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<tr>
<td>AB</td>
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<td>ACM</td>
<td>asbestos-containing material</td>
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<td>ADT</td>
<td>average daily traffic</td>
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<td>Area of Public Effect</td>
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**Komer Desert Center**

**HDR Draft EIR**

**City of La Quinta**

**October 2005**
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1.0 INTRODUCTION AND SUMMARY

1.1 INTRODUCTION

This Draft Environmental Impact Report (EIR) has been prepared in compliance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., CEQA Guidelines (Section 15000 et seq.) as promulgated by the California Resources Agency and the Governor’s Office of Planning and Research, and the Procedures and Guidelines of the City of La Quinta. The purpose of this environmental document is to assess the potential environmental effects associated with the proposed Komar Desert Center project (Proposed Project), and to propose mitigation measures (MM), where required, to reduce impacts to less than significant levels.

The Proposed Project consists of a 26.37-acre commercial retail center, to include a proposed Costco Wholesale, miscellaneous retail commercial and restaurants, and a bus stop on State Highway 111 near the development. In addition, a water line will be constructed to provide adequate service to the site.

This Draft EIR addresses the Proposed Project including the following discretionary actions:

- Komar Desert Center Specific Plan
- Site Development Permit (including):
  - Site Plan
  - Architectural Design
  - Landscape Design
  - Sign Program
- Conditional Use Permit(s) (CUPs) (for Tire Installation and Fuel Facility and a retail use over 50,000 square feet [SFI])
- Tentative Parcel Map
- Finance Assistance Agreement

In addition, the following ministerial actions are included in the discussion of the Proposed Project:

- Grading Permit(s)
- Building Permit(s)
- Sign Permit(s)

Implementation of the Proposed Project may include the following discretionary approvals by other responsible and/or regulatory agencies:

- U.S. Army Corp of Engineers (USACE) Section 404 Permit
- California Department of Fish and Game (CDFG) Section 1602 Streambed Alteration Permit
- Santa Ana Regional Water Quality Control Board (RWQCB) Section 401 Water Quality Certification/Waiver
- California Department of Transportation (Caltrans) Encroachment Permit
- South Coast Air Quality Management District (SCAQMD)
- Coachella Valley Water District Encroachment Permit (CVWD)

It was concluded that project implementation could result in significant environmental impacts; therefore, the City of La Quinta staff made the determination to prepare an EIR.
1.2 PURPOSE OF AN EIR

The purpose of an EIR is to analyze the potential environmental impacts associated with a proposed project. CEQA Guidelines (Section 15002) state that the purpose of an EIR is to: (1) inform the public and decision makers of the potential environmental impacts of a proposed project; (2) identify methods that could reduce the magnitude of potentially significant impacts of a project; and (3) identify alternatives that could reduce the magnitude of environmental impacts or propose more effective uses of the project site.

1.3 EIR ADEQUACY

The principal use of this Draft EIR is to evaluate and disclose potential environmental impacts associated with the implementation of the Proposed Project. An EIR is an informational document and is not intended to determine the merits, or recommend approval or disapproval, of a proposed project. Ultimately, City decision makers must weigh the environmental effects of a project among other considerations, including planning, economic and social concerns.

The standards for adequacy of an EIR, defined in Section 15151 of the CEQA Guidelines, are as follows:

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

1.4 EIR BACKGROUND AND CONTENT

Development of the Proposed Project is subject to the requirements of CEQA because it is an action that has the potential to result in a physical change in the environment subject to discretionary approval by a public agency (in this case, the City of La Quinta). The City of La Quinta began the process by sending out a Notice of Preparation (NOP), including a project description and the preliminary site plan (Appendix A). The NOP was sent to 23 agencies on August 5, 2005, and identified that an EIR would be necessary. The NOP served as a chance for interested local agencies to comment on the project before the Draft EIR was written. There was a 30-day review period, during which comments regarding the Proposed Project were received by the City. The review period closed September 7, 2005. Said comments are provided for review in Appendix A.2.

1.4.1 Environmental Topics Addressed

Based on the information provided in the comments to the NOP, the following environmental topics are analyzed in this Draft EIR:

- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Hazards and Hazardous Materials
- Hydrology
- Land Use and Planning
1.0 Introduction and Summary

- Noise
- Public Services and Utilities
- Transportation and Traffic
- Visual Resources
- Water Quality

1.5 EIR PROCESSING

This Draft EIR was prepared under the direction and supervision of the City of La Quinta Planning Department. It will be circulated for a 45-day public review and comment period as mandated by CEQA. A public hearing(s) will be held before the City of La Quinta Planning Commission to consider the Proposed Project and the adequacy of the Draft EIR, at which time further public comments will be heard. After the public hearing(s), written responses to all written comments and public testimony concerning environmental issues will be compiled into a Final EIR. As required by CEQA, responses to comments submitted by public agencies will be distributed to those agencies for review, prior to consideration of the Final EIR by the City Council. At the conclusion of the Final EIR public hearing process, the City Council will determine whether to certify the Final EIR as adequate and complete. In addition, the Findings of Fact and Mitigation Monitoring and Reporting Program will be certified along with the Final EIR.

1.6 ENVIRONMENTAL EFFECTS ELIMINATED FROM FURTHER REVIEW

The City of La Quinta determined that certain environmental effects (on agriculture, population and housing, and recreation) of the project would not be significant. These impacts, therefore, are not discussed in this Draft EIR. The following presents the rationale for these issues not being evaluated in this Draft EIR.

Agriculture Resources

The project site is not utilized for agricultural cultivation, is not under a Williamson Contract, and is not designated as Prime Farmland, Unique Farmland or Farmland of Statewide Importance. Therefore, no significant impacts to agricultural resources will occur as a result of the Proposed Project. Agricultural resources will not be discussed further in this Draft EIR.

Population and Housing

The Proposed Project could induce population growth by providing jobs, since commercial uses will be constructed, but the project responds to the demands for more commercial development in the City. The project is consistent with the General Plan, which provides a balance of employment opportunities and residential uses. The site does not contain any housing that would be removed as part of project implementation. No adverse impacts to population and housing are anticipated as a result of the Proposed Project. Population and housing will not be discussed further in this Draft EIR.

Recreation

The Proposed Project involves the construction and operation of a commercial center on a vacant parcel and will not increase the burden on parks in the area, nor will it include construction or expansion of recreational facilities. No adverse impacts to parks and recreation are anticipated as a result of the Proposed Project. Parks and Recreation will not be discussed further in this Draft EIR.
1.0 Introduction and Summary

1.7 AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

Section 15123(b)(2) of the CEQA Guidelines requires that an EIR summary identify areas of controversy known to the Lead Agency, including issues raised by other agencies and the public. Some issues of concern were expressed through responses to the NOP.

The following issues and questions were raised in letters received on the NOP. A reference to the section in which each issue is addressed follows the comment in italics. Copies of the letters received in response to the NOP are included in Appendix A.2.

South Coast Air Quality Management District

- SCAQMD recommended that the analysis of the potential air quality impacts associated with the Proposed Project use the SCAQMD CEQA Air Quality Handbook. Analysis of air quality impacts associated with construction and operation of the Proposed Project utilized the SCAQMD CEQA Air Quality Handbook. (Section 4.1, Air Quality)

- The lead agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Construction and operation phases of the Proposed Project were analyzed for any potential adverse air quality impacts. (Section 4.1, Air Quality)

- When preparing the air quality analysis for the Proposed Project, it is recommended that the lead agency perform a localized significance analysis by either using the localized significance thresholds (LSTs) or perform dispersion analysis. The Air Quality Analysis for the Proposed Project used LSTs to determine construction and operational impacts. (Appendix B Air Quality Analysis)

- A mobile source risk assessment shall be performed by the lead agency since the project generates and attracts vehicle trips. Mobile source risk assessment was performed for the Proposed Project. (Appendix B Air Quality Analysis)

- CEQA requires that feasible mitigation measures be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. Mitigation measures are provided to address the significant project impacts. (Section 4.1, Air Quality)

- Recommendations also include the use of the CEQA Air Quality Handbook to assist in identifying mitigation measures for any potential impacts associated with the Proposed Project. The CEQA Air Quality Handbook was utilized in identifying mitigation measures for the Proposed Project. (Section 4.1, Air Quality)

Desert Sands Unified School District

- The project proponents for the Proposed Project would be required to pay the maximum allowable commercial/industrial school fee pursuant to Assembly Bill (AB) 2926, AB 1600 and AB 181 at the time building permits are issued. The project applicant shall be required to pay commercial development fees pursuant to AB 2926, AB 1600 and AB 181. (Section 4.7 Public Services and Utilities)

California Department of Fish and Game

- A complete assessment of flora and fauna within and adjacent to the project area should be conducted, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats. Per conversations with Kimberly Nicol of the CDFG, a list of sensitive wildlife species for the La Quinta area (including Palm Springs pocket mouse, Palm...
1.0 Introduction and Summary

Springs round-tailed ground squirrel, and western burrowing owl) was obtained. A complete assessment of sensitive plant and wildlife species was conducted and a discussion is included of special-status plants and animals and rare natural communities found on the project site. (Appendix B, Biological Resources Technical Report, Section 4.2, Biological Resources)

- The EIR should include thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The EIR includes a thorough discussion of direct, indirect, and cumulative impacts to biological resources resulting from development of the Proposed Project. (Section 4.2, Biological Resources)

- A range of alternatives should be analyzed to ensure that alternatives to the Proposed Project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resource should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate. Alternatives including No Project, Reduced Square Footage, and Alternative Site are analyzed. Alternatives were chosen to avoid or otherwise minimize air and traffic impacts. No significant impacts to biological resources were identified. The Proposed Project was designed to minimize impacts and those not able to be avoided are mitigated (Section 5.0 Project Alternatives)

- A California Endangered Species Act (CESA) Permit must be obtained if the project has the potential to result in “take” of species of plants or animals listed under CESA, either during construction or over the life of the project. Revisions to the Fish and Game Code, effective January 1988, require that the Department issue a separate CEQA document for the issuance of a CESA permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit. Construction of the Proposed Project would not impact any listed plant or wildlife species. (Section 4.2, Biological Resources, Section 4.2.2)

- The Department opposes the elimination of watercourses and/or their channelization or conversion to subsurface drains. All wetlands and watercourses, whether intermittent or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Wetlands are not found on the project site, but temporary impacts to “Waters of the U.S.” and “Waters of the State” would occur within the La Quinta Evacuation Channel during trenching of the off-site water line and storm drain. Permanent impacts would occur with the installation of a concrete slab used for protection and stabilization of the storm drain in the Channel. (Section 4.2, Biological Resources)

Native American Heritage Commission

- This letter recommended that contact be initiated with the Native American Heritage Commission for a record search of the area of project effect (APE) to determine whether or not the APE has been previously surveyed for cultural resources; if any known cultural resources have been recorded on or adjacent to the APE; low, moderate, or high probability that cultural resources are located in the APE; and to determine if previously unrecorded cultural resources are present. Contact was initiated with the Native American Heritage Commission to conduct a record search of the APE. These findings are discussed in the EIR. (Section 4.3, Cultural Resources)

- If an archaeological survey is required, a professional report detailing the findings and recommendations of the records search and field survey shall be submitted to the planning
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department. The Phase I Cultural Resources study considered all previously conducted cultural resources studies and archaeological site records located within a quarter-mile radius of the project area. A supplemental cultural resources Phase I record search and survey study for an additional portion to the north and east of the project area was conducted. As recommended by the Phase I survey report, a Phase II archaeological test study was conducted. A final report containing site forms, site significance, and mitigation measures has been prepared and submitted to the City of La Quinta Planning Department. (Section 4.3, Cultural Resources)

- This letter also recommended that contact with the Native American Heritage Commission be conducted for a Sacred Lands File search of the project area and information on tribal contacts in the project vicinity that may have additional cultural resource information. A Native American consultation letter was sent to the Native American Heritage Commission requesting a review of the Sacred Lands Inventory, as well as a list of Native American individuals who may have knowledge of cultural resources in the project area. (Section 4.3, Cultural Resources)

- The lack of surface evidence of archeological resources does not preclude their subsurface existence. There is the potential of subsurface archeological resources being discovered on the project site. A mitigation measure is required including the requirement of a cultural resources monitor be on-site during initial grading. If buried cultural resources are found on the project site, the monitor is empowered to divert construction to allow time to evaluate the artifacts and make recommendations. (Section 4.3, Cultural Resources)

- Provisions for the discovery of Native American human remains or cemeteries should be included in the mitigation plans. A mitigation measure discussing the possibility of discovering human remains on the project site is outlined in the EIR. (Section 4.3, Cultural Resource)

- Avoidance should be considered when significant cultural resources are discovered during the course of project planning, as defined in Section 15370 of the CEQA Guidelines. No significant cultural resources were found on the project site. (Section 4.3, Cultural Resources)

California Department of Health Services

- If a new water supply well is developed or modifications to the existing domestic water treatment system is proposed to serve the Komar Desert Center project site, an application to amend the water system permit must be reviewed and approved by the California Department of Health Services Riverside District Office. These future developments may be subject to separate environmental review. A new water supply well is not proposed to be developed and there would be no modifications to the existing domestic water treatment system for the Proposed Project. (Section 4.9, Public Services and Utilities)

Coachella Valley Water District

- A portion of the project area is adjacent to the right-of-way of the La Quinta Evacuation Channel. The District requests that the developer be required to install suitable facilities to prohibit access to this right-of-way. The project applicant shall install a screen wall in accordance with the City of La Quinta Municipal Code along the portion of the project site adjacent to the La Quinta Evacuation Channel. (Section 2.0, Project Description.)

- The District requests that the developer obtain an encroachment permit from them prior to any construction within the right-of-way of the La Quinta Evacuation Channel. This includes, but is not limited to, surface improvements, drainage inlets, landscaping, and roadways. The project applicant shall obtain an encroachment permit from the Coachella Valley Water District for temporary construction within the Channel. (Section 2.0, Project Description)
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- Nuisance flows or other non-stormwater generated runoff may not be discharged into the La Quinta Evacuation Channel. Nuisance flows or other non-stormwater generated runoff would not be discharged into the Channel during construction or operation of the Proposed Project. Stormwater from the buildings and parking areas on the project site would be carried through a conveyance system to a hydrodynamic separator device (CDS, or continuous deflective separation unit) and ultimately discharged to the La Quinta Evacuation Channel. (Section 4.9, Water Quality)

Department of Toxic Substances Control

- The comment letter from the Department of Toxic Substance Control (DTSC) misidentified the EIR for Komar Desert Center Project as a Negative Declaration (ND). References to “the ND” are actually directed towards the EIR.

- The ND should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. Portions of the project site have historically been used for agricultural purposes. The release of hazardous substances during the historic use of the project site is analyzed in the EIR. (Section 4.5, Hazards and Hazardous Materials)

- For all identified known or potentially contaminated sites, the ND should evaluate whether conditions at the site may pose a threat to human health or the environment. A Phase I Assessment may be sufficient to identify these sites. A Phase I Environmental Site Assessment was conducted for the project site. (Section 4.5, Hazards and Hazardous Materials)

- The ND should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. In response to conclusions of the Phase I Environmental Site Assessment, soil sampling was performed at the project site by Kleinfelder because of past agricultural uses at the site. The Department of Toxic Substances of the California Environmental Protection Agency would provide regulatory oversight if levels of soil contamination were found to be above the U.S. EPA Region IX Preliminary Remediation Goals (PRGs) for residential soil (Appendix F: Phase I Environmental Site Assessment)

- If hazardous materials or wastes were stored at the site, an environmental assessment should be conducted to determine if a release has occurred. A Phase I Environmental Assessment was prepared for the Proposed Project to determine if a hazardous materials release had occurred at the project site. (Appendix F, Phase I Environmental Site Assessment)

- If so, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. Limited Environmental Soil Sampling was performed at the project site because of past agricultural uses on the site. (Appendix F, Limited Environmental Soil Sampling Letter Report)

- It may be necessary to determine if an expedited response action is required to reduce existing or potential threats to public health or the environment. If no immediate threat exists, the final remedy should be implemented in compliance with state regulations and policies. The project site was historically used for agricultural purposes and Limited Environmental Soil Sampling was performed at the project site. Concentrations of dichlorodiphenyldichloroethane [DDE], a metabolite product of dichlorodiphenyltrichloroethane [DDT] were determined to be below the U.S. EPA Region IX Preliminary Remediation Goals [PRGs] for residential soil. (Section 4.5, Hazards and Hazardous Materials)
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- Proper investigation, sampling, and remedial actions overseen by the appropriate agency, if necessary, should be conducted at the site prior to the new development or any construction. Two historic uses of the project site have the potential to adversely affect future land uses: agricultural pesticides and the presence of oil and/or gas infrastructure use. As such, Limited Environmental Soil Sampling was performed at the project site to assess whether these potential environmental concerns may have impacted the project site. (Section 4.5, Hazards and Hazardous Materials)

- If any property adjacent to the project site is contaminated with hazardous chemicals, and if the Proposed Project is within 2,000 feet from a contaminated site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the Proposed Project is within a "Border Zone Property." The project site is not adjacent to a contaminated site. (Section 4.5, Hazards and Hazardous Materials)

- If building structures, asphalt or concrete-paved surface areas or transportation structures are planned to be demolished, an investigation should be conducted of the presence of lead-based paints or products, asbestos containing materials (ACMs), biohazards and other waste water chemicals of concern. If lead-based paints or products or ACMs, or other chemicals of concern are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California regulations and policies. No building structures, asphalt or concrete-paved surface areas or transportation structures are planned to be demolished during construction of the Proposed Project. (Section 4.5, Hazards and Hazardous Materials)

- The project construction may require soil excavation and soil filling in certain areas. Appropriate sampling is required prior to disposal of the excavated soil. If the soil is contaminated, properly dispose of it rather than placing it in another location. Land Disposal Restrictions (LDRs) may be applicable to these soils. Also, if the project proposes to import soil to backfill the areas excavated, proper sampling should be conducted to make sure that the imported soil is free of contamination. Earthwork will be balanced on-site, soils will not be exported or imported. (Section 4.4, Geology/Soils)

- Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. A study of the site overseen by the appropriate government agency might have to be conducted to determine of there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment. There will be no demolition on the project site during construction and humans and sensitive receptors would be protected during construction. (Section 4.5, Hazards and Hazardous Materials)

- Certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA. A gas station is proposed to be built on the project site and will contain three 30,000-gallon capacity Underground Storage Tanks [USTs]. Prior to authorization or start of construction of the Proposed Project, the project applicant shall prepare a Spill Prevention and Contingency Plan (SP&CP) to prevent runoff of potential petroleum product spills. Also, in order to operate the fueling facility, Costco Wholesale will have to meet the requirements of all applicable local, state, and federal regulation. (Section 4.5, Hazards and Hazardous Materials)
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- If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the ND should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight. Limited Environmental Soil Sampling and testing was performed at the project site following U.S. EPA guidelines and contaminated groundwater was not found to exist at the project site. (Section 4.5, Hazards and Hazardous Materials and Appendix F, Phase I Environmental Site Assessment and Limited Environmental Soil Sampling Letter Report)

- If the site was used for agricultural purposes or if weed abatement occurred, on-site soils may contain pesticide and agricultural chemical residue. If the project area was used for poultry, dairy and/or cattle industry operations, the soil may contain related dairy, animal, or hazardous waste. If so, activities at the site may have contributed to soil and groundwater contamination. Proper investigation and remedial actions, if necessary, should be conducted at the site prior to construction of the project. The project site was historically used for agricultural purposes and Limited Environmental Soil Sampling was performed at the project site. Concentrations of dichlorodiphenyldichloroethane [DDE], a metabolite product of dichlorodiphenyltrichloroethane [DDT] was determined to be below the U.S. EPA Region IX Preliminary Remediation Goals [PRGs] for residential soil. (Section 4.5, Hazards and Hazardous Materials.)

City of Indio

To identify potentially significant traffic impacts and to develop appropriate mitigation measures, the Draft EIR and the traffic impact study for the Komar Desert Center must address each of the following questions:

1) Project Definition

- What is the expected completion date of the overall project? Development of the Proposed Project is anticipated to occur over approximately two years. Buildout is projected for approximately early-to-mid-2007 and will occur in two distinct phases. Construction of Phase I (the Costco Wholesale parcel) is scheduled to begin as soon as the EIR is certified and the Proposed Project is approved by the City Council. Phase I should be completed by August 2006. Phase II (the Komar parcels) is not scheduled to begin construction until tenants are secured and the site plan goes through individual site plan review with the City for each building to verify applicability with the site plan and building codes. Tentatively, this date is projected for February 2006. Phase II should be completed by April 2007. (Section 2.0 Project Description)

- Will the phased project be analyzed for environmental impacts after the expected occupancy of each phase? The EIR analyzes environmental impacts for full occupancy of both developments. Subsequent plans will be evaluated for conformance with the EIR. If changes to the project would result in new impacts, additional CEQA review would be required. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- Are there any special project amenities that would either increase or decrease forecast trips? There are no special project amenities that would require additional forecast trips. However, surveys of existing Costco Wholesale stores demonstrate that a Costco Wholesale generally has a 61% higher trip generation rate than shown for similar developments in the Institute of Transportation Engineers (ITE) Trip Generation Manual (Reference 3). This increase in trips
has been accounted for in all of the analysis. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

• Will clear documentation be provided to support these assumptions? The EIR and supporting technical studies provide adequate support for all traffic assumptions. (Section 2.0, Project Description and Section 4.10, Traffic and Transportation)

2) Baseline Conditions

• How will the traffic study identify the overall study area and the specific roadway segments and intersections to be evaluated? Study intersections and segments were selected based on a review of the local transportation system. The study area was broadened even further based on the recommendations of City of La Quinta staff. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

• What methodology will be used to document existing traffic volumes and operating conditions? Kittelson & Associates staff conducted site visits and traffic counts for the proposed development during April 2005 during the weekday PM peak hour. They conducted additional site visits to generate a site inventory. In September 2005 traffic counts were conducted during a four hour period at two intersections deemed to be critical to clearly identify the weekend peak hour. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

• Will Saturday peak hour conditions be considered in addition to weekday AM and PM commute hours? The traffic analysis includes analysis of two critical intersections during a four hour period on Saturdays in September 2005. The analysis does not include weekday AM peak hour conditions because the Proposed Project is primarily retail and will, therefore, not generate any significant traffic volume during that time period. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

• What adjustments will be made if traffic counts were conducted in the summer when schools in the area were closed and seasonal residents were elsewhere? Traffic counts were conducted in April during the peak seasonal period while schools were open. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

• What adjustments will be made to expand traffic counts to reflect higher season winter traffic volumes? It was not necessary to make adjustments to reflect higher season winter traffic because the study was conducted during the winter peak season of January-April. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

3) Cumulative Projects

• How will the listing of related development projects be developed? The listing of four related developments was determined by the City of La Quinta staff. These developments include: Sam’s Club, Jefferson Plaza (Home Depot Phase II), Pavilion (Adams St. Retail/Restaurants) and La Quinta Corporate Center. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

• What assumptions will be made regarding vehicle trips associated with related projects? Site generated trips for related developments were determined by a review of approved traffic impact studies provided by the City of La Quinta. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

• Will an annual growth factor be used to address traffic impacts from various minor development projects and regional growth? In addition to the background traffic calculated from the four
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related development projects mentioned above, an annual traffic growth rate of two and a half percent was applied to the existing 2005 traffic volumes to account for the near-term regional growth. This growth rate was calculated based on historical data obtained from the Caltrans Web site. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- Will the project be analyzed on “opening day” for each project phase and at build out of the General Plan of the Cities of La Quinta and Indio? Traffic conditions were analyzed at Opening Year 2006, Opening Year 2006 with planned roadway improvements, and Future Build Out Year 2020. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

4) Facility Improvements

- What specific roadway and intersection improvements will be assumed to be in place when each phase of the proposed project opens? The following roadway improvement projects were identified by the City of La Quinta to occur in 2006 (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis):
  - Highway 111 will be widened to six through lanes from Jefferson Street to Adams Street, and will have dual left-turn lanes at La Quinta Drive, Dune Palms Road, and Depot Road. It will also include dual left-turn lanes on eastbound Highway 111 at Adams Street, Dune Palms Road, Depot Road and Jefferson Street. No improvements are proposed to eastbound HWY 111 at Jefferson Street.
  - A second southbound through lane and a second southbound left-turn lane will be constructed on Adams Street at the intersection with Highway 111.
  - Jefferson Street will be widened to six through lanes, with dual left-turn lanes and a separate right-turn lane at all major intersections from Highway 111, north beyond Fred Waring Drive to Indio Boulevard.

- What assumptions will be made regarding roadway and intersection improvement projects that are planned but not currently funded? The following roadway improvement projects are assumed to be completed in the City of Indio by the year 2020, based on a review of the City of Indio General Plan Circulation Element for 2020 (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis):
  - Highway 111 will be widened to six through lanes from Jefferson Street to Madison Street, and will have a single left-turn lane, two through lanes and a shared through/right turn lane at the major intersections.
  - Madison Street south of Highway 111 will be widened to a single left-turn lane, two through lanes and a shared through/right turn lane at major intersections.
  - Avenue 48 will be widened to a single left-turn lane, two through lanes and shared through/right turn lane at major intersections.

- What assumptions will be used for capacity enhancements typically given for upgraded traffic signal systems and how will these be documented? The traffic study includes analysis of intersections where it is recommended that a right turn overlap phase be allowed to improve operations. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

5) Project Trips

- What methodology and references will be used to forecast vehicle trips to and from the proposed project? The trip generation estimates for the Proposed Project area are based on the 7th edition
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of the Institute of Transportation Engineers (ITE) Trip Generation Manual published in 2003 (reference 3). The trip generation estimates for the Costco Wholesale are based on trip generation surveys conducted at several existing Costco Wholesale stores. These surveys result in a trip rate that is approximately 61-percent higher than the rate shown for similar developments in the ITE manual. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- What assumptions will be made and what documentation will be provided for internal trips within the project site? Total internal trips for Costco Wholesale and the Komar Shopping Center are assumed to be 5% and 9% respectively. The Institute of Transportation Engineers (ITE) Trip Generation Handbook (Reference 2) was used to quantify these trips. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- What assumptions will be made and what documentation will be provided for pass-by trips captured from existing traffic volumes? It was assumed that the pass-by trips for the Proposed Project will constitute a portion of the motorists on Highway 111. To quantify the impact of these trips, pass-by data were obtained from the Institute of Transportation Engineers (ITE) Trip Generation Manual and from independent studies for other Costco Wholesale stores. The pass-by data from ITE and Costco Wholesale support a volume of pass-by trips that are greater than appropriate for the volume of traffic on the adjacent streets. These studies show that pass-by trips for a shopping center can range from 15 to over 50 percent while the pass-by rate for a Costco Wholesale is generally 38 percent during the weekday pm peak hour. Applying these percentages to the study would have assumed that a disproportionately high number of motorists on Highway 111 during the weekday pm peak hour would stop at the Costco Wholesale/Komar development. Therefore, the actual number of pass-by trips on Highway 111 used in the Traffic Impact Analysis was reduced to not exceed 10 percent of the adjacent street through traffic. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- Will the assumptions for forecast trips for the proposed project be documented and related to the existing Costco Wholesale in the City of Palm Desert? The database was used to develop the number of trips was based on independent studies of 14 similar Costco Wholesale stores with fuel stations in the U.S. This database did not include Palm Desert Costco Wholesale, but did include Costco Wholesale stores in Simi Valley and Vallejo. The sample size of 14 was deemed appropriate to gauge the trip generation for Costco Wholesale and it would have been cost prohibitive to conduct an additional study at the Palm Desert Costco Wholesale.

- How will transit, bicycle, and pedestrian forecasts for the project be documented? The traffic analysis did not forecast any volumes for transit, bicycle and pedestrian traffic. Therefore, there was no reduction of trip value by including transit, pedestrian or bicycle ridership.

- How will trips be assigned and distributed to the area roadways and intersections, and how will these assumptions be documented? The assumed assignment of the site-generated trips is based on a review of the marketing study conducted for the proposed Costco Wholesale development, the existing Costco Wholesale members in the site vicinity, a review of the surrounding transportation system including existing traffic patterns, and conversations with City of La Quinta staff. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

6) Project Impacts

- What criteria will be used to identify significant project vehicle traffic impacts on street segments and intersections in the Cities of La Quinta and Indio? Appendix G of the CEQA
Guidelines was used to determine significant project impacts to the transportation system. Specifically, the following thresholds are considered:

- **Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system** (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

- **Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.** Policy 3-2.1.3 of the Circulation Element of the City's General Plan establishes LOS D as the minimum peak hour standard for streets in La Quinta. Furthermore, the City considers operational impacts to be significant if intersections forecasted to operate at LOS E or F without the Proposed Project experience a 0.02 increase in volume to capacity (v/c) with site development. According to conversations with City of Indio Traffic Engineer, Tom Brohard, Indio has also established LOS D as the minimum peak hour standard for its streets. However, the City of Indio does not have a threshold of significance for intersections already projected to operate at LOS E or F without the Proposed Project. Therefore, for the purposes of the Traffic Analysis, the same threshold of significance, i.e. the 0.02 increase in v/c, used in the City of La Quinta was applied to the intersections in City of Indio.

