1618
Adj Flow Rate, veh/h	164	854	41	9	461	22	34	2	23	65	24	238
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	19	2	2	2	2	2	2	2	2	2	2	19
Cap, veh/h	194	940	45	28	745	36	87	5	59	63	330	242
Arrive On Green	0.13	0.53	0.53	0.03	0.84	0.84	0.09	0.09	0.09	0.18	0.18	0.18
Sat Flow, veh/h	1541	1770	85	1781	1770	84	981	58	663	356	1870	1372
Grp Volume(v), veh/h	164	0	895	9	0	483	59	0	0	65	24	238
Grp Sat Flow(s),veh/h/ln	1541	0	1855	1781	0	1855	1702	0	0	356	1870	1372
Q Serve(g_s), s	8.8	0.0	37.2	0.4	0.0	7.3	2.8	0.0	0.0	15.0	0.9	14.7
Cycle Q Clear(g_c), s	8.8	0.0	37.2	0.4	0.0	7.3	2.8	0.0	0.0	15.0	0.9	14.7
Prop In Lane	1.00		0.05	1.00		0.05	0.58		0.39	1.00		1.00
Lane Grp Cap(c), veh/h	194	0	985	28	0	781	151	0	0	63	330	242
V/C Ratio(X)	0.84	0.00	0.91	0.32	0.00	0.62	0.39	0.00	0.00	1.03	0.07	0.98
Avail Cap(c_a), veh/h	236	0	985	147	0	781	200	0	0	63	330	242
HCM Platoon Ratio	1.00	1.00	1.00	2.00	2.00	2.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.62	0.00	0.62	0.89	0.00	0.89	1.00	0.00	0.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	36.3	0.0	18.1	40.7	0.0	4.5	36.6	0.0	0.0	35.0	29.2	34.9
Incr Delay (d2), s/veh	13.7	0.0	9.2	5.7	0.0	3.3	1.7	0.0	0.0	123.3	0.1	53.0
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.0	0.0	16.7	0.2	0.0	2.1	1.2	0.0	0.0	3.4	0.4	8.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	50.0	0.0	27.3	46.4	0.0	7.7	38.2	0.0	0.0	158.3	29.3	87.9
LnGrp LOS	D		C	D		A	D			F	C	F
Approach Vol, veh/h		1059			492			59			327	
Approach Delay, s/veh		30.8			8.4			38.2			97.6	
Approach LOS		C			A			D			F	

Timer - Assigned Phs		2	3	4		6	7	8				
Phs Duration (G+Y+Rc), s		11.5	5.3	49.1		19.0	14.7	39.8				
Change Period (Y+Rc), s		4.0	4.0	4.0		4.0	4.0	4.0				
Max Green Setting (Gmax), s		10.0	7.0	37.0		15.0	13.0	31.0				
Max Q Clear Time (g_c+I1), s		4.8	2.4	39.2		17.0	10.8	9.3				
Green Ext Time (p_c), s		0.1	0.0	0.0		0.0	0.1	2.7				

Intersection Summary												
HCM 6th Ctrl Delay, s/veh			36.6									
HCM 6th LOS			D									



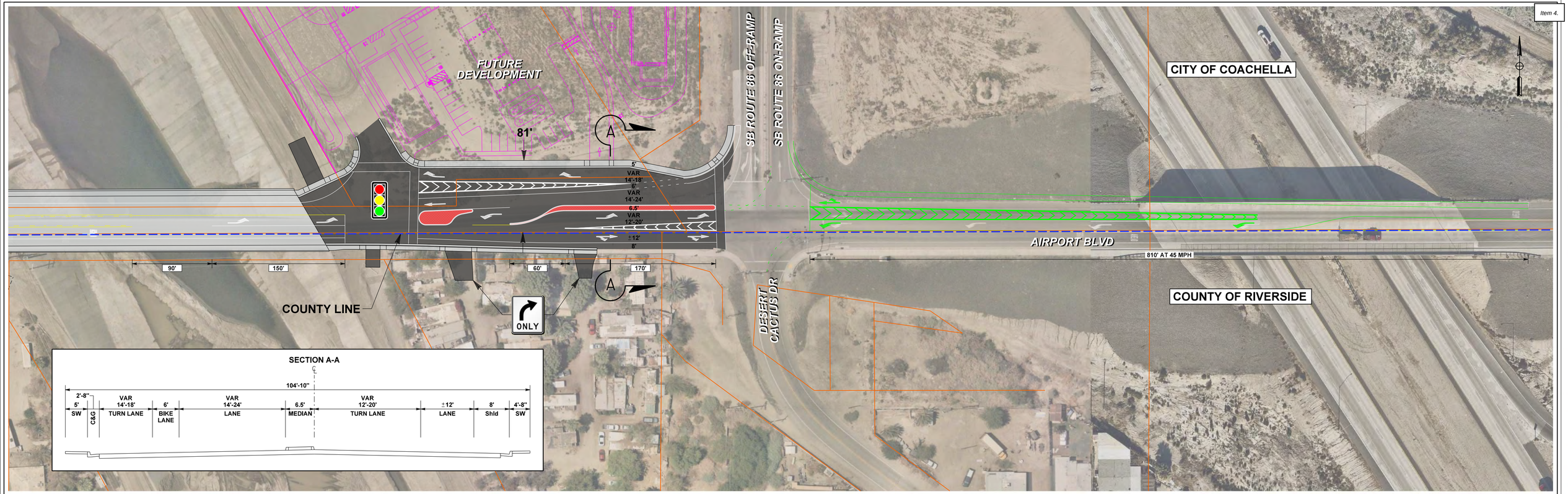
DOKKEN ENGINEERING
110 BLUE RAVINE ROAD
SUITE 200
FOLSOM, CA 95630
(916) 858-0642

REPLACEMENT OF THE AIRPORT BOULEVARD BRIDGE OVER WHITEWATER RIVER PROJECT

PRELIMINARY PROJECT OVERVIEW
INTERIM STRIPING

NO SCALE

SEPTEMBER 2



DOKKEN ENGINEERING
110 BLUE RAVINE ROAD
SUITE 200
FOLSOM, CA 95630
(916) 858-0642

REPLACEMENT OF THE AIRPORT BOULEVARD BRIDGE OVER WHITEWATER RIVER PROJECT

PRELIMINARY PROJECT OVERVIEW
INTERIM STRIPING

NO SCALE

SEPTEMBER 2

CITY/BBK MARK-UP
SUBJECT TO REVISION
FEBRUARY 26, 2026

RECORDING REQUESTED BY AND

WHEN RECORDED MAIL TO:

FOR RECORDER'S USE ONLY

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DEVELOPMENT AGREEMENT

BETWEEN

THE CITY OF COACHELLA

AND

EMPIRE AIRPORT, LLC

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Appendix I Defined Terms

DEVELOPMENT AGREEMENT
BETWEEN THE CITY OF COACHELLA
AND
EMPIRE AIRPORT, LLC

THIS DEVELOPMENT AGREEMENT ("**Agreement**") dated for reference purposes only as of _____, 2026, and effective as of the Effective Date, is by and between the **City of Coachella**, a California municipal corporation ("**City**"), and **Empire Airport, LLC**, a California limited liability company ("**Developer**") pursuant to the authority of Sections 65864 *et seq.* of the California Government Code. City and Developer are also sometimes referred to individually as a "**Party**" and together as the "**Parties**." An index of all capitalized defined terms is included at the end of this document.

RECITALS

This Agreement is entered upon the basis of the following facts, understandings and intentions of City and Developer.

A. In order to strengthen the public planning process, encourage private participation in comprehensive planning, and reduce the economic costs and risk of development, the Legislature of the State of California enacted Section 65864 *et seq*. of the Government Code (the "**Development Agreement Statute**"), which authorizes the City and a developer having a legal or equitable interest in real property to enter into a binding development agreement, establishing certain development rights in the property.

B. Developer is the owner of that certain real property located in the City of Coachella, County of Riverside, California and legally described on **Exhibit A** attached hereto and incorporated herein, (the "**Property**" or "**Project Site**"). The rights and obligations of Developer under this Agreement shall attach to all property currently owned by Developer, as described on Exhibit A, upon recordation of this Agreement. The Project Site is located at the northwest corner of the intersection of State Route 86 and Airport Boulevard in the City and is comprised of four parcels totaling approximately 47.96 acres in size. The Assessor's Parcel Numbers (APNs) for the Project Site are 763-330-013, 763-330-018, 763-330-029, and a portion of Cal Trans Deed DDB 25983-01-01.

C. The overall Project Site will include 42.36 acres of industrial uses with a 5.6-acre site for an Imperial Irrigation District ("**IID**") substation located at the northern end of the Project Site. Developer intends to develop the Property with a mixed-use business park, including warehouse space, small businesses, self-storage units and personal vehicle storage, a small retail and restaurant development, a billboard sign, a fuel station and convenience store, as well as associated landscaping, parking, and signage (the "**Project**") as depicted in **Exhibit B**. The Project is more fully described in, and subject to, (i) this Agreement, (ii) the Change of Zone No. 20-01from M-H (Heavy Industrial) to MS (Manufacturing Services) and C-G (General Commercial) approved by the City Council on _____ by Resolution No. _____, (iii) the Environmental Impact Report prepared for the Project, approved and certified by the City Council on _____ by City Council Resolution No. _____ (the "**Project EIR**"),

(iv) Conditional Use Permit Nos. 324, 325 and 326 approved by the City Council on _____ by City Council Resolution No. _____, (v) Architectural Review No. 20-04 approved by the City Council on _____ by City Council Resolution No. _____, (vi) any future discretionary or ministerial approvals and/or permits issued for the Project (collectively, the "**Project Site Development Permits**"), and (vii) the conditions of approval associated with each and all of the foregoing approvals (collectively, the "**Conditions of Approval**"). The documents, permits, approvals, and conditions described in the foregoing clauses (i) through (vii) are collectively referenced herein as the "**Project Approvals**" or "**Entitlements**."

D. The complexity, magnitude and long-range nature of the Project would be difficult for Developer to undertake if the City had not determined, through this Development Agreement, to inject a sufficient degree of certainty in the land use regulatory process to justify the substantial financial investment associated with development of the Project. As a result of the execution of this Agreement, both Parties can be assured that the Project can proceed without disruption caused by a change in planning and development policies and requirements, which assurance will thereby reduce the actual or perceived risk of planning, financing, and proceeding with construction of the Project.

E. For the reasons recited herein, City and Developer have determined that the Project is a development for which this Development Agreement is appropriate. This Development Agreement will eliminate or reduce uncertainty regarding Project Approvals, thereby encouraging planning for, investment in, and commitment to the use and development of the Property. Development of the Project will in turn provide substantial employment and property and sales tax benefits as well as other public benefits, thereby achieving the goals and purposes for which the Development Agreement Statute was enacted.

F. The City Council has determined that this Agreement is consistent with the City's General Plan, including the goals and objectives thereof.

G. All actions taken by the City in connection with approving this Agreement have been duly taken in accordance with all applicable legal requirements, including the California Environmental Quality Act (*Public Resources Code* Section 21000, et seq.) ("**CEQA**"), and all other requirements for notice, public hearings, findings, votes and procedural matters. In connection therewith, the City Council has found and determined that this Agreement is consistent with and part of the Project Approvals and that all potentially significant environmental effects of those Project Approvals, as well as feasible measures to mitigate those effects to the maximum extent feasible, have been analyzed, disclosed and mitigated as set forth in the Project EIR.

H. On _____, 2026, the City Council adopted its Ordinance No.___ approving this Agreement.

NOW, THEREFORE, in consideration of the foregoing recitals of fact and the mutual covenants and promises set forth herein, the City and Developer hereby agree as follows:

AGREEMENT

ARTICLE 1
GENERAL PROVISIONS

1.1 **Incorporation of Preamble, Recitals, and Exhibits**. The preamble paragraph, Recitals, Exhibits, and any Appendices, and all defined terms contained therein, are hereby incorporated into this Agreement by this reference as if set forth in full.

1.2 **Definitions**. The capitalized terms used in this Agreement shall have the meanings set forth in **Appendix I** attached hereto and otherwise as defined in the body of this Agreement.

1.3 **Term**.

1.3.1 **Effective Date**. This Agreement shall become effective upon the later of (i) the date of execution of this Agreement by both Parties, and (ii) the effective date of Ordinance No. _____ approving this Agreement (the "**Effective Date**"). Notwithstanding the foregoing or any provision of this Agreement to the contrary, if after all appeals or time to appeal have been exhausted, a court of competent jurisdiction enters a final judgment or issuance of a final order directed to the City to set aside, withdraw, or abrogate the approval of this Agreement, then this Agreement shall be deemed to have no force or effect upon either Party.

1.3.2 **Term of Agreement**. The term of this Agreement shall commence upon the Effective Date and shall continue in full force and effect thereafter for a period of ten (10) years **(**the "**Initial Term**"**)** unless extended pursuant to the mutual agreement of the Parties or earlier terminated as provided elsewhere in this Agreement. The term of this Agreement shall be extended from the end of the Initial Term for an additional period of ten (10) years, so long as Developer has commenced minimum improvements, including but not limited to the receipt of permits and commencement of construction for site grading for Phase 1 infrastructure improvements ("**Minimum Improvements**") for the Project during the Initial Term **("Additional Term")**. The Initial Term and the Additional Term are collectively referred to as the "**Term**". The Term has been established by the Parties in order to provide ample time to develop the Project and obtain the community benefits of the Project.

ARTICLE 2
APPLICABLE LAW

2.1 **Applicable Rules**. Except as otherwise expressly provided in this Agreement, during the Term, the Project Approvals, including any future applications for discretionary or ministerial approvals and/or permits necessary or convenient for implementation of the Project (collectively, "**Subsequent Approvals")** shall be processed, considered, reviewed, and acted upon in accordance with the rules, regulations, ordinances, and officially adopted policies of the City in full force and effect as of the Effective Date of this Agreement (collectively, the "**Applicable Rules**").

2.2 **Future Changes to Applicable Rules**.

2.2.1 To the extent any changes in the Applicable Rules, or any provisions of future general plans, specific plans, zoning ordinances, or other rules, regulations, ordinances or policies (whether adopted by means of ordinance, initiative, referenda, resolution, policy, order, moratorium, or other means) of the City (collectively, "**Future Changes to the Applicable Rules**") are not in conflict with the Vested Elements (as defined in Section 3.2 below), such Future Changes to the Applicable Rules shall be applicable to the Project.