- **Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).**

- **Result in inadequate emergency access.**

- **Result in inadequate parking capacity.**

- **Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).**

(Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis, Appendix G of CEQA guidelines)

- **Will the traffic study utilize the methodology identified in Caltrans Guide for the Preparation of Traffic Impact Studies for evaluation of traffic impacts on State facilities?** The traffic study does utilize the methodology identified in the Caltrans Guide for the Preparation of Traffic Studies. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- **Will the traffic study include analyses of Congestion Management Program facilities?** The regional transportation system subject to the Riverside County Congestion Management Program (CMP) is defined as all state highways and principal arterials. Of the roadways that directly serve the project site, Highway 111 is within the CMP designated highway system. Outside of the immediate vicinity, I-10 and SR 86 are also within the CMP system. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- **What realistic mitigation measures will be considered for roadways and intersections?** The Proposed Project shall pay its fair share of development impact fees which will help offset the cost of already planned improvements on Highway 111 and Jefferson Street. In addition to provide for smooth ingress and egress from its site, the Proposed Project shall provide and maintain low growing landscaping in the vicinity of the site driveways and along the site frontage to Highway 111 (EW) for a distance of 12 to 15 feet back of curb to ensure adequate sight distance for safe and easy flow of traffic. Additionally, the Proposed Project will provide a
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half street improvement on the south-side of Highway 111 (EW) along the site frontage including an additional eastbound through lane, a right-turn deceleration lane on Highway 111 (EW) at each of the site driveways, and dual left turn lanes on Highway 111 (EW) at Depot Road (NS). Furthermore, the traffic signal at the Highway 111(EW)/Depot Road (NS) intersection will need to be modified to accommodate the road widening and turn lanes on Highway 111. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- How will significant traffic impacts on residential streets be identified and mitigated? Because the City of La Quinta's major arterial grid street system is very efficient and well operating, travelers are more likely to remain on the major arterials, because travel times would be less than on the residential streets. Therefore, the Traffic Impact Analysis did not analyze impacts on the residential streets. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- How will “fair share” contributions for the project be developed? Where it is determined that the Proposed Project causes a significant impact, the traffic analysis develops potential mitigation measures that would bring the intersection back to LOS D. In addition, the traffic study includes a cost estimate for each of these improvements. The City of La Quinta will use these cost estimates to determine the proportional cost share for the Proposed Project based on the DIF. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- What mechanisms will be used by the City of La Quinta to mitigate significant project traffic impacts in the City of Indio? The traffic study applies the same threshold of significance to intersections studied in the City of Indio to determine significant impacts and the same approach to mitigation measures as used in the City of La Quinta. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- Will the study address traffic safety issues and impacts? The site plan was evaluated to provide safe and efficient on-site circulation for pedestrians, automobiles and trucks. Kittelson & Associates, Inc. worked with the project’s development team to enhance the operational and safety aspects of the proposed driveways, on-site circulation, and parking lot design. Based on this evaluation, mitigation measures require adding a deceleration lane and storage lanes for left and right turns at the access points. In addition, a median shall be installed on the project site driveway between the inbound and outbound lanes for a distance of 360 feet from Highway 111 to limit where motorists can turn across the opposing lanes and thereby minimize conflicts between motorists. Interior designs were also evaluated to ensure that the main volume of traffic can not immediately pass by the main Costco Wholesale storefront where all the pedestrian activity is oriented. Parking was designed to ensure that people have safe passage from the parking lot to the Costco Wholesale. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

7) Site Plan

- Will the traffic study evaluate sight distance, queuing, vehicle storage requirements, and traffic access control at the proposed project driveways? Yes, the site plan was evaluated and it was determined that it does provide safe and efficient on-site circulation for pedestrians, automobiles and trucks. Kittelson & Associates, Inc. worked with the project’s development team to enhance the operational and safety aspects of the proposed driveways, on-site circulation, and parking lot design. Specifically, analysis was conducted to ensure that the driveway throat could accommodate the inbound traffic from the dual left turn lane from HW 111. Left turns within the
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Driveway throat and opportunities for cut through traffic were eliminated from original site plan. There is adequate site distance from the driveways on HW 111 and the report identifies the need to maintain low growing shrubs to ensure that landscaping will not encroach into the site triangle lines. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- Will the project access driveways be evaluated for new traffic signals? The traffic signal at the Highway 111/Depot Road intersection was identified as needing modification to accommodate the road widening and turn lanes on Highway 111. Main site access will take advantage of the existing signalized T intersection and the intersection will modified into a 4-legged intersection. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- Will the internal on site circulation be evaluated? The site plan was evaluated and it was determined that it does provide safe and efficient on-site circulation for pedestrians, automobiles and trucks. Kittelson & Associates, Inc. worked with the project’s development team to enhance the operational and safety aspects of the proposed driveways, on-site circulation, and parking lot design. Specifically, the parking field was designed to discourage motorists from driving past the main front door of the Costco Wholesale where pedestrian activity occurs and additional drive aisles were provided between the property boundaries for Costco Wholesale/Komar site to ensure that the motorists did not have to use the driveways to get from one site to the next. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- Will the traffic study evaluate the overall number of parking spaces being proposed on site against both City requirements and accepted traffic engineering practices? The City of La Quinta Parking Requirements Ordinance requires a minimum parking ratio of 1 space per 200 SF of floor area for Commercial Park districts. At 149,739 SF, the ordinance would require the Costco Wholesale parcel to provide 749 parking spaces. Since Phase I (Costco Wholesale) of the project provides 832 spaces, this phase exceeds the parking standards. The Phase II (Komar) parcels will have a maximum square footage of 83,700 SF of regional commercial land uses. The parking ordinance would require the project to provide 399 additional parking spaces on the Phase II parcels. Since the proposed site plan provides 458 spaces on the Phase II parcels, Phase II of the project also exceeds the parking standards. The proposed site plan provides a maximum of approximately 1,532 parking spaces for all retail development. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- What measures will be employed to contain project generated parking within the proposed project? There are no other parking options besides the parking lot. The only adjacent street to the Proposed Project is Highway 111, which does not allow parking. Adequate on-site parking is provided. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

- Will the traffic study relate the number of forecast vehicle trips to the amount of parking to be provided on site? (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis) The Traffic Study does not specifically relate the number of forecasted vehicle trips to the amount of parking. However, the project meets the City of La Quinta Parking Requirements Ordinance. (Section 4.10, Traffic and Transportation and Appendix J, Traffic Impact Analysis)

Issues to be Resolved

The final determinations to be made by the City of La Quinta as to whether the benefits of the project outweigh the significant, unavoidable impacts of the project related to air quality and traffic and transportation.
1.8 SUMMARY OF IMPACTS AND MITIGATION MEASURES

A detailed discussion of existing environmental conditions, environmental impacts, and recommended mitigation measures is included in Section 4.0, Environmental Impact Analysis. Table 1-1 summarizes the environmental impacts, mitigation measures, and level of significance after mitigation associated with the Proposed Project.

1.9 ALTERNATIVES

A detailed discussion of the alternatives considered for the project is included in Section 5.0, Project Alternatives. An analysis is provided for each of the three alternatives that focuses on the ability of the alternatives analyzed to reduce or eliminate the environmental impacts associated with the Proposed Project. In addition, each alternative is evaluated on its ability to meet the project objectives. Table 1-2 compares the impacts of the Proposed Project to the Alternatives.
### Table 1-1. Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

<table>
<thead>
<tr>
<th>Environmental Impact</th>
<th>Significance Before Mitigation</th>
<th>Mitigation Measures</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>AIR QUALITY</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Significant short-term ROG and NOx during construction.</td>
<td>Potentially Significant (for ROG and NOx only)</td>
<td>MM 4.1-1 Regular equipment tune-ups and limits in equipment idling shall be implemented.</td>
<td>Less than significant for ROG; Unavoidably significant for NOx.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>MM 4.1-2 During finish construction, pre-coated building materials and high pressure-low volume (HPLV) paint applicators.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>MM 4.1-3 The project applicant shall employ an extended painting schedule over a two-month period using less than 100 gallons per day of low-VPC paint or ensure that no more than 89,700 SF would be painted within one month.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>MM 4.1-4 Construction routes shall be controlled to reduce interference with non-project traffic patterns and to preclude truck queuing or idling near sensitive receptor sites.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>MM 4.1-5 The project applicant shall comply with the provisions of the City of La Quinta Municipal Code that established minimum requirements for construction activities to reduce fugitive dust and PM-10 emissions. A plan to control fugitive dust through the implementation of best available control measures (BACMS) shall be prepared and submitted to the City for approval prior to the issuance of grading permits. Applicable BACMs include but are not limited to:</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Cut and fill quantities will be balanced onsite as much as practicable to minimize truck trips for import or export of dirt.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Adequate watering techniques shall be employed to minimize the impact of construction-related dust particulates. Portions of the site that are undergoing surface earth moving operations shall be watered such that a crust will be formed on the ground surface, and then watered again at the end of each day. Site watering will be performed as necessary to adequately mitigate blowing dust.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Any vegetative cover to be utilized onsite shall be planted as soon as practicable to reduce the disturbed area subject to wind erosion. Irrigation systems required for these plants shall be installed as soon as practicable to maintain good ground cover and to minimize wind erosion of the soil.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Any construction access roads (other than temporary access roads) shall be paved as soon as practicable and cleaned after each work day. The maximum vehicle speed on unpaved roads shall be 15 mph.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Grading operations shall be suspended during first stage ozone episodes or when winds exceed 25 mph. A high wind response plan shall be formulated for enhanced dust control if winds are forecast to exceed 25 mph in any coming 24-hour period.</td>
<td></td>
</tr>
</tbody>
</table>
# 1.0 Introduction and Summary

## Environmental Impact

<table>
<thead>
<tr>
<th>Environmental Impact</th>
<th>Significance Before Mitigation</th>
<th>Mitigation Measures</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Generation of objectionable odors by construction vehicles.</td>
<td>Potentially Significant</td>
<td>See MM 4.1-1 through 4.1-6</td>
<td>Less than significant</td>
</tr>
<tr>
<td>Significant short-term truck exhaust during construction</td>
<td>Less than significant with mitigation</td>
<td>See MM 4.1-1 through 4.1-10</td>
<td>Less than significant</td>
</tr>
<tr>
<td>Cumulative operational impacts</td>
<td>Potentially Significant</td>
<td>MM 4.1-7 The project applicant shall comply with energy use guidelines in Title 24 of the California Administrative Code. MM 4.1-8 The use of energy efficient street lighting and parking lot lighting per the City Lighting Ordinance shall be required for all on-site travel paths to reduce emissions at the power generation facility serving the area. MM 4.1-9 The project applicant shall comply with the City of La Quinta’s Transportation Demand Management Program by submitting an active approved plan under the SCAQMD Regulation XV program requirements. Furthermore, the project applicant shall comply with SCAQMD Ride Share program. MM 4.1-10 The project applicant shall notify the city and SCAQMD of the start and end of grading in conformance and within the time frames established in the 2002 PM 10 Management Plan.</td>
<td>Unavoidably significant</td>
</tr>
</tbody>
</table>

## Biological Resources

Grading the Proposed Project site would result in the removal of 19.6 acres of Disturbed Sonoran Creosote Bush Scrub | Potentially significant | MM 4.2-1 Mitigation for the direct impact of 19.6 acres of disturbed Sonoran creosote bush scrub would include the project applicant paying into the Coachella Valley Association of Government’s Coachella Valley Fringe-toed Lizard Mitigation Fee Program prior to obtaining building permits. The project applicant shall pay $600 per acre of land impacted. | Less than significant |
### 1.0 Introduction and Summary

<table>
<thead>
<tr>
<th>Environmental Impact</th>
<th>Significance Before Mitigation</th>
<th>Mitigation Measures</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grading of the Proposed Project site would result in the temporary impact to 0.15 acre of Waters of the State</td>
<td>Potentially significant</td>
<td>MM 4.2-2 Mitigation for temporary impacts to 0.15 acre of CDFG jurisdiction shall be implemented at a 1:1 ratio for on-site restoration. Prior to any project-related activities that would result in temporary impacts to CDFG jurisdiction, the project applicant shall acquire a Section 1802 Lake/Streambed Alteration Agreement.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>Grading of the Proposed Project site would result in the permanent impact to 0.002 acre of Waters of the State</td>
<td>Potentially significant</td>
<td>MM 4.2-3 Mitigation for permanent impacts to 0.002 acre (70 square feet) of CDFG jurisdictional area at the toe of the slope of the Channel bank shall be implemented at a 1:1 ratio by removal of tamarisk within the Channel.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>Grading of the Proposed Project site would result in the temporary impact to 0.15 acre of Waters of the U.S.</td>
<td>Potentially significant</td>
<td>MM 4.2-4 Mitigation for temporary and permanent impacts to USACE jurisdictional waters shall be implemented at a 1:1 ratio for on-site restoration. Prior to any project-related activities that would result in impacts to “Waters of the U.S.” the project applicant shall acquire a Section 404 Permit from the USACE and a 401 Water Quality Certification from the Regional Water Quality Control Board.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>Implementation of the Proposed Project would potentially impact species that require special survey requirements.</td>
<td>Less than significant with mitigation</td>
<td>MM 4.2-5 Due to the presence of suitable habitat on-site for the western burrowing owl, a pre-construction survey is required (pursuant to CDFG protocols) to ensure that any owls that may be occupying the site are identified. The pre-construction survey will need to be performed within 30 days of the start of construction. An experienced and qualified biologist shall conduct this survey. Should burrowing owls be present on the site prior to construction, then CDFG will be contacted and consulted. Pursuant to CDFG’s Staff Report on Burrowing Owl Mitigation (1995), and unless otherwise directed by CDFG, occupied burrows within the area where development is proposed between February 1 and August 31 shall not be disturbed and shall be provided with a 250-foot buffer from development activities. Furthermore, in the event that breeding pairs or single birds are found occupying on-site burrows, off-site habitat mitigation at the rate of 6.5 acres per single bird or pair shall be pre-approved by CDFG for subsequent purchase to satisfy this mitigation requirement. Outside of the breeding season and in consultation with CDFG, passive relocation of burrowing owls may be accomplished through the construction of artificial burrows at an adjacent off-site and pre-approved location.</td>
<td>Less than significant</td>
</tr>
</tbody>
</table>
# 1.0 Introduction and Summary

<table>
<thead>
<tr>
<th>Environmental Impact</th>
<th>Significance Before Mitigation</th>
<th>Mitigation Measures</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grading of the Proposed Project site development areas would be conducted during the bird breeding season with potential impacts to species covered by the Migratory Bird Treaty Act (MBTA).</td>
<td>Less than significant with mitigation</td>
<td><strong>MM 4.2-6</strong> To avoid impacts to nesting birds, the removal of potential nesting vegetation (i.e., trees, shrubs, ground cover, etc.) supporting migratory birds/raptors shall be avoided during the nesting season (if feasible), recognized from February 1 through August 31.</td>
<td>Less than significant</td>
</tr>
<tr>
<td><strong>MM 4.2-7</strong> If vegetation removal must occur during the nesting season, a qualified biologist shall conduct a migratory nesting bird survey to ensure that vegetation removal would not impact any active nests. Surveys must be conducted no more than three days prior to vegetation removal. If active nests are identified during nesting bird surveys, then the nesting vegetation would be avoided until the nesting event has completed and the juveniles can survive independently from the nest. The biologist shall flag the nesting vegetation and would establish an adequate buffer (e.g., construction fencing) around the nesting vegetation. The size of the buffer would be based on the type of bird nesting (i.e., raptors shall be afforded larger buffers). Clearing/grading shall not occur within the buffer until the nesting event has completed.</td>
<td></td>
<td></td>
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<tr>
<td>Temporary indirect impacts would potentially occur during project implementation</td>
<td>Less than significant with mitigation</td>
<td><strong>MM 4.2-8</strong> Temporary protection fencing shall be utilized to protect adjacent off-site native habitats during construction. An experienced and qualified biologist shall establish the limits of the native habitat (i.e., jurisdictional waters) in the field prior to the initiation of any site construction activities. Fencing along the La Quinta Evacuation Channel (upstream and downstream of the work area to the top of the embankment) shall also be installed to define the work limits for the prevention of vehicles from traveling beyond the construction area and possibly causing erosion of the channel walls or other discharge into the drainage.</td>
<td>Less than significant</td>
</tr>
<tr>
<td><strong>MM 4.2-9</strong> The qualified biologist shall verify in writing that the temporary and permanent habitat protection fences have been appropriately placed and are functioning normally during and after site construction activities have taken place. Once earthwork and related site activities are completed, the temporary fence shall be removed.</td>
<td></td>
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<tr>
<td><strong>MM 4.2-10</strong> To avoid native habitats, construction staging areas, equipment refueling areas, and other areas for equipment and materials storage shall be located within the identified construction area. To avoid inadvertent impacts to biological resources that may be present, storage and access areas shall be displayed on the approved project plans and specifications.</td>
<td></td>
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<tr>
<td><strong>MM 4.2-11</strong> Activities, including staging areas, equipment access, and disposal of temporary placement of excess fill, shall be prohibited within drainages outside of the identified construction area. Runoff from project-related hardscape surfaces shall be discharged to the existing La Quinta Evacuation Channel. Runoff will be filtered using a Continuous Deflective Separation (CDS) unit, or similar structure, prior to discharging via underground pipe at the invert of the existing Channel.</td>
<td></td>
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</tbody>
</table>
## 1.0 Introduction and Summary

<table>
<thead>
<tr>
<th>Environmental Impact</th>
<th>Significance Before Mitigation</th>
<th>Mitigation Measures</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Proposed Project is within the Draft Plan area</td>
<td>Less than significant with mitigation</td>
<td>MM 4.2-12 If the Draft Plan is approved prior to approval of the Proposed Project, MM 4.2-2 – 4.2-11 would be required in addition to MM 4.2-12 below. The project applicant shall pay the Local Development Mitigation Fee as required by the Final Plan. The $600 per acre fee, as described in MM 4.2-1, would be subsumed by this new Local Development Mitigation Fee if the Draft Plan is finalized and adopted prior to permit issuance or approval of the Komar Desert Center project.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>Cumulative impacts</td>
<td>Less than significant</td>
<td>No mitigation measures are required</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>

### CULTURAL RESOURCES

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Discovering unknown cultural resources during construction</td>
<td>Potentially significant</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>MM 4.3-1</td>
<td>Due to the presence of important archaeological sites in the vicinity of the project area, construction grading activities shall require monitoring by a qualified archaeologist.</td>
</tr>
<tr>
<td>MM 4.3-2</td>
<td>Should buried cultural resources be encountered during construction activities, work in that area must be halted until a qualified archaeologist can evaluate the nature and significance of the find. If human remains are unearthed during construction, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resources Code Section 5097.98</td>
</tr>
<tr>
<td></td>
<td>Less than significant</td>
</tr>
<tr>
<td>Discovering unknown paleontological resources during construction</td>
<td>Potentially significant</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>MM 4.3-3</td>
<td>Excavation in areas identified as likely to contain paleontological resources, including any disturbed surface or subsurface sediments of the Lake Cahuilla beds, shall be monitored by a qualified paleontological monitor.</td>
</tr>
<tr>
<td>MM 4.3-4</td>
<td>Paleontological monitoring shall occur only for those undisturbed sediments wherein fossil plant or animal remains are found with no associated evidence of human activity or any archaeological context.</td>
</tr>
<tr>
<td>MM 4.3-5</td>
<td>Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays, and to remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. Monitors shall be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens. Monitoring may be reduced if the potentially fossiliferous units described above are not present or if the fossiliferous units present are determined by a qualified paleontological monitor to have low potential to contain fossil resources.</td>
</tr>
<tr>
<td>MM 4.3-6</td>
<td>All recovered specimens shall be prepared to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates.</td>
</tr>
<tr>
<td>MM 4.3-7</td>
<td>Specimens shall be identified and curated into an established, accredited, professional museum repository with permanent retrievable storage. The paleontologist shall have a written repository agreement in hand prior to the initiation of mitigation activities.</td>
</tr>
<tr>
<td></td>
<td>Less than significant</td>
</tr>
</tbody>
</table>
## 1.0 Introduction and Summary

<table>
<thead>
<tr>
<th>Environmental Impact</th>
<th>Significance Before Mitigation</th>
<th>Mitigation Measures</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>MM 4.3-8 Due to the presence of historic Native American sites in the immediate vicinity of the project area, construction clearing, brushing, trenching and all grading activities shall require monitoring by a tribal monitor.</td>
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<tr>
<td></td>
<td></td>
<td>MM 4.3-9 A report of findings with an appended itemized inventory of identified specimens shall be prepared. The report will address archaeological, paleontological, and tribal items. This report shall incorporate the full results of the literature review, as well as the full results of the recommended review of the records of the Vertebrate Paleontology Department of the Natural History Museum of Los Angeles County. The report shall be submitted prior to the issuance of the Certificate of Occupancy.</td>
<td></td>
</tr>
<tr>
<td>Cumulative impacts</td>
<td>Potentially significant</td>
<td>See MM 4.3-1 through 4.3-7</td>
<td>Less than significant</td>
</tr>
</tbody>
</table>

**GEOLOGY AND SOILS**

<table>
<thead>
<tr>
<th>No significant impacts</th>
<th>Less than significant</th>
<th>No mitigation measures are required.</th>
<th>Not applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cumulative impacts</td>
<td>Less than significant</td>
<td>No cumulative mitigation measures are required</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>

**HAZARDS AND HAZARDOUS MATERIALS**

<table>
<thead>
<tr>
<th>No significant impacts</th>
<th>Less than significant</th>
<th>No mitigation measures are required</th>
<th>Not applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cumulative impacts</td>
<td>Less than significant</td>
<td>No cumulative mitigation measures are required</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>

**HYDROLOGY**

<table>
<thead>
<tr>
<th>No significant impacts</th>
<th>Less than significant</th>
<th>No mitigation measures are required</th>
<th>Not applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cumulative impacts</td>
<td>Less than significant</td>
<td>No cumulative mitigation measures are required</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>

**LAND USE AND PLANNING**

<table>
<thead>
<tr>
<th>No significant impacts</th>
<th>Less than significant</th>
<th>No mitigation measures are required</th>
<th>Not applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cumulative impacts</td>
<td>Less than significant</td>
<td>No cumulative mitigation measures are required</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>

**NOISE**

<table>
<thead>
<tr>
<th>No significant impacts</th>
<th>Less than significant</th>
<th>No mitigation measures are required</th>
<th>Not applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cumulative impacts</td>
<td>Less than significant</td>
<td>No cumulative mitigation measures are required</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>

**PUBLIC SERVICES/UTILITIES**

| The Proposed Project may impact fire protection services in the project area. | Less than significant with mitigation | MM 4.9-1 The project applicant shall pay development impact fees per City of La Quinta Ordinance 408 to the RCFD for the purpose of developing new commercial facilities within the City. Since no significant adverse impacts to fire protection services would result from implementation of the Proposed Project, no additional mitigation measures would be required. | Less than significant |
### 1.0 Introduction and Summary

<table>
<thead>
<tr>
<th>Environmental Impact</th>
<th>Significance Before Mitigation</th>
<th>Mitigation Measures</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Proposed Project may impact the DSUSD school system.</td>
<td>Less than significant with mitigation</td>
<td>MM 4.9-2 The project applicant shall pay development fees to the Desert Sands Unified School District for the purpose of developing new school facilities within the City. The project applicant shall pay $0.36 per square foot in fees. Since no significant adverse impacts to school facilities would result from implementation of the Proposed Project, no additional mitigation measures would be required.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>The Proposed Project may impact the City of La Quinta's Civic Center.</td>
<td>Less than significant with mitigation</td>
<td>MM 4.9-3 The project applicant shall pay development impact fees per City of La Quinta Ordinance 408 to the City for improvements to the City's Civic Center.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>The Proposed Project may impact the City of La Quinta's Maintenance Facilities.</td>
<td>Less than significant with mitigation</td>
<td>MM 4.9-4 The project applicant shall pay development impact fees per City of La Quinta Ordinance 408 to the City for improvements to the Maintenance Facilities.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>Cumulative impacts</td>
<td>Less than significant</td>
<td>No cumulative mitigation measures are required</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>

**TRAFFIC AND CIRCULATION**

| Site access and circulation | Potentially significant | MM 4.10-1: Provide and maintain low growing landscaping in the vicinity of the site driveways and along the site frontage to Highway 111 (EW) for a distance of 12 to 15 feet back of curb to ensure adequate sight distance for safe and easy flow of traffic. Provide a half street improvement on Highway 111 (EW) along the site frontage including an additional eastbound through lane, a right-turn deceleration lane on Highway 111 (EW) at each of the site driveways, and dual left turn lanes on Highway 111 (EW) at Depot Road (NS). Furthermore, the traffic signal at the Highway 111/EW) Depot Road (NS) intersection will need to be modified to accommodate the road widening and turn lanes on Highway 111. Provide a reciprocal easement of access at a location on the western edge of the development. | Less than significant |
| Safety Hazards | Potentially significant | See MM 4.10-1 | Less than significant |
| Future operational impacts | Potentially significant | MM 4.10-2 Re-stripe westbound approach to allow separate right-turn lane. MM 4.10-3 Add a separate right-turn lane MM 4.10-4 Add a second southbound left-turn lane MM 4.10-5 Eastbound: Allow right-turn overlap phasing; Westbound: add a separate westbound right-turn lane | Less than significant (Intersections of Highway 111 and Washington Street, La Quinta Drive and Dune Palms Road. Unavoidably significant (intersection of Highway 111 and Jefferson Street) |
## 1.0 Introduction and Summary

<table>
<thead>
<tr>
<th>Environmental Impact</th>
<th>Significance Before Mitigation</th>
<th>Mitigation Measures</th>
<th>Significance After Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cumulative impacts</td>
<td>Potentially significant</td>
<td>See MM 4.10-2 and -5</td>
<td>Unavoidably significant</td>
</tr>
<tr>
<td><strong>VISUAL RESOURCES</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No significant impacts</td>
<td>Less than significant</td>
<td>No mitigation measures are required</td>
<td>Not applicable</td>
</tr>
<tr>
<td>Cumulative impacts</td>
<td>Less than significant</td>
<td>No cumulative mitigation measures are required</td>
<td>Not applicable</td>
</tr>
<tr>
<td><strong>WATER QUALITY</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No significant impacts</td>
<td>Less than significant</td>
<td>No mitigation measures are required</td>
<td>Not applicable</td>
</tr>
<tr>
<td>Cumulative impacts</td>
<td>Less than significant</td>
<td>No cumulative mitigation measures are required</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>
### Table 1-2. Comparison of Proposed Project and Project Alternatives

<table>
<thead>
<tr>
<th>Issue Area</th>
<th>Proposed Project</th>
<th>No Project/No Development Alternative</th>
<th>Commercial Development with Reduced Square Footage</th>
<th>Commercial Development at Alternative Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality</td>
<td>Significant and Unmitigated</td>
<td>No Impact</td>
<td>Less than Significant</td>
<td>Significant and Unmitigated</td>
</tr>
<tr>
<td>Biological Resources</td>
<td>Less than Significant with Mitigation</td>
<td>No Impact</td>
<td>Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
</tr>
<tr>
<td>Cultural Resources</td>
<td>Less than Significant with Mitigation</td>
<td>No Impact</td>
<td>Less than Significant with Mitigation</td>
<td>Less than Significant with Mitigation</td>
</tr>
<tr>
<td>Geology and Soils</td>
<td>Less than Significant</td>
<td>No Impact</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Hazards and Hazardous Materials</td>
<td>Less than Significant</td>
<td>No Impact</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Hydrology</td>
<td>Less than Significant</td>
<td>No Impact</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Land Use and Planning</td>
<td>Less than Significant</td>
<td>No Impact</td>
<td>Less than Significant</td>
<td>Less than significant</td>
</tr>
<tr>
<td>Noise</td>
<td>Less than Significant</td>
<td>No Impact</td>
<td>Less than significant</td>
<td>Less than significant</td>
</tr>
<tr>
<td>Public Services/Utilities</td>
<td>Less than Significant with Mitigation</td>
<td>No Impact</td>
<td>Less than significant</td>
<td>Less than significant with Mitigation</td>
</tr>
<tr>
<td>Traffic and Circulation</td>
<td>Significant and Unmitigated</td>
<td>No Impact</td>
<td>Less than Significant with Mitigation</td>
<td>Significant and Unmitigated</td>
</tr>
<tr>
<td>Visual Resources</td>
<td>Less than Significant</td>
<td>No Impact</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>Water Quality</td>
<td>Less than Significant</td>
<td>No Impact</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
</tr>
</tbody>
</table>
2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The proposed Komar Desert Center development site is comprised of 26.37 acres of land in eastern Riverside County (Figure 2-1, Regional Location Map). It is located west-southwest of the intersection of Interstate 10 (I-10) and State Highway 86 (Highway 86). The property is located along the southern edge of State Highway 111 (Highway 111), and the eastern border of the City of Indio, within the City of La Quinta, County of Riverside, California. The area is accessed from I-10 by major roadways including Highway 111. The La Quinta Evacuation Channel, which is an emergency storm water channel, is owned by the Coachella Valley Water District and borders the project site on the southeast corner of the property.

As shown on Figure 2-2, Vicinity Location Map, the land surrounding the project site is primarily undeveloped. The future land uses include commercial and residential uses. The east property line of the proposed commercial center abuts adjacent undeveloped property zoned for commercial uses and located in the City of Indio. The area to the west of the property line is also undeveloped and is zoned for commercial and residential uses in the City of La Quinta. The southerly property line is bound by the La Quinta Evacuation Channel and the Desert Sands Unified School District Headquarters.

2.2 SITE CHARACTERISTICS

The Proposed Project site is level land at an elevation of approximately 60 feet above mean sea level (Figure 2-3, Existing Site Topography). The area is characterized by alluvium, consisting of silty sands, clayey sands, and sands with variable amounts of gravel. There are no bedrock outcrops or boulders on the parcel.

Houses, farm structures, and agricultural fields were present on the project site as early as 1949. By 1973, a date palm grove and agricultural fields were present on the northern portion of the property, but were abandoned and those areas are currently vacant. The southern and western portions of the project site currently support disturbed native desert vegetation. The northern portion of the project site supports disturbed ruderal/weedy habitat. Uses identified with the project site include previous grading, dead palm trees, scrap piles of old agricultural equipment, other related debris, off-road vehicle use, and an illegal encampment.

The project site lies within the Whitewater River watershed within eastern Riverside County and is part of the Colorado River Basin. Drainage from the eastern portion of the site currently drains to the La Quinta Excavation Channel, which in turn drains to the Coachella Valley Stormwater Channel, and in turn discharges to the Whitewater River approximately 2,500 feet to the north. The western portion of the site drains to a low point, eventually being captured by the City of La Quinta storm drain system. Surface water drainage across the ungraded site is predominantly towards the south facing local topography via sheet flow. Refer to Section 4.6, Hydrology, for further discussion on drainages.

2.3 PROJECT CHARACTERISTICS

2.3.1 Project Objectives

Project Applicant

- The objective of the proposed commercial development is to provide commercial services including, but not limited to, home improvement products and equipment, personal supplies, pharmacy, optical exams and sales, gasoline, office and pet supplies, eating establishments, financial services, and tire and auto services.
2.0 Project Description

- Develop a retail center to provide goods and services to the community, create jobs, and generate increased property and sales taxes to benefit the City of La Quinta.
- Offer retail merchandise at a scope and price not currently offered in the trade area.
- Service a portion of the retail market that is currently traveling outside of the City of La Quinta.
- Create an attractive, viable project, and realize a reasonable return on investment.

City of La Quinta

- Create a development compatible with, and sensitive to, existing surrounding land uses in the project area.
- Complement the development of commercial centers and ancillary uses that convey a high-quality visual image and character.
- Enhance the existing retail uses located on Highway 111 and provide local residents with convenient access to a retail use which is highly desired by local residents, thereby eliminating the need for these residents to drive long distances for the same shopping experience.
- Continue to enlarge the City’s revenue base in order to enhance and expand the quality of municipal services La Quinta residents expect.
- Diversify and expand the City’s economic base, offer a variety of products and services, increase employment opportunities, enhance City/Agency fiscal resources, preserve and enhance La Quinta’s unique environment, and contribute to the quality of life for La Quinta residents.
- Provide for necessary transportation improvements and strategies to accommodate the demands of new and existing development.
- Balance the City’s immediate needs for commercial property, but also maintain long-term needs for adequate open space and recreational areas.
- Ensure adequate utility infrastructure and public services for new development, and ensure that timing and funding of improvements are closely correlated with development phasing.
- Mitigate the potential impacts to the surrounding area to the greatest extent practicable, while still allowing for the market-driven commercial development, which will enhance the tax base of the City and provide employment opportunities for area residents.