2.2.2 Future Changes to the Applicable Rules shall be deemed to be in "conflict" with the Vested Elements if any one of the following would occur:

2.2.2.1 Alter or change any land use, including permitted or conditional uses, of the Project Site from that permitted under this Agreement and the Applicable Rules.

2.2.2.2 Limit or reduce the height or bulk of the Project, or any portion thereof, or otherwise require any reduction in the height or bulk of individual proposed buildings or other improvements from that permitted under this Agreement and the Applicable Rules.

2.2.2.3 Limit or reduce the density or intensity of the Project, or any portion thereof, or otherwise require any reduction in the square footage or number of proposed buildings, parking or loading spaces, or other improvements from that permitted under this Agreement and the Applicable Rules.

2.2.2.4 Except as otherwise provided in this Agreement, in any manner unreasonably control, delay, or limit the rate, timing, phasing, or sequencing of the approval, development, or construction of all or part of the Project.

2.2.2.5 Increase any Development Fees, except as expressly permitted by this Agreement.

2.2.2.6 Except as otherwise provided in this Agreement, materially increase (by an amount greater than 15%) the cost of performance of, or preclude compliance with, any provision of the Project Approvals.

2.2.2.7 Conflict with or materially increase the obligations of Developer under this Agreement.

2.2.2.8 Adversely affect in any material respect the rights of Developer under this Agreement.

2.2.2.9 Except as otherwise provided in this Agreement, limit or restrict the availability of public utilities, services, infrastructure, or facilities (for example, without limitation, water rights, water connection or sewage capacity rights, sewer connections, etc.) to the Project.

2.2.2.10 Except as expressly provided herein, impose limits or controls in the rate, timing, phasing, or sequencing of development of the Project beyond those existing on the Effective Date.

2.2.2.11 Limit or control the location of buildings, structures, grading, or other improvements of the Project inconsistently with or more restrictively than limitations included in the Project Approvals.

2.2.2.12 Apply to the Project any Future Changes to the Applicable Rules otherwise allowed by this Agreement that are not uniformly applied to all substantially similar types of development projects and project sites under the City's jurisdiction.

2.2.2.13 Require the issuance of additional permits or approvals by the City other than those required by the Applicable Rules.

2.2.2.14 Establish, enact, increase, or impose against the Project or Property any fees, assessments, or other monetary obligations other than those specifically permitted by this Agreement; provided, however, that the foregoing shall not prevent or limit the imposition or collection of any generally applicable real or personal property taxes with respect to the Property or any generally applicable sales, use, excise taxes, or business license fees with respect to any commercial uses within the Project.

2.2.2.15 Impose against the Project any condition, dedication, or other exaction not specifically authorized by the Project Approvals, the Applicable Rules, or this Agreement.

2.2.2.16 Subject to Section 2.7, limit the processing of applications and approvals of Subsequent Approvals, including without limitation Future Changes to the Applicable Rules that require additional processing of such applications and approvals of Subsequent Approvals.

2.2.3 To the extent that Future Changes to the Applicable Rules conflict with the Vested Elements, they shall not apply to the Project and the Vested Elements shall apply to the Project, except as provided in this Section 2.2.3 and in Sections 2.3 through 2.6, inclusive. A Future Change in the Applicable Rules that conflicts with the Vested Elements shall nonetheless apply to the Property and the Project if, and only if (i) consented to in writing by Developer in its sole and absolute discretion; (ii) it is determined by the City, and evidenced through express findings, that the change or provision is reasonably required in order to prevent a condition dangerous to the public health or safety as set forth in Section 2.4 below; (iii) required by changes in State or Federal law as set forth in Section 2.5 below; (iv) it consists of changes in, or new fees permitted by, Section 4.2.3.2; (v) it consists of revisions to, or new Uniform Code Regulations to the extent permitted by Section 2.3 below; or (vi) it is otherwise expressly permitted by this Agreement. In the event of any of the foregoing, the applicable Future Change to the Applicable Rules shall be deemed to be a part of the Applicable Rules.

2.2.4 Pursuant to Section 65865.4 of the Development Agreement Statute, unless this Agreement is terminated by mutual agreement of the Parties as provided for under Section 8.1, or terminated pursuant to Section 8.2, either Party may enforce this Agreement notwithstanding any Future Changes to the Applicable Rules.

2.3 **Applicability of Uniform Code Regulations**. Notwithstanding any provision herein to the contrary, nothing in this Agreement shall preclude the City from applying to the Project any provisions, requirements, rules, or regulations applicable across the City's jurisdiction that are contained at any time during the Term in the California Building Standards Code, as amended by the City in accordance with the California Health and Safety Code, including requirements of the applicable Building Code, Administrative Code, Energy Code, Residential Code, Mechanical Code, Electrical Code, Plumbing Code, Fire Code, or other applicable construction codes (collectively, "**Uniform Code Regulations**").

2.4 **Public Health and Safety Exception**. The City shall exercise its discretion under this Agreement and the Applicable Rules in a manner which is consistent with the public health, safety, and welfare. Notwithstanding any provision in this Agreement to the contrary, and in addition to application to the Project of Uniform Code Regulations, City shall retain, at all times, its authority to take any legally valid action necessary to protect persons or property from dangerous or hazardous conditions which create a threat to the public health or safety, including, without limitation, authority to condition or deny a permit, approval, or agreement or other entitlement or to change or adopt any new regulations applicable to the Project so long as such condition or denial or new law (i) is limited solely to addressing a specific and identifiable issue in each case required to protect the physical health and safety of the public, and (ii) is based on written findings by City and transmitted to Developer, specifically identifying, based on objective and quantifiable evidence in the official record, the precise nature and extent of the dangerous or hazardous conditions requiring such condition or denial or change in the Applicable Rules, why there are no reasonable alternatives to the imposition of such condition or denial or changes in the law, and how such condition or denial or new law would alleviate the dangerous or hazardous condition ("**Public Health and Safety Exception**"). Developer retains the right to dispute any City reliance on the Public Health and Safety Exception.

2.5 **Changes in State or Federal Laws**. In accordance with Government Code Section 65869.5, in the event that state or federal laws or regulations enacted after the Effective Date ("**State or Federal Law**") prevent or preclude compliance with one or more provisions of this Agreement, the Parties shall meet in good faith for a period not exceeding sixty (60) days (unless such period is extended by mutual written consent of the Parties) to determine the feasibility of any modification or suspension of this Agreement that may be necessary to comply with such State or Federal Law, to determine the effect such modification or suspension would have on the purposes and intent of this Agreement and the Vested Elements, and to prepare such modification. Following the meeting between the Parties, the provisions of this Development Agreement may, to the extent feasible, and upon mutual agreement of the Parties, be modified or suspended, but only to the minimum extent necessary to comply with such State or Federal Law. In such

an event, this Development Agreement together with any required modifications shall continue in full force and effect. In the event that the State or Federal Law operates to frustrate materially and irremediably (a) the Vested Elements, or (b) the City's right to receive the community benefits as set forth in this Agreement, Developer, in the event of item (a), or the City, in the event of item (b), may terminate this Agreement. In addition, Developer shall have the right to challenge (by any method, including litigation), at its sole cost, the State or Federal Law preventing compliance with, or performance of, the terms of this Development Agreement and, in the event that such challenge is successful, this Development Agreement shall remain unmodified and in full force and effect, unless the Parties mutually agree otherwise, except that if the Term of this Development Agreement would otherwise terminate during the period of any such challenge and Developer has not commenced with the development of the Project in accordance with this Development Agreement as a result of such challenge, the Term shall be extended for the period of any such challenge. If Developer raises such a challenge, then City agrees, upon Developer's written request and at Developer's sole cost and expense, to cooperate with Developer concerning Developer's challenge, which cooperation shall be subject to the provisions of Section 6.2; provided, however, that City shall not have any obligation to commence, prosecute, or defend any litigation with respect to any such challenge.

2.6 **CEQA**. Nothing in this Agreement shall be deemed to limit the City's ability to comply or compel Developer compliance with CEQA, including any mitigation measures in the EIR ("**Mitigation Measures**").

2.7 **Subsequent Approvals**.

2.7.1 Processing of Subsequent Approvals. To develop the Project as contemplated in this Agreement, the Project will require land use approvals, entitlements, development permits, and use and/or construction approvals other than the Initial Approvals, which may include, without limitation: development plans, conditional and administrative use permits, plot plans, tentative and final subdivision maps, street abandonments, design plan approvals, certificates of compliance, demolition permits, improvement agreements, infrastructure agreements, grading permits, building permits, right of way permits, site plans, sewer and water connection permits, certificates of occupancy, parcel maps, encroachment permits, and amendments thereto and to the Project Approvals (collectively, "**Subsequent Approvals**"). City, provided Developer submits all legally required material, reports, and requisite data in order to deem any subsequent approvals complete, will accept, make completeness determinations, and process, promptly and diligently to completion, all applications for Subsequent Approvals in accordance with Applicable Rules and the terms of this Agreement. At such time as any Subsequent Approval is approved by the City, then such Subsequent Approval shall become subject to all the terms and conditions of this Development Agreement applicable to Project Approvals and shall be treated as a "**Project Approval**" under this Development Agreement.

2.7.2 Scope of Review of Subsequent Approvals. By approving the Initial Approvals and this Agreement, City has made a final policy decision that the Project is in

the best interests of the public health, safety, and general welfare. Accordingly, City shall not use its authority in considering any application for a discretionary Subsequent Approval to change the policy decisions reflected by the Initial Approvals or otherwise to prevent or delay development of the Project as set forth in the Initial Approvals. Instead, the Subsequent Approvals shall be deemed to be tools to implement those final policy decisions. The scope of the review of applications for Subsequent Approvals shall be limited to a review of substantial conformity with the Vested Elements as set forth and subject to Section 3.2 (and except as otherwise provided by Sections 2.2 through 2.6, inclusive, and other Applicable Rules). Where such conformity/compliance exists, City shall not deny an application for a Subsequent Approval.

2.7.3 Conditions of Subsequent Approvals.

2.7.3.1 City shall have the right to impose reasonable conditions upon Subsequent Approvals including, without limitation, normal and customary dedications for rights of way or easements for public access, utilities, water, sewers, and drainage necessary for the Project; provided, however, such conditions and dedications shall not be inconsistent with the Applicable Rules, nor inconsistent with the development of the Project as contemplated by this Agreement except to the extent required by the Applicable Rules. Developer may protest any conditions, dedications, or fees while continuing to develop the Property. In the event of a protest by Developer, the City retains the right to pause any Subsequent Approval processes until the protest is resolved, to ensure that the Project proceeds in a manner consistent with the City's interests and regulations, but the City shall not withhold or delay any permit or other approval for any aspect of the Project not directly subject to the Subsequent Approval that is the subject of the protest.

2.7.3.2 Conditions imposed on Subsequent Approvals may only require dedications or reservations for, or construction or funding of, Public Improvements beyond those already included or referenced in the Initial Approvals, the Mitigation Measures (except to the extent required by CEQA in connection with any Subsequent Approvals) or Section 3.8.1, in the event of a Public Health and Safety Exception, as defined in Section 2.4 of this Agreement. In addition, any and all conditions imposed on Subsequent Approvals for the Project must comply with Section 4.2 (Payment of Fees and Costs).

2.8 **Regulatory Agency Approvals**. The Parties acknowledge and agree that, in addition to the Initial Approvals and any Subsequent Approvals, the Project, including the provision of some of the community benefits, may require Developer to obtain approvals or clearances from various Regulatory Agencies, other third-party public agencies and utilities (collectively, the "**Third-Party Agency Approvals**"). Without limitation, the Third-Party Agency Approvals may include approvals or clearances from the Coachella Valley Water District ("**CVWD**"), IID, the U.S. Army Corps of Engineers, the California Department of Fish & Wildlife, and the Regional Water Quality Control Board. Developer agrees to use diligent and commercially reasonable efforts to procure the Third-Party Agency Approvals. If requested by Developer, the City shall cooperate with Developer, at Developer's sole cost, in Developer's efforts to obtain the Third-Party Agency Approvals. If after using all reasonable efforts, Developer is unable to obtain

any Third-Party Agency Approval needed in order for Developer to develop the Project or meet its obligations under this Agreement, including providing the public benefits described in this Agreement, such inability shall constitute a Permitted Delay subject to the provisions of Section 11.6.

2.9 **Changes to Development Agreement Statute**. This Agreement has been entered into in reliance upon the provisions of the Development Agreement Statute as those provisions existed at the Effective Date. No amendment or addition to those provisions, which would materially affect the interpretation or enforceability of this Agreement, shall be applicable to this Agreement unless such amendment or addition is specifically required by the California Legislature, or is mandated by a court of competent jurisdiction. In the event of the application of such a change in the Development Agreement Statute, the Parties shall meet in good faith to determine the feasibility of any modification or suspension of this Agreement that may be necessary to comply with such change in law and to determine the effect such modification or suspension would have on the purposes and intent of this Agreement and the Vested Elements. Following the meeting between the Parties, the provisions of this Agreement may, to the extent feasible and upon mutual agreement of the Parties, be modified or suspended but only to the minimum extent necessary to comply with such change in law. If such amendment or change is permissive rather than mandatory, this Agreement shall not be affected by the same unless the Parties mutually agree in writing to amend this Agreement to permit such applicability.

ARTICLE 3
DEVELOPMENT OF THE PROJECT

3.1 **Development Rights**. Developer shall have a vested right to develop the Project on the Property, in accordance with the Vested Elements.

3.2 **Vested Elements**. The overall design, development, construction, and use of the Project and all improvements in connection therewith, including without limitation, permitted uses of the Property, the maximum density of development, the intensity of use, the maximum height and size of the proposed buildings, provisions for reservation or dedication of land for public purposes, the conditions, terms, restrictions, and requirements for subsequent discretionary actions, the provisions for and financing for Public Improvements, and the other terms and conditions of development applicable to the Property are as set forth in the Project Approvals, and are hereby vested in Developer, subject to, and as provided in, the provisions of this Development Agreement (the "**Vested Elements**"). The intent of this Section 3.2 is to cause all development rights which may be required to develop the Project in accordance with this Agreement and the Project Approvals to be deemed to be "vested rights" as that term is defined under California law applicable to the development of land or property and the right of a public agency to regulate or control such development of land or property. City hereby agrees to be bound with respect to the Vested Elements, subject to Developer's full and timely compliance with the terms and conditions of this Agreement, the Project Approvals, and all Applicable Rules. By stating that the terms and conditions of this Agreement and the

Project Approvals control the overall design, development and construction of the Project, this Agreement is consistent with the requirements of California Government Code Section 65865.2 (requiring a development agreement to state permitted uses of the property, the density or intensity of use, the maximum height and size of proposed buildings and provisions for reservation or dedication of land for public purposes). Notwithstanding the preceding provisions of this Section 3.2 or any other provision in this Agreement to the contrary, in the event of any conflict between the terms and conditions of any Project Approvals (including Developer's rights and obligations thereunder) other than this Agreement, including without limitation any Subsequent Approvals, and the terms and conditions of this Agreement (including Developer's rights and obligations hereunder), the terms and conditions of this Agreement shall control.

3.3 **Life of Subdivision Maps and Other Project Approvals**.

3.3.1 Life of Subdivision Maps. The terms (lifespan) of the TTM and any other Subdivision Maps approved by the City for the Project shall be automatically extended such that the TTM and all such other Subdivision Maps remain in effect for a period of time coterminous with the Term of this Agreement, or such longer period as may be permitted under state law.

3.3.2 Life of Other Project Approvals. The term of all other Project Approvals, including all implementing approvals, conditional use permits ("CUPs"), and architectural review approvals, shall be automatically extended such that the Project Approvals remain in effect for the same term as the Term of this Agreement, with the exception of construction permit approvals, which shall be valid for the period of time identified within the applicable California Building Standards Code.

3.3.3 Termination of Agreement. In the event that this Agreement is terminated prior to the expiration of the Term of the Agreement for any reason other than a Developer Event of Default, the term of any Subdivision Map approved by the City for the Project or any other Project Approval, as well as the vesting period for any vesting Subdivision Map approved as a Project Approval, shall be the term otherwise applicable to such approval in accordance with the California Subdivision Map Act, which term shall commence to run on the date that such termination of this Agreement takes effect. In the event of any termination of this Agreement for a Developer Event of Default, the provisions of Section 8.2.3 shall govern with respect to the term of the Project Approvals.

3.4 **Compliance with CEQA**. Developer acknowledges that the development of the Project and the Project Site is subject to compliance with CEQA, including but not limited to any applicable Mitigation Measures as may be amended from time to time. The EIR, which has been certified by the City as being in compliance with CEQA, addresses the potential environmental impacts of the Project as it is described in the Initial Approvals. To the extent that the Project will require the issuance of Subsequent Approvals that are discretionary in nature, such Subsequent Approval shall be subject to review by the City during public hearings to the extent required by CEQA or other Applicable Rules. The City will rely on the previously-certified EIR to satisfy the requirements of CEQA to the fullest extent permissible by CEQA, and City will not

require a new initial study, negative declaration, EIR addendum, or subsequent or supplemental EIR unless required by CEQA and will not impose on the Project any additional mitigation measures other than specifically required by CEQA. Nothing in this Agreement shall limit the ability of the City to impose conditions on any Subsequent Approvals resulting from Material Changes as such conditions are determined by the City to be necessary to mitigate significant environmental impacts identified through the CEQA process and associated with the Material Changes or otherwise to address significant environmental impacts as defined by CEQA created by a Subsequent Approval; provided, however, any such conditions must be in accordance with CEQA. As used herein, "**Material Changes**" means the circumstances described in subparts (a), (b), and (c) of Public Resources Code Section 21166.

3.5 **Compliance with Project Approvals**. In developing the Project, Developer shall at all times comply with the Project Approvals and Applicable Rules, and Developer further agrees that all improvements required to be constructed by Developer for the Project (including all onsite improvements and offsite improvements) shall be constructed in accordance with this Agreement, the Project Approvals, and Applicable Law.

3.6 **Development Timing**.

3.6.1 *Pardee* Finding. Development of the Project Site is permitted to occur in phases as described and contemplated in **Exhibit C** ("**Construction Phasing**"). The Parties wish to avoid the result of *Pardee Construction Co. v. City of Camarillo*, 37 Cal.3d 465 (1984), where the failure of the parties there to expressly provide for the timing of development resulted in the court's determination that a later-adopted initiative restricting the timing of development prevailed over the parties' agreement. Accordingly, the Parties acknowledge and agree that Developer shall have the right, subject to the provisions of the Project Approvals and the requirements of Sections 4.1 and 4.2 of this Agreement, to develop the Project at such time and in such phases as Developer deems appropriate in the exercise of its subjective business judgment.

3.7 **Final Subdivision Maps**. Developer may from time to time file applications for Subsequent Approvals of final subdivision maps (including phased final subdivision maps) with respect to some or all of the Project Site in accordance with the provisions of the Subdivision Map Act.

3.8 **Provision and Financing of Public Improvements**.

3.8.1 Construction and Dedication. Subject to the other provisions of this Agreement, Developer shall be responsible for the design, engineering, and construction of all roads, parks, drainage, sewer, water, and utility improvements, and all other infrastructure and improvements for the Project, including any onsite improvements or offsite improvements, that may or are to be dedicated or otherwise made available for public use pursuant to this Agreement or the Project Approvals ("**Public Improvements**"). Except as set forth in this Section 3.8.1 or otherwise agreed to in writing by the City, in its reasonable discretion, all Public Improvements necessary to serve any particular phase of

the Project shall be completed prior to the City's issuance of the first Certificate of Occupancy for any development within that phase or any earlier date specified in the Project Approvals.

3.8.2 3.8.2 Airport Boulevard Improvements. Developer shall dedicate and improve the portion of the Project Site fronting Airport Boulevard east of the Whitewater Bridge and west of the State Route 86 interchange boundary, from the northerly edge of the County Bridge widening improvement project up to the northerly edge of the Right of Way abutting the Project Site, as determined by the demands outlined in the traffic study performed as part of the Project EIR, and shall design and install a new traffic signal at the Project's main entrance at Airport Boulevard. (collectively, the "**Airport Boulevard Improvements**"). Developer may be eligible to receive credit against Transportation Uniform Mitigation Fees, Street and Transportation Development Impact Fee, and Bridge and Grade Separation Fees for the cost of the Airport Boulevard Improvements and land dedication to the extent the Airport Boulevard Improvements are included in the public facilities identified to be funded with such fees under a City capital improvement program or nexus fee study, subject to reasonable confirmation by the City at the time the Airport Boulevard Improvements are constructed. Prior to commencement of the Airport Boulevard Improvements, the Parties shall meet in good faith to confirm the amount of fee credits applicable to the Airport Boulevard Improvements and to consider further City contributions to the cost of the Airport Boulevard Improvements, based upon the economically beneficial businesses and occupants in the Project that warrant such City contribution

3.8.3 Developer shall maintain and be liable for all Public Improvements until formally accepted by City, or when finally accepted by another authority if another authority has jurisdiction over the Public Improvements, and/or when finally accepted by a public utility if a public utility has jurisdiction over the Public Improvements. Upon completion of required Public Improvements hereunder in conformance with the approved plans, Developer shall offer for dedication to City, from time to time as such Public Improvements are completed, those Public Improvements for which the Project Approvals require such offer of dedication, and, City shall promptly accept from Developer such completed Public Improvements in accordance with Applicable Rules (the "**Dedicated Public Improvements**"). Developer may offer dedication of Dedicated Public Improvements in phases and City shall not refuse to accept such phased dedications or refuse phased releases of bonds or other security so long as all other conditions and requirements for acceptance have been satisfied by Developer, and subject to any such conditions to the Project Approvals pertaining to maintenance of the Public Improvements following acceptance. Upon Developer's request, and at Developer's sole cost, City shall reasonably cooperate with Developer (a) to locate any new easements required for the Project so as to minimize interference with development of the Project, and (b) in Developer's efforts to relocate or remove easements to facilitate development of the Project, provided that such cooperation does not entail any financial or legal liability for the City.

3.8.4 Financing. Except as otherwise expressly provided in this Agreement or negotiated with the City, Developer shall fund all Public Improvements for

the Project by means of its own funds and any other means of financing, subject to approval by the City, as generally described in this Section 3.8.4 (the "**Financing Plan**"). The City agrees to reasonably cooperate with Developer in the formation of a Mello-Roos Community Facilities District (**CFD**) or other assessment district or other financing mechanism, as deemed appropriate by City and Developer to help implement the Financing Plan, provided that such cooperation does not entail any financial or legal liability for the City., including but not limited to entering into Joint Community Facility Agreements with CVWD, IID, Coachella Valley Power Agency ("**CVPA**"), and/or other public agencies to fund public facilities, including capital facilities fees (each, a "**Financing Mechanism**") that Developer in its sole discretion may elect to initiate related to the Project as and when so requested by Developer, provided that such Financing Mechanisms shall be subject to the following:

3.8.4.1 Developer shall, without need for a written request from the City, advance amounts necessary to pay all actual costs and expenses of City to evaluate and structure any Financing Mechanism, to the end that City will not be obligated to pay any costs related to the formation or implementation of any Financing Mechanism.

3.8.4.2 Any Financing Mechanism will provide for the reimbursement to Developer of any advances by Developer described in Section 3.8.4.1, and any other costs incurred by Developer that are related to the Financing Mechanism, such as the costs of legal counsel, special tax consultants, engineers, etc. Developer agrees to promptly submit to City a detailed accounting of all such other costs incurred by Developer, along with supporting documentation, at such time as Developer makes application for reimbursement.

3.8.4.3 City shall, without limiting its discretion, consult with Developer prior to engaging any consultant (including bond counsel, underwriters, appraisers, market absorption analysts, financial advisors, special tax consultants, assessment engineers, and other consultants deemed necessary to accomplish any financing). However, City retains the sole right to make the final selection of any such consultants.

3.8.4.4 Developer shall submit to City Developer's phasing plan for any Public Improvements to be financed, including the priority and financing needs, as well as proposed improvement areas and/or tax zones. City shall act as the lead agency in forming the Financing Mechanism and will use available proceeds of any public financing in accordance with such priorities, and as otherwise provided in this Agreement.

3.8.4.5 City and Developer will determine, following consultation with any other participating public agencies, the means by which any Public Improvements may be acquired by City or other public agency, as applicable.

3.8.4.6 In addition, any financing may include amounts necessary to discharge any assessment, special tax, or other liens on the Property.

3.8.4.7 Any public financing shall be secured solely by assessments or special taxes levied within the respective district, proceeds of the bonds issued that are placed in a bond fund, reserve fund, or other such fund for the financing and investment earnings thereon.

3.8.4.8 The payment of actual initial and annual administrative costs of City to be incurred in connection with any Financing Mechanism shall be adequately assured, through the inclusion in any assessment or special tax methodology of appropriate provision for such costs as estimated by City, to the end that City shall not be called upon to provide for any initial or annual administrative costs related to any Financing Mechanism.

3.8.4.9 The bond term of any Financing Mechanism shall not exceed thirty-five (35) years, and bonds may be issued in one or more series; the maximum tax rate shall not exceed two percent (2.00%), and special taxes shall be authorized to escalate by two percent (2.00%) annually.

3.8.4.10 The status of Entitlement applications and fee deposits as of the Effective Date is summarized in **Exhibit D** (Summary of Entitlement Applications and Fee Deposits).

ARTICLE 4
OBLIGATIONS OF DEVELOPER

4.1 IID Substation Obligations.

4.1.1 Developer to Contribute Land for Substation. In consultation with IID and City, Developer has selected and acquired an approximately 5.6-acre parcel, all or a portion of which may be available for a potential new electrical substation, located at the northern end of the Project Site (the "**Substation Site**"). The Project EIR includes the proposed substation in the Project description and fully analyzes the potentially significant adverse environmental effects of constructing and operating the substation on the Substation Site, including feasibility measures to mitigate any such effects.

4.1.2 Cooperation in Facilitating Electrical Service. The Parties shall reasonably cooperate in good faith in facilitating electrical service to the Project, which may include construction of a new IID substation on the Project site. Developer shall pay its fair-share toward the cost of any new substation constructed on the Project site, and the parties shall reasonably cooperate in good faith in pursuing a cost-sharing and/or reimbursement agreement with IID or other third parties to provide for reimbursement to City or Developer from other benefitted parties who are served by the capacity of the new substation to the extent either agrees to advance or fund costs for a new substation in excess of that Party's fair-share of the total costs.

4.2 **Payment of Fees and Costs**.

4.2.1 General. All fees, exactions, dedications, reservations, or other impositions to which the Project would be subject, but for this Development Agreement, are referred to in this Development Agreement either as "Administrative Fees" or "Development Fees". Developer shall timely pay or perform, as applicable, all Administrative Fees and Development Fees applicable to the Project or the Project Site in accordance with the terms of this Agreement.

4.2.2 Administrative Fees. As used in this Agreement, "**Administrative Fees**" means fees charged by the City, on a City-wide basis in effect at the time to cover the costs of City's review of applications for any permit or other approval or review or inspection by City. Administrative Fees are not Development Fees. Applications for Subsequent Approvals shall be charged, and Developer shall timely pay to the City, Administrative Fees to allow City to recover its actual and reasonable costs of processing Subsequent Approvals. Administrative Fees shall be paid in accordance with the City's ordinances or requirements, as applicable, and the provisions of this Section. Without limiting the foregoing, Developer shall reimburse City or pay directly all reasonable and actual costs relating to the hiring of consultants and the performing of studies as may be necessary to review or process any applications for Project Approvals or perform any related environmental review and City shall provide Developer with detailed invoices relating thereto as part of any reimbursement request. Prior to engaging the services of any such consultant, or authorizing the expenditure of any funds for such consultant, the City shall consult with Developer in an effort to mutually agree to terms regarding (i) the scope of work to be performed, (ii) the projected costs associated with the work, and (iii) the particular consultant that would be engaged to perform the work.

4.2.3 Development Fees.

4.2.3.1 Definition. As used in this Agreement, "**Development Fees**" means all fees, contributions, exactions, dedications, reservations, or impositions, other than taxes or assessments, whether established for or imposed upon the Project individually or as part of a class of projects, that are imposed by City on the Project in connection with any Project Approval for any purpose, including, without limitation, defraying all or a portion of the cost of public services and/or facilities construction, improvement, operation, and maintenance attributable to the burden created by the Project. Development Fees do not include: (a) any Administrative Fee; (b) any Mitigation Measure (unless the Mitigation Measure consists of payment of a Development Fee); (c) any community benefits to be provided by Developer hereunder; (d) taxes or special assessments; (e) any utility connection fees in effect from time to time generally applicable on a City-wide basis to similar land uses as the Project; or (f) any fees, taxes, assessments, or impositions imposed by other entities that the City collects on behalf of such other entities, all of which shall be due and payable by Developer as and when due in accordance with applicable law.