2.3.2 Discretionary Approvals

Implementation of the Proposed Project will require the following discretionary approvals by the City of La Quinta:

- Certification of this EIR and adoption of any necessary findings pursuant to CEQA
- Specific Plan
- Site Development Permit from the Planning Commission (including):
  - Site Plan
  - Architectural Design
  - Landscape Design
  - Sign Program
- Conditional Use Permits
2.0 Project Description

- Tentative Parcel Map
- Finance Assistance Agreement

In addition, the following ministerial actions are included in the discussion of the Proposed Project:

- Grading Permit(s)
- Building Permit(s)
- Sign Permit(s)

Implementation of the Proposed Project may include the following discretionary approvals by other responsible and/or regulatory agencies:

- USACE Section 404 Permit
- CDFG Section 1602 Streambed Alteration Permit
- Santa Ana RWQCB Section 401 Water Quality Certification/Waiver
- Caltrans Encroachment Permit
- SCAQMD Permits for Operating Construction and Operational Equipment
- CVWD Encroachment Permit

2.3.3 Proposed Land Use

When completed, the 26.37-acre commercial site will consist of a proposed Costco Wholesale and associated parking as the major tenant, as well as commercial pads and associated parking on two additional parcels, which will be developed by Komar (Figure 2-4, Proposed Project Site Plan). Other commercial development will include retail, restaurants, a bank, and a drive-through restaurant. More than 1,300 parking spaces would be provided on the property to serve the anchor facility and the additional restaurants and stores. The total area for structures, parking, and landscaping would be 26.37 acres (Table 2-1). The total project will be constructed in two phases, over approximately 2 years. Phase I will include the Costco Wholesale parcel and buildings, as well as the driveways, landscaping, and parking. The Costco Wholesale parcel will be developed as a large-scale commercial retail center use, including a tire center (5,200 square feet [SF]), food service (1,076 SF), and the retail center (143,463 SF), as well as a four-island station, 16 pump members-only fueling station.

<table>
<thead>
<tr>
<th>Table 2-1. Proposed Land Uses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land Use</td>
</tr>
<tr>
<td>--------------------</td>
</tr>
<tr>
<td>Buildings</td>
</tr>
<tr>
<td>Landscaping</td>
</tr>
<tr>
<td>Parking/Streets</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
</tr>
</tbody>
</table>

Phase II will consist of the Komar parcels and buildings, including the landscaping and parking on said parcels. Phase II will be developed by Komar Investments. The tenants that will utilize these parcels have not been finalized, and will be driven by the market in the City of La Quinta to ensure that the retailers are well-suited to serve the needs of the citizens of La Quinta. However, the building envelope areas have been established; Envelope Area 1 will hold approximately 43,400 SF of CR uses, Envelope Area 2 will hold approximately 20,800 SF of CR uses, and Envelope Area 3 will hold approximately...
### Proposed Project Site Plan

**FIGURE 2-4**

**KOMAR**
- Land Area: ~404,668
- Acres: ~9.4
- Total Building Area: 83,700 SF
- Land/Building Ratio: 3.9/1 (20%)
- Parking Required: 399
- Parking Provided: 458
- Parking Ratio: 5.5/1,000 SF

**COSTCO**
- Land Area: ~735,648 SF
- Acres: ~18.8 AC
- Total Building Area: 149,739 SF
- Land/Building Ratio: 3.9/1 (20%)
- Parking Required: 755 Stalls
- Parking Provided: 833 Stalls
- Parking Ratio: 5.5/1,000 SF

**PROPERTY INFORMATION**

<table>
<thead>
<tr>
<th>Project</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land Area</td>
<td>~1,140,336 SF</td>
</tr>
<tr>
<td>Acres</td>
<td>~26.2 AC</td>
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<tr>
<td>Total Building Area</td>
<td>233,439 SF</td>
</tr>
<tr>
<td>Land/Building Ratio</td>
<td>3.9/1 (20.5%)</td>
</tr>
<tr>
<td>Parking Required</td>
<td>1,154 Stalls</td>
</tr>
<tr>
<td>Parking Provided</td>
<td>1,291 Stalls</td>
</tr>
<tr>
<td>Parking Ratio</td>
<td>5.5/1,000 SF</td>
</tr>
</tbody>
</table>

**Building Envelope Area 1:**
- 43,400 SF

**Building Envelope Area 2:**
- 20,800 SF

**Building Envelope Area 3:**
- 19,500 SF

---

*Source: HDR Architects, 2009 | Many Solutions*
19,500 SF of CR uses. It is anticipated that the parcels will be developed as a mixture of medium and small retail uses, restaurants, financial/bank uses, and fast-food restaurants with drive-through service. These uses are subject to change, as approved by the City of La Quinta, consistent with the adopted Specific Plan. Proposed parking for parcels 1 and 2 of the Komar development will be located at the center of the site with the structures circling the site at the perimeter. Parcels 1 and 2 will provide sufficient parking to meet city code.

**Costco Wholesale Development**

The Costco Wholesale Corporation is a nationwide, wholesale warehouse retailer that provides a wide variety of products to its members. This particular warehouse as proposed will include a tire center and a freestanding fueling station for Costco Wholesale member use only. (Figure 2-4). The Costco Wholesale facility is expected to employ approximately 200-250 people, totaling 75 to 125 people per shift.

The Costco Wholesale is anticipated to have a maximum height of 35 feet – 4 inches, with architectural elements extending as high as 41 feet – 4 inches. The Costco Wholesale building will be 149,739 SF and constitutes coverage of approximately 13 percent of the total site. The Costco Wholesale building is proposed at the southern end of the parcel. The main entrance would be located on the northeast corner of the building. The tire center is proposed along the east side of the building, immediately adjacent to the main entrance. Loading/unloading of delivery trucks will take place on the western side of the building. The loading/unloading area is designated to accommodate four trucks at a time. An outdoor food court and outdoor seating area are proposed next to the tire center on the east side of the building. Table 2-2 details the proposed uses for the buildings on the Costco Wholesale parcel.

<table>
<thead>
<tr>
<th>Parcel</th>
<th>Use</th>
<th>Building Square Footage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Costco Wholesale</td>
<td>Commercial Center Building</td>
<td>143,463</td>
</tr>
<tr>
<td>Costco Wholesale</td>
<td>Tire Center</td>
<td>5,200</td>
</tr>
<tr>
<td>Costco Wholesale</td>
<td>Food Service</td>
<td>1,076</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>149,739</td>
</tr>
</tbody>
</table>

**Costco Wholesale Fueling Facility**

The project applicant is proposing to include a four-island vehicle fueling facility. Each island is designed with two double-sided gasoline dispensers, for a total of eight fueling pumps, or sixteen fueling positions. To serve the four islands and the sixteen gasoline dispensers, three 30,000-gallon underground fuel storage tanks shall be installed. The station has been designed to be fully automated and self-service only. It is proposed to be located on the northern side of the Proposed Project site.

The Riverside County Fire Prevention Department reviews the details associated with the fueling facility through the Building Permit review process. According to the Fire Marshal’s office, a separate fire hydrant will be required for the fueling facility. All required hydrants would be included in the overall warehouse and shopping center design. Fire flow requirements are based on building construction type, square footage, and type of business/operation. Commercial projects of this type generally require a flow of 4,000 gallons per minute at a minimum residual pressure of 20 pounds per square inch (psi). Once the Proposed Project is built, it will have adequate pressure and flow designed to meet the Riverside County Fire Department (RCFD) requirements.

To operate the fueling facility, Costco Wholesale shall meet requirements of local, state and federal regulatory agencies, including the City of La Quinta Fire Department (LQFD), Riverside County
2.0 Project Description

Environmental Health-Hazardous Materials Division (Hazardous Materials, Underground Tank Permit), Certified Unified Program Agency, Air Quality Management District, California Accidental Release Program (Risk Management Plan), State Water Resources Control Board (SWRCB), California Environmental Protection Agency (EPA) and the U.S. EPA.

Komar Development (Phase II)

Komar parcels 1 and 2 will be constructed during Phase II of the development. It is uncertain which specific tenants will occupy the parcels; however, the development will be compliant with the approved land uses for the Regional Commercial designation. Table 2-3 details the proposed uses for the buildings on the Komar parcels. As with the Costco Wholesale site, fire hydrants will be proposed consistent with RCFD requirements.

<table>
<thead>
<tr>
<th>Parcel</th>
<th>Use</th>
<th>Building Square Footage</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Regional Commercial</td>
<td>64,200</td>
</tr>
<tr>
<td>2</td>
<td>Regional Commercial</td>
<td>19,500</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>83,700</td>
</tr>
</tbody>
</table>

2.3.3.1 Architectural Design

Costco Wholesale

The Phase I architectural design features of the Costco Wholesale are depicted on Figure 2-5. The proposed architecture is characterized as contemporary desert, and colors used will emphasize neutral tones. Proposed architectural treatments include a simple architectural massing that utilizes masonry, cultured stone, and smooth finish stucco. All architectural detailing is subject to review and approval by the City of La Quinta.

Costco Wholesale Fuel Facility

The fueling facility layout is generally consistent with Costco Wholesale’s master design criteria, subject to review and approval by the City of La Quinta. The design features of the fuel facility are depicted in Figure 2-5. The distance from grade to the fascia is 14 feet and 6 inches, and the fascia itself is 4 feet in height. The controller enclosure will have a height of 8 feet – 1½ inches.

Komar Development

Phase II, the development of the Komar parcels, will blend with Costco Wholesale designs by applying similar materials and paint colors. The paint and materials to be used for the buildings that are constructed on the Komar parcels will be similar to the materials that are used for the Costco Wholesale building. This will ensure that the entire site has a similar look and feel throughout future development. The final tenants have not been confirmed for the Komar parcels; therefore, only maximum square footages for the buildings within certain envelopes are being proposed. Any future building on the Komar parcels will require site plan review and approval by the City of La Quinta. Figure 2-6 depicts a conceptual architectural rendering of the type of development that would be suitable for the Komar parcels.
2.0 Project Description

2.3.3.2 Project Access

Access to the Proposed Project will occur by way of two points on Highway 111. The main access point will be 60 feet in width, and will bisect the project site, running from Highway 111 south to the Costco Wholesale parcel parking lot, providing access to the fueling station. The second access point will be 40 feet in width, and will run from Highway 111 along the eastern edge of the project, south to the Costco Wholesale parking lot. Future access points will also be provided to the west connecting the subject property to future commercial development.

2.3.3.3 Truck Deliveries

Costco Wholesale

The main Costco Wholesale building and all of its components will require up to 28 truck deliveries (12-17 large trucks and 9-11 small trucks) on a typical weekday, resulting in up to 140 truck deliveries in an average week. Deliveries to the warehouse will be made primarily in Costco Wholesale trucks from its freight consolidation facility in Mira Loma, California. Trucks will be routed from eastbound I-10 via the Indio Boulevard exit to southbound Jefferson Street. They will enter the site via Highway 111 at the main signalized entry drive or unsignalized driveway. They will depart the site via the main entry drive on Highway 111 back to I-10 via Jefferson Street. Truck delivery times for the main Costco Wholesale building are proposed to occur 24 hours per day with the majority of deliveries occurring between the hours of 4:00 AM to 10:00 AM, and 2:00 PM to 8:00 PM, averaging about one to two trucks per hour during the peak delivery periods.

Costco Wholesale Fuel Facility

Fuel truck deliveries are anticipated to occur daily during the hours of operation, usually between 6:00 AM and 10:00 PM, one to four trucks per day are expected. The fuel trucks will traverse the same route as the Costco Wholesale delivery trucks to the project site and then pull into the fueling facility. While delivering the fuel, the truck will be parked over the underground tanks located on the west side of the fueling facility. The truck will not block access to any of the sixteen fueling positions. The fuel trucks will access and exit the site in the same manner as delivery trucks to the Costco Wholesale Building.

Costco Wholesale Tire Center

The tire sales/install (only) center typically will receive shipments of tires two times per week and pick up of old tires usually will occur once per week. The typical routing for tire sales/install center trucks will be the same as the Costco Wholesale delivery trucks; however, the tire trucks will go straight to the tire sales/install center. Deliveries to and pickups from the tire sales/install center will be scheduled for pre-opening hours, typically about 6:00 A.M.

2.3.3.4 Parking

Parking would be provided primarily on the north and east side of the Costco Wholesale building and nearest to the main entrance of the building. The City of La Quinta Parking Requirements Ordinance requires a minimum parking ratio of 1 space per 200 SF of floor area for commercial park districts. At 149,739 SF, the ordinance would require the Costco Wholesale parcel to provide 749 parking spaces. Since Phase I (Costco Wholesale) of the project provides 832 spaces, this phase exceeds the parking standards. The Phase II (Komar) parcels will have a maximum square footage of 83,700 SF of regional commercial land uses. The parking ordinance would require the project to provide 399 additional parking spaces on the Phase II parcels. Since the proposed site plan provides 458 spaces on the Phase II parcels, Phase II of the project also exceeds the parking standards. The proposed site plan provides a maximum of approximately 1,532 parking spaces for all retail development.
2.0 Project Description

2.3.3.5 Pedestrian Accessibility

Pedestrian walkways have been provided for in the project site design, as shown on Figure 2-4. The Proposed Project site plan provides pedestrian walkways to link the parking areas of Costco Wholesale to the front entrance of the warehouse. The pathways end at the front entrance to the warehouse and intersect the driveway at the front of the warehouse. The other commercial development areas also have pedestrian walkways linking the parking areas and the future commercial pads. Additionally, a pedestrian walkway will link the proposed bus stop, on Highway 111 in front of the development, to the development sidewalks.

2.3.3.6 Lighting Plan

The parking lot will be illuminated with downward pointing lights. The Komar parcels will contain pole light fixtures that are no taller than 22 feet above the finished grade, in compliance with the Highway 111 Design Standards. The pole light fixtures on the Costco Wholesale parcel will be affixed to a pole that will be no taller than 35 feet above the finished grade. The lighting fixtures are of a shoebox style with the bulbs recessed in the shoebox to minimize dispersion and glare that would affect adjacent residents. The locations of the lighting poles are sited in a uniform pattern across the entire site, approximately 100 feet apart. Lighting poles adjacent to the boundaries of the project will provide light fixtures with shields so as not to cause substantial glare to adjacent developments. The lighting fixtures attached to the east, west, and south sides of the Costco Wholesale building will be placed at a maximum of 18 feet in height. The Costco Wholesale Fuel Facility will utilize recessed under-canopy-lighting. The City Planning Department would approve the final lighting plan design.

2.3.3.7 Landscaping

The preliminary landscape plan for the Proposed Project site proposes a number of drought tolerant landscape trees, shrubs and groundcover plants. Landscape elements and enlargements are shown on Figure 2-7, Conceptual Landscape Plan. The project applicants have developed the landscape plan to meet the City of La Quinta Municipal Code Regulations, Highway 111 Design Guidelines, and Coachella Valley Water District General Landscape Guidelines and Irrigation System Design Criteria. Partial screening of the Proposed Project from Highway 111 and the surrounding parcels has been accomplished through the use of a variety of plant species along the perimeters of the property.

2.3.3.8 Screen Wall

The Proposed Project would install a wall in accordance with the City of La Quinta Municipal Codes, along the portion of the project site adjacent to the La Quinta Evacuation Channel. The screen wall would not be visible from the project site as a landscape buffer would be constructed in front of the wall.

2.3.4 Infrastructure Improvements

Bus stop – During Phase 1 Costco Wholesale will construct a bus stop along Highway 111. The bus stop will be connected to the internal pedestrian system within the commercial center.

Sewer – Sewer service will be provided to the site by the CVWD via an existing 15-inch sewer line located in Dune Palms Road. Sewer will be connected via a proposed easement within the adjacent property to the west. Onsite sewer lines will be installed with stubouts to development pads.

Water – Water service will also provided to the site by CVWD and will be available at the property from an 18-inch water line located to the east of the property in Jefferson Street. Improvements will be constructed to connect to the existing water line in Jefferson Street, and tunnel a new water line through the La Quinta Evacuation Channel and through the vacant parcels in the City of Indio directly to the east of the project site. Both domestic and irrigation water will be taken from this water line.
2.0 Project Description

The staging area for the construction of the waterline will be located on the project site, on what is being referred to as Komar parcel 1. Many of the technical reports analyze an area on the adjacent parcel to the east to hold a staging area during construction. However, the phasing of the Komar Desert Center Project is such that the construction staging for the water line can happen on site. Therefore, the analysis in all sections of this Draft EIR does not include the construction staging area on the adjacent parcel.

New onsite waterlines will consist of 12-inch domestic water lines, 6-inch fire hydrants, and 1½-inch to 2-inch service lines as needed. Initial water improvements will involve creation of a looped water line to serve the pads within the site, the connection of landscape irrigation lines, and the provision of stub outs with blow off valves in anticipation of the future building at each pad. When buildings are constructed, they will be connected to the water line and the blow off valves will be removed.

Electricity – Electric services will be provided to the site by the Imperial Irrigation District and are available to the property on Highway 111.

Gas – Natural gas service will be provided to the site by Southern California Gas Company (SCGC), which has a four-inch gas main in Highway 111. The service will be in accordance with the Company’s policies and extension rules on file with the California Public Utilities Commission. Service from this location would require cutting and reconstruction of some street pavement which would typically be completed within one day. SCGC anticipates service for this project to be routine.

2.3.4.1 Transportation/Circulation

Highway 111 Improvements

A series of roadway improvements are planned along Highway 111 in the near future and includes widening Highway 111 to six lanes, with dual left-turn lanes and separate right-turn lanes at all of the major intersections from Adams Street to Jefferson Street. The Costco Wholesale/Komar development will provide half of the Highway 111 street improvements along the site frontage.

2.3.4.2 Drainage and Flood Control

The site storm drain system will be designed to intercept flow from the parking areas and buildings, ultimately conveying the flow to the existing La Quinta Evacuation Channel. Storm water will be filtered using a Continuous Deflective Separation (CDS) unit, or similar structure, prior to discharging via underground pipe at the inlet of the existing Channel. A seven foot by ten foot concrete slab will be placed at the outlet of the storm drain for protection and stabilization of the channel.

2.3.4.3 Water Quality

The Water Quality Management Plan identifies Best Management Practices (BMPs) that will be used on-site to control predictable pollutant runoff. The BMPs identified include the measures specified in the Countywide Water Quality Management Plan (WQMP) and National Pollutant Discharge Elimination System (NPDES) Drainage Area Management Plan (DAMP), the assignment of long-term maintenance responsibilities (specifying the developer, parcel owner, maintenance association, lessee, etc.) and the locations of all structural BMPs.

The City's Public Works Department will be responsible for ensuring that the commercial development complies with Riverside County storm water control BMPs and guidelines. The development team will coordinate with the City to provide an overall Stormwater Pollution Prevention Plan (SWPPP) for the entire commercial center project. The SWPPP will be comprised of BMPs in conformance with Riverside County guidelines that will be utilized to reduce the discharge of pollutants from the storm water conveyance system to the maximum extent practicable.
2.0 Project Description

2.3.4.4 Fuel Facility

The concrete fueling island pad will be constructed using grade breaks and grading the fueling pad and site with 2 to 4 percent slopes so that water, fuel or liquid present in the fuel dispensing area will go either directly to an oil water separator or directed away from it to a trench drain and conveyed through underground piping to the oil/water separator. No separate connection to the sanitary sewer system is required. The surrounding impervious surface and roof drains runoff is treated the same as the rest of the fuel facility site and conveyed into the overall storm water system.

2.4 CONSTRUCTION ACTIVITIES / PROJECT PHASING

Development of the Proposed Project is anticipated to occur over approximately two years. Buildout is projected for approximately early-to-mid-2007 and will occur in two distinct phases. Construction of Phase I (the Costco Wholesale parcel) is scheduled to begin as soon as the EIR is certified and the Proposed Project is approved by the City Council, which is expected to be in winter 2006. Phase I should be completed by August 2006. Phase II (the Komar parcels) is not scheduled to begin construction until tenants are secured and the site plan goes through individual site plan review with the City for each building to verify applicability with the site plan and building codes. Tentatively, this date is projected for winter 2006. Phase II should be completed by April 2007.

Construction scheduling will comply with the City of La Quinta’s Noise Ordinance (9.100.210 Noise Control), which sets forth maximum noise levels as related to potentially sensitive surrounding land uses. Construction for the project site will be limited to occur between the hours 7 AM and 7 PM Monday through Saturday with the exception of legal holidays. Clearing and excavation activities will involve the use of earth moving equipment such as heavy-duty trucks, scrapers, backhoes and front-end loaders. Foundation construction generally entails the use of concrete trucks, cranes and pneumatic tools; and building construction will involve generators, compressors, and light trucks.
3.0 GENERAL ENVIRONMENTAL SETTING

3.1 JURISDICTIONAL SETTING

The project site lies within the boundaries of the City of La Quinta. The City is within the eastern portion of Riverside County (Figure 2-1, Regional and Vicinity Map).

City of La Quinta

The City of La Quinta encompasses 34.76 square miles (22,246 acres) within the Coachella Valley, located at the base of the Santa Rosa Mountains. Per the California Department of Finance, June 2003, the City’s estimated population is 30,452.

The City is located approximately 16 miles from Palm Springs, and 120 miles from San Diego and Los Angeles. Primary access to the City and the area is via I-10 from the northwest/southeast. Portions of unincorporated County of Riverside border the city in all directions. The City of Indio lies to the east, the City of Indian Wells to the west, and the City of Palm Desert to the northwest.

City of La Quinta General Plan

Planning within the City of La Quinta is governed by the March 20, 2002 Comprehensive General Plan consisting of the mandatory Land Use, Circulation, Open Space, Conservation, Safety, and Noise Elements. The mandatory Housing Element was certified in 2004. Additional elements include Parks and Recreation, Natural Resources, Infrastructure and Public Services, Environmental Hazards, and Cultural Resources Elements.

Riverside County

Riverside County encompasses 7,295 square miles (4,669,167 acres) in southern California. Approximately 10 percent of this area lies within 24 incorporated cities. Land use authority within the incorporated cities, including the City of La Quinta, rests with the cities. The large majority of the County thus lies within unincorporated territory (covering 6,568 square miles, or 4,203,761 acres). Of this unincorporated area, private landowners hold 1,335,258 acres, while approximately 2,876,705 acres within the County are either held or managed by county, state, federal entities, or one of the Indian Nations.

Riverside County General Plan/Riverside County Integrated Plan (RCIP)

An update to all sections of the Riverside County General Plan was approved on October 7, 2003 as part of the Riverside County Integrated Project (RCIP). The RCIP is a comprehensive, three-part, integrated program to determine future conservation through the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP); address traffic and circulation issues through the Community & Environmental Transportation Acceptability Process (CETAP); and balance housing and economic needs by updating the County’s General Plan. The RCIP General Plan is divided into eight elements.

Western Coachella Valley Area Plan

The Western Coachella Valley area is characterized by a variety of contrasting and dramatic geographic features. Ringed by the rugged San Jacinto, Santa Rosa, and Little San Bernardino Mountains, the Coachella Valley contains a series of low-lying desert flatlands, sloping dunes, and rolling foothills. Cove-like areas line the base of the Santa Rosa Mountains. The Whitewater River runs the length of the Valley.

The Western Coachella Valley is framed by the San Jacinto Mountains and Santa Rosa Mountains National Monument to the west and Joshua Tree National Park to the north and east. The cities of Desert Hot Springs, Palm Springs, Cathedral City, Rancho Mirage, Palm Desert, Indian Wells, La Quinta, and...
3.0 General Environmental Setting

Indio are included in the Western Coachella Valley Area Plan. The RCIP General Plan update includes a detailed Area Plan for the community area.

3.2 ENVIRONMENTAL RESOURCES

The Western Coachella Valley area is a predominantly desert and mountainous region. The primary drainage in the area is the Whitewater River, which spans the length of the Coachella Valley. The Colorado River Aqueduct also runs through the Coachella Valley. Colorado River water imported via the Aqueduct provides supplemental water to nearly 17 million people in Riverside County and Southern California's coastal plain.

The Proposed Project site is located south of Highway 111, and to the west of Jefferson Street. I-10 is approximately two miles to the north. The Proposed Project as a whole is bounded on its easterly edge by the City of Indio; on the southeastern boundary by the La Quinta Evacuation Channel, owned by the Coachella Valley Water District; on the southern boundary by parcels designated as Major Community Facilities uses in the General Plan that contain the Desert Sands Unified School District Headquarters; and on the west by undeveloped property zoned for commercial and residential uses. Highway 111 bounds the project to the north.

Mountain ranges in the vicinity of the Proposed Project include the San Jacinto Mountains and Santa Rosa Mountains National Monument. This system of mountains runs north to northwest and includes the 8,716-foot-high Toro Peak in the Santa Rosa Mountains, and the 10,831-foot San Jacinto Peak in the San Jacinto Mountains. The Peninsular Ranges act as an effective barrier to the eastward moving storms and cooler air masses of the southern California coastal area. Additionally, the Little San Bernardino Mountains, which are located within the Joshua Tree National Park, frame the northeastern edge of the Coachella Valley.

Western Coachella Valley is traversed by several active and potentially active fault zones, including the San Andreas Fault, and has experienced several earthquakes of moderate magnitude since records have been kept. The Proposed Project site is characterized by alluvium, consisting of silty sands, clayey sands, and sands with variable amounts of gravel. There are no bedrock outcrops or boulders on the parcel.

The Proposed Project area is within the Draft Coachella Valley Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan (Draft Plan). This program has been designed to encompass core habitat, habitats, linkages, and wildlife corridors outside of existing reserve lands into a comprehensive plan for the protection of regional resources. The Plan is still in draft format, but has been considered in this Draft EIR, as the Proposed Project is in the proposed Plan area. The Proposed Project is located outside of any proposed conservation area.

The Proposed Project location is within the Whitewater River watershed. Drainage from the eastern portion of the site currently drains to the adjacent La Quinta Evacuation Channel, which in turn drains to the Coachella Valley Stormwater Channel, and in turn discharges to the Whitewater River approximately 2,500 feet to the north. The western portion of the site drains to a low point, eventually being captured by the City of La Quinta storm drain system. Surface water drainage across the ungraded site is predominantly towards the south facing local topography via sheet flow.

3.3 INFRASTRUCTURE AND SERVICES

Interstate 10 serves as the major transportation corridor between Riverside County and Los Angeles County. State Highway 111 provides access from southern inland San Diego County to I-10 north of Palm Springs. The major arterials that currently serve the project site include I-10, with off-ramps at Washington Street and Indio Boulevard/Jefferson Street north of the Proposed Project site. Major roadways that serve the Proposed Project site include Highway 111, Jefferson Street, and Washington Street.
3.0 General Environmental Setting

The Riverside County Fire Department (RCFD) working in conjunction with the California Department of Forestry and Fire Protection (CDF) provides fire protection services to the region. County Fire Stations No. 81 (North Bermuda Dunes) and No.32 (La Quinta) are located within 1.5 to 3 miles of the Proposed Project site and would provide primary response to the project area.

Police protection services are provided by the City of La Quinta Police Department, with Riverside County providing the personnel, equipment, and resources. The Riverside County Sheriff’s Department (RCSD), serves the City of La Quinta from the Indio Station. The Indio Station serves the eastern half of the Coachella Valley’s unincorporated area, as well as the City of Coachella, City of La Quinta and the Southern Coachella Valley Community Services District. Primary response to the project area is provided by the Sheriff’s Station in the City of Indio.

The City of La Quinta is currently served by the Desert Sands Unified School District (DSUSD) and the Coachella Valley Unified School District, which are located in La Quinta and Coachella respectively. There are three public elementary schools, one public middle school, and one public high school in the City of La Quinta.

Utilities services for the project area are provided by the following entities:

- The Coachella Valley Water District (CVWD) – water and sewer
- Imperial Irrigation District (IID) Energy – electrical service
- Southern California Gas Company (SCGC) – natural gas

3.4 LAND USE AND DEVELOPMENT

3.4.1 Surrounding Land Uses

The Proposed Project as a whole is bounded on its easterly edge by the City of Indio; on the southeastern boundary by the La Quinta Evacuation Channel, owned by the Coachella Valley Water District; on the southern boundary by parcels designated as Major Community Facilities uses, which are occupied by the Desert Sands Unified School District Headquarters; and on the west by undeveloped property zoned for commercial and residential uses. Highway 111 bounds the project to the north (Figure 3-1). Currently the project site is undeveloped and vacant. Photos of the site and existing vegetation are shown in Figure 3-2, Photo Location Map and Figure 3-3, Site Photos.

3.5 CUMULATIVE PROJECTS

3.5.1 Introduction

The State CEQA Guidelines define cumulative effects as “two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts.” The CEQA Guidelines further state that the individual effects can be the various changes related to a single project or the changes involved in a number of other closely related past, present, and reasonable foreseeable probable future projects (Section 15355). The CEQA Guidelines allow for the use of two alternative methods to determine the scope of projects for the cumulative impact analysis:

- List Method - A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency.
- Regional Growth Projections Method - A summary of projections contained in an adopted general plan or related planning document which is designed to evaluate regional or area wide conditions (CEQA Guidelines Section 15130).
3.0 General Environmental Setting

For the purpose of this EIR, both the List Method and the Regional Growth Projections Method have been used to assess the project's cumulative environmental effects. Where appropriate, the List Method is used and includes known specific projects located within the vicinity of the proposed project.

3.5.2 Cumulative Projects

The list of cumulative projects assumed for this analysis is based upon the identification of related development in the vicinity of the Proposed Project. Projects identified in the list method include projects identified by the traffic consultant through the course of project research at the City of La Quinta.

Table 3.5-1 provides a list of the cumulative projects. Cumulative impacts associated with those projects were evaluated in their respective environmental review documents, or are currently under environmental review. Figure 3-4 depicts the location of the cumulative projects.

Table 3.5-1. Cumulative Projects

<table>
<thead>
<tr>
<th>Map ID</th>
<th>Project</th>
<th>Description</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Sam's Club</td>
<td>136,000 square feet of commercial development, plus a fueling station.</td>
<td>Under building and precise grading review.</td>
</tr>
<tr>
<td>2</td>
<td>Jefferson Plaza (Home Depot - Phase II)</td>
<td>218,279 square feet of retail, restaurant, and gas station uses.</td>
<td>Under Construction</td>
</tr>
<tr>
<td>3</td>
<td>The Pavilion</td>
<td>164,000 square</td>
<td>Grading and building permit review in process.</td>
</tr>
<tr>
<td>4</td>
<td>La Quinta Corporate Center</td>
<td>91,600 SF of business park uses, 79,300 SF of commercial uses, 235,000 SF of office uses, 7,000 SF of restaurant uses, 6,500-square-foot bank, a 30,000 SF fitness center, a 15 fueling position service station, 10.6 acres of industrial park uses, and 3.61 acres of self-storage.</td>
<td>All but approximately 3.5 acres of the Center has been constructed. Three office buildings are about to commence construction on approximately 2 of the remaining 3.5 acres. At this time it is uncertain as to what might be constructed on the remaining 1.5 acres.</td>
</tr>
</tbody>
</table>

3.5.3 Regional Growth Projection Model

Because the geographic scope of cumulative impacts to some issue areas is broader than the immediate area where the listed projects are located, the list method can not adequately address a project's potential cumulative impacts to some issue areas (e.g., Hydrology and Water Quality). Therefore, a regional growth projections model is also used to evaluate cumulative effects in this EIR.

The cumulative impact analysis contained in Section 4.0 of the Draft EIR is based on environmental factor-specific related projects that would contribute to overall post-development build-out impacts. The four geographically related projects identified above have been incorporated into the cumulative impact analysis for transportation and traffic, local air quality, noise, and public services and utility assessment. All other cumulative environmental impacts included in this Draft EIR are considered based upon regional planning documents, such as the La Quinta General Plan.
4.0 ENVIRONMENTAL IMPACT ANALYSIS

Introduction

This section provides information on existing conditions, evaluates the potential environmental consequences of the proposed project, and where applicable, recommends mitigation measures for each environmental category. The environmental factors that are evaluated in this Draft EIR are based on the evaluation and findings of the Initial Study (Appendix A). The potential for cumulative impacts is also addressed. Each subchapter is organized under the following headings:

- Environmental Setting
- Project Impacts (including Thresholds of Significance)
- Cumulative Impacts
- Regulatory Requirements and Conditions
- Level of Significance Before Mitigation
- Environmental Mitigation Measures
- Level of Significance After Mitigation

The focus of the environmental analysis in each of the following sections is the proposed actions as described in Section 2.0, Project Description.

Upon public review of this EIR and City staff finalization of recommended project conditions of approval, a Mitigation Monitoring Reporting Program (MMRP) for Komar Desert Center will be prepared. The updated MMRP will be adopted at the time the Final EIR is submitted to the City Council for certification.
4.0 Environmental Impact Analysis

4.1 AIR QUALITY

The following report has been prepared to analyze potential impacts to air quality resulting from the Proposed Project and is included in Appendix B on the attached CD:


4.1.1 Environmental Setting

The project site is located within the Coachella Valley Planning Area (CVPA) of the Salton Sea Air Basin (SSAB). The SSAB contains the eastern portion of Riverside County and Imperial County. The Coachella Valley encompasses approximately 2,500 square miles and is located in the central portion of Riverside County. The distinctive climate of this area is determined primarily by its terrain and geographical location. The San Jacinto Mountains and the Santa Rosa Mountains to the west of the basin create large seasonal temperature differences in the valley. Regional meteorology is largely dominated by a persistent high-pressure area (the Pacific High), which commonly resides over the eastern Pacific Ocean. Seasonal variations in the strength and position of this pressure cell cause changes in the weather patterns of the area; however, the systems that reach the SSAB are much weaker than they are upon first landfall. Local climatic conditions are characterized by hot summers, mild winters, infrequent rainfall, and moderate humidity. The project site is located in a portion of Riverside County that has experienced limited urban/suburban development as compared to Los Angeles and Orange Counties. Consequently, the project vicinity has fewer emission sources and generally lower concentrations of pollutants.

Pollutant concentrations in the basin vary with location, season, and time of day. Daytime temperature inversions are common, the bases of which sit at 6,000-8,000 feet above the ground. These inversions prevent vertical mixing and limit the ability of airborne pollutants to disperse. Nighttime (radiation) inversions occur at heights of 1,000 feet or less. In summer, these radiation inversions disappear quickly in the morning. In the winter, however, there is less solar radiation reaching the ground so radiation inversions persist, thus limiting mixing to 200-2,000 feet above the ground. Therefore, the worst air quality occurs at night to early morning when radiation inversions are strongest.

4.1.1.1 Applicable Plans and Regulations

Federal and State Regulations

*Federal Clean Air Act*

The Federal Clean Air Act (CAA) was enacted in 1955 and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The CAA established federal air quality standards, known as National Ambient Air Quality Standards (NAAQS) included in Table 4.1-1, and specifies future deadlines for achieving compliance. The CAA also mandates that the state submit and implement State Implementation Plans (SIPs) for local areas not meeting these standards. These plans must include pollution control means that demonstrate how the standards will be met. Air quality planning, enforcement, and monitoring responsibilities for the CVPA are carried out by the SCAQMD. The NAAQS were amended in July 1997 to include an additional standard for ozone, and to adopt a standard for fine particulates (PM-2.5).

The 1990 Amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS, require a demonstration of reasonable further progress toward attainment, and incorporate additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA that would most substantially affect the development of the Proposed Project are Title I (Non-attainment Provisions) and Title II (Mobile Source Provisions).
## 4.0 Environmental Impact Analysis

### Table 4.1-1. Federal and State Ambient Air Quality Standards

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Averaging Time</th>
<th>California Standard</th>
<th>National Standard</th>
<th>Pollutant Health Effects</th>
<th>Major Pollutant Source(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ozone (O₃)</td>
<td>1 hour</td>
<td>0.09 ppm (180 µg/m³)</td>
<td>0.12 ppm (235 µg/m³)</td>
<td>High concentrations can directly affect lungs, causing irritation. Common effects are damage to vegetation and cracking of untreated rubber.</td>
<td>Motor vehicles</td>
</tr>
<tr>
<td></td>
<td>8 hours</td>
<td>--</td>
<td>0.08 ppm (157 µg/m³) (Note 1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>8 hours</td>
<td>9 ppm (16 mg/m³)</td>
<td>9 ppm (10 mg/m³)</td>
<td>Interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.</td>
<td>Internal combustion engines (primarily gasoline powered motor vehicles)</td>
</tr>
<tr>
<td></td>
<td>1 hour</td>
<td>20 ppm (23 mg/m³)</td>
<td>35 ppm (40 mg/m³)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nitrogen Dioxide (NO₂)</td>
<td>Annual Average</td>
<td>--</td>
<td>0.053 ppm (100 µg/m³)</td>
<td>Irritates eyes and respiratory tract. Colors atmosphere reddish brown.</td>
<td>Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads</td>
</tr>
<tr>
<td></td>
<td>1 hour</td>
<td>0.25 ppm (470 µg/m³)</td>
<td>--</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sulfur Dioxide (SO₂)</td>
<td>Annual Average</td>
<td>--</td>
<td>0.030 ppm (80 µg/m³)</td>
<td>Irritates upper respiratory tract; injures lung tissue. Can yellow the leaves of plants, and destroy marble, iron, and steel. Limits visibility and reduces sunlight.</td>
<td>Fuel combustion, chemical plants, sulfur recovery plants, and metal processing</td>
</tr>
<tr>
<td></td>
<td>24 hours</td>
<td>0.04 ppm (105 µg/m³) (Note 2)</td>
<td>0.14 ppm (365 µg/m³)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1 hour</td>
<td>0.25 ppm (655 µg/m³)</td>
<td>--</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Particulate Matter (PM₁₀)</td>
<td>Annual Arithmetic Mean</td>
<td>20 µg/m³ (Note 3)</td>
<td>--</td>
<td>May irritate eyes and respiratory tract. Absorbs sunlight, reducing amount of solar energy reaching the earth. Produces haze and limits visibility.</td>
<td>Dust and fume producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities such as wind-raised dust and ocean spray</td>
</tr>
<tr>
<td></td>
<td>24 hours</td>
<td>50 µg/m³</td>
<td>150 µg/m³</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Annual Arithmetic Mean</td>
<td>--</td>
<td>50 µg/m³</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fine Particulate Matter (PM₂·⁵)</td>
<td>Annual Arithmetic Average</td>
<td>15 µg/m³</td>
<td>--</td>
<td>May increase respiratory symptoms and diseases and decrease lung function.</td>
<td>Vehicle exhaust, industrial combustion.</td>
</tr>
<tr>
<td></td>
<td>24 Hour</td>
<td>--</td>
<td>65 µg/m³</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lead (Pb)</td>
<td>30 Day Average</td>
<td>1.5 µg/m³</td>
<td>--</td>
<td>May cause learning disabilities, brain and kidney damage.</td>
<td>Metal smelters, resource recovery, leaded gasoline, deterioration of lead paint</td>
</tr>
<tr>
<td></td>
<td>Calendar Quarter</td>
<td>--</td>
<td>1.5 µg/m³</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Source:** California Air Resources Board (CARB) Fact Sheet May 6, 2005 (www.arb.ca.gov/aqs/aags2.pdf)

**Notes:**
1. New federal 8-hour O₃ standards were promulgated by EPA on July 18, 1997; contact EPA for further clarification and current federal policies.
2. This SO₂ standard was formerly less strict—0.05 ppm (131 µg/m³)—in CARB Fact Sheet 38 (1988), as reported in the April 1993 SCAQMD Air Quality Handbook for Preparing Environmental Impact Reports.
3. This PM-10 standard was formerly less strict—30 µg/m³—in CARB Fact Sheet 38 (1988), as reported in the April 1993 SCAQMD Air Quality Handbook for Preparing Environmental Impact Reports. This revised standard was approved by CARB on June 20, 2002, with final approval by the Office of Administrative Law in May 2003.

mg/m³ = milligrams per cubic meter
ppm = parts per million
µg/m³ = micrograms per cubic meter
4.0 Environmental Impact Analysis

Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants: ozone (O₃), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), coarse particulates (PM-10), carbon monoxide (CO), and lead (Pb) (Table 4.1-1). The CAA sets certain deadlines for meeting the NAAQS within the Basin, including O₃ by 2010, PM-10 by 2006, and CO by 2000.

Mobile source emissions are regulated in accordance with Title II provisions. These provisions require use of cleaner-burning gasoline and other cleaner-burning fuels, such as methanol and natural gas. Automobile manufacturers are also required to reduce tail pipe emissions of hydrocarbons and nitrogen oxides (NOₓ).¹

California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the state to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practical date (Table 4.1-1). Air pollution from commercial and industrial facilities is regulated by local air quality management districts, whereas, mobile sources of air pollution are regulated by the California Air Resources Board (CARB) and the EPA. All air pollution control districts have been formally designated as “attainment” or “non-attainment” for each state air quality standard. Non-attainment designations are categorized into three levels of severity: (1) moderate; (2) serious; and (3) severe.

According to the CARB 2004 State Area Designations, the Basin is designated as a non-attainment area for O₃ and PM-10. Non-attainment areas are required to prepare air quality management plans (AQMP) to include specified emission reduction strategies to meet clean air goals. A 1997 AQMP, amended in 1999, approved in 2000, and amended again in 2003, was designed to meet both federal and state air quality planning guidelines. Components include the following:

- Demonstration of attainment for O₃, CO, and PM-10.
- Updated emissions inventories (1993 base year) of VOC, NOₓ, CO, SOₓ, and PM-10.
- Emissions budgets for future years of the inventoried compounds.
- An updated pollution control strategy.
- Contingency measures if the plan as presently proposed fails to meet stated timetables.

Demonstration of compliance with CARB’s established reporting periods for compliance with air quality goals. A seven-year initial reporting period (from January 1, 1988 to December 31, 1994) was established. Subsequent reporting periods occur every three years (i.e., 1997, 2000, etc.) and require a reduction in regional emissions by 5 percent per year.

Local Regulations

South Coast Air Quality Management District

The SCAQMD has jurisdiction over approximately 12,000 square miles, consisting of the Basin as well as the Los Angeles County and Riverside County portions of what used to be, under state classification, the Southeast Desert Air Basin. The SCAQMD has adopted a series of Air Quality Management Plans to meet the California and national standards. The AQMP provides a framework for which the Basin would achieve compliance with the CAAQS and NAAQS. The most recent version of the AQMP was adopted in 2000 and amended in 2003.

A Proposed Project relates to the AQMP through the land use and growth assumptions used to forecast automotive air pollution emissions. The AQMP is based on the designated land use for a project site as

¹ NOₓ is a collective term that includes all forms of nitrogen oxides (NO, NO₂, NO₃) that are emitted as by-products of the combustion process. However, because most of these chemicals eventually convert to NO₂ in the atmosphere, all NOₓ emissions are conservatively reported as the criteria pollutant NO₂.
described in the approved General Plan. To the extent that a project is consistent with the growth assumptions in the General Plan, it is also consistent with the AQMP. Such consistency implies that a project would not create any significant regional air quality impacts because such impacts have already been anticipated within the framework of the regional air quality planning process. However, it is recommended in the AQMP that, although incompatibility with the AQMP may be a source for potentially significant impacts, compatibility is not a sufficient basis for a finding of less than significant impact. Impact significance is therefore evaluated on a project-specific basis using SCAQMD impact assessment guidance and state and federal AAQS.

**Regional Comprehensive Plan and Guide**

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and serves as a forum for regional issues relating to transportation, the economy and community development, and the environment. SCAG has prepared the Regional Comprehensive Plan and Guide (RCPG) for the SCAG region, which includes chapters on growth management and regional mobility that form the basis of the land use and transportation control portions of the AQMP and are utilized in the preparation of air quality forecasts.

### 4.1.1.2 Existing Conditions

**Ambient Air Quality**

**Regional Air Quality**

The Basin is a non-attainment area for PM-10 and O₃. PM-10 concentrations are high because the majority of the region is desert. As friction is generated between moving air and the sparse vegetation of the regions, this area tends to be very windy, especially during the day. This condition is further enhanced by the rapid daytime heating of the lower air over the desert. This leads to strong convection activity in which there is accelerated exchange of lower and upper air. This in turn increases surface winds. During the winter, however, the rapid cooling in the surface layers at night retards this exchange of momentum, and the result is nearly calm winds, especially at night.

Elevated levels of ozone in the Basin are primarily attributable to sources in Los Angeles and Orange Counties. Ozone and ozone precursors from these counties are transported through this area by atmospheric winds. Ozone precursors are emissions such as carbon monoxide, methane, non-methane hydrocarbons and nitrogen oxides, which in the presence of solar radiation react with other chemical compounds to form ozone. Frequent temperature inversions enhance ozone concentrations in the area by limiting vertical mixing to a shallow depth.

Over the past several decades, both the state and federal governments have set and periodically revised ambient air quality standards for pollutants that cause the greatest health concern. These standards encompass the most common varieties of airborne materials that can pose a health hazard. Pollutants with ambient standards remain the chief focus of air quality management activities around the nation.

Air quality standards are set at levels that provide a reasonable margin of safety and protect the health of most sensitive individuals in the population. Pollutants for which ambient standards have been set are referred to as “criteria pollutants.” Criteria pollutants include the following:

- O₃
- CO
- NO₂
- SO₂
4.0 Environmental Impact Analysis

- PM-10 (comprising airborne particles of less than or equal to 10 microns in diameter)
- PM-2.5 (comprising airborne particles of less than 2.5 microns in diameter)
- Pb

Local Air Quality

The SCAQMD maintains a network of air quality monitoring stations located throughout the Basin. As defined by SCAQMD, the monitoring stations most representative of existing air quality conditions in the area of the Proposed Project are the Indio and Palm Springs air monitoring stations. The Indio station monitors O₃ and PM-10. CO and NOₓ are monitored at Palm Springs. Table 4.1-2 summarizes the last seven years of published data from the Indio and Palm Springs stations.

Table 4.1-2. Project Area Air Quality Monitoring Summary – 1997-2003
(Number of Days Standards Were Exceeded and Maximum Observed Concentrations)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Ozone¹</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1-Hour &gt; 0.09 ppm</td>
<td>0⁴</td>
<td>16</td>
<td>13</td>
<td>43</td>
<td>21</td>
<td>24</td>
<td>24</td>
</tr>
<tr>
<td>1-Hour &gt; 0.12 ppm</td>
<td>0⁴</td>
<td>2</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>8-Hour &gt; 0.09 ppm</td>
<td>1⁴</td>
<td>12</td>
<td>7</td>
<td>7</td>
<td>15</td>
<td>16</td>
<td>19</td>
</tr>
<tr>
<td>Max 1-Hour Conc. (ppm)</td>
<td>0.09⁴</td>
<td>0.13</td>
<td>0.13</td>
<td>0.11</td>
<td>0.11</td>
<td>0.11</td>
<td>0.12</td>
</tr>
<tr>
<td>Carbon Monoxide²</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1-Hour &gt; 20. ppm</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>8-Hour &gt; 9. ppm</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Max 1-Hour Conc. (ppm)</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>2</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>Max 8-Hour Conc. (ppm)</td>
<td>1.5</td>
<td>1.6</td>
<td>1.6</td>
<td>1.6</td>
<td>1.6</td>
<td>1.2</td>
<td>1.3</td>
</tr>
<tr>
<td>Nitrogen Dioxide²</td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>1-Hour &gt; 0.25 ppm</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<td>0</td>
</tr>
<tr>
<td>Max 1-Hour Conc. (ppm)</td>
<td>0.07</td>
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</tr>
<tr>
<td>Respirable Particulates (PM-10)³</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>24-Hour &gt; 50 µg/m³²⁸</td>
<td>25/56</td>
<td>32/80</td>
<td>30/56</td>
<td>52/103</td>
<td>55/117</td>
<td>52/115</td>
<td>52/117</td>
</tr>
<tr>
<td>24-Hour &gt; 150 µg/m³³⁰</td>
<td>0/56</td>
<td>0/80</td>
<td>0/56</td>
<td>0/103</td>
<td>2/117</td>
<td>0/115</td>
<td>3/117</td>
</tr>
<tr>
<td>Max. 24-Hr. Conc. (µg/m³)</td>
<td>182</td>
<td>114</td>
<td>119</td>
<td>114</td>
<td>604</td>
<td>199</td>
<td>309</td>
</tr>
<tr>
<td>Ultra-Fine Particulates (PM-2.5)¹</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>24-Hour &gt; 65 µg/m³²⁶</td>
<td>-</td>
<td>-</td>
<td>0/83</td>
<td>0/115</td>
<td>0/113</td>
<td>0/117</td>
<td>0/118</td>
</tr>
<tr>
<td>Max. 24-Hr. Conc. (µg/m³)</td>
<td>-</td>
<td>-</td>
<td>30.</td>
<td>29.</td>
<td>34.</td>
<td>27.</td>
<td>27.</td>
</tr>
</tbody>
</table>

Source: South Coast AQMD – Indio and Palm Springs Air Monitoring Station Data Summaries

Notes:
1. Information taken from the Indio Air Monitoring Station Data Summary
2. Information taken from the Palm Springs Air Monitoring Station Data Summary
3. Excludes high windy days when natural sources dominate PM-10 levels (except 2001, 2003)
4. Incomplete data year
   - = No measurements before 1999
   ppm = parts per million
   µg/m³ = micrograms per cubic meter
4.0 Environmental Impact Analysis

Ozone levels continue to exceed standards in the desert communities of the Basin; however, the magnitude of smog events and peak ozone levels has dropped noticeably since 1997. The federal 1-hour ozone standard has only been exceeded three times in the last seven years, and not at all since 1999. The portion of the SSAB around the project site is close to becoming an attainment area for the federal 1-hour ozone standard. The federal 8-hour ozone standard is exceeded frequently in the Indio area. The project area averages around 12 days per year with violations. When the non-attainment designations for the 8-hour ozone standard were released in 2004, the Indio portion of the SSAB was designated as a “serious” non-attainment area.

More localized pollutants such as traffic generated CO and NOx do not exceed standards because nocturnal air drainage off the mountains is clean and local development is not sufficiently intensive to allow for a significant pollution accumulation. Since CO and NOx levels in areas of heavier traffic concentration in Palm Springs are very low, they are expected to be even lower in the project vicinity. There is substantial excess dispersive capacity to accommodate localized vehicular air pollutants such as CO and NOx without any threat of violating applicable AAQS.

The Proposed Project site is currently undeveloped. No emissions other than PM-10 are currently associated with the site. PM-10 levels frequently exceed the state standard due to regular high wind events which generate dust from natural sources. Only a few measurements in excess of the national particulate standard have been recorded at the Indio air monitoring station, however. The data suggest that the federal PM-10 standard is occasionally exceeded in the project area and that there is a very high frequency of violations of the more stringent state PM-10 standard.

Measurements of PM-2.5 in Indio began in 1999. There have been no violations of the PM-2.5 standard in the last five years of data. Given the high frequency of violations of the PM-10 standard, most airborne dust clearly derives from fugitive soil dusts, from agriculture, construction, unpaved roads, etc. because such dust normally does not break down into the sub 2.5-micron size range. Existing dust levels near the project site, while often high, are neither chemically active material, nor are they small enough to reach the deepest lung tissue.

4.1.2 Project Impacts

4.1.2.1 Thresholds of Significance

As defined in Appendix G of the CEQA Guidelines, project impacts to air quality are considered significant if any of the following occur:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Expose sensitive receptors to substantial pollutant concentrations; or
- Create objectionable odors affecting a substantial number of people.

Air quality planning within the SSAB is based on attainment of the NAAQS and CAAQS. To this end, the SCAQMD has established thresholds of significance for the assessment of air quality impacts attributable to private development projects during the construction phase. These regional significance thresholds are summarized in Table 4.1-3. NAAQS and CAAQS thresholds are summarized in Table 4.1-1.
4.0 Environmental Impact Analysis

Table 4.1-3. SCAQMD Construction Emissions Significance Thresholds

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Construction (pounds per day)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>550</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO\textsubscript{x})</td>
<td>100</td>
</tr>
<tr>
<td>Reactive Organic Gases (ROG)</td>
<td>75</td>
</tr>
<tr>
<td>Particulate Matter (PM-10)</td>
<td>150</td>
</tr>
<tr>
<td>Sulfur Oxides (SO\textsubscript{x})</td>
<td>150</td>
</tr>
</tbody>
</table>

Source: SCAQMD CEQA Air Quality Handbook, November 1993 Rev.

A standardized methodology has also been developed by the SCAQMD and Caltrans to quantify CO pollutant concentrations from vehicle traffic. Project related vehicle traffic is modeled using the California line source roadway dispersion model CALINE4. A project would have a significant impact upon local area air quality if it causes a new exceedance of an NAAQS or CAAQS.

CAAQS have also been established for sulfates, hydrogen sulfide, vinyl chloride, and lead. Based on the types of the fuels consumed during project construction and operations, emissions of sulfates, hydrogen sulfide, vinyl chloride, and lead are expected to be negligible. These pollutants are, therefore, not analyzed in this study.

Additional Indicators

In its CEQA Handbook, the SCAQMD also states that additional indicators should be used as screening criteria to determine the need for further analysis with respect to air quality. The additional indicators are as follows:

- Project could interfere with the attainment of the federal or state ambient air quality standards by either violating or contributing to an existing or projected air quality violation.
- Project could result in population increases within the regional statistical area which would be in excess of that projected in the AQMP and in other than planned locations for the project’s build-out year.
- Project could generate vehicle trips that cause a CO hot spot.

The SCAQMD CEQA Handbook also identifies various secondary significance criteria related to toxic, hazardous, or odorous air contaminants. Hazardous air contaminants are contained within the small diameter particulate matter (PM-2.5) fraction of diesel exhaust. Such exhaust will be generated by heavy construction equipment and by diesel-powered delivery trucks.

For PM-2.5 exhaust emissions, recently adopted policies require the gradual conversion of delivery fleets to diesel alternatives, or the use of “clean” diesel if emissions are demonstrated to be as low as those from alternative fuels. Because health risks from toxic air contaminants (TACs) are cumulative over an assumed 70-year lifespan, measurable off-site public health risk from TAC exposure would occur for only a brief portion early in project lifetime, and only in dilute quantity.

Local Significance Thresholds

SCAQMD has developed local significance thresholds (LST) in response to its Environmental Justice Enhancement Initiative. The purpose of these thresholds is to insure that economically disadvantaged areas of the air basin are not subjected to any disproportionate levels of air pollution emissions. The use
of these thresholds is voluntary for local jurisdictions, particularly those with low baseline air pollution levels.

The LST methodology contains screening level emissions estimates that apply to on-site emissions. Project operational emissions will derive from automobiles that will distribute air pollution over a wide region. Any possible application of LST thresholds to the proposed project would be from construction only. The estimated daily disturbance area during construction is 2.7 acres. The LST threshold for a 2.7-acre disturbance area and a 350-foot distance from the project site to the nearest homes is as follows:

<table>
<thead>
<tr>
<th>Table 4.1-4. SCAQMD LST Thresholds</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO&lt;sub&gt;x&lt;/sub&gt;</td>
</tr>
<tr>
<td>CO</td>
</tr>
<tr>
<td>PM-10</td>
</tr>
</tbody>
</table>

Project-related construction activities will be less than these threshold values. When the entire project site is considered as a source area, the LST thresholds will be even higher. Voluntary use of LSTs is not an issue for the Proposed Project because project-related construction emissions are below the triggering thresholds, and the project site is not in an economically disadvantaged area which LSTs were developed.

CARB has similarly developed air pollution/land use guidelines focused on diesel exhaust exposure around facilities that generate large volumes of truck traffic. The land use guideline for trucking operations is to avoid placement of residential uses within 1,000 feet of a facility generating more than 100 truck trips per day, of which 40 are refrigerated trucks running continuously. A Costco Wholesale generates less than 20 diesel trips per day with only 1-2 refrigerated trucks as follows:

<table>
<thead>
<tr>
<th>Table 4.1-5. Costco Wholesale Store Diesel Trip Generation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Warehouse Store</td>
</tr>
<tr>
<td>Gas Station</td>
</tr>
<tr>
<td>Tire Center</td>
</tr>
<tr>
<td><strong>Average</strong></td>
</tr>
</tbody>
</table>

The CARB guidelines also recommend a 300-foot setback between large gas stations and the closest homes. The separation distance between the proposed gas station and the nearest homes exceeds 500 feet. CARB air toxics avoidance guidelines will be met by the proposed project.

**Sensitive Receptors**

Air quality impacts are analyzed relative to those persons with the greatest sensitivity to air pollution exposure. Such persons are called “sensitive receptors.” Sensitive population groups include young children, the elderly, and the acutely and chronically ill (especially those with cardio-respiratory disease).

Residential areas are considered to be sensitive to air pollution exposure because they may be occupied for extended periods, and residents may be outdoors where exposure is highest. Schools are similarly considered to be sensitive receptors. Commercial uses are considered less sensitive to air pollution exposure because they are populated by mainly healthy adults for limited periods in an indoor environment.

The Proposed Project site is currently undeveloped. One house is located west of the site, but is anticipated to be converted to commercial use. The closest existing residential uses are located to the south of the proposed site, about 350 feet from the site. The number of existing sensitive receptors in the
4.0 Environmental Impact Analysis

immediate project vicinity is very low. Project-related mobile source emissions will be masked by the presence of heavily traveled arterial roadways, particularly Highway 111 and Jefferson Street.

Many mobile source air pollutants require additional transformation to convert into their most unhealthful forms. That conversion process occurs several hours later and miles away. Localized sensitive receptor impacts thus derive mainly from “primary” pollutants that require no additional transformation. Primary pollutants include particulate matter (both from soil dust and diesel exhaust) and CO. Project-related emissions of NOx or reactive organic gases (ROG), contributors to regional smog formation, are less critical in local sensitive receptor exposure.

4.1.3 Environmental Impacts

Construction Impacts (Short-Term)

Construction of the Proposed Project will generate pollutant emissions from the following activities: (1) fugitive dust emissions from construction activity; (2) grading operations and soil disturbance; (3) exhaust emissions from construction activity and vehicular trips; and (4) application of architectural surface treatments.

Construction emissions were calculated based on the type and magnitude of project development, the time line for project construction, the mix of construction equipment required to build the project, and emission factors from the CARB URBEEMIS2002 emissions inventory model. Emissions from construction activities were calculated on a daily basis and were compared to the SCAQMD’s daily related emissions thresholds. The load factors and horsepower ratings used were the default values from the URBEEMIS2002 model. The work schedule was also based on the default values of the model set for a twelve month cycle. Daily construction-related emissions during grading and finish construction for the Proposed Project are presented in Table 4.1-6. Construction of the project was modeled in year 2006, with project build-out in 2007.

<table>
<thead>
<tr>
<th>Activity</th>
<th>ROG</th>
<th>NOx</th>
<th>CO</th>
<th>SO2</th>
<th>PM-10 Total</th>
<th>PM-10 Exhaust</th>
<th>PM-10 Dust[^c]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grading</td>
<td>22.8</td>
<td>170.5[^a]</td>
<td>174.8</td>
<td>0.0</td>
<td>34.8</td>
<td>7.8</td>
<td>27.0</td>
</tr>
<tr>
<td>Construction &amp; Paving</td>
<td>171.9[^b]</td>
<td>90.0</td>
<td>101.8</td>
<td>0.2</td>
<td>3.8</td>
<td>3.6</td>
<td>0.2</td>
</tr>
<tr>
<td>SCAQMD Threshold</td>
<td>75</td>
<td>100</td>
<td>550</td>
<td>150</td>
<td>150</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Exceeds Threshold?</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Source: CEQA Significance Threshold from South Coast Air Quality Management District’s CEQA Air Quality Handbook, 1993

Notes:
- a Exceeds threshold due to equipment operations.
- b Exceeds threshold due to application of paints and coatings.
- c PM-10 dust emissions measurements include implementation of best available control measures (BACMs) as required by the Municipal Code and SCAQMD regulation.

Construction related daily emissions of ROG and NOx exceed the SCAQMD significance thresholds. Emissions for other pollutants will not exceed the SCAQMD significance thresholds and, therefore, no further analysis for these emissions was required. Exceedance of the ROG emissions threshold is due primarily to application of paintings and coatings during finish construction. Exceedance of the NOx threshold is due to exhaust emissions generated by construction vehicles during grading activities. These emissions are significant but temporary. The mobile nature of the on-site construction equipment and off-site trucks will prevent any micro-scale violation of standards. There may be localized instances when the characteristic diesel exhaust is noticeable from passing trucks or nearby heavy equipment. Truck
4.0 Environmental Impact Analysis

exhaust impacts can be minimized by controlling construction routes to reduce interference with non-project traffic patterns and to preclude truck queuing or idling near sensitive receptor sites. Once project construction activities have been completed, project-related construction emissions would cease.

Operation Impacts

Regional Emissions

Air pollutant emissions associated with the operation of the Proposed Project would be generated primarily by mobile source exhaust emissions from the operation of roadway vehicles to the project site. These vehicle exhaust emissions are evaluated on a regional basis in terms of the amount emitted into the region on a pounds-per-day rate.

Emissions modeled for the operational phase of the project were compiled using the California Air Resources Board’s URBEMIS2002 emissions inventory model. The model was run using the adjusted trip generation factors specified by Kittelson & Associates, Inc. for the Proposed Project (Appendix J). Using a build-out year of 2007, area source emissions and the resulting vehicular operational emissions for the Proposed Project were calculated. These calculations were also performed for the year 2010 to account for buildout of the associated shops and restaurants, which may be developed after the Costco Wholesale has been completed.

Per the traffic study, the Proposed Project is forecasted to generate an additional 17,140 ADT vehicle trips per day at project buildout. However, many of these trips are pass-by or diverted trips leading to a net trip generation of 7,870 ADT. Air pollutant emissions associated with daily project operations (for both 2007 and 2010) are shown in Table 4.1-7. The majority of project emissions would generally be due to vehicle exhaust emissions. Emissions attributable to the project site during operation would result in emissions that exceed the SCAQMD daily operational phase threshold for CO for opening year 2006. Although continued improvement of vehicles and replacement of older vehicles with newer vehicles reduces the amount of CO generated, Table 4.1-7 shows an exceedance of 3 percent of the SCAQMD threshold.

Local Scale Carbon Monoxide Analysis

During the operational phase of the project, project-generated traffic would have the potential for local area impacts. To further analyze whether future traffic changes will create an adverse air quality impact, a micro-scale air quality screening analysis was performed for the traffic analysis grid around the project area. A modified Bay Area Air Quality Management District (BAAQMD) screening procedure based on the California line source roadway dispersion model CALINE4 was run for three traffic scenarios at ten intersections that may experience Levels of Service of D or worse in order to evaluate any changes due to changes in patterns of anticipated growth. The City of La Quinta identified the weekday PM peak hour as the study time period. The weekday AM peak hour was not analyzed as the proposed development is mainly retail and is not expected to generate any significant traffic volumes during this time period.