4.2.3.2 Applicability and Payment.

(a) Generally. No Development Fees shall be applicable to the Project except as provided in this Agreement. The Project shall be subject only to the Development Fees as set forth in **Exhibit E** ("**Existing Development Fees**"), except as otherwise expressly permitted by this Section 4.2.3.2. Developer shall pay all applicable Development Fees at the time that Developer applies for or obtains, as applicable, a building permit for the Project, according to the following limitations.

(b) Categories of Development Fees. During the Term no new categories of Development Fees (i.e., categories other than those set forth in the Existing Development Fees) shall apply to development of the Project.

(c) Amounts of Development Fees. There shall be no increase in the amounts of the Existing Development Fees for a period of five (5) years from the Effective Date of this Agreement. Upon commencement of construction of vertical construction in Phase 1 of the Project, the Existing Development Fees shall be frozen for an additional five (5) year period, commencing at the later of (i) expiration of the initial five (5) year period, or (ii) the date of commencement of vertical construction in Phase 1, at the fee schedule effective on that extension date.

4.2.3.3 Fee Credits. Developer shall receive the benefit of any credits against Development Fees ("**Fee Credits**") if and only to the extent any Fee Credits are specifically set forth in **Exhibit E**, or as may be subsequently agreed to in writing by the parties, including but not limited to the potential fee credits described in Section 3.8.2 of this Agreement.

4.3 **Hold Harmless and Indemnification of City**. To the fullest extent permitted by law, Developer shall defend with counsel of Developer's choosing, subject to approval by City, and hold harmless the City and its elected and other officials, officers, agents, and employees ("**Indemnified Parties**") from and against any third party Claims brought against the Indemnified Parties: (a) to attack, set aside, void, or annul this Agreement; or (b) resulting or arising from death or injury to any person or for any damage to or loss of property resulting directly or indirectly from Developer's performance of this Agreement, except to the extent such Claims for death, injury, damage, or loss are ultimately determined by a court to be the result of the gross negligence or willful misconduct of the City. In the event a third-party Claim is commenced against the City, City shall give prompt notice of same to Developer, which notice shall be a condition of Developer's obligations under this Section 4.3. If Developer is required to defend the City as set forth above, Developer shall be entitled to select legal counsel to defend the City, subject to the City's approval, at Developer's cost. In the event of a court order issued as a result of a successful legal challenge as described in item (a) above, the City shall, to the extent permitted by law or court order, in good faith seek to comply with the court order in such a manner as will maintain the integrity of the Project Approvals and avoid or minimize to the greatest extent possible (i) any impact to the development of the Project as provided for in, and contemplated by,

the Vested Elements, or (ii) any conflict with the Vested Elements or frustration of the intent or purpose of the Vested Elements.

4.4 **Payment of Prevailing Wages.**

4.4.1 Developer acknowledges that the City has made no representation, express or implied, to Developer or any person associated with Developer regarding whether or not laborers employed relative to the construction and installation of improvements on the Property, if any, must be paid the prevailing per diem wage rate for their labor classification, as determined by the State of California, pursuant to California Labor Code Sections 1720, et seq. Developer agrees with the City that Developer shall assume the responsibility and be solely responsible for determining whether or not laborers employed relative to any construction of capital improvements on the Property or for the Development must be paid the prevailing per diem wage rate for their labor classification, as determined by the State of California, pursuant to California Labor Code Sections 1720, et seq.

4.4.2 If Civil Code sections 9550 et seq. require contractors to procure a payment bond for the improvements on the Property, then the Developer shall ensure that its contractors deliver the required bond.

4.4.3 Developer, on behalf of itself, its successors, and assigns, waives and releases the City from any right of action that may be available to any of them pursuant to California Labor Code Sections 1726 and 1781. Developer acknowledges the protections of California Civil Code Section 1542 relative to the waiver and release contained in this Section 4.4, which reads as follows:

> A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS THAT THE CREDITOR OR RELEASING PARTY DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE AND THAT, IF KNOWN BY HIM OR HER, WOULD HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR OR RELEASED PARTY.
>
> BY INITIALING BELOW, DEVELOPER KNOWINGLY AND VOLUNTARILY WAIVES THE PROVISIONS OF CALIFORNIA CIVIL CODE SECTION 1542 SOLELY IN CONNECTION WITH THE WAIVERS AND RELEASES OF THIS SECTION 4.4:

_____
Developer's Initials

_____
Developer's Initials

4.4.4. Developer shall defend with counsel reasonably acceptable to the City, indemnify and hold harmless City and its elected officials, officers, employees, agents and contractors from any and all liability, costs, claims, damages, fines, penalties and expense, including costs of litigation and attorneys' fees, arising out of or in any way connected with Developer's construction of the facilities and improvements described in this Agreement and Developer shall indemnify, defend with counsel reasonably acceptable to the City and hold harmless the City against any claims pursuant to California Labor Code Section 1781 arising from this Agreement or the construction or installation of any improvements on the Property or for the Development, in accordance with the terms of Section 4.4 of this Agreement.

4.5 **Provision of Community Benefits**. Developer will provide the development of an underutilized site, creating new and diverse employment opportunities within the City as identified under the City's 2035 General Plan Update. The Project will contribute to an increase in the City's fiscal health through the development of mixed commercial uses, while ensuring that the scale of the development respects the surroundings and existing land use patterns. Additionally, the Project will include improvements to Airport Boulevard and provide a site for the construction of additional IID electrical facilities to improve the electric grid and enhance reliability to the City. In connection with the Project, Developer is providing the following benefits to the City and area residents (collectively, "**Community Benefits**"):

4.5.1 New Substation. Pursuant to Section 4.1 above, Developer is contributing a site for the potential construction of a new substation, which will provide additional system resiliency and reliability to existing City residents, as well as provide additional capacity to serve future development within the City. The Substation Site will be located at the northern end of the overall Project Site on a parcel that has been acquired from the California Department of Transportation (Caltrans).

4.5.2 Airport Boulevard Improvements and New Traffic Signal. As set forth in Section 3.8.1 above, Developer is installing a new traffic signal at the Project's main entrance, as well as dedicating and improving portions of Airport Boulevard between the Whitewater Bridge and the State Route 86 interchange boundary.

4.5.3 Fuel Station, Convenience Store, and Restaurant. Developer intends to install a fuel station and associated convenience store with parking located at the site's entrance along Airport Boulevard, as well as a retail and drive-through restaurant located to the northeast of the Project Site entrance, which will enhance the City's sales tax base and help fund the City's public safety services and other City services.

4.5.4 Additional Development. Developer intends to install a variety of additional buildings and structures totaling approximately 615,000 square feet, which may include a combination of large warehouse structures, small warehouse structures, small business buildings, structures for storing personal vehicles, self-storage buildings, and other permitted industrial and commercial buildings that will enhance the employment opportunities available in the City.

4.5.5 Electronic Signage. Developer intends to install an electronic freeway sign adjacent to the State Route 86S freeway that can be used to advertise City events and otherwise promote the City of Coachella. The City's name and logo will be included on the freeway sign at no cost to City.

4.6 **Developer Representations and Warranties**. Developer represents, warrants, and covenants to the City, as of the Effective Date and thereafter during the Term, as follows:

4.6.1 Authority. Developer is a California limited liability company duly organized and validly existing, and is authorized to own property and do business in the State of California. Developer has the capacity and full right, power, and lawful authority to own its property and perform the terms and covenants of this Agreement, and the execution, delivery, and performance of this Agreement by Developer has been fully authorized by all requisite action on the part of Developer. The person(s) executing this Agreement on behalf of Developer has all requisite power, right, and authority to do so and to bind Developer to this Agreement.

4.6.2 Valid Binding Agreement. This Agreement and all other documents and instruments which have been executed and delivered by or on behalf of Developer pursuant to or in connection with this Agreement constitute or, if not yet executed or delivered, will when so executed and delivered constitute legal, valid, and binding obligations of Developer, enforceable against Developer in accordance with their respective terms, except as such enforceability may be limited by bankruptcy, insolvency, reorganization, arrangement, and other laws affecting creditors' rights, or by application of equitable principles. Developer has no knowledge of any inability to perform its obligations under this Agreement. The execution and delivery of this Agreement by Developer have been duly and validly authorized by all necessary action. No consent, authorization, or approval of, or other action by, and no notice to or filing with any governmental authority, regulatory body, or any other person is required for the execution, delivery, and performance by Developer of this Agreement or any of the terms and covenants herein or therein.

4.6.3 No Breach of Law or Agreement. Neither the execution nor delivery of this Agreement or of any other documents or instruments executed and delivered, or to be executed or delivered, pursuant to this Agreement, nor the performance of any provision, condition, covenant, or other term hereof or thereof, will conflict with or result in a breach of or default under any agreement to which Developer is a party or will result in the creation or imposition of any lien upon any assets or property of Developer, other than liens established in accordance with this Agreement.

4.6.4 Pending Proceedings. Developer has no knowledge of any default under any law or regulation or under any order of any court, arbitrator, board, commission or agency, and there are no known claims, actions, suits, or proceeding pending or, to the knowledge of Developer, threatened against or affecting developer, at law of in equity, before any court, arbitrator, board, commission, or agency which might, if determined

adversely to Developer, materially affect Developer's ability to perform its obligations under this Agreement.

4.6.5 Development Experience. Developer has significant expertise and a proven track record in the development of other projects similar in nature and scale to the Project, and possesses robust financial resources, skilled personnel, and all necessary resources, in order to successfully develop the Project and fulfill all of its obligations under this Agreement and the Project Approvals in a timely and efficient manner.

ARTICLE 5
OBLIGATIONS OF CITY

5.1 **IID Substation Cost-Sharing Reimbursement**. City shall reasonably cooperate in good faith and support Developer's efforts to enter into a cost-sharing and reimbursement agreement with IID to provide for reimbursement to Developer for a portion of the new substation costs from other benefitted properties within the City. If City adopts or collects a surcharge or other fee or financing mechanism to fund electrical infrastructure within the City, the substation costs incurred by Developer shall be given the highest priority (at least on par with any other electrical infrastructure) in receiving City funding contribution or reimbursement from the proceeds of such surcharge, fee, or other finding mechanism.

5.2 **Water and Sewer Service**. City shall cooperate and facilitate Developer receiving water service from the new CVWD waterline via the Whitewater River channel crossing and the Airport Boulevard activation project, pursuant to an existing agreement between City and CVWD, dated January 9, 2008. Further, City provided a letter dated July 15, 2025, authorizing CVWD to provide service only until such time as City is able to provide service. Developer and City shall reasonably cooperate to ensure that, prior to issuance of a first building permit for the Project, City and CVWD will enter into a new agreement to outline the means and methods of providing water and or sewer service to the Project and the transfer of service from CVWD back to the City at such future time as the City has the necessary facilities in place to provide such service.

5.3 **Processing During Third Party Litigation**. The filing of any third-party lawsuit(s) against the City or Developer relating to this Agreement, the Project Approvals, or other development issues affecting the Project or the Project Site, shall not delay or stop the development, processing, or construction of the Project or the issuance of Subsequent Approvals unless the third party obtains an injunction or other court order preventing the activity.

5.4 **Expedited Processing**. The parties agree that Developer must be able to proceed rapidly with the development of the Property and, accordingly, that expedited City review of Subsequent Approvals, including but not limited to improvement plans, final maps, modifications to Project Approvals, building permits and construction inspections, is essential to the successful completion of the Project. Accordingly, to the

extent that the applications and submittals are in conformity with the Project Approvals, Applicable Rules, and this Agreement, and adequate funding exists therefor, City agrees to provide adequate City resources to diligently accept, review, and take action on all subsequent applications and submittals made to City by Developer in furtherance of the Project. Similarly, to the extent that adequate funding exists therefor, City shall provide adequate City resources to promptly review and approve improvement plans, conduct construction inspections, and accept completed public facilities. Developer agrees to reimburse the City for all costs associated with providing expedited services, above and beyond those costs covered by the City's Processing Fees. In the event City does not have adequate resources, City shall authorize the use of "contract labor" for inspection and plan review purposes, which shall be reimbursed by Developer, pursuant to a mutually agreeable reimbursement agreement that also specifies any fee credit to Developer to avoid Developer paying more than once for the same plan check, inspection, or other City service. City shall consult with Developer concerning the selection of the most knowledgeable, efficient and available "contract labor" for purposes of providing inspection and plan review duties for the City and the Project; provided, however, that City shall retain the exclusive right to select any "contract labor" it deems suitable.

ARTICLE 6
MUTUAL OBLIGATIONS

6.1 **Notice of Completion or Revocation**. Upon the Parties' completion of performance or revocation of this Agreement, a written statement acknowledging such completion or revocation, signed by the appropriate agents of City and Developer, shall be recorded in the Office of the Recorder of the County of Riverside, California.

6.2 **Estoppel**. Each Party hereto shall provide, upon the request of the other Party and within thirty (30) days of such request, a signed estoppel certificate in a reasonable form for the benefit of third parties.

6.3 **Good Faith and Fair Dealing**. The Parties shall cooperate with each other and act in good faith in complying with the provisions of this Agreement. In their course of performance under this Agreement, the Parties shall cooperate and shall undertake such actions as may be reasonably necessary and appropriate to implement the Project as contemplated by this Agreement.

6.4 **Other Necessary Acts**. Each Party shall execute, acknowledge, and deliver to the other all further instruments and documents and shall take such further actions as may be reasonably necessary to carry out this Agreement in order to provide and secure to each Party the full and complete enjoyment of its rights and privileges hereunder.

6.5 **Compliance with Financing Plan**. Developer shall at all times comply with applicable provisions of the Financing Plan and Developer and City shall each at all times comply with their respective obligations under applicable provisions of the Financing Mechanism.

ARTICLE 7
ANNUAL REVIEW OF DEVELOPER'S COMPLIANCE

7.1 **Procedure**. The annual review required by Government Code Section 65865.1 shall be conducted for the purposes and in the manner stated in those laws as further provided herein ("**Annual Review**"). As part of each Annual Review, Developer must demonstrate good faith compliance with the provisions of the Development Agreement. Not more than sixty (60) days and not less than forty-five (45) days prior to the Annual Review Date, City shall provide Developer with written notice for Developer to provide a letter to the City containing substantial evidence to show compliance with this Agreement. Within sixty (60) days after Developer submits its letter, City shall review the information submitted by Developer and all other available evidence on Developer's compliance with this Agreement. All such other available evidence shall, upon receipt of by the City be made available as soon as possible to Developer. City shall notify Developer in writing whether Developer has complied with the terms of this Agreement. If the City finds that Developer has not complied with the provisions of the Development Agreement, City may issue a finding of noncompliance. City's finding of compliance or noncompliance may be appealed to the City Council within ten (10) days after the issuance of such finding, and upon the filing of such an appeal, the City shall schedule a City Council hearing in accordance with the City's Municipal Code. The issuance of a finding of compliance or finding of noncompliance by the City and the expiration of the appeal period without appeal, or the confirmation of the issuance of the finding on such appeal, will conclude the review for the applicable period and such determination will be final, subject only to judicial review. In the absence of the City notice required above, to commence the annual review process, Developer shall be deemed to be in good faith compliance with the provisions of this Development Agreement until such annual review is subsequently completed.