The model procedure that was followed combined the results of the traffic analysis with very restrictive dispersion conditions in order to generate a worst-case impact assessment. Light winds almost parallel to each roadway analyzed were used to estimate pollutant exposure adjacent to the worst-case arterial intersection analyzed in the project traffic study. CO was used as an indicator of any “hot spot” potential because CO, unlike regional pollutants such as ozone, is directly related to source activity immediately adjacent to the receptor (a primary, unreacted pollutant impact).
Table 4.1-7. Average Daily Project-Related Mobile Source Emissions

<table>
<thead>
<tr>
<th>Build-Out Year 2007 Emissions</th>
<th>Emission (pounds per day)</th>
<th>ROG</th>
<th>NOₓ</th>
<th>CO</th>
<th>SOₓ</th>
<th>PM-10</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area Source Emissions</td>
<td></td>
<td>0.3</td>
<td>2.3</td>
<td>2.1</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Operational Emissions</td>
<td></td>
<td>54.3</td>
<td>69.8</td>
<td>727.0</td>
<td>0.4</td>
<td>66.8</td>
</tr>
<tr>
<td>Total Emissions</td>
<td></td>
<td>54.6</td>
<td>72.1</td>
<td>729.1</td>
<td>0.4</td>
<td>66.8</td>
</tr>
<tr>
<td>SCAQMD Threshold</td>
<td></td>
<td>75</td>
<td>100</td>
<td>550</td>
<td>150</td>
<td>150</td>
</tr>
<tr>
<td>Exceeds Threshold?</td>
<td></td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Percent of Threshold</td>
<td></td>
<td>73</td>
<td>72</td>
<td>133</td>
<td>&lt;1</td>
<td>45</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Build-Out Year 2010 Emissions</th>
<th>Emission (pounds per day)</th>
<th>ROG</th>
<th>NOₓ</th>
<th>CO</th>
<th>SOₓ</th>
<th>PM-10</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area Source Emissions</td>
<td></td>
<td>0.3</td>
<td>2.3</td>
<td>2.1</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Operational Emissions</td>
<td></td>
<td>42.6</td>
<td>54.3</td>
<td>565.1</td>
<td>0.4</td>
<td>66.7</td>
</tr>
<tr>
<td>Total Emissions</td>
<td></td>
<td>42.9</td>
<td>56.6</td>
<td>567.2</td>
<td>0.4</td>
<td>66.7</td>
</tr>
<tr>
<td>SCAQMD Threshold</td>
<td></td>
<td>75</td>
<td>100</td>
<td>550</td>
<td>150</td>
<td>150</td>
</tr>
<tr>
<td>Exceeds Threshold?</td>
<td></td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Percent of Threshold</td>
<td></td>
<td>57</td>
<td>57</td>
<td>103</td>
<td>&lt;1</td>
<td>45</td>
</tr>
</tbody>
</table>

Source: URBEMIS 2002 for Windows, Version 7.4.2

Notes:
ROG = Reactive organic gases
NOₓ = Nitrogen oxides
CO = Carbon monoxide
SOₓ = Sulfur oxides
PM-10 = Particulate matter up to 10 microns in size

The results of the micro-scale impact analysis are summarized in Table 4.1-8. Maximum hourly CO levels near La Quinta are currently around 3 ppm (Table 4.1-2). It would take an additional local contribution of 17 ppm to equal the CO standard of 20 ppm. Maximum “with project” local CO levels will be less than 4.0 ppm. The maximum project-related CO impacts (the difference between Opening Year (2006) With Project and Opening Year (2006) Without Project) are an addition of 0.8 ppm. No existing or future CO “hot spots” are forecast to occur at any intersections near the project area from combined background (no project) plus project traffic.

4.1.4 Cumulative Impacts

As discussed above, the AQMP provides a framework for the assessment of air quality within the Basin. It also provides for air pollutant control strategies, and assists in establishing a SIP. The SIP defines how the Basin will achieve the federal ambient air quality standards. Because the project is included in the City’s General Plan, regional emissions associated with the project are accounted for within the AQMP and are therefore consistent with the AQMP. In addition to exceeding air quality thresholds during the operational phase, implementation of the Proposed Project along with other related development in the area will incrementally impact cumulative air quality conditions.
Table 4.1-8. Micro-scale Air Quality Impact Analysis

PM Peak Hour

(Hourly CO levels [ppm] above background)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Highway 111 (EW) at:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Washington Street (NS)</td>
<td>2.7</td>
<td>2.8</td>
<td>3.6</td>
</tr>
<tr>
<td>Adams Street (NS)</td>
<td>---</td>
<td>2.4</td>
<td>2.8</td>
</tr>
<tr>
<td>La Quinta Drive (NS)</td>
<td>---</td>
<td>2.5</td>
<td>2.7</td>
</tr>
<tr>
<td>Dune Palms Road (NS)</td>
<td>1.9</td>
<td>2.9</td>
<td>3.3</td>
</tr>
<tr>
<td>Depot Road (NS)</td>
<td>---</td>
<td>---</td>
<td>2.7</td>
</tr>
<tr>
<td>Jefferson Street (NS)</td>
<td>---</td>
<td>2.4</td>
<td>2.6</td>
</tr>
<tr>
<td>Madison Street (NS)</td>
<td>---</td>
<td>2.3</td>
<td>2.3</td>
</tr>
<tr>
<td>Fred Waring (EW) at:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Washington Street (NS)</td>
<td>2.5</td>
<td>2.6</td>
<td>2.6</td>
</tr>
<tr>
<td>Miles Avenue (EW) at:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Jefferson Street (NS)</td>
<td>---</td>
<td>0.7</td>
<td>0.7</td>
</tr>
<tr>
<td>Avenue 48 (EW) at:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Jefferson Street (NS)</td>
<td>1.4</td>
<td>1.5</td>
<td>1.5</td>
</tr>
</tbody>
</table>

Source: Screening procedure based upon BAAQMD guidelines (modified).
Note: Add 3 ppm (background) to each value above and compare to 20 ppm one-hour standard.

4.1.5 Regulatory Requirements and County Conditions

Regulatory Requirements

**SCAQMD Rule 403 Fugitive Dust Control:** This rule prohibits the release of fugitive dust emissions from any active operation, open storage pile, or disturbed surface area visible beyond the property line of the emission source. Particulate matter on public roadways is also prohibited. This rule requires the use of at least one dust control measure to insure compliance with both federal and state PM-10 standards.

For the City of La Quinta, highly effective dust control is required due to the non-attainment status of the Basin for PM-10. To comply with this regulation, a plan to control fugitive dust outlining the best available control measures (BACMs) to be implemented must accompany any grading permit application.

**SCAQMD Rule 1113 Volatile Organic Compounds:** The applicability of this rule includes any person who applies or solicits the application of any architectural coatings used with the SCAQMD. Limits to the VOC content of architectural coatings as described in this rule shall be adhered to.

**City of La Quinta Transportation Demand Management:** Per section 9.180 et seq. of the City of La Quinta, California Municipal Code, the project applicant is required to submit a Transportation Demand Management Plan to encourage changes in individual traffic behavior. However, an applicant may be exempt from this requirement, per Municipal Code 9.180.040 D, if the applicant submits an active approved plan under the SCAQMD Regulation XV program requirements. The project applicant intends to meet this requirement and exemption by submitting its SCAQMD plan to the City of La Quinta.

**South Coast Air Quality Management District (SCAQMD) Rule 2202:** The SCAQMD's Governing Board both rescinded Regulation XV and adopted Rule 2202 – On-Road Motor Vehicle, on December 8,
1995. The purpose of this rule is to provide employers with a menu of options to reduce mobile source emissions generated from employee commutes, to comply with federal and state CAA requirements, Health & Safety Code Section 40458, and Section 182(d)(1)(B) of the federal CAA. Rule 2202 applies to any employer who employs 250 or more employees on a full or part-time basis at a worksite for a consecutive six-month period calculated as a monthly average. An employer subject to this rule shall annually register with the SCAQMD to implement an emission reduction program that will obtain emission reductions equivalent to a worksite specific emission reduction target (ERT) specified for the compliance year. Rule 2202 provides employers with a menu of options that they can choose from to implement and meet the ERT for their worksite. The various emissions reduction strategies and trip reduction strategies currently contained in the rule that employers can implement and receive credit towards their ERTs are listed below.

**Emission Reduction Strategies** (Subdivision (f))
- Clean On-Road Mobile Sources (Regulation XVI)
- Clean Off-Road Mobile Sources (Regulation XVI)
- Pilot Credit Generation Programs
- Air Quality Investment Program
- Short Term Emission Reduction Credits (STERCs) From Stationary Sources (Regulation XIII)
- Area Source Credits (Regulation XXV)

**Trip Reduction Strategies** (Subdivision (g))
- Peak Commute Trip Reductions
- Other Work-Related Trip Reductions
- Vehicle Miles Traveled (VMT) Programs
- Off-Peak Commute Trip Reductions

The project applicant intends to meet the SCAQMD Rule 2202 requirements by implementing an emission reduction program that will obtain emission reductions equivalent to a worksite specific ERT specified for the compliance year, as agreed upon with the SCAQMD.

In addition, in order to meet the requirements of all other applicable rules and regulations, building construction shall comply with energy use guidelines in Title 24 of the California Administrative Code. The use of energy efficient street lighting and parking lot lighting per the City Lighting Ordinance shall also be required for all on-site travel paths to reduce emissions at the power generation facility serving the area.

### 4.1.6 Level of Significance Before Mitigation

The Proposed Project is anticipated to generate significant short-term ROG and NOx impacts during the construction phase as indicated in Table 4.1-6. While construction-related NOx emissions are temporary and do not represent a long-term impact, it remains significant until the construction phase ends. Operational, long-term air pollutant emissions for CO are projected to exceed the SCAQMD significance threshold in both 2007 and 2010. Consequently, it appears that regional operational emissions associated with the Proposed Project would result in significant air quality impacts for the operational phase; however, a micro-scale analysis further evaluated CO impacts generated by the Proposed Project and resulted in a determination that CO impacts are individually and cumulatively less than significant for the year 2007. However, the minor exceedance of the SCAQMD threshold in 2010 will remain significant. The Proposed Project would significantly impact air quality during the operational phase because it will violate the SCAQMD significance threshold.
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The Basin in which the Proposed Project is located is non-attainment for PM-10. Project-related PM-10 impacts will, therefore, contribute to an already elevated PM-10 baseline; however, construction and operational emissions for PM-10 are below the SCAQMD significance threshold. The Basin is also in serious non-attainment for the SCAQMD 8-hour ozone standard; however, construction and operation of the Proposed Project would not significantly contribute to further exceedance because project-related emissions of ozone precursors CO and NOx do not exceed SCAQMD thresholds. In addition, the Proposed Project will not exceed local significance thresholds for on-site emissions; nor will it exceed the California Air Resources Board guidelines for diesel exhaust exposure.

Commercial uses are considered less sensitive to air pollution exposure than other uses because they are populated by mainly healthy adults for limited periods in an indoor environment. The closest existing residential uses are located to the south of the proposed site, about 350 feet from the site. Therefore, the number of existing sensitive receptors in the immediate project vicinity is very low. Furthermore, project-related mobile source emissions will be masked by the presence of heavily traveled arterial roadways, particularly Highway 111 and Jefferson Street. The Proposed Project will not expose sensitive receptors to substantial pollutant concentrations.

Construction activity air quality impacts occur mainly in proximity to the surface disturbance area. There may, however, be some “spill-over” into the surrounding community through dirt or silt being washed into public streets, or off-site dust impacts. Emissions controls require good housekeeping procedures and a construction traffic management plan that will maintain such “spill-over” effects at a less than significant level. The Proposed Project shall provide such a plan in accordance with the City’s Transportation Demand Management requirement.

There may be localized instances when the characteristic diesel exhaust odor is noticeable from passing trucks or nearby heavy equipment during the construction phase of the Proposed Project. Without mitigation, these odors could be significant.

According to the micro-scale analysis, maximum Opening Year (2006) With Project local CO emission levels are projected to be less than 4.0 ppm. No existing or future CO hot spots are forecast to occur at any intersections near the project area from combined existing conditions plus project conditions because the Proposed Project would not generate vehicle trips that would lead to generation of a CO hot spot.

As identified above, implementation of the Proposed Project along with other related development in the area will incrementally impact cumulative air quality conditions. Cumulative air quality impacts would therefore be significant.

4.1.7 Environmental Mitigation Measures

Construction Activities

The Proposed Project is anticipated to generate significant short-term ROG and NOx impacts during the construction phase. Also, there is a potential impact to create objectionable odors from generation of truck exhaust by construction vehicles. The following mitigation measures are required to reduce air quality impacts associated with construction activities:

MM 4.1-1 Regular equipment tune-ups and limits in equipment idling shall be implemented.

MM 4.1-2 During finish construction, pre-coated building materials and high pressure-low volume (HPLV) paint applicators shall be used.

MM 4.1-3 The project applicant shall employ an extended painting schedule over a two-month period using less than 100 gallons per day of low-VPC paint or ensure that no more than 83,700 square feet would be painted within one month.
4.0 Environmental Impact Analysis

**MM 4.1-4** Construction routes shall be controlled to reduce interference with non-project traffic patterns and to preclude truck queuing or idling near sensitive receptor sites.

**MM 4.1-5** The project applicant shall comply with the provisions of the City of La Quinta Municipal Code that established minimum requirements for construction activities to reduce fugitive dust and PM-10 emissions. A plan to control fugitive dust through the implementation of best available control measures (BACMs) shall be prepared and submitted to the City for approval prior to the issuance of grading permits. Applicable BACMs include but are not limited to:

- Cut and fill quantities will be balanced onsite as much as practicable to minimize truck trips for import or export of dirt.
- Adequate watering techniques shall be employed to minimize the impact of construction-related dust particulates. Portions of the site that are undergoing surface earth moving operations shall be watered such that a crust will be formed on the ground surface, and then watered again at the end of each day. Site watering will be performed as necessary to adequately mitigate blowing dust.
- Any vegetative cover to be utilized onsite shall be planted as soon as practicable to reduce the disturbed area subject to wind erosion. Irrigation systems required for these plants shall be installed as soon as practicable to maintain good ground cover and to minimize wind erosion of the soil.
- Any construction access roads (other than temporary access roads) shall be paved as soon as practicable and cleaned after each work day. The maximum vehicle speed on unpaved roads shall be 15 mph.
- Grading operations shall be suspended during first stage ozone episodes or when winds exceed 25 mph. A high wind response plan shall be formulated for enhanced dust control if winds are forecast to exceed 25 mph in any coming 24-hour period.
- Any construction equipment using direct internal combustion engines shall use a diesel fuel with a maximum of 0.05 percent sulfur and a four-degree retard.
- Construction operations affecting off-site roadways shall be scheduled by implementing traffic hours and shall minimize obstruction of through-traffic lanes.
- Idling trucks or heavy equipment shall turn off their engines if the expected duration of idling exceeds five minutes.
- Perimeter walls and landscaping shall be constructed in a manner that assists in protecting the site from blow-sand. All walls and landscaping shall be maintained on a regular basis to remove accumulated blow-sand.

**MM 4.1-6** The project applicant shall comply with all applicable SCAQMD Rules and Regulations including Rule 403 insuring the clean up of construction-related dirt on approach routes to the site.

**Operations**

The Proposed Project would generate significant long-term (operational) air quality impacts. The following mitigation measures are required to reduce operational air quality impacts:
4.0 Environmental Impact Analysis

MM 4.1-7 The project applicant shall comply with energy use guidelines in Title 24 of the California Administrative Code.

MM 4.1-8 The use of energy efficient street lighting and parking lot lighting per the City Lighting Ordinance shall be required for all on-site travel paths to reduce emissions at the power generation facility serving the area.

MM 4.1-9 The project applicant shall comply with the City of La Quinta’s Transportation Demand Management Program by submitting an active approved plan under the SCAQMD Regulation XV program requirements. Furthermore, the project applicant shall comply with SCAQMD Ride Share program.

MM 4.1-10 The project applicant shall notify the city and SCAQMD of the start and end of grading in conformance and within the time frames established in the 2002 PM-10 Management Plan.

Cumulative Impacts

The Proposed Project would generate significant incremental cumulative impacts to air quality but mitigation measures 4.1-7 through 4.1-10 would partially mitigate cumulative impacts.

4.1.8 Level of Significance After Mitigation

With implementation of mitigation measure 4.1-4, the objectionable odor impact will be minimized to below a level of significance. Furthermore, with implementation of mitigation measure 4.1-5, ROG emissions impact will be minimized to below a level of significance. However, even with implementation of the above-listed reduction measures, construction-related activities would still result in NOx emissions in exceedance of the identified significance threshold as shown in Table 4.1-4. Operational impacts leading to an exceedance of the CO threshold in 2010 will remain significant. Project-specific and cumulative air quality impacts are projected to remain significant after mitigation during the construction phase. Therefore, in order to approve the Proposed Project, the City of La Quinta will need to adopt a Statement of Overriding Consideration for construction phase NOx emissions impact, operations phase CO emissions impact and cumulative impacts.
4.0 Environmental Impact Analysis

4.2 BIOLOGICAL RESOURCES

The following reports have been prepared to analyze the impacts of the proposed project and are included in their entirety in Appendix C of this Draft EIR:


The Biological Resources Technical Report determined the potential impacts on biological resources, USACE jurisdictional waters of the U.S., and CDFG jurisdiction within and adjacent to the proposed 26.3-acre commercial project site. The Focused Small Mammal Surveys evaluated the project site for sensitive small mammals. An evaluation of existing conditions and project impacts, and proposed mitigation measures to reduce impacts to less than significant levels, were included in both reports.

4.2.1 Environmental Setting

4.2.1.1 Site History

Structures and agricultural fields have been present on the project site as early as 1949. By 1973, date palm groves as well as agricultural fields were present on the northern portion of the property. The southern and western portions of the project site currently support disturbed native desert vegetation. The northern portion of the project site supports disturbed ruderal/weedy habitat. Uses identified within the project site boundaries include previous grading, dead palm trees, scrap piles of old agricultural equipment, other related debris, off-road vehicle use, and an illegal encampment.

4.2.1.2 Applicable Plans

City of La Quinta – General Plan and Master Environmental Assessment (2002)

The City of La Quinta General Plan and Master Environmental Assessment (MEA) was adopted in 2002. The General Plan “is a comprehensive information and planning guide established by State law to provide a framework for making informed decisions about the future of the community.” The Biological Resources section of the Natural Resources Element of the General Plan establishes the goals, policies, and programs relating to the preservation of valuable biological resources occurring within La Quinta and the surrounding area.

Draft Coachella Valley Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan (Draft Plan)

The Draft CVMSHCP and NCCP (Draft Plan) covers the central portion of Riverside County which includes the westernmost edge of the Sonoran Desert. The Draft Plan will establish and provide funds to monitor and manage a Reserve System that will conserve habitat for 27 Covered Species as well as 23 natural communities; maintain the ecological processes such as sand transport that sustains the conserved habitat over time; and protect wildlife movement corridors between major natural areas such as the San Jacinto Mountains and the San Bernardino Mountains, and the Indio Hills and Joshua Tree National Park. The Draft Plan will add more than 200,000 acres to existing local, state, federal, and private conservation lands to establish an approximately 725,000 acre Reserve System. This will include portions of Joshua Tree National Park, and the Santa Rosa and San Jacinto Mountains National Monument which will greatly expand the existing Coachella Valley fringe-toed lizard preserve, and establish new conservation areas. These areas will protect the covered species and natural communities conserved in the Draft Plan, protect watersheds and creeks important to the local water supply, limit urban
sprawl, enhance the areas quality of life, and provide new recreational opportunities including trails and
crane viewing areas.

The Draft Plan balances environmental protection and economic development objectives in the Draft Plan
Area and simplifies compliance with endangered species related laws. The Draft Plan is intended to
satisfy the legal requirements for the issuance of permits that will allow the take of species covered by the
Draft Plan in the course of otherwise lawful activities. The Draft Plan will, to the maximum extent
practicable, minimize and mitigate the impacts of the taking and provide for conservation of the covered
species. The proposed term of the permits is 75 years, which is the length of time required to fully fund
the Draft Plan implementation. The acquisition program is projected to require 30 years to acquire all the
permittee obligation land. Full funding of the endowment for the Monitoring Program, the Management
Program, Adaptive Management, and ongoing administration costs is projected to require 75 years. At
present, the Draft Plan, including approval of take authorization and state and federal agency approval has
not been finalized.

4.2.1.3 Existing Conditions

Refer to the Biological Resources Technical Report (HDR 2005) and Focused Small Mammal Report
(Natural Resources Assessment, Inc. 2005) for methodology of biological surveys for the project site.

Vegetation Associations and Habitats

The majority of the Proposed Project site consists of disturbed Sonoran creosote bush scrub and disturbed
habitat. The disturbed areas (formerly used for agricultural purposes) are found in the northern portion of
the project site and paved urban/developed areas are found in association with State Highway 111.
Disturbed Sonoran creosote bush scrub is found throughout the remainder of the property.

Vegetation Associations

Vegetation and land uses mapped within the property include disturbed native desert vegetation and
disturbed habitat (Figure 4.2-1, Vegetation Communities). The Biological Resources Technical Report
provides a list of the vegetation associations and the total acreage for each habitat type present on the
Proposed Project site. The following is a general description of the plant associations/vegetation types
shown on Figure 4.2-1:

Disturbed Sonoran Creosote Bush Scrub - The Sonoran creosote bush scrub community is dominated by
shrubs and succulents and is found within the Colorado Desert Region from the Little San Bernardino
Mountains, south and eastward into Baja California. Plant species typically associated with Sonoran creosote
bush scrub include creosote bush, burro-weed, and brittle bush. Several large stands of mesquite are found
within this vegetation community on-site which cover a 0.5-acre area. These mesquite hummocks are
clustered at the western edge of the property, with one isolated hummock located in the south-central portion
of the site. Sandy soils occur around these hummocks. Other species associated with these hummocks include
creosote bush, oligomeris, Spanish needles, sand verbena, and others.

Disturbed Habitat - The northern portion of the project site supports weedy vegetation that currently
qualifies as Disturbed Habitat. This habitat is found on previously graded, relatively flat terrain that
formerly supported a date palm grove and associated agricultural structures. The off-site water line area
also supports Disturbed Habitat, as does most of the La Quinta Evacuation Channel. In addition to weedy
forbs and grasses, such as Saharan mustard, ripgut brome, and other weeds, occasional sand dune species
are found in the habitat, including sand verbena and others in low numbers that are recruiting back
into the area from the adjacent natural area. However, the predominance of the vegetation is non-native,
ruderal species. Also present are pieces of lumber, agricultural debris, dead or dying date palms, and
other relict ornamental species.
Urban/Developed - Development is found in association with State Highway 111, which forms the northern edge of the project site. This area is paved, with sparse, mostly weedy vegetation along the shoulder of the highway.

Sensitive Vegetation Associations and Habitats

Vegetation communities (habitats) are generally considered “sensitive” if: (1) they are considered rare within the region by various agencies including U.S. Fish & Wildlife Service (USFWS), California CDFG, and other local agencies; (2) if they are known to support sensitive animal or plant species; and/or (3) they are known to serve as important wildlife corridors. These sensitive habitats are typically depleted throughout their known ranges, or are highly localized and/or fragmented.

A review of the CNDDB (2005) indicates that the following sensitive vegetation association is known from the La Quinta quadrangle: desert fan palm oasis woodland. This special-status vegetation community listed in the CNDDB 2005 does not occur on-site. The scattered mesquites hummocks with associated sandy areas found within the project site are considered a sensitive vegetation community since this habitat is typically associated with a variety of rare plants and sensitive wildlife species (i.e., western burrowing owl).

Special-Status Plant Species

No federally- or state-listed plant species were detected on-site. A summary list of sensitive plants known to occur in the general vicinity of the project site and legal status are found in Appendix D of the Biological Resources Technical Report (HDR 2005). A focused rare plant survey was conducted on the project site for the following potentially occurring species: glandular ditaxis (California Native Plant Society [CNPS] List 2), Coachella Valley milkvetch (Federal Endangered and CNPS List 1B), slender woolly-heads (CNPS List 2), and oroopia sage (CNPS List 1B).

The CNPS has created five “lists” in an effort to categorize degrees of concern and are described as follows: List 1A: Plants Presumed Extinct in California; List 1B: Plants Rare, Threatened, or Endangered in California and Elsewhere; List 2: Plants Rare, Threatened, or Endangered in California But More Common Elsewhere; List 3: Plants About Which We Need More Information – A Review List, and; List 4: Plants of Limited Distribution – A Watch List. The potentially occurring plants on the project site were listed under List 1B and 2. Plants of List 1B are rare throughout their range and all but a few are native to California. All of them are judged by CNPS to be vulnerable under present circumstances or to have a high potential for becoming so because of their limited or vulnerable habitat, their low numbers of individuals per population, or their limited number of populations. List 2 species are recognized for the importance of protecting the geographic range of widespread species. By doing this, the diversity of the California’s plants is protected and the evolutionary process and genetic diversity of the species is maintained.

Due to the increased rainfall experienced throughout the Southern California deserts, the probability of encountering these species was low to moderate. No rare plant species were identified during the surveys.

Special-Status Wildlife Species

Federal- and/or state-listed wildlife species, Draft Plan covered species, and La Quinta General Plan/MEA Species of Concern were evaluated by conducting species specific habitat assessments and/or species specific focused surveys (HDR 2005). Of the twenty-five special-status wildlife species identified within the MEA and Draft Plan, eight special-status wildlife species have a potential to occur on site (Table 4.2-1). These species included the Coachella Valley fringe-toed lizard; flat-tailed horned lizard; western burrowing owl; loggerhead shrike; crissal thrasher; southern yellow bat; Palm Springs rufous-tailed ground squirrel; and Palm Springs pocket mouse. Protocol surveys were conducted for Palm Springs pocket mouse and a habitat assessment was conducted for Palm Springs round-tailed ground
squirrel and western burrowing owl. A habitat assessment was also conducted for the Coachella Valley fringe-toed lizard and the flat-tailed horned lizard. None of these species or the other identified potentially occurring special-status species were observed during general and/or focused surveys of the project site. Furthermore, the project site is not identified in the Draft Plan as a conservation area for any of the special-status species identified in Table 4.2-1.

Table 4.2-1. Special-Status Animal Species that have Potential to Occur Within the Project Site

<table>
<thead>
<tr>
<th>Special-Status Species</th>
<th>Legal Status</th>
<th>Observed</th>
<th>Draft Plan Covered Species</th>
<th>La Quinta Master Environmental Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arroyo Southwestern Toad</td>
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<td></td>
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<tr>
<td></td>
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<tr>
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<tr>
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<tr>
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## 4.0 Environmental Impact Analysis

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<tr>
<th>Special-Status Species</th>
<th>Legal Status</th>
<th>Observed</th>
<th>Draft Plan Covered Species</th>
<th>La Quinta Master Environmental Assessment</th>
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<td>Palm Springs (Coachella Valley) Round-Tailed Ground Squirrel</td>
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</table>

### Notes:

- **Federal**
  - FE – Federally Endangered
  - FT – Federally Threatened
  - FSC – Federal Species of Concern

- **State**
  - SE – State Endangered
  - ST – State Threatened

- **CDFG**
  - CSC – California Species of Concern

- **CFP** – California Fully-Protected Species

## Jurisdictional Waters

The La Quinta Evacuation Channel (channel) operated by the CVWD is located along the southeastern project site boundary. The channel extends for approximately 3.5 miles in length and transports runoff from the Oleander Reservoir to the Coachella Valley Stormwater Channel (Whitewater River) which terminates in the Salton Sea. The evacuation channel exhibits a scoured surface with ruderal vegetation and cut and defined banks. No obligate or facultative wetland plant species occur with the proposed area of impact. Therefore, the channel is assumed to be “Waters of the State” and “Waters of the U.S.” and subject to permitting authority of CDFG and USACE.
4.0 Environmental Impact Analysis

Nesting Birds
The project site contains trees, shrubs, and ground cover providing suitable habitat for nesting migratory birds, including raptors. Impacts to nesting migratory birds are prohibited under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code.

Wildlife Corridor
The project site does not provide the necessary habitat and it does not currently function as a wildlife corridor or linkage based on the current conditions of development, habitat disturbance and degradation, human presence (off-road vehicle use and illegal encampments), agricultural practices, and proposed development in the surrounding area. The channel located along the southeastern project site boundary may serve as a functioning wildlife dispersal corridor for resident small and medium sized animals due to the presence of limited mammal tracks identified within the channel.

4.2.2 Project Impacts
Project-related impacts can occur in two forms, direct and indirect. Direct impacts are considered to be those that involve the loss, modification or disturbance of plant communities, which in turn, directly affect the flora and fauna of those habitats. Direct impacts also include the destruction of individual plants or wildlife, which may directly affect regional population numbers of a species or result in the physical isolation of populations, thereby reducing genetic diversity and population stability.

Indirect impacts involve the effects of increases in ambient levels of noise or light, unnatural predators (i.e., domestic cats and other non-native animals), competition with exotic plants and animals, and increased human disturbance such as hiking and dumping of green waste on site. Indirect impacts may be associated with the subsequent day-to-day activities associated with project build-out, such as increased traffic use, permanent concrete barrier walls or chain-link fences, exotic ornamental plantings that provide a local source of seed, etc., that may be both short-term and long-term in their duration. These impacts are commonly referred to as “edge effects” and may result in a slow replacement of native plants by exotics, and changes in the behavioral patterns of wildlife and reduced wildlife diversity and abundance in habitats adjacent to project sites.

4.2.2.1 Thresholds of Significance
The following impact significance thresholds were taken from the CEQA Guidelines Appendix G (IV) screening criteria. These significance criteria are also used in the Riverside County General Plan EIR (County of Riverside 2002), Section 4.6, Biological Resources.

A significant impact to biological resources would be identified if the project was determined to:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS.
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFG or USFWS.
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (CWA) (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
• Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
• Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), NCCP, or other approved local, regional, or state habitat conservation plan.

4.2.2.2 Vegetation Associations and Habitats
The entire project site would be graded during the development of the Proposed Project, resulting in the loss of 26.3 acres of various habitats (Table 4.2-2). In addition, approximately 0.70 acre of Disturbed Habitat would be temporarily impacted during construction of the off-site water line (0.002 acre of permanent impacts and 0.69 acre of temporary impacts).

<table>
<thead>
<tr>
<th>Vegetation Association</th>
<th>Habitat Acreage</th>
<th>Project Impacts (Acres)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disturbed Sonoran Creosote Bush Scrub</td>
<td>19.6</td>
<td>19.6</td>
</tr>
<tr>
<td>Disturbed Habitat and Urban/Developed Habitat</td>
<td>7.4</td>
<td>7.4</td>
</tr>
<tr>
<td>TOTAL</td>
<td>27.0*</td>
<td>27.0*</td>
</tr>
</tbody>
</table>

* The project site totals 26.3 acres; however 0.7 acre of off-site habitat is impacted for construction of a water line.