7.1.1 Annual Review Costs. In accordance with Government Code Section 65865.1, Developer shall reimburse City for the actual and reasonable costs incurred in conducting each Annual Review, provided that: (a) City shall provide Developer with a written invoice identifying the Annual Review costs incurred; (b) reimbursable costs shall be limited to those directly related to the Annual Review process; (c) the total cost for any single Annual Review shall not exceed $ 2,500.00, unless otherwise agreed to in writing by the Parties; and (d) Developer shall have the right to dispute any Annual Review costs it believes to be unreasonable, in which case the Parties shall meet and confer in accordance with Section 10.2 of this Agreement to resolve any such dispute. City shall make reasonable efforts to minimize Annual Review costs.

7.2 **Noncompliance and Cure**. If City finds that Developer is not in compliance, City must specify in writing to the Developer the respects in which the Developer has failed to comply, and must set forth terms of compliance and specify a reasonable time for the Developer to meet the terms of compliance. Unless alleged noncompliance is an immediate threat to public health and safety, City shall grant a cure period of at least sixty (60) days and shall extend the sixty (60) day period if Developer is proceeding in good faith to cure the noncompliance and additional time is reasonably needed for Developer to prosecute such cure to completion. If Developer does not

comply with any terms of compliance within the prescribed time limits, this Agreement will be subject to termination or modification by the City as applicable. Developer shall have the right to appeal any determination of non-compliance, and upon any unsuccessful appeal to the City Council, to seek judicial review.

7.3 **Effect on Permitted Transferees**. If Developer has transferred a portion of the Project to a Permitted Transferee (other than a Developer Affiliate) pursuant to ARTICLE 9 of this Agreement, then the Annual Review shall be conducted separately with respect to each such Permitted Transferee. If such Annual Review results in a final determination that such Permitted Transferee has not complied with this Agreement, such determination and any resulting termination or modification of this Agreement by the City shall be effective only as to the Permitted Transferee to whom the determination is made and the portions of the Project Site in which such Permitted Transferee has an interest. Such Permitted Transferee shall have the right to appeal the City's determination of non-compliance, as described above. Such a termination or modification shall have no effect on Developer or any other Permitted Transferees which have an ownership interest in the Property, and which are in compliance with this Agreement.

ARTICLE 8
AMENDMENT; TERMINATION

8.1 **Amendment or Termination of Agreement**. This Agreement may be amended from time to time or canceled in whole or in part by mutual consent of both Parties in writing in accordance with the provisions of the Development Agreement Statute. Review and approval of an amendment to this Agreement shall be strictly limited to consideration of only those provisions to be added or modified. All amendments to this Agreement shall automatically become part of the Project Approvals. Notwithstanding the foregoing, no Insubstantial Modification or Operating Memorandum approved pursuant to Section 8.3, or the approval of a Subsequent Approval pursuant to Section 2.7, shall require an amendment to this Agreement. Upon approval, any such amendment shall be deemed to be incorporated automatically into the Project and the Vested Elements under this Agreement (subject to any conditions set forth in the amendment or Subsequent Approval).

8.2 **Expiration; Termination**.

8.2.1 Expiration of Term. Except as otherwise expressly provided in this Agreement, this Agreement shall be deemed terminated and of no further effect upon the expiration of the Term of this Agreement as set forth in Section 1.3; provided however, that such expiration shall not affect any right, duty, or expiration date arising from the Project Approvals (other than this Agreement) and, provided further that such expiration shall not relieve or release Developer from any obligation or liability for any Developer Event of Default arising prior to such expiration. As to any specific lot containing a residential dwelling within the Project, this Agreement shall terminate as to such lot upon

the issuance by the City of a certificate of occupancy for the dwelling and the close of escrow of the initial sale of that dwelling.

8.2.2 Survival of Obligations. Upon the expiration or termination of this Agreement as provided herein, neither Party shall have any further right or obligation with respect to the Property under this Agreement except with respect to any obligation that is specifically set forth as surviving the expiration or termination of this Agreement.

8.2.3 Termination by City. Notwithstanding any other provision of this Agreement, City shall not have the right to terminate this Agreement with respect to all or any portion of the Property before the expiration of the Term unless the City complies with all termination procedures set forth in the Development Agreement Statute and there is an alleged Developer Event of Default and such Developer Event of Default is not cured pursuant to ARTICLE 7 or ARTICLE 10 and Developer has first been afforded an opportunity to be heard regarding the alleged default before the City Council, and this Agreement is terminated only with respect to that portion of the Property to which the default applies. In the event of such termination by the City, the Project Approvals with respect to such portion of the Property shall automatically terminate and be of no further force or effect notwithstanding any provision to the contrary in the Project Approvals.

8.3 **Insubstantial Modifications and Operating Memoranda**. The Parties acknowledge that refinements and further development of the Project may demonstrate that minor changes are appropriate with respect to the details of the Project development and the performance of the parties under this Agreement. The parties desire to retain a certain degree of flexibility with respect to the details of the Project development and with respect to those items covered in general terms under this Agreement, and thus desire to provide a streamlined method of approving insubstantial modifications to, or clarifications of the Parties' responsibilities and obligations under this Agreement. Therefore, any minor modification or clarification to this Agreement which does not materially modify (i) the Term of this Agreement; (ii) permitted uses of the Project Site, (iii) maximum density or intensity of use within the Project, except as specifically allowed in the Project Approvals, (iv) provisions for the reservation or dedication of land, (v) conditions, terms, restrictions or requirements for subsequent discretionary actions, or (vi) monetary obligations of Developer (hereinafter an "**Insubstantial Modification**"), and that can be processed under CEQA as exempt from CEQA, or with the preparation of an Addendum to the EIR, shall not require a public hearing or City Council approval prior to the parties executing a modification to this Agreement. By way of example only, changes to mix of buildings and allowed uses within the conceptual site plan that do not exceed the total square footage allowed on the Project site and do not materially increase the trip generation or VMT caused by the Project are anticipated to constitute Insubstantial Modifications. Either Party may propose an Insubstantial Modification, consent to which shall not be unreasonably withheld, conditioned, or delayed by the other Party. Upon receiving a written request from the Developer for a modification to this Agreement, the City Manager or a designated representative will evaluate the request. The evaluation will consider: (1) whether the requested modification falls under the definition of an "Insubstantial Modification"; (2) whether the requested modification aligns with Applicable Rules (excluding that portion of this Agreement

sought to be modified); and (3) whether the requested modification aligns with the objectives of this Agreement. The City Manager will not unreasonably withhold a decision, but will also ensure the City's interests are adequately protected. If the City Manager or designee determines that the requested modification is an "Insubstantial Modification" that is consistent with Applicable Rules and tends to promote the goals of this Agreement, the proposed modification will be approved by the City as an Insubstantial Modification, and a written modification will be executed by the Parties and attached to this Agreement as an operating memorandum ("**Operating Memorandum**"). Neither an Operating Memorandum nor an Insubstantial Modification shall be deemed an "amendment" to this Agreement under Government Code Section 65858.

8.4 **Amendments to Project Approvals**. Notwithstanding any other provision of this Agreement, Developer may seek and City may review and grant amendments or modifications to the Project Approvals (including the Subsequent Approvals) subject to the following (except that the procedures for amendment of this Agreement are set forth in Section 8.1). Project Approvals (except for this Agreement) may be amended or modified from time to time, but only at the written request of Developer (at the City's discretion, subject to the terms of this Agreement) or with the written consent of Developer (at its sole discretion) and in accordance with Section 3.4 and relevant provisions of the City Municipal Code. All amendments to the Project Approvals shall automatically become part of the Project Approvals. The permitted uses of the Property, the intensity of use, the maximum height and size of the proposed buildings, provisions for reservation or dedication of land for public purposes, the conditions, terms, restrictions and requirements for subsequent discretionary actions, the provisions for Public Improvements and financing of Public Improvements, and the other terms and conditions of development as set forth in all such amendments shall automatically become Vested Elements pursuant to this Agreement (subject to any conditions set forth in the amendments) without requiring an amendment to this Agreement. Amendments to the Project Approvals shall be governed by the Project Approvals and the Applicable Rules, subject to Section 3.4. City shall not request, process, or consent to any amendment to the Project Approvals that would affect the Property or the Project without Developer's prior written consent.

ARTICLE 9
TRANSFER AND ASSIGNMENT; RELEASE; RIGHTS OF MORTGAGEES; CONSTRUCTIVE NOTICE

9.1 **Right to Assign**. Provided that there does not then exist a Developer Event of Default, Developer shall have the right at any time during the Term, subject to the provisions of this Section 9.1, to sell, mortgage, hypothecate, assign, or transfer all or a portion of its rights, duties, and obligations arising under this Agreement (each, a "**Transfer**") to any person, partnership, joint venture, firm, or corporation (each, a "**Transferee**"). No Transfer shall be permitted unless made pursuant to a sale, assignment, or other transfer of all or a portion of Developer's interest in the Property. Notwithstanding any other provision of this Agreement to the contrary, each of the

following Transfers are permitted and shall not require City consent under this Section 9.1:

9.1.1 Any Transfer for financing purposes to secure the funds necessary for construction and/or permanent financing of the Project;

9.1.2 An assignment of this Agreement to a parent or subsidiary of Developer or a company under common ownership with Developer ("**Developer Affiliate**"); provided such Developer Affiliate executes and delivers to the City a recordable Assignment and Assumption Agreement substantially in the form attached hereto as **Exhibit F** and otherwise reasonably acceptable to City ("**Assignment and Assumption Agreement**"); or

9.1.3 Dedications and grants of easements and rights of way required in accordance with the Project Approvals.

Any and all other Transfers hereunder, other than the sale or lease of a commercial lot to a business entity, shall require the prior written consent of the City, which consent shall not be unreasonably withheld or delayed. City's withholding of consent shall be deemed reasonable if, in light of the proposed Transferee's experience, reputation and financial resources, such Transferee would not, in City's reasonable determination, be able to perform the obligations proposed to be assumed by such Transferee. Such determination shall be made by the City will be appealable to the City Council and subject to judicial review. If City consents to any such Transfer, the Transferee shall, in addition to any other conditions upon such consent, execute and deliver to City an Assignment and Assumption Agreement. Any Transfer consented to by City, or permitted without City's consent pursuant to this Section 9.1, is herein referred to as a "**Permitted Transfer**" and the Transferee of a Permitted Transfer is herein referred to as a "**Permitted Transferee**."

9.2 **Release upon Permitted Transfer**. Effective upon any Permitted Transfer pursuant to Section 9.1, except for a Permitted Transfer to a Developer Affiliate pursuant to Section 9.1.2, Developer shall be released from its obligations under Agreement with respect to the Property, or portion thereof so transferred, only after the City's written confirmation of successful transfer of obligations to the Transferee. Thereafter, a default under this Agreement by Developer shall not be considered or acted upon by City as a default by the Permitted Transferee and shall not affect the Permitted Transferee's rights or obligations hereunder. Likewise, a default by a Permitted Transferee shall not be considered or acted upon by the City as a default by Developer and shall not affect Developer's retained rights and obligations hereunder. The City is entitled to enforce each and every such obligation assumed by the Permitted Transferee directly against the Permitted Transferee as if the Permitted Transferee were an original signatory to this Agreement with respect to such obligation. A Permitted Transfer to a Developer Affiliate shall not relieve or release Developer from any of its obligations hereunder unless otherwise specifically agreed to in writing by the City in its sole discretion, which shall not be unreasonably withheld. Notwithstanding the foregoing provisions of this Section or any other provision of this Agreement to the contrary, a Permitted Transfer shall not relieve or release Developer from: (a) any indemnity

obligations of Developer hereunder arising or accruing from any events occurring prior to the Permitted Transfer; or (b) any liability of Developer for any Developer Event of Default occurring prior to the Permitted Transfer unless otherwise specifically agreed to in writing by City, in its sole discretion, which shall not be unreasonably withheld.

9.3 **Rights of Mortgagees; Not Obligated to Construct; Right to Cure Default**.

9.3.1 Mortgagee Protection. This Agreement shall not prevent or limit Developer in any manner, at Developer's sole discretion, from encumbering the Property or any portion thereof or any improvement thereon by any mortgage, deed of trust, or other security device securing financing with respect to the Property ("**Mortgage**"). This Agreement shall be superior and senior to any lien placed upon the Property or any portion thereof after the date of recording this Agreement, including the lien of any Mortgage. Notwithstanding the foregoing, no breach hereof shall defeat, render invalid, diminish, or impair the lien of any Mortgage made in good faith and for value, but all of the terms and conditions contained in this Agreement shall be binding upon and effective against and inure to the benefit of any person or entity, including any deed of trust beneficiary or mortgagee ("**Mortgagee**") who acquires title to the Property, or any portion thereof, by foreclosure, trustee's sale, deed in lieu of foreclosure, or otherwise.

9.3.2 Mortgagee Not Obligated. Notwithstanding the provisions of Section 9.3.1, no Mortgagee (including a Mortgagee who obtains title to Developer's interest in the Property or the Project or any portion thereof as a result of foreclosure proceedings or transfer in lieu of foreclosure) shall in any way be obligated by the provisions of this Agreement to construct or complete the Project, unless the Mortgagee expressly assumes such obligation by written notice to City or by written agreement with City. Nothing in this Agreement shall be deemed to construe, permit, or authorize any such Mortgagee to devote the Property or the Project or any portion thereof to any uses or to construct any improvements thereon other than those uses or improvements provided for or authorized by this Agreement, or by the Project Approvals and Applicable Rules, and only to the extent Mortgagee complies with the terms of this Agreement and executes and delivers to the City, in a form and with terms reasonably acceptable to City, an assumption agreement of Developer's obligations hereunder.

9.3.3 Notice of Default to Mortgagee, Right of Mortgagee to Cure. If City timely receives a notice from a Mortgagee requesting a copy of any Notice of Default given to Developer hereunder and specifying the address for service thereof, then City shall deliver to such Mortgagee, concurrently with service thereon to Developer, any notice given to Developer with respect to any claim by the City that Developer has committed a default, and if the City makes a determination of noncompliance hereunder, City shall likewise serve notice of such noncompliance on such Mortgagee concurrently with service thereof on Developer. If Developer does not cure or remedy the claimed default within the applicable cure period set forth in this Agreement, then City shall provide notice of such ("**Developer Non-Cure Notice**") to each Mortgagee who has previously made a written request to the City therefore. Each such Mortgagee shall (insofar as the rights of the City are concerned) have the right, at its option, to cure or remedy or commence to cure or

remedy any such default within (a) fifteen (15) days (with respect to monetary defaults only) after receipt of the Developer Non-Cure Notice, or (b) sixty (60) days (with respect to non-monetary defaults), after receipt of the Developer Non-Cure Notice unless a further extension of time to cure is granted in writing by City. In case of a default which is not susceptible of being cured by such Mortgagee (including a bankruptcy of Developer), such Event of Default does not have to be cured. If a Mortgagee is required to obtain possession of the Property (or a portion thereof) in order to cure or remedy any claimed Event of Default, the time to cure shall be tolled so long as the Mortgagee is attempting in good faith to obtain possession, including by appointment of a receiver or foreclosure, and the Mortgagee shall be deemed to have timely cured or remedied the claimed Event of Default, provided the Mortgagee commences the proceedings necessary to obtain possession within sixty (60) days after receipt of the Developer Non-Cure Notice, diligently pursues such proceedings to completion, and after obtaining possession diligently completes such cure or remedy.

9.4 **Constructive Notice**. Every person or entity who now or hereafter owns or acquires any right, title, or interest in or to any portion of the Project or the Project Site and undertakes any development activities at the Project Site is, and shall be, constructively deemed to have consented and agreed to, and is obligated by, all of the terms and conditions of this Agreement, whether or not any reference to this Agreement is contained in the instrument by which such person acquired an interest in the Project or the Project Site.

ARTICLE 10
ENFORCEMENT OF AGREEMENT; REMEDIES FOR DEFAULT; DISPUTE RESOLUTION

10.1 **Events of Default**. Subject to any extensions of time by mutual consent of the Parties, in writing, and subject to the provisions of Section 11.6 regarding Permitted Delays and a Mortgagee's right to cure pursuant to Section 9.3, any failure by either Party (a "**Defaulting Party**") to perform any material term or provision of this Agreement shall constitute an event of default by the Defaulting Party ("**Event of Default**") (i) if such Defaulting Party does not cure such failure within sixty (60) days (such sixty (60) day period is not in addition to any sixty (60) day cure period under Section 7.2, if Section 7.2 is applicable) following written notice of default from the other Party ("**Notice of Default**"), where such failure is of a nature that can be cured within such sixty (60) day period, or (ii) if such failure is not of a nature which can be cured within such sixty (60) day period, the Defaulting Party does not within such sixty (60) day period commence efforts to cure such failure, or thereafter does not within a reasonable time prosecute to completion such cure. Any Notice of Default given hereunder shall specify in detail the nature of the failures in performance that the noticing Party claims constitutes the Event of Default, all facts constituting substantial evidence of such failure, and the manner in which such failure may be satisfactorily cured in accordance with the terms and conditions of this Agreement. During the time periods herein specified for cure of a failure of performance, the Defaulting Party shall not be considered to be in default for purposes of (a) termination of this Agreement, (b) institution of legal proceedings with respect thereto, or (c) issuance of any Subsequent

Approval with respect to the Project. The waiver by either Party of any Event of Default under this Agreement shall not operate as a waiver of any subsequent breach of the same or any other provision of this Agreement.

10.2 **Emergency Working Group Meeting**. Notwithstanding any other provision in this Agreement, neither Developer nor City shall commence any legal action, or willfully engage in any other act or omission inconsistent with the terms of this Agreement, including but not limited to withholding or delaying prompt issuance of any ministerial Subsequent Approvals by City, (collectively, a "**Self-Help Remedy**"), without first initiating, and participating in good faith in, an "**Emergency Working Group Meeting**" pursuant to the terms of this Section. Upon receipt of any Notice of Default, or upon the existence of any dispute or disagreement between the Parties arising out of or relating to this Agreement and/or the Project, any party may initiate an Emergency Working Group Meeting to address and seek to resolve the dispute or disagreement by giving written notice to the other Party setting forth the nature of the issue in dispute and the desire to hold an immediate Emergency Working Group Meeting. The Meeting shall be held within ten (10) business days of the written notice, unless extended by mutual written agreement of the Parties. The Emergency Working Group shall consist of the following members: (1) the City Manager; (2) the City Planning Director; (3) City Public Works Director; (4) City Building Official; (5) City Attorney; (6) Developer's President, Vice President or Managing Member; (7) Developer's project manager or other employee appointed by Developer; (8) Developer's legal counsel; and (9) at Developer's election, up to two other representatives of Developer, if Developer owns any interest in the Property at the time of the dispute. Nothing herein shall be construed to extend the time period for this Emergency Working Group Meeting obligation beyond the sixty (60) day cure period referred to in Section 10.1 (even if the sixty (60) day cure period itself is extended pursuant to Section 10.1(ii)) unless the Parties agree otherwise in writing.

10.3 **Remedies and Termination**. If, after notice, Emergency Working Group Meeting, and expiration of the cure periods and procedures set forth in Sections 10.1 and 10.2 (subject to the provisions of Section 10.2), the alleged Event of Default is not cured, the non-Defaulting Party, at its option, may institute legal proceedings pursuant to Section 10.4 and/or terminate this Agreement pursuant to Section 8.2.3 or Section 10.4.2 (as applicable). In the event that this Agreement is terminated pursuant to Section 8.2.3 or Section 10.4.2 and litigation is instituted that results in a final decision that such termination was improper, then this Agreement shall immediately be reinstated as though it had never been terminated.

10.4 **Legal Action by Parties**.

10.4.1 Remedies. Either Party may, in addition to any other rights or remedies, institute legal action to cure, correct, or remedy any Event of Default, enforce any covenant or agreement herein, enjoin any threatened or attempted violation thereof, enforce by specific performance the obligations and rights of the Parties hereto, or obtain any remedies consistent with the purpose of this Development Agreement. Without limiting the foregoing, in the event of a Developer Event of Default (that is not timely cured

in accordance with Section 10.1), City may cease and terminate all processing of any applications for Subsequent Approvals to the extent otherwise permitted by Applicable Law. All remedies shall be cumulative and not exclusive of one another, and the exercise of any one or more of these remedies shall not constitute a waiver or election with respect to any other available remedy.

10.4.2 Limited Damages. Except as expressly set forth in this Section 10.4.2, neither Party shall be liable in damages for any default under this Agreement, it being expressly understood and agreed that, except as set forth below, the sole legal remedy available to either Party for a breach or violation of this Development Agreement by the other Party shall be an action in mandamus, specific performance, or other injunctive or declaratory relief to enforce the provisions of this Agreement by the other Party or to terminate this Agreement. This limitation on damages shall not preclude actions by a Party to enforce payments of monies or the performance of obligations requiring an obligation of money from the other Party pursuant to any of the following: (a) to make any payment due under any indemnity in this Agreement; (b) to advance or reimburse monies required under this Agreement; or (c) to pay attorneys' fees and costs as set forth in Section 10.5 or when required by an arbitrator or a court with jurisdiction. In no event shall either Party be liable hereunder for any consequential, special, or punitive damages. Notwithstanding anything to the contrary contained in this Agreement, in no event shall: (i) any partner, officer, director, member, shareholder, employee, affiliate, manager, representative, or agent of Developer be personally liable for any breach of this Agreement by Developer or for any amount which may become due to the City under the terms of this Agreement; or (b) any board, commission, department, member, commissioner, officer, agent, or employee of the City be personally liable for any breach of this Agreement by City or for any amount which may become due to Developer under the terms of this Agreement.

10.5 **Attorneys' Fees**. Should any legal action be brought by either Party against the other for default under this Agreement or to enforce or interpret any provision hereof, the Party prevailing in such action shall be entitled to recover against the non-prevailing Party its reasonable attorneys' fees and costs incurred in such action. The provisions of this Section 10.5 shall survive the expiration or termination of this Agreement.

10.6 **Nexus/Reasonable Relationship Challenges**. Developer consents to, and waives any rights it may have now or in the future to challenge the legal validity of, the conditions or requirements set forth in this Agreement including, without limitation, any claim that they constitute an abuse of the police power, violate substantive due process, deny equal protection of the laws, effect a taking of property without payment of just compensation, or impose an unlawful tax. Developer reserves the right, however, to challenge in court any future fee, exaction, or other Applicable Rules that would, in Developer's opinion, conflict with Applicable Law (including this Agreement) or reduce the development rights provided by this Agreement..

10.7 **No Waiver**. No waiver of any provision of this Agreement shall be binding unless executed in writing by the Party making the waiver. No waiver of any

provision of this Agreement shall be deemed to constitute a waiver of any other provision, whether or not similar, nor shall any waiver constitute a continuing waiver unless the written waiver so specifies. Except as otherwise expressly provided in this Agreement, any failure or delay by a Party in asserting any of its rights or remedies as to any default shall not operate as a waiver of any default or of any such rights or remedies, nor shall it deprive any such Party of its right to institute and maintain any actions or proceedings that it may deem necessary to protect, assert, or enforce any such rights or remedies

ARTICLE 11
MISCELLANEOUS PROVISIONS

11.1 **Entire Agreement**. This Agreement, including the preamble paragraph, Recitals, and Exhibits constitute the entire understanding and agreement between the Parties with respect to the subject matter of this Agreement.

11.2 **Binding Covenants; Run With the Land**. All of the provisions, agreements, rights, powers, standards, terms, covenants, and obligations contained in this Agreement shall be binding upon the Parties and their respective successors (by merger, reorganization, consolidation, or otherwise) and assigns, devisees, administrators, representatives, lessees, and all of the persons or entities acquiring the Property or any portion thereof, or any interest therein, whether by operation of law or in any manner whatsoever, and shall inure to the benefit of the Parties and their respective successors (by merger, consolidation, or otherwise) and assigns. All of the provisions of this Agreement shall be enforceable as equitable servitudes and constitute covenants running with the land pursuant to applicable law, including but not limited to, Section 1468 of the Civil Code of the State of California.

11.3 **Applicable Law and Venue**. This Agreement has been executed and delivered in and shall be interpreted, construed, and enforced in accordance with the laws of the State of California, without reference to any of its conflict of laws principles. All rights and obligations of the Parties under this Agreement are to be performed in the County of Riverside. The exclusive venue for any disputes or legal actions hereunder or arising out of or in connection with this Agreement shall be the Superior Court of California in and for the County of Riverside and all Parties waive their respective rights to change venue pursuant to Section 394 of the Code of Civil Procedure.

11.4 **Construction of Agreement**. The Parties have mutually negotiated the terms and conditions of this Agreement and its terms and provisions have been reviewed and revised by legal counsel for both City and Developer. Accordingly, no presumption or rule that ambiguities shall be construed against the drafting Party shall apply to the interpretation or enforcement of this Agreement. Language in this Agreement shall be construed as a whole and in accordance with its true meaning. As used herein: (a) the singular shall include the plural (and vice versa) and the masculine or neuter gender shall include the feminine gender (and vice versa) where the context so requires; (b) locative adverbs such as "herein," "hereto," "hereof," and "hereunder" shall refer to this Agreement in its entirety and not to any specific section or paragraph; (c) the terms

"include," "including," and similar terms shall be construed as though followed immediately by the phrase "but not limited to;" (d) "shall" and "must" are mandatory and "may" is permissive; and (e) "or" is not necessarily exclusive. Each reference in this Agreement to this Agreement shall be deemed to refer to this Agreement as amended from time to time pursuant to the provisions of this Agreement, as applicable, whether or not the particular reference refers to such possible amendment.

11.5 **Project Is a Private Undertaking; No Joint Venture or Partnership**. The development proposed to be undertaken by Developer on the Project Site is a private development, except for that portion to be devoted to Public Improvements to be constructed by Developer. Developer is not a state or governmental actor with respect to any activity conducted by the Developer hereunder. City has no interest in, responsibility for, or duty to third persons concerning any of said improvements. Nothing in this Agreement, in any actions or negotiations leading to this Agreement, in any acts or omissions under this Agreement, or otherwise is intended to or does establish the City and Developer as partners, co-venturers, or principal and agent with one another.

11.6 **Force Majeure**. Subject to the limitations set forth below, performance by any Party of its obligations hereunder shall be excused and the required date for performance thereof shall be extended day for day during any period of "**Permitted Delay**" as hereinafter defined, subject, however, to the requirement that Developer must promptly communicate with the City concerning the delay and provide reasonable documentation of Developer's good faith efforts to diligently pursue performance as required under this Agreement. For purposes hereof, Permitted Delay shall mean delay beyond the reasonable control and without the fault of the Party claiming the delay (and despite the good faith efforts of such Party) first arising after the Effective Date (except for item (xii) below) including, but not limited to: (i) acts of God; (ii) civil commotion; (iii) riots; (iv) strikes, picketing, or other labor disputes; (v) shortages of materials or supplies; (vi) damage to work in progress by reason of fire, floods, earthquake, or other casualties; (vii) an Event of Default of the other Party; (viii) restrictions imposed or mandated by any regulatory authorities, utility providers, or other public agencies, or delays in obtaining any Third-Party Agency Approvals; (ix) enactment of conflicting state or federal laws or regulations, (x) judicial decisions or similar legal incapacity to perform, (xi) epidemics and pandemics, including COVID 19-induced restrictions on the ability of any Party to perform its obligations of this Agreement; (xii) litigation brought by a third party attacking the validity of this Agreement; and (xiii) delays caused by the City.

11.7 **Recordation**. Pursuant to Section 65868.5 of the Development Agreement Statute the City shall cause this Agreement to be recorded with the Riverside County Recorder within ten (10) days after execution of the Agreement or any amendment thereto, with costs to be borne by Developer.

11.8 **Signature in Counterparts**. This Agreement may be executed in duplicate counterpart originals, each of which is deemed to be an original, and all of which when taken together shall constitute one and the same instrument.

11.9 **Computation of Time; Time of the Essence**. All references in this Agreement to "days" shall mean calendar days unless expressly referred to as "business days." The time in which any act is to be done under this Agreement is computed by excluding the first day, and including the last day, unless the last day is a Saturday, Sunday, or holiday, and then that day is also excluded. If the day for performance of any obligation under this Agreement is a Saturday, Sunday, or holiday, then the time for performance of that obligation shall be extended to the first following day that is not a Saturday, Sunday, or holiday under the laws of California.