Special-Status Plant and Wildlife Species
Project implementation would not impact sensitive plant or wildlife species on the project site through development of the Proposed Project. Therefore, no significant impacts to special-status plant and wildlife species would occur from implementation of the Proposed Project.

Sensitive Vegetation Associations and Habitats
Project implementation would remove sensitive scattered mesquite hummocks found within the disturbed Sonoran creosote bush scrub vegetation community on the project site. Therefore, potential impacts to sensitive vegetation could result from the Proposed Project.

Jurisdictional Waters

Impacts to CDFG Jurisdiction
The Proposed Project would temporarily impact 0.15 acre of “Waters of the State” within the La Quinta Evacuation Channel during trenching of the off-site water line (0.14 acre) and storm drain (0.01 acre). Potential impacts could occur from the installation of a permanent concrete slab (dissipater) approximately 0.002 acre (70 square feet) used for protection and stabilization of the storm drain. The concrete slab will be located at the toe of the slope of the Channel bank, directly east of the proposed Costco Wholesale building.

Impacts to USACE Jurisdiction
The 0.002 acre of permanent impact and 0.15 acre of temporary impact to the La Quinta Evacuation Channel would also be considered impacts to “Waters of the U.S.”

Nesting Migratory Birds or Raptors
The Project Site would impact trees, shrubs, and ground cover that provide suitable habitat for nesting migratory birds, including raptors. Impacts to such species are prohibited under the MBTA and California Fish and Game Code. Any impact to nesting birds is considered significant.
4.0 Environmental Impact Analysis

Wildlife Corridor

The Proposed Project would temporarily impact 0.15 acre of La Quinta Evacuation Channel utilized by resident small and medium sized animals as a dispersal corridor. The temporary impacts caused by the construction of the off-site water line would not adversely affect the regional movement of these animals within the channel. Therefore, no significant impacts would occur from implementation of the Proposed Project.

Indirect Impacts

Anticipated permanent and temporary indirect impacts may potentially occur from the associated construction activities adjacent to native habitat areas in the form of vegetation trampling by construction workers and construction vehicles outside the limits of grading, erosion into off-site areas, increased traffic, increased noise, and dust. These indirect impacts would be short term, but are considered potentially significant.

Consistency with Applicable Plans

City of La Quinta – General Plan (2002), Natural Resources Element/Biological Resources

The General Plan has local policies and programs to protect the long-term viability of sensitive species and habitat in cooperation with the Plan. It is expected that development associated with build-out of the proposed General Plan will have the cumulative effect of removing native wildlife and plant species, as well as breeding and foraging habitat, and introducing non-native plant species to the ecosystem. The continued implementation of community planning and development regulations, including Zoning, Subdivision, and Hillside Conservation Zone Ordinances, will contribute to the preservation of important biological resources.

Draft Coachella Valley Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan (Draft Plan)

At present, the Draft Plan has not been finalized; therefore, approval of Take Authorization and state and federal agency approval has not occurred. Although the Draft Plan has not been finalized, the Biological Resources Technical Report (HDR 2005) addressed the direct and indirect impacts to covered species as described in the Draft Plan program, and whether the Proposed Project would be consistent with the Draft Plan if it was adopted prior to approval of the Proposed Project. As discussed in the Biological Resources Technical Report (HDR 2005), the Proposed Project would be consistent with the Draft Plan.

The Proposed Project is located within the boundaries of the Draft Plan, but not within a proposed Conservation Area. Proposed activities with the Draft Plan area are required to perform habitat assessments for the 27 covered species and 27 natural communities as identified in the Draft Plan and if covered species are found, conduct focused surveys. Proposed activities outside of Conservation Areas are also required to pay a Local Development Mitigation Fee.

4.2.3 Cumulative Impacts

A review of related projects considered in Table 3.5-1, identified potential impacts to Sonoran creosote bush scrub, mesquite hummocks, potential habitat for Coachella Valley milk-vetch, Coachella Valley fringe-toed lizard, and potential habitat for flat-tailed horned lizard. Implementation of the Proposed Project, along with the related projects considered in Table 3.5-1, will add to the incremental loss of Sonoran creosote bush scrub (that includes mesquite hummocks and habitat for Coachella Valley fringe-toed lizard) in the project vicinity. The Proposed Project and related projects are required to implement appropriate mitigation measures to reduce biological impacts to a less than significant level. Further, the Draft Plan that is in process has been designed to minimize cumulative impacts to biological resources, including the loss of Sonoran creosote bush scrub on a regional basis. In addition, no current or planned
projects would impact the La Quinta Evacuation Channel. The Proposed Project will not add to a significant cumulative loss of biological resources based on the overall limited cumulative impacts to habitat, the surrounding and adjacent developments and disturbances, and the fragmented, isolated, and disturbed nature of the native habitat on-site.

4.2.4 Regulatory Requirements

The following regulatory requirements apply to the Proposed Project.

**Clean Water Act, Section 404**

The USACE regulates discharges of dredged or fill material into waters of the U.S. (including wetlands and non-wetland bodies of water that meet specific criteria) pursuant to Section 404 of the federal CWA (33 USC 1344), a permit is required for any filling or dredging within waters of the U.S. The permit as issued may require mitigation measures. As proposed, the project would require a Nationwide Permit 12 – Utility Line Activities from the USACE for temporary and permanent impacts to the La Quinta Evacuation Channel.

**Clean Water Act, Section 401**

Section 401(a)(1) of the CWA specifies that any applicant for a federal license or permit to conduct any activity which may result in any discharge into navigable waters, shall provide the federal permitting agency a certification from the State in which the discharge originates, that any such discharge would comply with the applicable provisions of the CWA. In California, the applicable RWQCB must certify that the project would comply with water quality standards. Permits requiring 401 certification include USACE Section 404 permits and NPDES permits issued by the EPA under Section 402 of the CWA. The City of La Quinta is within the jurisdiction of the Colorado River Basin (Region 7) RWQCB. As proposed, the project would require a 401 Water Quality Waiver Certification.

**Migratory Bird Treaty Act (16 USC §§ 703-712; 50 CFR 21; and 50 CFR 13)**

The MBTA is the domestic law that affirms, or implements, the United States’ commitment to four international conventions for the protection of shared migratory bird resources. The MBTA is administered by USFWS and governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts and nests except under a valid permit or as allowed in the implementing regulations. A qualified biologist shall conduct a nesting bird survey within three days of proposed grading within the nesting season in order to prevent any potential violation of the MBTA. The breeding season is from February 15 to August 31, although most passerine species have fledged by the end of July.

**California Fish and Game Code, Section 1600**

Legislation that took effect on January 1, 2004, Senate Bill (SB) 418 (Chapter 736) repealed California Fish and Game Code §§ 1600-1607 and added CFG Code §§ 1600-1616. Per § 1600 of the California Fish and Game Code, the CDFG is responsible for issuance of agreements with the project applicant that would protect fish and wildlife during the proposed construction. Section 1602 of the California Fish and Game Code requires any person, state or local governmental agency, or public utility to notify CDFG before beginning any activity that would do one or more of the following:

1. Substantially obstruct or divert the natural flow of a river, stream, or lake;
2. Substantially change or use any material from the bed, channel, or bank of a river, stream, or lake; or
3. Deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it can pass into a river, stream, or lake.
California Fish and Game Code § 1602 applies to all perennial, intermittent, and ephemeral rivers, streams, and lakes in the state. As proposed, the project would require a Section 1602 Lake/Streambed Alteration Agreement for temporary and permanent impacts to the La Quinta Evacuation Channel.

California Endangered Species Act

The California Endangered Species Act (ESA) (California Fish and Game Code §§ 2050, et seq.) generally parallels the main provisions of the Federal ESA and is administered by the CDFG. Its intent is to prohibit “take” and protect state listed endangered and threatened species of fish, wildlife, and plants. Unlike its federal counterpart, CESA also applies the take prohibitions to species petitioned for listing (state candidates). Under certain conditions, California ESA has provisions for take through a 2081 permit or Memorandum of Understanding (MOU). Because of the absence of state listed endangered or threatened or candidate species on the site, CDFG consultation relative to California ESA is not anticipated to be required prior to development of the project.

Draft Coachella Valley Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan (Draft Plan)

The Draft Plan is a criteria-based federal HCP and State NCCP, focused on preserving 27 individual covered species and 23 natural communities through habitat conservation. The Draft Plan will also serve to enhance maintenance of biological diversity and ecosystem processes while allowing the fulfillment of future economic goals. The project site is located within the Draft Plan Area. At present, the Draft Plan has not been finalized including approval of Take Authorization and state and federal agency approval. The Proposed Project was determined to be consistent with the Draft Plan as described above in Section 4.2.2 and in the Biological Resources Technical Report (HDR 2005). Should the Draft Plan be adopted prior to approval of the Proposed Project, the project applicant would pay the Local Development Mitigation Fee as required in the Plan. If the Draft Plan is not adopted prior to approval of the Proposed Project, the project applicant would only pay into the Coachella Valley Association of Government’s Fringe-toed Lizard Mitigation Fee Program.

4.2.5 Level of Significance Before Mitigation

Vegetation Communities

The project proposes to impact 19.6 acres of disturbed Sonoran creosote bush scrub that includes 0.5-acre of mesquite hummocks, a sensitive vegetation community. Impacts to the disturbed Sonoran creosote bush scrub vegetation community would be considered significant as the project site lies within the Coachella Valley Fringe-toed Lizard Fee Mitigation Area. Removal of the mesquite hummocks on-site would eliminate potential habitat for special-status species and would also be considered significant. However, special-status wildlife and plant species typically associated with mesquite hummocks were not observed within this habitat type, nor are they expected to occur. No significant impacts would occur from the removal of the mesquite hummocks on-site.

Special-Status Plant and Wildlife Species

Implementation of the Proposed Project would not impact special-status plant and wildlife species. Therefore, no significant impacts to special-status plant and wildlife species would result from implementation of the Proposed Project.

Jurisdictional Waters

Implementation of the Proposed Project would temporarily and permanently impact “Waters of the State” and “Waters of the U.S.” within the Channel during installation of the off-site water line and storm drain. Temporary impacts to the Channel would be considered significant if not restored back to their original condition prior to the trenching. Permanent impacts to the Channel would be mitigated per CDFG. The
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USACE does not anticipate mitigation for permanent impacts if less than 0.10 acre is impacted (pers. comm., Dan Swenson 2005).

Nesting Migratory Birds or Raptors

Impacts to trees, shrubs, and ground cover that provide suitable habitat for actively nesting migratory birds, including raptors, would be significant without mitigation.

Wildlife Corridor

The temporary impact to the La Quinta Evacuation Channel, considered a minimally functioning wildlife dispersal corridor for resident wildlife, during construction of the off-site water line would be considered less than significant.

Indirect Impacts

Indirect impacts may potentially occur from the associated construction activities adjacent to native habitats (i.e., mesquite hummocks and jurisdictional waters) in the form of vegetation trampling by construction workers and construction vehicles outside the limits of grading, erosion into off-site areas, increased traffic, increased noise, and dust. These indirect impacts would be short term, but are considered significant without mitigation.

4.2.6 Environmental Mitigation Measures

The following mitigation measures are required to address the significant on-site and off-site project impacts identified in Section 4.2.2. These measures would be implemented without the adoption of the Draft Plan.

**MM 4.2-1** Mitigation for the direct impact of 19.6 acres of disturbed Sonoran creosote bush scrub would include the project applicant paying into the Coachella Valley Association of Government’s Coachella Valley Fringe-toed Lizard Mitigation Fee Program prior to obtaining building permits. The project applicant shall pay $600 per acre of land impacted.

**MM 4.2-2** Mitigation for temporary impacts to 0.15 acre of CDFG jurisdiction shall be implemented at a 1:1 ratio for on-site restoration. Prior to any project-related activities that would result in temporary impacts to CDFG jurisdiction the project applicant shall acquire a Section 1602 Lake/Streambed Alteration Agreement.

**MM 4.2-3** Mitigation for permanent impacts to 0.002 acre (70 square feet) of CDFG jurisdictional area at the toe of the slope of the Channel bank shall be implemented at a 1:1 ratio by removal of tamarisk within the Channel.

**MM 4.2-4** Mitigation for temporary and permanent impacts to USACE jurisdictional waters shall be implemented at a 1:1 ratio for on-site restoration. Prior to any project-related activities that would result in impacts to “Waters of the U.S.” the project applicant shall acquire a Section 404 Permit from the USACE and a 401 Water Quality Certification from the Regional Water Quality Control Board.

**MM 4.2-5** Due to the presence of suitable habitat on-site for the western burrowing owl, a pre-construction survey is required (pursuant to CDFG protocols) to ensure that any owls that may be occupying the site are identified. The pre-construction survey will need to be performed within 30 days of the start of construction. An experienced and qualified biologist shall conduct this survey. Should burrowing owls be present on the site prior to construction, then CDFG will be contacted and consulted. Pursuant to CDFG’s Staff Report on Burrowing Owl Mitigation (1995), and unless otherwise directed by CDFG,
occupied burrows within the area where development is proposed between February 1 and August 31 shall not be disturbed and shall be provided with a 250-foot buffer from development activities. Furthermore, in the event that breeding pairs or single birds are found occupying on-site burrows, off-site habitat mitigation at the rate of 6.5 acres per single bird or pair shall be pre-approved by CDFG for subsequent purchase to the satisfy this mitigation requirement. Outside of the breeding season and in consultation with CDFG, passive relocation of burrowing owls may be accomplished through the construction of artificial burrows at an adjacent off-site and pre-approved location.

MM 4.2-6 To avoid impacts to nesting birds, the removal of potential nesting vegetation (i.e., trees, shrubs, ground cover, etc.) supporting migratory birds/raptors shall be avoided during the nesting season (if feasible), recognized from February 1 through August 31.

MM 4.2-7 If vegetation removal must occur during the nesting season, a qualified biologist shall conduct a migratory nesting bird survey to ensure that vegetation removal would not impact any active nests. Surveys must be conducted no more than three days prior to vegetation removal. If active nests are identified during nesting bird surveys, then the nesting vegetation would be avoided until the nesting event has completed and the juveniles can survive independently from the nest. The biologist shall flag the nesting vegetation and would establish an adequate buffer (e.g., construction fencing) around the nesting vegetation. The size of the buffer would be based on the type of bird nesting (i.e., raptors shall be afforded larger buffers). Clearing/grading shall not occur within the buffer until the nesting event has completed.

MM 4.2-8 Temporary protection fencing shall be utilized to protect adjacent off-site native habitats during construction. An experienced and qualified biologist shall establish the limits of the native habitat (i.e., jurisdictional waters) in the field prior to the initiation of any site construction activities. Fencing along the La Quinta Evacuation Channel (upstream and downstream of the work area to the top of the embankment) shall also be installed to define the work limits for the prevention of vehicles from traveling beyond the construction area and possibly causing erosion of the channel walls or other discharge into the drainage.

MM 4.2-9 The qualified biologist shall verify in writing that the temporary and permanent habitat protection fences have been appropriately placed and are functioning normally during and after site construction activities have taken place. Once earthwork and related site activities are completed, the temporary fence shall be removed.

MM 4.2-10 To avoid native habitats, construction staging areas, equipment refueling areas, and other areas for equipment and materials storage shall be located within the identified construction area. To avoid inadvertent impacts to biological resources that may be present, storage and access areas shall be displayed on the approved project plans and specifications.

MM 4.2-11 Activities, including staging areas, equipment access, and disposal of temporary placement of excess fill, shall be prohibited within drainages outside of the identified construction area. Runoff from project-related hardscape surfaces shall be discharged to the existing La Quinta Evacuation Channel. Runoff will be filtered using a Continuous Deflective Separation (CDS) unit, or similar structure, prior to discharging via underground pipe at the invert of the existing Channel.

If the Draft Plan is approved prior to approval of the Proposed Project, MM 4.2-2 – 4.2-11 would be required in addition to MM 4.2-12 below.
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MM 4.2-12 The project applicant shall pay the Local Development Mitigation Fee as required by the Final Plan. The $600 per acre fee, as described in MM 4.2-1, would be subsumed by this new Local Development Mitigation Fee if the Draft Plan is finalized and adopted prior to permit issuance or approval of the Komar Desert Center project.

4.2.7 Level of Significance After Mitigation

The project as currently proposed would impact 19.6 acres of disturbed Sonoran creosote bush scrub. Mitigation for impacts to this vegetation community would consist of payment for each impacted acre into the Coachella Valley Association of Government’s Coachella Valley Fringe-toed Lizard Mitigation Fee Program. Impacts would be less than significant with the purchase of additional lands within and around the Coachella Valley Preserve.

The project as currently proposed would temporally impact 0.15 acre and permanently impact 0.002 acre of CDFG and USACE jurisdiction. With the on-site restoration at a 1:1 ratio, the temporary and permanent impacts to state and federal jurisdictional waters would be less than significant.

With the implementation of the mitigation measures as recommended above, impacts to nesting migratory birds would be less than significant. Indirect impacts to native habitats adjacent to the project site would also be less than significant with the implementation of the above mitigation measures. With the implementation of the required regulatory measures, project design features, and mitigation measures as recommended above, impacts to biological resources would be less than significant.

Should the Draft Plan be finalized and adopted prior to the approval of the proposed project, then mitigation measures as addressed above, and pursuant to the Final Plan will be employed by the project applicant. If the Draft Plan is not finalized and adopted prior to the approval of the proposed project, the mitigation measures, as proposed above and within the Biological Resources Technical Report (HDR 2005) (i.e., payment into the Coachella Valley Fringe-toed Lizard Mitigation Fee Program), will be implemented. The proposed Komar Desert Center project would be considered consistent with the existing La Quinta General Plan and MEA, Coachella Valley Fringe-toed Lizard Mitigation Fee Program, Draft Plan, and no significant or cumulative impacts would result.
4.0 Environmental Impact Analysis

4.3 CULTURAL RESOURCES

The following reports have been prepared to analyze the cultural resource impacts of the Proposed Project and are included in their entirety in Appendix D of this Draft EIR:


This section summarizes the methodology, prehistoric and historic context of the project region, describes the regulatory framework for evaluating cultural and paleontological resources, and discusses potential impacts on these resources as a result of implementation of the Proposed Project.

4.3.1 Environmental Setting

Cultural resources are places, structures, or objects that are important for scientific, historic, and/or religious reasons to cultures, communities, groups, or individuals. Cultural resources include historic and prehistoric archaeological sites, architectural remains, engineering structures, and artifacts that provide evidence of past human activity. They also include places, resources, or items of importance in the traditions of societies and religions.

Paleontological resources are any remains, traces, or imprints of a plant or animal that has been preserved in the Earth's crust since some past geologic time. Paleontological resources include invertebrate fossils; microfossils; petrified wood; plants; trace; and vertebrate fossils.

Presently the project area is a vacant lot strewn with trash debris with the far east portion covered with fill material and sand dunes on the west. Surrounding properties and terrain adjacent to the project area includes Highway 111 and commercial development on the north, and vacant desert land and residential housing to the south, with the La Quinta Evacuation Channel immediately bounding the south, a vacant lot covered in fill material and gas station to the east, and a trailer park and commercial buildings to the west.

4.3.1.1 Methodology

The Phase I cultural resources study considered all previously conducted cultural resources studies and archaeological site records located within a one-mile radius of the project area. In order to provide an accurate account of cultural resources within the project area, and in addition to a record search, a pedestrian field survey was conducted. The record search for a one-mile radius and survey were conducted by Nina M. Harris of Harris Archaeological Consultants on March 24, and April 2 and 3, 2005.

A supplemental cultural resources Phase I record search and survey study for an additional portion to the north and east of the project area was conducted on June 8, 2005 and May 28, 2005, respectively. This four-acre supplemental portion of the project proposes to provide waterline piping for the commercial development.
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As recommended in the original Phase I survey report, a Phase II archaeological test study was conducted by Harris Archaeological Consultants to determine the presence or absence of subsurface cultural material deposits and determine the overall significance of seven previously recorded archaeological sites and two isolate artifacts identified within the Proposed Project area during the Phase I survey. This testing was conducted by Nina M. Harris, James Keasling, Kurt McLean, and Sarah Williams between March 15 and May 30, 2005. Laboratory analysis was conducted by Nina M. Harris and Sinead Ni Ghaibblain.

Field Survey

The field surveys were conducted on foot by one person walking several transects using 10-12 meter intervals to insure full project area coverage. Any cultural resources located during the survey were recorded.

During the Phase II test, surface artifacts from the site were mapped and collected individually, and by using a surface collection unit of two by two meters. Collected resources were then placed in re-sealable bags for inventory. A series of shovel test probes (STPs) were also excavated at each prehistoric site to determine the presence or absence of subsurface deposits and to define site boundaries. STPs were excavated using a 50 centimeter (cm) diameter excavated in 10 cm levels until two sterile levels (no artifacts present) were affirmed. In addition, test excavation units measuring one by one meter were excavated in arbitrary ten cm levels to determine the nature of subsurface deposits and collect a sample of artifacts. Each soil matrix was then passed through a 1/8th-inch screen and recovered artifacts were collected, bagged, and sent to the laboratory for analysis. Field inspection of test auger and pit back dirt was obtained during the geotechnical study to identify any residual cultural materials that may have been brought to the surface during testing.

Records Search

As part of the Phase I, a records search was conducted on March 25, 2005 at the California Historical Resources Information System at the Eastern Information Center, University of California Riverside (UCR), California, and included a review of all recorded historic and prehistoric archaeological sites within a one-mile radius of the project area. The study also reviewed records of all known cultural resource survey and excavation reports within a one-mile radius of the project area. Other sources consulted include lists the National Register of Historic Places, the California Inventory of Historic Resources and California Register of Historical Resources and California Historical Landmarks, California Points of Historical Interest (2004), and the Office of Historic Preservation Database of Determinations of Eligibility (2004). Historic maps (U.S. Geologic Survey [USGS] Indio 30' 1904, USGS Toro Peak 15' 1949, USGS La Quinta 7.5' 1959) and aerial photographs (1938, 1949, 1955 and 1973) on file at the information center and in the map collection room at the Science Library on the UCR campus were also reviewed.

The supplemental record search was also conducted at the California Historical Resources Information System at the Eastern Information Center, UCR on June 8, 2005. The study included a review of all recorded historic and prehistoric archaeological sites within a one-mile radius of the project area. The study also reviewed records of all known cultural resource survey and excavation reports as well as the various databases noted above. Historic maps (1904 USGS 30' Indio, 1959 USGS 15' Palm Desert, and 7.5' La Quinta updated in both 1972 and 1980) and aerial photographs (1939, 1949, 1955, and 1973) were also reviewed.

The Phase II records search was conducted at the CVWD and in the map collection room at the Toma Rivera Physics Library at UCR. The study consisted of review of historic maps, aerial photographs, and well drilling documentation. Historic maps and aerial photographs included those consulted for the supplemental Phase I study.
Initially, it was believed that all necessary information could be gathered by obtaining site forms only for those sites within a quarter-mile radius of the project site. However, after further consideration, the site forms for all sites within a one-mile radius of the project site were obtained and considered in this analysis.

The paleontology records review of the subject property was conducted at the Regional Paleontologic Locality Inventory (RPLI) at the San Bernardino County Museum. This included review of previous geologic mapping and study sites.

Tribal Consultation

Native American consultation included a letter dated March 28, 2005 sent to the Native American Heritage Commission (NAHC), requesting a review of the Sacred Lands Inventory, as well as a list of Native American individuals who may have knowledge of cultural resources in the project area. Twelve letters, one addressing two organizations, were sent April 9, 2005. Discussions with NAHC concluded that the initial contact list was incorrect and the correct list was then used to supply the organizations and groups with letters inviting participation per Senate Bill (SB) 18. Twenty-three letters were sent out on April 26, 2005.

4.3.1.2 Existing Conditions

Environment

The high beach line of Ancient Lake Cahuilla is located approximately one-half mile east of the subject property. Soils are coarse to fine-grained sandy marine and non-marine sediments and alluvial deposits derived from adjacent Mesozoic granitic and Precambrian conglomerate mountain ranges. The project area is leveled agricultural land on the east with sand dunes in the west. During the presence of Ancient Lake Cahuilla, resources included fish species and migratory birds and are evidenced in archaeological sites in the area.

Ethnography

The project area is within the territorial cultural boundaries of the Cahuilla Indians. The Cahuilla territory includes the San Gorgonio Pass and Palm Springs area as well as the mountains of the San Jacinto and Santa Rosa ranges to the eastern Coachella Valley (Kroeber 1925, Bean 1978).

Prehistory

Paleo-Indian Tradition (14,000-9,000 BP)

The Paleo-Indian Tradition (or Big Game Hunting Tradition) is the earliest recognized manifestation of human activity in North America. Artifacts representing this time frame are limited and include Clovis and Folsom spear points. During this period it is thought that the inhabitants were moving and migrating, following and hunting big game herds.

Earlier Periods (9,000-1,300 BP)

Early Period cultures are represented by more complex artifact assemblages adapted for use with the local resources that were used in more environmentally diverse landscapes compared to the Paleo-Indian Tradition (Willig et al. 1988). In the deserts of southern California, distinctive Lake Mojave, Pinto, and Gypsum artifact assemblages appear to reflect adaptations to environmental changes brought on by climatic conditions, and changing interactions between different culture groups.

The Lake Mojave cultural complex is characterized by lithic artifacts including percussion flake end and side scrapers, keeled scrapers, perforators, round scrapers, flakes, knife, oval knife, foliate points, Lake Mojave type points, crescents or crescentics, and Silver Lake type points. Artifacts associated with the
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Pinto period include shouldered stemmed point series, leaf shaped bifaces and heavy scrapers, made mostly from basalts. Milling slabs and manos are common (Warren 1980). Point types representing the Gypsum period include Humbolt Concave Base; Gypsum Cave or Elko Corner-notched; Elko Eared; leaf-shaped points; and rectangular based knives.

Later Periods

This period is marked by another shift in subsistence economies to locations where resources were more abundant. The economic characteristic of the Later Periods is one of more intensive and efficient exploitation of local resources. Cultural developments during this period in the Salton Trough, located within central Imperial and southeastern Riverside counties, was intermittently filled by at least four stands of freshwater Ancient Lake Cahuilla which temporarily attracted human populations (Waters 1983).

The Saratoga Springs period (1,500 BP to 800 BP) is characterized by smaller point types such as the Rose Spring and Eastgate series evidence technological change from atlatl to bow and arrow, with Gypsum Period point types still persisting into this period. The most dominant and most wide spread ceramics are the brown and buff wares from southern California and Colorado River.

The Shoshonean period (AD 1,200 to AD 1776) saw the emergence of two cultural families: the Yuman or Patayan concentrated in the south and the Shoshonean from the north (Warren 1980). The Shoshonean-speaking people expanded from northern portions of the Great Basin into that portion of the Colorado-Mojave Desert region situated north and west of the Colorado River. Shoshonean territories ultimately comprised much of Southern California while the Yuman/Patayan held out along the Colorado River and eventually expanded to the Coachella Valley region (Moratto 1984).

The Shoshonean/Yuman Period assemblage includes the Desert Side-notched and Cottonwood Triangular points, well-made triangular knives, unshaped manos and milling stones, incised stones, slate pendants, pestles and mortars, and shell beads. Cultural patterns reflecting the Late Period include permanent or semi-permanent seasonal village sites, a proliferation of acorn-milling and pinyon-processing sites in upland areas, and the use of obsidian from Obsidian Butte, Coso Range, and other sources. The Patayan influence from the deserts to the east include the presence of both brown ware, reflecting mountain and coastal associations, and buff ware ceramics derived from the Colorado River.

History

Historic phases include the Spanish Period (1769-1822), the Mexican Period (1822-1848) and the American Period (1848 to present).

The earliest Spanish expedition to the region was conducted by Juan Bautista de Anza in 1774. The effects of the European influx on the Cahuilla was delayed as compared to other Native American groups, but by the 1800s the mission influences were felt when some Cahuilla began farming and taking on European life ways. The Mexican period brought ranching to the region and many Cahuilla became ranch hands. By the American period when gold was discovered an influx of people to the area brought tensions between the Cahuilla and the Americans. A small pox epidemic in 1862 decimated the Cahuilla population reducing it from approximately 8,000 to 2,500 individuals.

The history in Coachella Valley includes the passage of a trading route through the valley located approximately where Route 111 passes along the foot of the mountains. The trail provided a route between the gold fields of Arizona and Los Angeles. In the 1870s the Southern Pacific Railroad brought some settlement to the area and the Homestead and Desert Land Acts opening public land for claim in the 1880 brought a larger population and farming to the area. Ground water sources further enhanced the agricultural base including the date palm industry. Water secured by the development of the Coachella Canal in 1948 provided a reliable resource encouraging further development. La Quinta was incorporated in 1982.
4.0 Environmental Impact Analysis

4.3.2 Project Impacts

4.3.2.1 Thresholds of Significance

As defined in Appendix G of the CEQA Guidelines, project impacts to cultural resources are considered significant if any of the following occur:

- Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature or;
- Disturb any human remains, including those interred outside of formal cemeteries.

4.3.2.2 Environmental Impacts

The original archaeological records and literature search for the project study area indicated that 43 cultural resources studies have been performed within a one-mile radius of the Proposed Project site. However, none of these studies have been conducted within the project area specifically. Eighty-eight archaeological sites or isolate artifacts have been previously identified within a quarter-mile radius of the project area. Of these, 10 are historic, 70 are prehistoric and 3 are multi-component sites. Two isolate prehistoric artifacts and one isolate historic artifact were also identified. Two had no site record. During the report review some sites identified during archaeological survey, test, and monitoring programs within a quarter mile south of the project area yielded substantial subsurface cultural material. This resulted in a monitoring program, additional testing with backhoe trenches, data recovery (Phase III) study, and subsequent avoidance mitigation recommendations resulting in planning changes for the project (Brock and Smith-Patten 2004).

Reviewing the one-mile radius for the original study, the supplemental records search resulted in the same findings with respect to previous cultural resource studies. Regarding archaeological sites or isolate artifacts, the supplemental record search, which included all sites within a one-mile radius, indicated 43 previous cultural resources studies conducted, and 88 archaeological sites recorded within one mile of the Project area. None of those sites are within the Project area. Of these 10 are historic, 70 are prehistoric, and three are multi-component sites. Two isolate prehistoric artifacts and one isolate historic artifact were also identified. Two have no record.

Historic maps and aerial photographs indicate structures and agricultural fields within the project area. The earliest aerial photograph dated 1938 shows vacant desert terrain. The earliest view of activity is shown on the 1949 aerial photograph indicating a possible structure in the northeast portion and one possibly centrally located on the project area with crop fields adjacent. These two structures remain on the 1955 aerial photograph. By 1973, the photograph clearly shows the date palm grove and agricultural fields. The USGS 7.5' La Quinta Quadrangle map dated 1959 shows three structures in the northeastern portion and one located centrally. The 1972 photo revision shows these same structures. The 1980 photo revision indicates only these same structures.