11.10 **Notices**. Any notice, demand, or other communication required to be given by Developer or City pursuant to this Agreement shall be in writing and shall be sufficiently given if (a) addressed as set forth below and (b) delivered in one of the following ways, and shall be deemed to have been delivered or received (i) three (3) days after the date when deposited in the United States registered or certified mail, return receipt requested, with postage prepaid (except in the event of a postal disruption, by strike or otherwise, in the United States), (ii) when personally delivered, (iii) when sent by electronic means, provided receipt was promptly confirmed in writing by another means of notice allowed in this Section 11.10 within one (1) business day, or (iv) one business day after the date deposited with a nationally recognized courier service (e.g., Federal Express) for next day delivery. The current principal office addresses and email addresses of the City and Developer are as follows:

To City:	City of Coachella 53990 Enterprise Way Coachella, CA 92236 Attn: Kendra Reif E-mail: kreif@coachella.org
With a copy to:	Best Best & Krieger 300 S Grand Avenue Fl 2 Los Angeles, CA 90071 Attn: Seth Merewitz E-mail: seth.merewitz@bbklaw.com

To Developer: Empire Airport LLC c/o
Haagen Company, LLC
12302 Exposition Blvd
Los Angeles, CA 90064
Attention: Alexander Haagen III
Manager
E-mail:AH3@haagenco.com

With a copy to: Rob Scapa
Haagen Company, LLC
12302 Exposition Blvd
Los Angeles, CA 90064
E-mail:

And to: Procopio, Cory, Hargreaves & Savitch LLP
200 Spectrum Center Drive, Suite 1650
Irvine, CA 92618
Attn: James D. Vaughn, Esq.
Email: james.vaughn@procopio.com

Either Party to this Agreement may at any time, upon written notice delivered via certified mail or email to the other Party, designate any other person or address in substitution of the person and address to which such notice or communication shall be given.

If failure to respond to a specified notice, request, demand, or other communication within a specified period would result in a deemed approval, a conclusive presumption, a prohibition against further action or protest, or other adverse result specifically provided under this Agreement, the notice, request, demand, or other communication shall state clearly and unambiguously on the first page, with reference to the applicable provisions of this Agreement, that failure to respond in a timely manner could have a specified adverse result.

11.11 **No Third Party Beneficiaries**. This Agreement and all provisions hereof is made and entered into for the sole protection and benefit of City, Developer, and their successors and assigns. No other person shall have right of action based upon any provision in this Agreement.

11.12 **Conflict of Interest**. No member, official, or employee of City shall make any decision relating to this Agreement which affects his or her personal interest or the interest of any corporation, partnership, or association in which he or she is directly or indirectly interested.

11.13 **Severability**. If any term, provision, covenant, or condition of this Agreement or its application to any Party or circumstance is held by a court of competent jurisdiction to be invalid, void, or unenforceable to any extent, the remaining provisions of this Agreement or the application of the term, provision, condition, or covenant to

persons or circumstances other than those as to whom or which it is invalid or unenforceable, shall not be affected and shall continue in full force and effect to the fullest extent permitted by law, unless enforcement of the remaining portions of the Agreement would be unreasonable or grossly inequitable under all the circumstances or would frustrate the purposes of this Agreement.

11.14 **Further City Actions**. Except as may be otherwise specifically provided herein, whenever any approval, notice, direction, consent, request, waiver, or other action by the City is required or permitted under this Agreement, such action may be given, made, or taken by the Designee. The Designee is authorized to execute and deliver, on behalf of the City and to take any action necessary or desirable to effectuate the provisions and intent of this Agreement.

IN WITNESS WHEREOF, the Parties hereto have executed this Agreement as of the day and year first above written.

DEVELOPER:

EMPIRE AIRPORT, LLC,
by Haagen Company LLC, its Manager
a California limited liability company,

By:_____
Alexander Haagen III, Its Manager

CITY:

CITY OF COACHELLA, a California municipal corporation

By:_____
Name:
Title:

ATTEST:

_____
Name
City Clerk

APPROVED AS TO FORM
LAW FIRM

_____
Name
City Attorney

Exhibit A

Legal Description Of Property

Certain real property consisting of approximately 47.96 acres located in the City of Coachella, County of Riverside, California, legally described on Exhibit A attached to the Development Agreement and generally located at the northwest corner of the intersection of State Route 86 and Airport Boulevard.

Exhibit B

Project Description

The proposed Project would include the development of a currently vacant and undeveloped approximate 47.96 acres in the southeastern portion of the city of Coachella. The overall proposed Project site would be developed for approximately 42.36 acres of industrial uses while an Imperial Irrigation District (IID) substation would be located at the northern 5.6 acres of the overall Project site. As a new business park development within the City, the overall proposed Project site would be developed for industrial uses comprised of large and small warehouse, personal vehicle storage and self-storage units, small business use spaces, a small retail and restaurant development, a billboard sign, and a fuel station with a convenience store, as well as associated landscaping, parking, lighting, and signage. Below is a summary of the Project components:

• The approximate 4,000 square foot (sqft) fuel station with associated convenience store and parking would be located at the site's entrance along Airport Boulevard, with an approximate 4,650 sqft retail and drive-through restaurant located to the northeast of the site entrance.

• Eighteen (18) proposed small business buildings, approximately 4,500 sqft in size each and totaling about 81,000 sqft, would be located along the site's eastern frontage along SR 86 and to the north of the fuel station and convenience store site within the southern portion of the overall Project site.

• Four (4) structures for storing personal vehicles averaging 19,200 sqft (for an estimated total of 76,800 sqft) with an internal open space area would be located to the north of the small business buildings and to the west of the proposed small warehouse buildings on site.

• Seventeen (17) self-storage buildings totaling 128,600 sqft, ranging in size between 5,200 sqft and 10,400 sqft, would be located in the center portion of the site, west of the small warehouse buildings.

• Five (5) small warehouse structures, ranging in size from 9,600 sqft to 24,000 sqft (totaling approximately 96,000 sqft) would also be located along the site's eastern frontage along SR 86. Six (6) large warehouse structures ranging in size from 22.400 sqft to 48,800 sqft, totaling approximately 233,100 sqft of warehouse space would be located along the northern portion of the site, in close proximity to the proposed electric substation

• An IID substation facility is proposed to be located at the northern end of the overall Project site on a parcel that has been acquired from the California Department of Transportation (Caltrans). The Project Applicant now owns the substation parcel. The new 315-foot x 315-foot electrical substation will require at least one 1-25 mega volt ampere (MVA) 92/13.2 kilovolt (kV) transformer bank in order to provide adequate power for the proposed Project. The final components of the new substation will be determined in consultation with IID and may include additional facilities to improve electrical system resiliency and reliability to the surrounding community. There also would be 92 kV transmission line extensions and associated distribution

feeders/backbones and distribution line extensions installed on the substation portion of the overall Project site.

• Utility connections to Coachella Valley Water District (CVWD) waterlines and sewer lines are proposed as part of Project implementation.

Exhibit C

Construction Phasing

	Phase I -2027	Phase II-2030	Phase III-2035
Large Warehouse Area (sq ft)	110,990	48,800	73,400
Small Warehouse Area (sq ft)	24,000	52,800	19,200
Small Business Area (sq ft)	31,500	22,500	27,000
Self Storage Area (sq ft)	67,300	------	61,300
Vehicle Storage Area (sq ft)	19,200	19,200	------
Fuel Center, C-Store (sq ft)	4,000	------	------
Retail – Restaurants (2) Area (sq ft)	4,650	------	------
Total Area per Phase	261,550	143,300	180,900

Exhibit D

Summary of Entitlement Applications and Fee Deposits

A. Summary of Entitlement Applications

Application	Description	Date Submitted	City File #	Notes
Change of Zone No. 20-01	Change from M-H (Heavy Industrial) to MS (Manufacturing Services) and C-G (General Commercial)	07/13/2020	# CZ 20-01	
Conditional Use Permit 324	Cannabis-related land uses	07/13/2020	# CUP 324	
Conditional Use Permit 325	Proposed drive through	07/13/2020	# CUP 325	
Conditional Use Permit 326	Proposed service station	07/13/2020	# CUP 326	
Architectural Review No. 20-04		07/13/2020	# AR 20-04	
Tentative Parcel Map No. 37921		07/13/2020	# TPM No. 37921	
Development Agreement		07/14/2025	# DA 25-02	

Exhibit E

Existing Development Fees and Credits

Fire:	Industrial: $198.57 per 1,000 sq. ft.
	Commercial: $381.04 per 1,000 sq. ft.
	Ind. Warehouse: $99.28 per 1,000 sq. ft.
Police:	Industrial: $12.10 per 1,000 sq. ft.
	Commercial: $23.22 per 1,000 sq. ft.
	Ind. Warehouse: $6.05 per 1,000 sq. ft.
Govt. Facilities:	Industrial: $93.04 per 1,000 sq. ft.
	Commercial: $178.54 per 1,000 sq. ft.
	Ind. Warehouse: $46.52 per sq. ft.
Streets/Trans:	Industrial: $3,027.72 per 1,000 sq. ft.
	Commercial: $3,730.15 per 1,000 sq. ft.
	Ind. Warehouse: $1,513.86 per 1,000 sq. ft.

Notes: Project subject to TUMF and MSHCP Fees in effect at time of payment

Exhibit F

Form: Assignment And Assumption Agreement

REQUESTED BY
AND WHEN RECORDED MAIL TO:

Exempt From Recording Fee Pursuant to Government Code § 27383

ASSIGNMENT AND ASSUMPTION AGREEMENT

This Assignment and Assumption Agreement ("Assignment") is entered into this ____ day of ____ by and between Empire Airport, LLC, a California limited liability company ("Assignor") and _____, a _____ ("Assignee") with reference to the following:

RECITALS

A. Assignor is the owner in fee simple of certain real property located in the City of Coachella, California, and legally described on Exhibit A attached hereto and incorporated herein by this reference (the "Property" or "Site").

B. On _____ the Assignor and the City of Coachella, a California municipal corporation and charter city ("City") entered into that certain Development Agreement, which was recorded against the [Site or Development Property] in the Official Records of the County of Riverside on _____, as Instrument No. _____ (the "Development Agreement").

C. Pursuant to the terms of the Development Agreement, the Site was to be used for a _____ (the "Project").

D. Assignor now desires to transfer the Site to Assignee, and concurrently therewith, to transfer to Assignee all of Assignor's rights and responsibilities under the Project Agreements [to the extent that such rights and responsibilities relate to the Site].

NOW, THEREFORE, in consideration of the foregoing Recitals, which are incorporated herein by this reference, and for good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the parties agree as follows:

1. Assignor hereby assigns to Assignee all of Assignor's rights and responsibilities under the terms of the Development Agreement, [but only to the extent that such rights and responsibilities arise from the ownership of the Project and/or Site] from and after the "Effective Date" (as that term is defined in Section 4 below) of this Assignment (collectively, the "Assigned Rights and Obligations").

2. Assignee hereby accepts the foregoing assignment of the Assigned Rights and Obligations, and agrees to be bound by the terms of the Development Agreement [to the extent that such terms affect or are affected by ownership of the Site].

3. The parties hereto acknowledge and agree that Assignee shall not be responsible for any of the obligations of the Development Agreement which arise from ownership of any portion of the Site and which arise prior to the Effective Date hereof. As such, a default by Assignor under the Development Agreement prior to the Effective Date hereof ("Assignor's Default") shall not be deemed a default by Assignee, and Assignor shall indemnify, defend and hold harmless Assignee from any and all losses, claims or liability, including without limitation reasonable attorneys' fees and costs, arising from an Assignor's Default. A default by Assignee under the Development Agreement with respect to the Site after the Effective Date hereof ("Assignee's Default") shall not be deemed a default by Assignor, and Assignee shall indemnify, defend and hold harmless Assignor from any and all losses, claims or liability, including without limitation reasonable attorneys' fees and costs, arising from an Assignee's Default.

4. This Assignment shall be deemed effective upon the last of the following events to occur: (a) conveyance of the Site to Assignee as evidenced by the recording of the grant deed therefor in the Official Records of the County of Riverside, California, and (b) the written consent to this Assignment by the City with respect to the Assigned Obligations arising under the Project Agreements (herein referred to as the "Effective Date").

5. Except as otherwise described in paragraph 4 above, the parties hereto each warrant and represent that they have taken all necessary corporate action to authorize the execution and performance of this Assignment and that the individuals executing this document on behalf of the parties are authorized to do so, and by doing so, create binding obligations as described herein of the party represented.

6. This Assignment shall be governed by the internal laws of the State of California, without regard to conflict of law principles.

7. This Assignment may be signed in counterparts which, when signed by both parties hereto, shall constitute a binding agreement.

WHEREFORE, the parties hereto have executed this Assignment on the date first written above.

"ASSIGNOR"

EMPIRE AIRPORT, LLC,
by Haagen Company LLC, its Manager,
a California limited liability company,

Date:_____, 2026

By:_____
Alexander Haagen III, Its Manager

"**ASSIGNEE**"

_____

Date:_____, 2026

By: _____
_____

CONSENT

By execution below, the City hereby consents to the foregoing assignment.

CITY OF COACHELLA, a California municipal corporation

By: _____
Its: City Manager

ATTEST:

_____
City Clerk

APPROVED AS TO FORM:
BEST, BEST & KREIGER, LLP

_____
City Attorney

EXHIBIT A

LEGAL DESCRIPTION OF THE SITE

[attachment to Assignment and Assumption Agreement]

APPENDIX I

1. DEFINED TERMS.

1.1. Additional Term. An extension of the term of the Agreement from the end of the Initial Term for an additional period of ten (10) years, so long as Developer has commenced construction of some improvements for the Project during the Initial Term.

1.2. Administrative Fees. Fees charged by the City, on a City-wide basis in effect at the time of payment to cover the costs of City's review of applications for any permit or other approval or review or inspection by City.

1.3. Agreement. This Development Agreement between the City of Coachella and Empire Airport, LLC.

1.4. Airport Boulevard Improvements. The Project's improvements on the portion of the Project Site fronting Airport Boulevard east of the Whitewater Bridge and west of the State Route 86 interchange boundary, from the northerly edge of the County Bridge widening improvement project up to the northerly edge of the Right of Way abutting the Project Site, as determined by the demands outlined in the traffic study performed as part of the Project EIR, including the design and installation of a new traffic signal at the Project's main entrance at Airport Boulevard.