A field survey was conducted on March 25, 2005 for the Proposed Project to identify cultural resources that might be present within the project area. The far northeastern portion of the project area is covered with fill. Ground visibility was poor (0-10 percent) at this location, in dune sections due to dense vegetation enhanced by heavy rains, and in areas where trash obscured the surface. Visibility across the rest of the project area varied from good (30-60 percent) in less dense vegetation to excellent
(60-100 percent) in exposed ground surface such as on roads and dune blow out areas. The archaeological site constituents and boundaries were determined by visual inspection of ground surface. Constraints to the survey included the fill area on the east and two transient camps, both measuring approximately 5 meters in diameter and located in the northwest and central north portion of the project area.

The project area has been impacted by farming and dumping activities and fill and grading in the eastern extant. Four historic sites, three prehistoric sites, and two prehistoric isolate artifacts were identified during the survey. During Phase II, additional studies were conducted on all identified sites. The supplemental field survey did not identify any additional cultural resources within the supplemental project area. Identified sites and isolates, as well as the subsequent study findings, are described below:

**Historic Debris Site**

This site, located on the north side of the La Quinta Evacuation Channel, consists of a historic debris scatter probably created by bulldozer. This site appears to be a scatter possibly associated with agricultural activities on the property. During the Phase II test, no diagnostic historic artifacts could be positively identified at this site and no artifacts were collected. Cultural material was inventoried.

**Domestic Debris Scatter**

This site consists of a historic domestic debris scatter. This site appears to be a scatter possibly associated with structures visibly located centrally on the property to the northeast as well as the 1959 and 1972 photorevised 7.5' USGS La Quinta quadrangle.

During the Phase II study, diagnostic artifacts were surface collected and a one by one meter unit was excavated. Four artifacts were collected from the surface of the domestic debris scatter, including one green and three clear glass fragments. Diagnostic artifacts from the one by one unit were collected. All other items were classified, counted in the field, and noted.

**Rock Scatter**

This site consists of a fire affected rock and ceramic burned daub (historic building material made from mixing earth, water, straw or grass, and lime or manure) scatter. The six pieces of rock are granitic, three of these are friable. No other artifacts or ecofacts are present. During the Phase II study, three Shovel Test Pits (STPs) and three one by one units were placed within the site. The test units were excavated to a maximum depth of 70 cm through light brown gray sand. Daub was collected from the upper levels of one by one unit. No cultural materials were identified in any of the STPs. Fire affected rock was not collected.

**Historic Trash Scatter 1**

This site consists of one brown ware fragment and a shell and bone fragment scatter amidst a possibly historic trash scatter. A trash scatter extends across the site and a large dump is located approximately 20 meters to the north. There were two noted shell concentrations that were very fragmented, decomposed and could not be identified. The north side of the site had been impacted by geotechnical drilling.

The site was tested with three STPs and a one by one meter unit. There were no artifacts or subsurface deposits identified in two of the STPs. Modern unidentifiable metal fragments (not collected) and three bone fragments (collected) were identified in the first level in the third STP. A few pieces of metal and a nail were noted, and some recently deposited lizard bone was collected from the upper levels of the one by one unit. No other cultural materials were identified. The surface bone was likely from a large recent trash deposit located approximately 25 meters north. No diagnostic artifacts aside from the ceramic and bone fragments were collected from the surface. The small bone fragments likely washed in from the trash pile located to the north and are not diagnostically identifiable.
Historic Debris Scatter

The site consists of a debris scatter and remains of an agricultural operation. This site may be a scatter possibly in part associated with structures visibly located centrally on the property as indicated on the 1959 and 1972 photo-revised USGS 7.5' La Quinta quadrangles and possibly on the aerial photograph from 1949. This site appears to have been heavily disturbed by deliberate destruction and removal of any structures and subsequent deposition of trash across the property. Additional trash dumping on the property is mixed with what might have come from the agriculturally associated activities.

Intensive field survey did not identify any intact structural remains at this location during the Phase II. Since so much dumping has occurred in the area, no artifacts can be associated directly with the structure known to have existed on the hill.

This site was tested with three STPs and a one by one unit. One STP encountered some historic trash in the upper levels. The one by one unit placed within the scatter encountered subsurface deposits to 30 cm depth. Diagnostic artifacts were collected and non-diagnostic artifacts were classified, counted in the field, and noted.

Historic Trash Scatter 2

This site consists of one brown ware fragment and a shell and bone fragment scatter amidst a possibly historic trash scatter.

During the Phase II surveys, one prehistoric ceramic fragment was collected from the surface. No historic artifacts could be positively identified. This site was tested for subsurface deposits with two STPs. No artifacts were identified in either STP. The shell was decomposed and fragmented and unidentifiable.

Historic Structure/Scatter

This site consists of two concrete slabs and a debris scatter of cinder blocks. The cinder blocks may represent a newer structure shown initially on the 1972 photo-revised USGS La Quinta quadrangle map and still present on the 1980 photo-revised USGS La Quinta quadrangle map, but aerial photographs suggest an earlier structure at this location. Two structures are shown as early as the 1959 USGS map and are still present on the 1972 photo-revision, yet no longer present on the 1980 revision even though the central slab is clearly dated 1969. This entire site appears to be heavily disturbed by deliberate destruction and removal of structures and subsequent deposition of trash across the property. Additional trash dumping on the property is mixed with what might have come from the agriculturally associated activities.

As determined during the Phase II survey, one series of slabs is comprised of three, and possibly four, separately poured slabs. The most recent pour occurred in 1969 as marked in the concrete in the north east corner of the central newer slab. The edges of the slabs are covered with aeolian sand deposits. Trash identified at the site is mostly recent, from the late 1960s and early 1970s. A small wooden platform which would have been located on the outside of the structure appeared near a hose bib.

The second slab was mostly buried beneath dirt, burned wood, and historic and recent trash. This feature appeared to be cabinetry. Several domestic and agricultural items were present onsite. Several scatters of possibly historic debris were identified within the immediate vicinity of the slab area, including a packing label reading “California Tomatoes, Coachella Valley.” A pile and scatter of cinder blocks is located in the northwest portion of the site, mixed with chunks of asphalt. These cinder blocks may represent a newer structure shown initially on the 1959 USGS quad. The asphalt is likely from the old Highway 111 road bed or a driveway for the structure.

A well was also identified during reconnaissance surveys. Documents from the Coachella Valley Water District indicate that the well was drilled on the property in 1944.
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Some discrepancy in the location of the structures on the USGS maps poses a problem as to which mapped structures are represented by the various slabs at this site.

The Phase II test included a Surface Scrape Unit placed on a re-deposited glass and ceramic scatter at Locus B and exploratory removal of dirt on the slabs. Diagnostic artifacts were collected and non-diagnostic artifacts were classified, counted in the field, and noted. Two features were revealed, one at Locus A and one at Locus B. Some artifacts encountered within the dirt matrix were collected from the Locus B feature.

Prehistoric Ceramic 1

This site is a single body fragment of prehistoric brown ware ceramic. This artifact is located within a disturbed portion of the project area previously used for agriculture. This isolate was not relocated during the Phase II test study as flagging markers and artifacts have likely been displaced during off-roading activities evident in the area at this time.

Prehistoric Ceramic 2

This site consists of two body fragments of prehistoric brown ware ceramic. The site is located on the north side of a dune. During the Phase II study, two prehistoric ceramic shards were collected from this location.

Tribal Consultation

NAHC responded with indication that no sacred spaces were identified within or near the project area. In response to the original consultation letters, The Morongo Band of Mission Indians noted the project location was out of tribal jurisdiction, but requested that Native American monitors be present during grading activities and requested to be informed should any significant discoveries be identified during the testing phase of the cultural study. The Augustine Band of Cahuilla Indians also indicated that the project area was not located within the boundary of traditional use by the Augustine Band, although the project site generally lies within the Cahuilla traditional territorial land use boundaries.

Native American consultation was conducted during the survey phase of the project and results through April are provided in the Phase I report (Harris 2005). Subsequent discussions with NAHC concluded that the initial contact list was incorrect and the correct list was then used to supply the organizations and groups with letters inviting project participation per Senate Bill 18. Twenty three letters were sent out on April 26, 2005. Three responses were received, which are included in Appendix D.

Paleontological Resources

The results of the paleontologic records search indicated that no paleontologic localities are recorded within the boundaries of, or within at least one mile of, the proposed property (Appendix D). However, the alternating lacustrine and fluvial sediments in the area identified by Whistler, termed the Lake Cahuilla beds, have previously yielded fossil remains representing diverse freshwater diatoms, land plants, sponges, ostracods, mollusks, fish, and small terrestrial vertebrates. For this reason, excavation within the boundaries of the Proposed Project site has high potential to impact significant nonrenewable fossil resources.

4.3.3 Cumulative Impacts

The cumulative total of all related project development in the City of La Quinta, including the Sam’s Club, Jefferson Plaza, The Pavilion, and La Quinta Corporate Center developments as identified in Table 3.5-1, creates the potential for additional impacts to historical, archaeological, and/or paleontological resources. Since historical, archaeological, and paleontological prehistoric artifacts occur across the project area and vicinity, the possibility of subsurface prehistoric deposits or fossil
resources, possibly deeply buried, is high. Due to the existence of the aforementioned resources, the areas that contain said resources are to be considered sensitive for cultural resources. In addition, the presence of sediments suitable to contain paleontological resources and the positive results of the literature review reinforce the high potential for encountering significant nonrenewable vertebrate fossils. With more development, there is an increased possibility of encountering historical, archaeological, and/or paleontological resources. Mitigation measures would be implemented for the Proposed Project and related project development that is subject to CEQA. However, through recordation and curation of resources to provide the public and historians the opportunity to review these resources, the Proposed Project would not result in a cumulatively significant impact.

4.3.4 Regulatory Requirements

California Environmental Quality Act

CEQA requires that historic and archaeological resources be evaluated for local significance and for the California Register of Historical Resources. The criteria for determining the significance of impacts to cultural resources, based on Section 15064.5 of the CEQA Guidelines and Guidelines for Nomination of Properties to the California Register of Historic Resources, and determining archaeological or historical significance are summarized below. Under CEQA, an archaeological or historical resource is important if it:

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

4.3.5 Level of Significance Before Mitigation

Much of the project area has been impacted by agricultural activities of a historic timeframe. All the structures on the property have been destroyed and only two slabs survive. The dunes on the west side of the project area remain natural. The far northeastern portion of the project area is covered with fill where ground surface was obscured and was not surveyed.

The three historic sites identified during the Phase I study and further analyzed during the Phase II appear to have little intact depositional integrity. The domestic debris scatter and historic debris scatter, appear to be single event depositional episodes resulting in a mixing of dated materials in a non-chronological sequence. Given the nature of the burned items in the collection, the historic structure/scatter, appears to have been re-deposited from the structure burn episode, perhaps re-deposited in this location during pot hunting activities or earth moving activities. Artifact types and dates indicate items are primarily for domestic use mixed with agricultural farming across these historic sites ranging generally from 1935-1970. Because the three historic sites do not have depositional integrity and the project site is disturbed, they would not significantly contribute to California’s history or persons, does not represent distinctive characteristics of a period in history, and would not yield information important to prehistory or history.

No intact subsurface deposits were encountered during the testing phase at the prehistoric sites. Results of STP and one by one unit excavations along with geotechnical testing indicate that there are no substantial cultural deposits in the test locations. Ceramic and fire affected resource artifact scatters may have been due to peripheral land use activities associated with other known sites in the area. Shell deposits associated with the Ancient Lake Cahuilla are scattered across portions of the project area.
4.0 Environmental Impact Analysis

suggested they were washed in or exposed during heavy rains and are not associated directly with archaeological sites in particular. Therefore, impacts to prehistoric resources would not meet the criteria listed above for CEQA significance, and would be less than significant.

While Phase II testing has resulted in recommendations that none of the previously recorded sites are significant or important under CEQA, because prehistoric artifacts occur across the project area, and due to the large number of sites nearby, the possibility of subsurface prehistoric deposits is high. Because the project site contains sediments that are known to contain fossils, impacts are considered significant. Development of the Proposed Project without mitigation, therefore, may potentially cause significant impacts to cultural and/or paleontologic resources.

4.3.6 Environmental Mitigation Measures

The following mitigation measures shall be implemented to reduce impacts to less than significant levels on undiscovered cultural resources on the Proposed Project site:

**MM 4.3-1** Due to the presence of important archaeological sites in the immediate vicinity of the project area, construction clearing, brushing, trenching and all grading activities shall require monitoring by a qualified archaeologist.

**MM 4.3-2** Should buried cultural resources be encountered during construction activities, work in that area shall halt until a qualified archaeologist can evaluate the nature and significance of the find. If human remains are unearthed during construction, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resources Code Section 5097.98.

**MM 4.3-3** Excavation in areas identified as likely to contain paleontological resources, including any disturbed surface or subsurface sediments of the Lake Cahuilla beds, shall be monitored by a qualified paleontological monitor.

**MM 4.3-4** Paleontological monitoring shall occur only for those undisturbed sediments wherein fossil plant or animal remains are found with no associated evidence of human activity or any archaeological context.

**MM 4.3-5** Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays, and to remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. Monitors shall be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens. Monitoring may be reduced if the potentially fossiliferous units described above are not present or if the fossiliferous units present are determined by a qualified paleontological monitor to have low potential to contain fossil resources.

**MM 4.3-6** All recovered specimens shall be prepared to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates.

**MM 4.3-7** Specimens shall be identified and curated into an established, accredited, professional museum repository with permanent retrievable storage. The paleontologist shall have written repository agreement in hand prior to the initiation of mitigation activities.

**MM 4.3-8** Due to the presence of historic Native American sites in the immediate vicinity of the project area, construction clearing, brushing, trenching and all grading activities shall require monitoring by a tribal monitor.
4.0 Environmental Impact Analysis

MM 4.3-9  
A report of findings with an appended itemized inventory of identified specimens shall be prepared. The report will address archaeological, paleontological, and tribal items. This report shall incorporate the full results of the literature review, as well as the full results of the recommended review of the records of the Vertebrate Paleontology Department of the Natural History Museum of Los Angeles County. The report shall be submitted prior to the issuance of the Certificate of Occupancy.

4.3.7 Level of Significance After Mitigation

While none of the prehistoric sites are considered significant or important under CEQA, because prehistoric artifacts occur across the project area, and due to the large number of important sites in the immediate vicinity of the project area, the possibility of subsurface prehistoric deposits is high. Construction grading activities shall therefore require monitoring. Monitors will be able to evaluate any findings and halt further activity until a final determination can be made by appropriate personnel. With implementation of the mitigation measures, impacts are reduced to below a level of significance.

Due to the presence of sediments that contain fossils the potential for significant impacts would occur. However, with implementation of the construction monitoring and curation of fossils (if found) the impacts are reduced to below a level of significance. With implementation of the proposed mitigation measures, impacts to undiscovered prehistoric resources located onsite would be less than significant. No significant impacts were identified for historic resources.
4.0 Environmental Impact Analysis

4.4 GEOLOGY / SOILS

The following reports have been prepared to analyze the geological impacts of the Proposed Project and are included in their entirety in Appendix E of this Draft EIR:


4.4.1 Environmental Setting

The Proposed Project site is located along the southwestern side of the Coachella Valley. Locally, the Coachella Valley represents the northern portion of the Salton Trough geomorphic province of California. Structurally, the Coachella Valley is bounded on the north by the Little San Bernardino Mountains, on the west by the Santa Rosa Mountains, and on the east by the Indio Mecca Hills. The Coachella Valley extends towards the south as the Salton Trough into the Gulf of California. The site is regionally geologically mapped to be underlain by alluvium consisting of gravel, sand, silt, and clay. Underlying the alluvium at depth are crystalline basement complexes of the area.

4.4.1.1 Characteristics of the Proposed Project Site

The site is located in the lower portion of the Coachella Valley, which is part of the Colorado Desert Geomorphic Province, which is bounded by the Colorado River to the east, the Mexican border to the south, the Peninsular Ranges on the west and the southern edge of the eastern Transverse Ranges to the north. The oldest rocks exposed in the Colorado Desert are Proterozoic crystalline gneisses, anorthosites and schists (Norris and Webb 1990). The subject property is predominately underlain by several hundred feet of lacustrine deposits and alluvial materials, which are underlain by dense to very dense granitic bedrock (SSCI 1994).

**Topography**

The Proposed Project site is generally flat with some small mounds and dunes and slopes slightly from north to south. The site is at an elevation of approximately 60 feet above mean sea level (Figure 2-3 Existing Site Topography).

**Soils**

The soils underlying the site are classified in the Gilman-Coachella-Myoma association, specifically Coachella Fine Sand and Myoma, Figure 4.4-1 (SSCI 1994). In addition, Myoma soils underlie the project site.

The site is generally underlain by interbedded layers of silty sand, sandy silt, and sand to the maximum depth explored (51.5 feet). The soils were generally in a loose to medium dense condition and generally became denser with depth. For coarse-grained soils, very loose to dense consistencies were indicated.

In the borings taken for the geotechnical study, alluvial soils were encountered consisting of eolian sand and alluvial sands, silty sands, and silts. Underlying the alluvium at depth are crystalline basement complexes of the area. The area is characterized by alluvium, consisting of silty sands, clayey sands, and sands with variable amounts of gravel. There are no bedrock outcrops or boulders on the parcel.
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Seismicity

Seismic hazards that occur as a result of the presence of faults capable of generating earthquakes are: (1) strong ground motion/shaking; (2) ground rupture; (3) liquefaction; and (4) landslides. Ground motion occurs when faults rupture at depth where pressures are high and result in earthquakes. Ground rupture occurs when the fault ruptures at depth and movement along the fault propagates to the ground surface resulting in vertical and/or lateral displacement. Liquefaction and landsliding are the result of ground motions where localized surface and subsurface ground unit conditions are susceptible to collapse or flow.

A search of the known active and potentially active faults within a 62-mile radius of the site resulted in the identification of 29 faults. The closest and most substantial of these faults is the San Andreas, located approximately 5.2 miles from the Proposed Project site. As the San Andreas Fault (Coachella/southern section) is a Type A fault as designated by the International Conference of Building Officials (ICBO), it may be capable of generating an earthquake with a magnitude greater than or equal to 7.0. According to the geotechnical report, 724 moderate earthquakes, having a magnitude of 4.0 or above, have occurred in the vicinity (62 miles) of the Proposed Project site in the past and have been noted from 1800 to 2004. The nearest historical earthquake to the project site lies approximately 3.3 miles away (Figure 4.4-2).

There are no known active faults crossing the site and the subject property does not lie within an Earthquake Fault Rupture Hazard Zone as defined by the State of California. However, the Proposed Project site is located within Seismic Zone 4 in the highly seismic Southern California region within the influence of several fault systems that are considered to be active or potentially active. Nearby faults are capable of producing potentially damaging seismic shaking at the site. It is anticipated that the project site will periodically experience ground shaking as the result of moderate to large magnitude earthquakes. Other active faults or potentially active seismic sources without surface expression (blind faults) are also capable of generating an earthquake.

Groundwater

Groundwater was not encountered in any of the 34 borings and 4 test pits ranging from 6 feet to 51.5 feet below the ground surface (bgs) that were advanced for either geotechnical investigation. The historical high groundwater level is reported to be greater than 100 feet below the surface of the site (CVWD 2005). Fluctuations of the groundwater level, localized zones of perched water, and soil moisture content should be anticipated during and following the rainy season. Irrigation of landscaped areas on or immediately adjacent to the site may also cause a fluctuation of local groundwater levels.

4.4.1.2 Methodology

Geotechnical analyses consisted of: (1) a literature review; (2) field exploration; and (3) laboratory testing.

Literature Review

For the initial geotechnical investigation, published and unpublished geologic literature was reviewed, including publications prepared by the California Division of Mines and Geology and previously prepared reports for the site. Appropriate seismic and faulting information including designated earthquake fault zones and an in-house database of faulting in the general site vicinity were also reviewed.

Field Exploration

The geotechnical investigation conducted hollow-stem auger borings and four test pits.
Laboratory Testing
Soil samples were collected and tested for in situ moisture and density, grain size distribution, collapse potential, direct shear, maximum density/optimum moisture content, R-value, and corrosion tests. For the supplemental investigation, testing also consisted of sieve analysis and unit weight determinations.

4.4.2 Project Impacts

4.4.2.1 Thresholds of Significance
As defined in Appendix G of the CEQA Guidelines, project impacts to geological resources are considered significant if any of the following occurred:

a) Expose people or structures to potential substantive adverse effects, including the risk of loss, injury, or death involving:
   i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
   ii) Strong seismic ground shaking?
   iii) Seismic related ground failure, including liquefaction?
   iv) Landslides?

b) Result in substantial soil erosion or the loss of topsoil?

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building code (1994), creating substantial risks to life or property?

e) Have soils incapable of adequately supporting the use of septic tanks or alternative water disposal system where sewers are not available for the disposal of waste water?

4.4.2.2 Environmental Impacts
The Proposed Project site is located in a seismically active area, but there are no known active faults crossing the site and the site is not located in or immediately adjacent to an Alquist-Priolo Earthquake Fault Zone. Due to the site’s proximity to the San Andreas fault, the proposed development would probably experience moderate to occasionally high ground shaking from this fault as well as some background shaking from other seismically active areas of the southern California region. The project site is located in Seismic Zone 4 of the 1997 edition of the Uniform Building code (UBC). The most significant geologic hazard to the project is the potential for moderate to strong ground shaking resulting from earthquakes generated on the faults within the vicinity of the site.

Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. The project site is located in a relatively flat lying valley floor area; therefore, landslides or other forms of natural slope instability would not represent a significant hazard to the site.

Field investigations (Appendix E) indicated groundwater to be at a depth of 100 feet below the existing surface. The effects of liquefaction would not be a factor due to depth of the liquefiable soils. The project site is also not located within a state and County designated Seismic Hazard Zone for liquefaction potential. Therefore, liquefaction would not cause a significant impact at the project site.
Implementation of the Proposed Project would involve a minimal grading program consisting of 59,500 cubic yards of cut and fill to be balanced onsite. As the project site is mainly flat, the earthwork is fairly evenly distributed throughout the entire project site with an average of one to two feet being added or removed at most locations. Erosion of on-site soils was found to be slight, runoff is very slow to medium, and the hazard of soil blowing is high. Soils within the project area would be subject to exposure to wind and water erosion during site preparation. Until permanent vegetation is established, slopes will likely require short-term soil blowing protection such as jute matting, polymer applicants, or other suitable methods as may be recommended by a landscape architect. Erosion associated with site preparation would be temporary and would cease upon completion of construction activities.

According to Kleinfelder (Appendix E), the density of material derived during boring on-site was determined to be loose to dense. Furthermore, the soils on the project site are anticipated to possess a slight to moderate potential for collapse in the upper soils at the site.

Soils that exhibit moderate to high shrink/swell potential may cause damage to components, including underground utilities, pipelines, foundations, and infrastructure. The project site is underlain by granular soils, which are not believed to have a significant expansion potential.

The Proposed Project will not be serviced by septic tanks or other alternative wastewater disposal systems. Therefore, no impacts would occur.

4.4.3 Cumulative Impacts

Potential impacts related to geologic, seismic, and soils hazards include strong ground motion/shaking, ground rupture, liquefaction, and landslides. For the Proposed Project, all are site-specific. There are no known active faults crossing the site and the subject property does not lie within an Earthquake Fault Rupture Hazard Zone. No soils would be moved off-site. All cumulative development, including the cumulative projects identified in Table 3.5-1, would be subject to similar requirements to those imposed and implemented on the Proposed Project and would be required to adhere to all applicable regulations, standards, and procedures. Therefore, implementation of the Proposed Project would result in a less than significant cumulative impact to geology and soils.

4.4.4 Regulatory Requirements

The following regulatory requirements apply to geology, seismicity, and soils.

Alquist-Priolo Special Studies Zones Act of 1972

The Alquist-Priolo Special Studies Zones Act (A-P Act) of 1972 requires mitigation for hazards for surface faulting to structures for human occupancy. The A-P Act’s main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. A-P zones are established by the California Department of Mines and Geology.

Seismic Hazards Mapping Act of 1990

The Seismic Hazards Mapping Act (S-H Act) of 1990 provides a statewide seismic hazard mapping and technical advisory program to assist cities and counties in fulfilling their responsibilities for protecting the public health and safety from the effects of strong ground shaking, liquefaction, landslides, or other ground failure and other seismic hazards caused by earthquakes. Mapping and other information generated pursuant to the S-H Act is to be made available to local governments for planning and development purposes. The State requires: (1) local governments to incorporate site-specific geotechnical hazard investigations and associated hazard mitigation as part of the local construction permit approval process; and (2) the agent for a property seller or the seller if acting without an agent, must disclose to any prospective buyer if the property is located within a Seismic Hazard Zone. The State Geologist is responsible for compiling seismic hazard zone maps.
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Federal Soil Protection Act

The purpose of this Act is to protect or restore the functions of the soil on a permanent sustainable basis. Protection and restoration activities include prevention of harmful soil changes, rehabilitation of the soil of contaminated sites and of water contaminated by such sites, and precautions against negative soil impacts. Where impacts are made on the soil, disruptions of its natural functions and of its function as an archive of natural and cultural history should be avoided as far as practicable.

In addition, the requirements of the Federal Water Pollution Control Act (also referred to as the Clean Water Act) through the National Pollution Discharge Elimination System Permit, the Riverside County General Plan (Chapter 6 – Safety Element), and the City of La Quinta General Plan (Chapter 8 – Environmental Hazards Element) provide guidance for protection of geological and soil resources.

4.4.5 Level of Significance Before Mitigation

The project site is located in a seismically active area and strong ground shaking from earthquakes could possibly affect the development; however, the Proposed Project structures, including the Costco Wholesale fueling facility, would be subject to the requirements of UBC for Zone 4 for resistance to seismic shaking. In addition, the Proposed Project will be constructed in accordance with other UBC criteria, current seismic design specifications of the Structural Engineers Association of California, other applicable regulations, ongoing site-specific geotechnical investigations, and all applicable requirements of the State of California Occupational Safety and Health Administration (Cal/OSHA). Therefore, no significant impacts would occur from seismic ground shaking.

Hazards including landslides and liquefaction are unlikely to occur as a result of geography, topography, and site-specific geotechnical considerations. Therefore, no significant impacts would occur from landslides or liquefaction.

During construction of the Proposed Project, there is a low potential for soil erosion on and off-site. Soil erosion would be controlled and would remain less than significant through the implementation of a project-specific Erosion Control Plan and Storm Water Pollution Prevention Plan (SWPPP). In addition, permanent vegetation shall be planted to provide long-term erosion protection for the Proposed Project site.

The on-site soils are anticipated to possess a slight to moderate potential for collapse. Upper soils should be overexcavated to depths indicated in the geologic report and replaced as recompacted engineered fill resulting in a less than significant impact. The project site is also underlain by granular soils, which are anticipated to possess a low expansion potential; therefore, the Proposed Project would not be impacted.

The supplemental investigation determined that the geologic characteristics on-site are such that construction is geotechnically feasible and the structure can be adequately supported. Therefore, impacts resulting from the Proposed Project are not considered significant according to the aforementioned criteria.

Impacts to geology and/or soils on-site would remain less than significant if the guidelines and approved design features from the geotechnical reports are incorporated into design and construction of the Proposed Project. These include:

Project shall adhere to the following project design features:

- The proposed development shall be designed in accordance with the requirements of the latest edition of the UBC for Seismic Zone 4.
- Removal and stripping operations shall expose a firm, non-yielding subgrade that is free of significant voids and organics.
4.0 Environmental Impact Analysis

- All excavations shall comply with applicable local, state, and federal safety regulations including the current OSHA Excavation and Trench Safety Standards.

- Pipe zone backfill shall consist of imported soil less than ¾ inch in maximum dimension. Trench zone backfill shall consist of onsite soil or imported fill which meets the requirements for engineered fill provided in the recommendations in Appendix E. Imported material shall consist of fine-grained sand.

- Positive surface drainage shall be provided to prevent pooling and/or saturation of the soils in the vicinity of foundations, concrete slabs-on-grade, or pavements, with a minimum of 5 percent positive fall away from building perimeters to a distance of at least 5 feet.

- Continuous and isolated spread footings shall have minimum widths of 18 inches and be embedded at least 18 inches below the lowest final adjacent subgrade.

Compliance with all recommendations and design features set forth in the geotechnical reports (Appendix E) would ensure that project-related impacts would be less than significant. No significant short-term or cumulative geological impacts will occur as a result of the Proposed Project. No additional mitigation measures would be required.

4.4.6 Environmental Mitigation Measures

No significant impacts are anticipated for the Proposed Project; therefore, no mitigation measures pertaining to geology and/or soils are required.

4.4.7 Level of Significance After Mitigation

Project-specific and cumulative impacts to geology and/or soils will be less than significant.
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4.5 HAZARDS AND HAZARDOUS MATERIALS

The following reports have been prepared to analyze the hazardous materials impacts of the Proposed Project and are included in their entirety in Appendix F of this Draft EIR:

*Phase I Environmental Site Assessment.* Costco La Quinta Site; South of the Intersection of Highway 111 and Depot Drive and Northwest of the La Quinta Evacuation Channel; La Quinta, California. Prepared by Kleinfelder, Inc. April 14, 2005.


A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. Hazardous materials include solids, liquids, or gaseous materials that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, could pose a threat to human health or to the environment. These properties are defined in the California Code of Regulations (CCR), Title 22, Sections 66261.20-66261.24. Hazards include the risks associated with potential explosions, fires, or release of hazardous substances in the event of an accident or natural disaster, which may cause or contribute to an increase in mortality or serious illness, or pose substantial harm to human health or the environment. Within typical construction sites, materials that could be considered hazardous include diesel fuel, gasoline, equipment fluids, concrete, cleaning solutions and solvents, lubricant oils, adhesives, pipeline materials/equipment, human waste, and chemical toilets. A “hazardous waste” is any hazardous material that is discarded, abandoned, or to be recycled. The criteria that render a material hazardous also make a waste hazardous (California Health and Safety Code, Section 25117).

4.5.1 Existing Conditions

The subject property is currently undeveloped with debris (concrete, wood, and metal) observed on the property near the northern portion during site visits.

Previous Environmental Investigations

Kleinfelder reviewed an existing environmental document that was provided by Costco Wholesale (SSCI 1994). The Environmental Site Assessment Update for the Evaluation of Potentially Hazardous Materials, Asset Grouping #1 (La Quinta, California) was completed on August 18, 1994. The assessment was performed on multiple properties in the city of La Quinta, California. One of the properties (Control Number 520) is described as “Jefferson & Hwy 111 – 37.11 acres, undeveloped”. The Proposed Project site is included in this assessment.

The report indicates that a Union Oil Gasoline Station was located at the southwestern corner of Highway 111 and Jefferson Street (offsite) until either 1988 or 1989. Based on review of an Executive Summary for Jefferson & Highway 111 – Control Number 520 (Appendix B of the Phase I Environmental Site Assessment), Dames & Moore completed a Phase II Environmental Site Assessment at the former gasoline station in August 1994. The Phase II Environmental Site Assessment included soil and soil vapor sampling. Based on the findings of the Phase II Environmental Site Assessment, Dames & Moore recommended that no further action was necessary at the former gasoline station.