1.5. Annual Review. Annual review as required by Government Code Section 65865.1 and further described in Article 7 of this Agreement.

1.6. Applicable Rules. The rules, regulations, ordinances, and officially adopted policies of the City in full force and effect as of the Effective Date of this Agreement.

1.7. Assignment and Assumption Agreement. A duly executed agreement between Developer and a Permitted Transferee whereby the Developer assigns and the Permitted Transferee assumes all of Developer's rights and obligations under this Agreement as to that portion of the Project Site or Property transferred to that Permitted Transferee pursuant to the provisions of Article 9 of this Agreement.

1.8. CEQA. California Environmental Quality Act (*Public Resources Code Section 21000, et seq.*)

1.9. CFD. Mello-Roos Community Facilities District.

1.10. City. The City of Coachella.

1.11. Community Benefits. The extraordinary benefit provided by Developer to City and its residents, as more specifically described in Section 4.4 of this Agreement.

1.12. Conditions of Approval. The conditions of approval imposed by the City on the Project Site Development Permits, as identified in Recital C of the Agreement.

1.13. Construction Cost Index. The Construction Cost Index published monthly by the Engineering News-Record (ENR) to track changes in the cost of construction over time, to the extent incorporated into the City's Existing Development Fees.

1.14. Construction Phasing. Development of the Project Site is permitted to occur in phases as described and contemplated in Exhibit C.

1.15. CVPA. Coachella Valley Power Agency.

1.16. CVWD. Coachella Valley Water District.

1.17. Dedicated Public Improvements. Those Public Improvements constructed by or on behalf of Developer that have been accepted by City in accordance with the Applicable Rules.

1.18. Defaulting Party. Party who fails to perform any material term or provision of this Agreement as more fully described in Section 10.1 of the Agreement.

1.19. Developer. Empire Airport, LLC, a California limited liability company.

1.20. Developer Affiliate. A parent or subsidiary of Developer or a company under common ownership with Developer.

1.21. Developer Event of Default. Any failure by Developer to perform any material term or provision of this Agreement that is not cured within 60 days following written notice of default from City (or such further time as may be reasonably required to cure), as more fully described in Article 10 of this Agreement.

1.22. Development Agreement Statute. Sections 65864 et seq. of the Government Code.

1.23. Development Fees. All fees, contributions, exactions, dedications, reservations, or impositions, other than taxes or assessments, whether established for or imposed upon the Project individually or as part of a class of projects, that are imposed by City on the Project in connection with any Project Approval for any purpose, including, without limitation, defraying all or a portion of the cost of public services and/or facilities construction, improvement, operation, and maintenance attributable to the burden created by the Project.

1.24. Effective Date. The later to occur of (i) the date of execution of the Development Agreement by both Parties, and (ii) the effective date of Ordinance No. ____ approving Agreement.

1.25. Event of Default. Any failure by either Party to perform any material term or provision of this Agreement that is not cured within 60 days following written notice of default

from the other Party (or such further time as may be reasonably required to cure), as more fully described in Article 10 of this Agreement.

1.26. Existing Development Fees. The Development Fees applicable to the Project as set forth on Exhibit E.

1.27. Fee Credits. The fee credits or other fee reductions applicable to the Project as set forth on Exhibit E.

1.28. Financing Mechanism. A Mello-Roos Community Facilities District or other financing district used to fund public facilities.

1.29. Future Changes to the Applicable Rules. Any changes in the Applicable Rules, or any provisions of future general plans, specific plans, zoning ordinances, or other rules, regulations, ordinances or policies (whether adopted by means of ordinance, initiative, referenda, resolution, policy, order, moratorium, or other means) occurring after the Effective Date.

1.30. IID. Imperial Irrigation District.

1.31. Indemnified Parties. The City and its elected and other officials, officers, agents, and employees.

1.32. Initial Term. The period commencing upon the Effective Date and continuing thereafter for a period of ten (10) years, unless extended pursuant to the mutual agreement of the Parties or earlier terminated as provided in the Agreement.

1.33. Insubstantial Modification. Any minor modification or clarification to this Agreement which does not materially modify (i) the Term of this Agreement; (ii) permitted uses of the Project Site, (iii) maximum density or intensity of use within the Project, except as specifically allowed in the Project Approvals, (iv) provisions for the reservation or dedication of land, (v) conditions, terms, restrictions or requirements for subsequent discretionary actions, or (vi) monetary obligations of Developer. By way of example only, changes to mix of buildings and allowed uses within the conceptual site plan that do not exceed the total square footage allowed on the Project site and do not materially increase the trip generation or VMT caused by the Project are anticipated to constitute Insubstantial Modifications.

1.34. Material Changes. The circumstances described in subparts (a), (b), and (c) of Public Resources Code Section 21166.

1.35. Mitigation Measures. Mitigation measures listed in the EIR.

1.36. Mortgage. Any mortgage, deed of trust, or other security device securing financing with respect to the Property

1.37. Mortgagee. Any deed of trust beneficiary, mortgagee or other secured party who acquires title to the Property, or any portion thereof, by foreclosure, trustee's sale, or deed in lieu of foreclosure**.**

1.38. Notice of Default. Written notice to a Party asserting that Party's failure to perform a material term of the Agreement.

1.39. Operating Memorandum. Written modification executed by Parties approved by City Manager or designee as an Insubstantial Modification.

1.40. Party or **Parties.** City of Coachella and Empire Airport, LLC.

1.41. Permitted Delay. Delay beyond the reasonable control and without the fault of the Party claiming the delay (and despite the good faith efforts of such Party) first arising after the Effective Date (except for item (xii) below) including, but not limited to: (i) acts of God; (ii) civil commotion; (iii) riots; (iv) strikes, picketing, or other labor disputes; (v) shortages of materials or supplies; (vi) damage to work in progress by reason of fire, floods, earthquake, or other casualties; (vii) an Event of Default of the other Party; (viii) restrictions imposed or mandated by any regulatory authorities, utility providers, or other public agencies, or delays in obtaining any Third-Party Agency Approvals; (ix) enactment of conflicting state or federal laws or regulations, (x) judicial decisions or similar legal incapacity to perform, (xi) epidemics and pandemics, including COVID 19-induced restrictions on the ability of any Party to perform its obligations of this Agreement; (xii) litigation brought by a third party attacking the validity of this Agreement; and (xiii) delays caused by the City.

1.42. Permitted Transfer. Any Transfer consented to by City or permitted without City's consent under Section 9.1 of the Agreement.

1.43. Permitted Transferee. Transferee of a Permitted Transfer

1.44. Project. Development of the Property with a mixed-use business park, including warehouse space, small businesses, self-storage units and personal vehicle storage, a small retail and restaurant development, a billboard sign, a fuel station and convenience store, as well as associated landscaping, parking, and signage.

1.45. Project Approvals. (i) This Agreement, (ii) the Change of Zone No. 20-01from M-H (Heavy Industrial) to MS (Manufacturing Services) and C-G (General Commercial) approved by the City Council on _____ by Resolution No. _____, (iii) the Environmental Impact Report prepared for the Project, approved and certified by the City Council on _____ by City Council Resolution No. _____ (the "**Project EIR**"), (iv) Conditional Use Permit Nos. 324, 325 and 326 approved by the City Council on _____ by City Council Resolution No. _____, (v) Architectural Review No. 20-04 approved by the City Council on _____ by City Council Resolution No. _____, (vi) any future discretionary or ministerial approvals and/or permits issued for the Project (collectively, the "**Project Site Development Permits**"), and (vii) the conditions of approval associated with each and all of the foregoing approvals.

1.46. **Project EIR.** The Environmental Impact Report prepared for the Project, approved and certified by the City Council on _____ by City Council Resolution No. _____.

1.47. **Project Site Development Permits.** Any future discretionary or ministerial approvals and/or permits issued for the Project.

1.48. **Property** or **Project Site.** Certain real property consisting of approximately 47.96 acres located in the City of Coachella, County of Riverside, California, legally described on Exhibit A attached to the Development Agreement and generally located at the northwest corner of the intersection of State Route 86 and Airport Boulevard.

1.49. **Public Health and Safety Exception.** City's authority to take any legally valid action necessary to protect persons or property from dangerous or hazardous conditions which create a threat to the public health or safety, including, without limitation, authority to condition or deny a permit, approval, or agreement or other entitlement or to change or adopt any new regulations applicable to the Project so long as such condition or denial or new law (i) is limited solely to addressing a specific and identifiable issue in each case required to protect the physical health and safety of the public, and (ii) is based on written findings by City and transmitted to Developer, specifically identifying, based on objective and quantifiable evidence in the official record, the precise nature and extent of the dangerous or hazardous conditions requiring such condition or denial or change in the Applicable Rules, why there are no reasonable alternatives to the imposition of such condition or denial or changes in the law, and how such condition or denial or new law would alleviate the dangerous or hazardous condition.

1.50. **Public Improvements.** All roads, parks, drainage, sewer, water, and utility improvements, and all other infrastructure and improvements for the Project, including any onsite improvements or offsite improvements, that may or are to be dedicated or otherwise made available for public use pursuant to this Agreement or the Project Approvals.

1.51. **State or Federal Law.** A state or federal law or regulation enacted after the Effective Date.

1.52. **Subsequent Approvals.** Any future applications for discretionary or ministerial approvals and/or permits necessary or convenient for implementation of the Project, which may include, without limitation: development plans, conditional and administrative use permits, plot plans, tentative and final subdivision maps, street abandonments, design plan approvals, certificates of compliance, demolition permits, improvement agreements, infrastructure agreements, grading permits, building permits, right of way permits, site plans, sewer and water connection permits, certificates of occupancy, parcel maps, encroachment permits, and amendments thereto and to the Project Approvals.

1.53. **Substation Site.** An approximately 5.6 acre parcel to be available for a potential new electrical substation, located at the northern end of the Project site.

1.54. Term. The term of this Agreement, including the Initial Term and the Additional Term, as may be extended or terminated.

1.55. Third-Party Agency Approvals. Required approvals or clearances from various Regulatory Agencies, other third-party public agencies and utilities.

1.56. Transfer. Any sale, mortgage, hypothecation, assignment or transfer all or a portion of Developer's rights, duties, and obligations arising under this Agreement.

1.57. Transferee. Any person, partnership, joint venture, firm, or corporation who is receiving all or a portion of Developer's rights, duties, and obligations arising under this Agreement pursuant to a Transfer.

1.58. Uniform Code Regulations. California Building Standards Code, as amended by the City in accordance with the California Health and Safety Code, including requirements of the applicable Building Code, Administrative Code, Energy Code, Residential Code, Mechanical Code, Electrical Code, Plumbing Code, Fire Code, or other applicable construction codes

1.59. Vested Elements. The overall design, development, construction, and use of the Project and all improvements in connection therewith, including without limitation, permitted uses of the Property, the maximum density of development, the intensity of use, the maximum height and size of the proposed buildings, provisions for reservation or dedication of land for public purposes, the conditions, terms, restrictions, and requirements for subsequent discretionary actions, the provisions for and financing for public improvements, and the other terms and conditions of development applicable to the Property as set forth in the Project Approvals.

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AFFIDAVIT OF PUBLICATION

Brianna Greenwood
City Of Coachella - Legals
53990 Enterprise WAY
Coachella CA 92236-3817

STATE OF WISCONSIN, COUNTY OF BROWN

The Desert Sun, a newspaper published in the city of Palm Springs, Riverside County, State of California, and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issue:

PDS desertsun.com 03/13/2026
PDS Palm Springs Desert Sun 03/13/2026

and that the fees charged are legal.
Sworn to and subscribed before on 03/13/2026

Legal Clerk

Notary, State of WI, County of Brown

My commission expires

Publication Cost:	$384.14	
Tax Amount:	$0.00	
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Please do not use this form for payment remittance.

VICKY FELTY
Notary Public
State of Wisconsin

NOTICE OF PUBLIC HEARING
CITY OF COACHELLA PLANNING COMMISSION MEETING

NOTICE IS HEREBY GIVEN that the Planning Commission of the City of Coachella will hold a public hearing on Wednesday, April 1, 2026 at 6:00 p.m. at 1515 Sixth Street, Coachella CA 92236 to consider oral and written testimony and make a recommendation to the City Council regarding Change of Zone 20-01, Tentative Parcel Map 37921, Conditional Use Permits 324, 325 and 326, Architectural Review 20-04, Development Agreement 25-02 and the Coachella Airport Business Park Environmental Impact Report (EIR, SCH #2023040106) for 48± acres to be developed for industrial and commercial uses. The Project is located on the northwest corner of State Route 86 and Airport Boulevard in the City of Coachella, California. The site is identified as Assessor's Parcel Numbers (APN) 763-330-013, 763-330-018, and 763-330-029. The applicant proposes the development of 624,500 square feet of building space, consisting of warehouse, business park, self-storage and similar space, a gasoline service station and fast food restaurant with drive-through and an Imperial Irrigation District substation. Applicant: Empire Airport Co. LLC.



Pursuant to CEQA, an Environmental Impact Report (EIR, SCH #2023040106) was prepared for the project. The EIR concluded that the proposed project will not have a significant effect on the environment with the implementation of mitigation measures, with the exception of transportation impacts relating to vehicle miles traveled, which will remain significant and unavoidable.

Copies of the Application materials submitted are available for public inspection at the Coachella Development Services Department 53990 Enterprise Way, Coachella, CA 92236 between the hours of 7:00 am and 6:00 pm, Monday through Thursday. City Hall is closed on Fridays. (Se Habla Español).

In addition to submitting written comments at the address noted above, you may email kreif@coachella.org or call (760) 398-3102 before 4:30 p.m. on the day of the meeting to leave a voice message. You may request to speak via zoom by contacting the Planning Commission Secretary through the above means before 5:30 p.m. on the day of the meeting and requesting a Zoom link to the meeting. Public comments either received via email, telephonically or via Zoom must be limited to a maximum of 250 words written or three minutes spoken.

The live stream of the meeting may be viewed online by accessing the City's website at www.coachella.org, and clicking on the "Agendas/Minutes" tab located on the home page, and finding the Zoom Meetings link to the meeting on the posted agenda.

If any individual or group challenges this action in court, issues raised may be limited to those issues raised at the public hearing described in this notice or in written testimony. Any questions or comments may be directed to:

Kendra Reif, Community Development Director
53-990 Enterprise Way, Coachella, CA 92236
(760) 398-3102

BY ORDER OF PLANNING COMMISSION SECRETARY
Pub: 3/13/26