It is Kleinfelder’s opinion that the portion of Control Number 520 identified as an area of concern, southwestern corner of Highway 111 and Jefferson Street, is located hydrologically downgradient relative to the site and is unlikely to have impacted the site.
Methodology

For the Phase I Environmental Site Assessment, the history of the site was researched to identify obvious uses of the site back to the first developed use, or 40 years ago, whichever was earlier or readily available. Kleinfelder reviewed historical aerial photographs including 1953, 1959, 1978, 1984, 1996, and 2002. Aerial photographs were obtained from several historical photograph collections through EDR of Southport, Connecticut to identify any past activities at the site that may not be documented by other means or observed during a site visit which may have potentially generated hazardous materials and impacted the site. Historical topographic maps reviewed included 1904, 1959, 1959 photo revised 1972, and 1959 photo revised 1980. Oil and gas maps were also reviewed by Kleinfelder to identify oil and/or gas wells located on or close to the site. Information concerning regional geology and hydrogeology of the site and vicinity was obtained from published data and maps of the site vicinity. A brief drive-by survey of the area adjoining the site was performed by Kleinfelder on March 24, 2005. Also, Kleinfelder contracted a government database search performed by EDR to review known federal, state, and local environmental databases for possible hazardous waste generating establishments in the vicinity of the site, as well as on sites in the area with known environmental concerns.

Based on the results of the Phase I Environmental Site Assessment, limited environmental soil sampling was subsequently performed at the subject property. Samples were analyzed for organochlorine pesticides.

4.5.2 Project Impacts

Significance Criteria

Based on CEQA State Guidelines Appendix G, the following significance criteria have been developed for hazardous materials compliance:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school;
- Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would it result in a safety hazard for people residing or working in the project area;
- Be located within the vicinity of a private airstrip, would it result in a safety hazard for people residing or working in the project area;
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and
- Expose people or structures to a significant risk of loss, injury or death involving wildland fires.
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4.5.2.1 Environmental Impacts

The Proposed Project would involve the transport of fuels, lubricants, and various other liquids needed for operation of construction equipment at the site and would be transported to the construction site on an as-needed basis by equipment service trucks. In addition, project workers would commute to the project site via private vehicles, and would operate construction vehicles/equipment on both public and private streets. Materials hazardous to humans, wildlife, and sensitive environments would be present during project construction of the buildings. These materials include diesel fuel, gasoline, equipment fluids, concrete, cleaning solutions and solvents, lubricant oils, adhesives, human waste, and chemical toilets. The potential exists for direct impacts to human health and biological resources from accidental spills of hazardous materials from construction equipment during construction of the buildings and operation of the fuel facility; however, existing standards are in place for the handling, storage and transport of these materials.

Historic Impacts

Historical Aerial Photographs

Two historic uses have the potential to adversely affect future land uses: agricultural pesticides and the presence of oil and/or gas infrastructure use. As such, a limited environmental soil sampling report was performed at the subject property to assess whether these potential environmental concerns may have impacted the project site.

Laboratory analysis results indicated that the soils onsite contained detectable concentrations of dichlorodiphenyldichloroethane (DDE), a metabolite product of dichlorodiphenyltrichloroethane (DDT). Concentrations of DDE ranged from 0.015 milligrams per kilogram (mg/kg) to 1.50 mg/kg. These concentrations were compared to the maximum detected organochlorine pesticide concentration of 1.50 mg/kg of DDE to the DDE California Human Health Screening Level (CHHSL) for Residential Land Use at 1.6 mg/kg. The total organochlorine pesticide (DDE plus DDT) concentration of 1.534 mg/kg was also compared to the DDT CHHSL of 1.6 mg/kg. Both of these concentrations are below the CHHSL. The detected concentrations of DDE and DDT found onsite are also below the respective US EPA Region IX Preliminary Remediation Goals (PRGs) for residential soil, at 1.7 mg/kg.

As to the presence of oil and/or gas facilities, according to Wildcat Map page W-71 of the 2001 Munger Map Book of California and Alaska Oil and Gas Fields (Appendix B of the Phase I Environmental Site Assessment), oil and/or gas wells are not located on or adjoining the site.

Project Impacts

According to the March 21, 2005 EDR regulatory agency database search report, there are no liens for the site listed in the United States Environmental Protection Agency (USEPA) Federal Superfund Licens List, and no recorded land-use environmental deed restrictions pertaining to the site listed in the California Department of Toxic Substances Control’s (DTSC) database.

The search of available environmental records conducted for the Phase I Environmental Site Assessment (Kleinfelder 2005) revealed that the proposed subject property was not listed in any of the databases reviewed as having environmental concerns and is not located on any hazardous materials site as designated by Government Code § 6592.5.

One site adjoining the subject property is listed in the Resource Conservation and Recovery Act (RCRA)-GEN database. This Home Depot facility is listed as a small quantity generator of hazardous waste. No violations were found for the facility; therefore, this site is not an environmental concern that is likely to impact the subject property.
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Another concern is the possible presence of radon. Radon is a colorless, odorless radioactive gas that comes from the natural decay of uranium and thorium found in nearly all soils. Radon can enter a home or other structure through cracks and openings in the foundation. The potential for elevated indoor radon levels is of concern because of the risk of lung cancer from breathing concentrations of radon gas. According to the USEPA, Riverside County is within a Radon Zone Level of 2. Properties within Zone 2 have average concentrations of radon in indoor air greater than 2 picocuries per liter (pCi/L) of air and below 4 pCi/L of indoor air, which is below the USEPA action level of 4 pCi/L of indoor air. Based on this information, it appears unlikely that structures built on the site would experience average concentrations of radon in indoor air greater than the USEPA action level of 4 pCi/L. Also, no unusual smells, odors, or visual emissions were noted during the inspection of the subject property.

Numerous debris piles have been dumped near the northern portion of the property; however, no obvious evidence of substantive hazardous material dumping was noted in the visible areas in and around these trash piles.

No visual or physical evidence of discolored soil or water, stressed vegetation, hazardous materials, aboveground storage tanks (ASTs), underground storage tanks (USTs), pits, ponds, or lagoons were discovered at the subject property or in the immediate vicinity. Furthermore, none of the adjoining properties appear to have environmentally impacted the subject property.

A vehicle fueling facility is proposed in the northwest portion of the project site, just south of Komar Building Envelope Area 3. The fueling station will operate four dispenser islands with two double-sided gasoline dispensers on each island. The station will also contain three 30,000-gallon capacity USTs made of fiberglass due to its corrosion resistance and plasticity. Other hazardous materials to be used on the project site will be limited to containers (1 to 5 gallon size) of degreasers and cleaning chemicals for building maintenance. In general, the containers will be stored in a storage room inside the main Costco Wholesale building. Products for sale will include small quantities of motor oil, degreasers, and cleaning chemicals. These products will be stored either on pallets in the delivery area or stocked on shelves within the main Costco Wholesale building.

Potential impacts could result from a spill or overfilling, leaking or rupture of an UST system (dispenser, piping, and tanks), and spillage from an accidental event (i.e., delivery truck or vehicle collision, etc.). Gasoline products are potential fire and explosion hazards and the uses on and adjacent to the site would be exposed to these potential hazards. The severity of the impact would depend on the size of the fire or explosion, the public directly exposed to the incident, and response time and effectiveness to control or contain the fire.

Potential impacts to the environment may also result from surface spills and underground releases. If a major spill or release were not contained and controlled, it would flow to the open La Quinta Evacuation Channel approximately 750 feet southeast of the fuel facility. If unconfined, the spilled fuel would eventually reach Whitewater River and eventually the Salton Sea. The storm drainage system for the fueling facility area will be designed in accordance with City and water and sewer district standards. Stormwater will be directed to a series of catch basins and processed through an oil/water separator prior to discharge to the downstream system. Potential impacts to groundwater could occur if a leak or major spill went undetected and was able to migrate through the soil to reach the water table.

Uses around the proposed fuel station that could be affected by a release or major accident at the site include two proposed retail stores located approximately 40 feet to the north and 170 feet to the east. The Costco Wholesale proposed in this project would be approximately 280 feet to the south. A water well located in the southeastern ¼ of the southwestern ¼ of Section 29, Township 5 South, Range 7 East, approximately ½ mile southwest of the site, recorded a 2003 average depth to water of 176.7 feet below
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ground surface (bgs). The gradient of first-encountered groundwater in the vicinity of the site is anticipated to have a southeastern flow direction (CTL 2005).

4.5.3 Cumulative Impacts

The simultaneous development of the Proposed Project and related projects would not result in cumulatively significant impacts since all development in the vicinity would be subject to the same local, regional, state, and federal regulations pertaining to hazards and hazardous materials. Compliance with hazardous materials regulations and implementation of mitigation measures for all facilities will reduce cumulative project impacts to less than significant levels. Therefore, no significant cumulative impacts associated with hazardous materials are identified for the Proposed Project, and no mitigation is necessary.

4.5.4 Regulatory Requirements

Hazardous materials management is subject to numerous laws and regulations at all level of government. Additionally drinking water standards for hazardous materials are mandated by both federal and state agencies.

Federal Policies and Regulations

The EPA regulates the management of hazardous materials and wastes. The primary federal hazardous materials and waste laws are contained in RCRA, the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), and the Toxic Substances Control Act (TSCA). These laws apply to hazardous waste management, soil and groundwater contamination, and the controlled use of particular chemicals.

State Policies and Regulations

In California, EPA has delegated most of its regulatory responsibilities to the state. TSCA allows EPA to ban (or phase out) the use of chemicals that may present unreasonable risks to public health or the environment.

The state agencies most involved in enforcing public health and safety laws and regulations include the Cal-EPA DTSC, the Cal-OSHA, the San Diego RWQCB, and the California Integrated Waste Management Board.

DTSC enforces hazardous materials and waste regulations in California under the authority of EPA. California's Hazardous Waste Control Law incorporates the federal hazardous materials and waste standards of RCRA, but California's regulations are stricter in many respects.

In California, Cal-OSHA assumes primary responsibility for enforcing worker safety regulations such as the federal Hazard Communication Program regulations. Cal-OSHA regulations are found in the CCR Title 8. Although Cal-OSHA regulations have incorporated federal OSHA standards, Cal-OSHA regulations are generally more stringent than those of the federal government.

California UST regulations (CCR Title 23, Division 3, Chapter 16) set forth requirements for design, construction, testing, and monitoring of UST systems. Over the past 12 years, new engineering standards for UST installation and operation have been developed to reduce the degree of impact from gasoline product releases to the environment (i.e., secondary containment and control systems). The UST regulations are intended to protect the waters of the state from discharges of hazardous substances (i.e., gasoline). These regulations establish construction requirements for new UST facilities; establish monitoring requirements, establish uniform requirements for unauthorized release reporting, and for repair, upgrade and closure. State and federal regulatory agencies involved in the regulation of USTs
include the California Accidental Release Program (Risk Management Plan), SWRCB, California EPA, and the U.S. EPA.

In addition, the following regulations and agencies require specific permits or approvals to construct gasoline facilities:

- EPA Underground Storage Tank Regulations (Subpart D, 40 CFR Part 280)
- Underwriters Laboratories, Inc. (UL)
- National Fire Protection Agency (NFPA) Article 30, regarding Flammable and Combustible Liquids Code
- American Petroleum Institute (API) Recommended Practices for Installation of Underground Storage Systems
- City Fire Marshall UST Permit approval
- Local Air Quality District Authority to Construct approval

Local Policies and Regulations

The Federal and State Clean Air Acts are enforced locally by the Riverside County Air Pollution Control District (APCD). The APCD regulates potential discharges of criteria air pollutants (including organic compounds that contribute to ozone formation) and toxic air contaminants. The Uniform Fire Code addresses the standards for using and containing flammable/combustible/hazardous materials. Article 52 of the Fire Code lists the requirements for dispensing gasoline into automobiles and Article 79 list the containment requirements. The UBC lists the standards for grading, excavation, electrical, pumping, and other building related issues.

The Riverside County Department of Environmental Health Hazardous Materials Management Division will perform review of the underground gasoline storage tanks, product piping, dispensers, and monitoring system for the project. The Department of Environmental Health is the CUPA for this area; therefore, it will process all California-required UST and Facility Permits to Construct and Operate. The Department will be responsible for issuing the Authority to Construct and Permit to Operate.

The County of Riverside Department of Environmental Health is the lead-overseeing agency for fuel service facilities within the City of La Quinta. The County inspectors will verify that the installation and operation of the USTs are in compliance with the following codes, regulations, and requirements:

- Uniform Fire and Building Code (Revised California Fire Code 2001)
- Title 23, CCR, Chapter 16 (June, 2001)
- California Air Resources Board Regulations (Gasoline Vapor Recovery System Certification and Test Procedures)
- APCD High Through-Put Facility Health Risk Assessment

To meet the requirements of the above-listed federal, state, and local regulations, the project applicants shall incorporate the following BMPs and project design features (PDFs):
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- Incorporate dust suppression measures to minimize exposure to potential pesticides.
- Dispose of all trash, debris, stockpiled agricultural materials, equipment, and site improvements offsite in accordance with the current local, state, and federal disposal regulations.
- Evaluate any petroleum contaminated materials as well as buried trash and debris encountered during grading prior to removal and disposal following proper procedures.
- Incorporate the following BMPs to comply with recent changes to the California State Water Quality Guidelines:
  - The fuel dispensing area must be covered with an overhanging canopy. The canopy's minimum dimensions must be equal to or greater than the area within the grade break. The canopy must not drain onto the fuel dispensing area and the canopy downspouts must be routed to prevent drainage across the fueling area.
  - The fuel dispensing area must be paved with Portland cement concrete (or equivalent) and the use of asphalt concrete shall be prohibited.
  - The fuel dispensing area must have a 2- to 4-percent slope to prevent ponding and must be separated from the rest of the site by a grade break that prevents run-on of storm water to the extent practicable.
  - At a minimum, the concrete fuel dispensing area must extend 6.5 feet from the corner of each fuel dispenser or the length at which the hose and nozzle assembly may be operated plus 1 foot, whichever is less.
  - The City will also require the use of BMPs for spill cleanup of the undercanopy and tank fill locations and for protection of storm water systems from contamination. This includes small spill cleanup by means of a spill containment kit or other acceptable dry cleanup products and directing undercanopy storm water through an oil/water separator. After water quality treatment on-site, storm water from the overall development may be released to the public storm water system. Costco Wholesale's standard fueling facility storm water system design will be appropriate for this project.

In addition, the system proposed is certified to meet the federal UST leak detection standards of 95 percent probability of detection and 5 percent probability of false alarm. California State Water Resources Control Board also certifies the system under LG-113. Furthermore, employees will be trained in the proper procedures for spill clean up and emergency response. A more detailed description of the operational and design features of the proposed fuel facility and UST is included in Appendix F.

4.5.5 Level of Significance Before Mitigation

Potential impacts could result from a spill or overfilling, leaking, or rupture of an UST system, spillage from an accidental event, or surface spills and underground releases. However, prior to authorization or start of construction of the Proposed Project, the project applicant shall prepare a Spill Prevention and Contingency Plan (SP&CP) to prevent runoff of potential petroleum product spills. This Plan will be submitted for review and approval of the appropriate jurisdictional agency and all construction crew members shall be trained in the requirements of the SP&CP. The Plan will include information on storage of hazardous materials, emergency response procedures, employee training requirements, fire safety, first-aid procedures, hazardous materials release containment/control procedures, and release reporting requirements. Additional special precautions would be taken during construction close to water bodies (flood control channel) to avoid accidental spills and contamination of water resources (see Section 4.9, Water Quality for more details). With the implementation of the PDFs listed above, impacts resulting from construction and operation of the Proposed Project would be less than significant.
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In order to operate the fueling facility, Costco Wholesale will have to meet the requirements of all applicable local, state, and federal regulations. Because these standards are in place, the Proposed Project is not anticipated to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Furthermore, there are no foreseeable upset and accident conditions that would involve the release of hazardous materials into the environment.

The Proposed Project would not create a significant hazard to the public or the environment because the Proposed Project site is not located on any hazardous materials site as designated by Government Code Section 65962.5. Also, the Proposed Project is not located within 0.25 mile of an existing or proposed school; therefore, the construction and operation of the project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within an existing or proposed school zone.

The Proposed Project is not located within an airport land use plan or within two miles of a public airport. Therefore, construction and operation of the project would not result in a safety hazard for people residing or working in the project area. The Proposed Project is also not located within the vicinity of a private airstrip and would not result in any associated safety hazard for people residing or working in the project area.

Construction and operation of the Proposed Project will not impair or interfere with implementation of any adopted emergency response plan or emergency evacuation plan. In addition, the County of Riverside General Plan designates the area surrounding the Proposed Project as low for wildfire susceptibility. Accordingly, construction and operation of the Proposed Project would not expose people or structure to a significant risk of loss, injury, or death involving wildland fires.

Costco Wholesale has met or exceeded all the standards and requirements outlined above for the Proposed Project. Moreover, implementation of the Proposed Project would not exceed any of the identified CEQA Guidelines (Appendix G(I)) significance criteria which identify the criteria that establish a significant impact. Therefore, the Proposed Project’s impacts to hazardous materials resulting from the construction and operation of the proposed commercial development would be less than significant.

4.5.6 Environmental Mitigation Measures

No significant impacts are anticipated for the Proposed Project; therefore, no mitigation measures pertaining to hazardous materials are required.

4.5.7 Level of Significance After Mitigation

Project-specific and cumulative impacts to hazardous materials will be less than significant.
4.0 Environmental Impact Analysis

4.6 HYDROLOGY

The following reports have been prepared to analyze the impact the Proposed Project will have on hydrology and are included in their entirety in Appendix G of this Draft EIR:


4.6.1 Environmental Setting

The CVWD has an existing stormwater drainage system in the City of La Quinta. More than 200 miles of stormwater protection and management facilities have been developed within the CVWD, including the Coachella Valley Stormwater Channel, the La Quinta Evacuation Channel, and a system of storm drainage retention and detention basins. These facilities are designed to accommodate and direct regional stormwater flows safely through the City of La Quinta and into the Whitewater River (Figure 4.6-1). The City’s drainage system currently consists of a network of recently retrofitted storm drains within the rights-of-way of streets, ranging from 18 to 60 inches in diameter. In addition, the City maintains six all-weather bridge crossings within the city limits. Since its incorporation, the City has required that new development construct on-site retention and/or detention basins capable of managing 100-year stormwater flows. Development that is immediately adjacent to the Coachella Valley Stormwater Channel has the option of conveying runoff directly into this facility.

Furthermore, the City’s Municipal Code includes provisions on retaining polluted water to reduce pollutants to the maximum extent practicable (Chapter 8.70, Stormwater Management and Discharge Controls). These provisions include standards and guidelines that shall be used to control and minimize the volume and rate of stormwater runoff from project sites to prevent deterioration of water quality. The following specific regulatory requirements are applicable to the Proposed Project.

Surface water drainage across the ungraded site is predominantly towards the south facing local topography via sheet flow. Portions of the site are currently situated within Zone X, a 500-year flood hazard zone or 100 year flood hazard zone that is protected by levee improvements (FEMA 2005). The 100-year zone is confined to the La Quinta Evacuation Channel located immediately adjacent to the southern boundary of the site (Figure 4.6-2).

Conceptual hydraulic analysis of the site suggests 100-year event flows presently estimated at 21 to 36 cubic feet per second (cfs) for the unimproved site, and up to 68 cfs for the developed site.

4.6.2 Project Impacts

4.6.2.1 Thresholds of Significance

According to CEQA Guidelines Appendix G (VIII), a significant hydrology and/or drainage impact would be identified if the project was determined to result in any of the following:

- Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on or off-site and/or a substantial increase in the rate or amount of surface runoff in a manner that would result in flooding on or off-site.
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- Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.
- Place within a 100-year flood hazard areas structures that would impede or redirect flood flows.
- Expose people or structures to a significant risk of loss, injury, or death involving flooding (including flooding as a result of the failure of a levee or dam) or inundation by seiche, tsunami, or mudflow.
- Result in a substantial and adverse increase in inundation, sedimentation, and/or damage from water forces to the subject property or downstream areas.

4.6.2.2 Environmental Impacts

The Proposed Project site development will increase the amount of impervious pavement and building surfaces, which will result in runoff volume and velocity; reduced infiltration; increased flow frequency, duration, and peaks; faster time to reach peak flow; and water quality degradation. The onsite drainage system, as described below, is designed to accommodate the 100-year flows from the Proposed Project site.

The drainage plan (Figure 4.6-3) identifies the conceptual on-site and off-site drainage for the Proposed Project. The Conceptual Hydrology/Hydraulic Report prepared by Fuscoe Engineering (Appendix G) states that the CVWD, as owners of the La Quinta Evacuation Channel, will allow the project site storm drain system to ultimately outlet into the Channel because it has enough capacity to handle the flow without flooding. Conceptual hydraulic analysis of the Proposed Project Site suggests the post construction 100-year event flows leave the site at flow rates ranging from 40 to 68 cfs. Surface runoff from the parking areas and structures within the Proposed Project site will be directed into a properly sized storm drain collection system and in turn into a hydrodynamic separation device (CDS, or continuous deflection separation unit) to remove pollutants typically associated with parking lots prior to release into the La Quinta Evacuation Channel.

Based upon the treatment requirements specified in the Riverside County Regional DAMP, the site is required to be able to treat 2.9 cfs of storm water runoff. The planned treatment design capacity of the CDS unit is proposed to treat 6 cfs. Approximately 8.7 percent of the site will be landscaped with native and/or drought tolerant plants, thereby minimizing urban runoff and preserving permeable capacity.

The Proposed Project site drainage system is designed to carry the stormwater flows into the on-site drainage system, and then discharge the stormwater from the site into the Channel at a single location.

4.6.3 Cumulative Impacts

The cumulative total of all related project development in the City of La Quinta, including the Sam's Club, Jefferson Plaza, the Pavilion, and La Quinta Corporate Center developments as identified in Table 3.5-1, creates the potential to impact hydrology, as the development of these projects represents and increase in the amount of impervious surfaces. According to the City’s General Plan Environmental Hazards Element, future development that is not adjacent to the La Quinta Evacuation Channel is required to construct onsite retention/detention basins as well as other necessary stormwater management facilities in order to adequately manage 100-year stormwater flows. Future development immediately adjacent to the La Quinta Evacuation Channel has the option, instead of onsite retention, to discharge these flows directly into the Channel. The cumulative projects considered in this analysis are required to adhere to the

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This is based upon a rainfall intensity of 0.2 inches of rainfall per hour for each hour of a storm event as determined from local historic rainfall data.
requirements of the General Plan and CVWD. With adherence to the General Plan and CVWD approval, there will be no cumulative impacts to hydrology since it has been calculated that runoff from projects adjacent to the La Quinta Evacuation Channel will not exceed the flood carrying capacity of the channel, and a less than significant impact is identified.

### 4.6.4 Regulatory Requirements

The following regulatory requirement applies to the Proposed Project, but is not necessarily all-inclusive:

- **Federal Emergency Management Agency (FEMA) Letter of Map Revision** – A Conditional Letter of Map Revision (LOMR) shall be obtained prior to any map recordation. The Conditional LOMR shall show that all structures will be eligible for removal from existing Flood Zone A to a Zone X. The project applicant shall be bonded until all structures are officially removed from the Flood Zone A designation by FEMA. The final LOMR shall be obtained prior to final inspection that all structures have been officially removed from Flood Zone A and placed in Zone X.

In order to meet the requirements of the above-listed regulation, the project applicant shall provide required studies, calculations, plans and other information required to meet the FEMA requirements, and shall obtain a LOMR prior to issuance of the first building permit. In addition, the project applicant shall construct all on-site drainage facilities, including storm drain improvements, and hydrodynamic separator devices, to be in compliance with all applicable plans and policies.

### 4.6.5 Level of Significance Before Mitigation

As identified above, the 100-year zone is confined to the La Quinta Evacuation Channel located adjacent to the southeastern boundary of the Proposed Project site. Development of the Proposed Project is not a significant impact because the Proposed Project would not place structures within the 100-year flood zone. With no structures in the 100-year flood zone, flood flow is not restricted by the Proposed Project. Project development will cause minor alteration of the existing drainage pattern in the area; however, the proposed improvements are consistent with the objectives and requirements for reducing the potential for flooding of the Proposed Project site. Therefore, impacts are not significant. With the proposed improvements, the Proposed Project would not create or contribute on- or off-site runoff water that would exceed the capacity of the planned storm water drainage system. Furthermore, the site storm drain system will be designed to convey such storm events without impact to the constructed environment. On-site and off-site runoff will be controlled and will not subject on-site or downstream uses to sedimentation or damage from water forces. Therefore, impacts are less than significant.

The proposed on-site drainage system has the capacity to carry the anticipated storm flows to the La Quinta Evacuation Channel. Therefore, the project would not expose people or structures to an increased flooding risk as a result of the project.

### 4.6.6 Environmental Mitigation Measures

No significant impacts are anticipated for the Proposed Project; therefore, no mitigation measures pertaining to hydrology are required.

### 4.6.6 Level of Significance After Mitigation

Project-specific and cumulative impacts to both on- and off-site hydrology and drainage will be less than significant.
4.0 Environmental Impact Analysis

4.7 LAND USE AND PLANNING

4.7.1 Environmental Setting

4.7.1.1 Applicable Plans

The following plans were considered for analysis in this Draft EIR because they have potential jurisdiction over the Proposed Project. After consideration it was found that not all the plans are applicable, as detailed in the paragraphs below.

**County of Riverside – Riverside County Integrated Project (RCIP)**

The RCIP was initiated in 1998 to comprehensively update the County’s General Plan. The RCIP is comprised of the CETAP, a MSHCP, currently for western Riverside County only, and the Riverside County General Plan update. The RCIP, County of Riverside General Plan text, was adopted October 7, 2003.

The RCIP governs only the unincorporated areas of the County. Regional planning programs, including the Draft Coachella Valley MSHCP/NCCP (Draft Plan) program may, however, be relevant to incorporated portions of the County, including the City of La Quinta. The Draft Coachella Valley MSHCP/NCCP is a region-wide program for habitat conservation. Additional information on the Draft Plan and its relationship with the Proposed Project is provided in Section 4.2, Biological Resources of this Draft EIR.

**Southern California Association of Governments (SCAG) – Regional Comprehensive Plan and Guide (RCPG)**

SCAG is designated by the federal government as the Southern California region’s Metropolitan Planning Organization (MPO) and Regional Transportation Planning Agency (RTPA). SCAG addresses regional planning concerns through various documents, including the 1996 RCPG. The RCPG is “intended to serve the region as a framework for decision making with respect to the growth and changes that can be anticipated during the next 20 years and beyond.” Core chapters of the RCPG that respond to federal and state planning requirements include: Growth Management, Regional Transportation Plan, Air Quality, Hazardous Waste Management, and Water Quality. Ancillary chapters are those on Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Solid Waste Management. The City of La Quinta Comprehensive General Plan complies with the RCPG.

**City of La Quinta – Comprehensive General Plan**

The City of La Quinta General Plan was adopted in March 2002. Figure 4.7-1, General Plan Designations, shows the adopted land use for properties within the City’s boundary. The General Plan “is the foundation upon which all land use decisions are to be based. The Plan is a comprehensive information and planning guide established by State law to provide a framework for making informed decisions about the future of the Community”. The adopted General Plan governs the land use for the project site and also establishes general development standards and guidelines, including goals, objectives, policies, and specific implementation mechanisms for guiding future development.

**City of La Quinta – Zoning Code**

The City of La Quinta Planning and Zoning Code is contained in Chapter 9 of the City’s Municipal Code. It contains more detailed regulations regarding the development standards and land uses for the project site than those contained in the General Plan.
4.0 Environmental Impact Analysis

City of La Quinta – 2005-2006 Economic Development Plan

The City of La Quinta 2005-2006 Economic Development Plan was adopted April 19, 2005. The Economic Development Plan “outlines a vision and direction for the City’s economic development activities. It presents the mission statement, implementation policies, projected resources, and business plan the City will follow to sustain a comprehensive economic development effort.” The Economic Development Plan guides the goals for the type of development desired for the project site.

City of Indio – Comprehensive General Plan

The City of Indio General Plan was adopted in 2004. Figure 4.1-7, General Plan Designations, shows the adopted land use for properties within the City of Indio’s boundaries. The adopted General Plan governs the land use for the properties in the City of Indio adjacent to the project site. The adjacent parcels are designated as Mixed Use, and require a Specific Plan. The City of Indio has adopted Mixed Use Specific Plan 300 (MUSP 300) for the adjacent parcels. MUSP 300 permits the adjacent parcels to be developed using a combination of six land uses that will be applied to create development which provides for a transition from higher intensity commercial uses to more traditional residential developments. The land uses adopted in MUSP 300 include:

- Residential Medium (RM) – allows for a range of detached single-family units and attached low intensity multi-family residential units.
- Residential High (RH) – permits multi-family developments of condominiums, and single-family attached town home units.
- Neighborhood Commercial (NC) – provides for convenient small scale shopping and personal service uses in close proximity to residential neighborhoods.
- Community Commercial (CC) – provides for general merchandising and retailing establishments that serve the needs of the City’s residents.
- Commercial Office (CO) – promotes the development of professional offices and directly related commercial services.
- Regional Commercial (RC) – intended to provide for the development of large, full service retail and commercial centers.

4.7.1.2 Existing Land Uses

The 26.37-acre project site is currently vacant, and has been vacant in recent history. The Proposed Project is bounded by State Highway 111 (Highway 111) to the north, the City of Indio to the east, the La Quinta Evacuation Channel to the southeast, on the southern boundary by parcels designated as Major Community Facilities uses, and on the west by undeveloped property zoned for commercial and residential uses. The southern parcel of the Proposed Project site is designated as the Commercial Park (CP) land use category in the General Plan; the northern parcels of the project site are designated for Regional Commercial (CR) land use. Surrounding land uses are depicted on Figure 4.7-1.
4.7.2 Project Impacts

4.7.2.1 Thresholds of Significance

Implementation of the Proposed Project would result in a significant land use impact, as defined in Appendix G (IX) of the CEQA Guidelines, if any of the following occur:

- Physical division of an established community
- A conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- A conflict with any applicable habitat conservation plan or natural community conservation plan.

4.7.2.2 Environmental Impacts

Physical Division of an Established Community

The Proposed Project would build a commercial development between two vacant parcels to the east and west, which are also both zoned for commercial development. Additionally, the project is bounded on the north by Highway 111, a major arterial and commercial development. Finally, the headquarters of the Desert Sands Unified School District is located to the south, and is designated with a land use of major community facilities. The Proposed Project would not cause one part of a community to be separated from another part of a community, as it is surrounded on three sides by commercial land use designations and on the fourth by the major community facilities designation. Therefore, the Proposed Project does not create a division in an established community.

Consistency with Applicable Land Use and Habitat Conservation Plans

Riverside County Integrated Project (RCIP)

Information on the RCIP has been provided for the regional context for surrounding land uses out of the jurisdiction of the City of La Quinta Comprehensive General Plan. The RCIP does not govern land use for the project site. Therefore, there is no land use inconsistency with the RCIP.

Regional Comprehensive Plan and Guide (RCPG)

Information on the RCPG has been provided for the regional context for growth management, the Regional Transportation Plan, air quality, hazardous waste management, and water quality. The RCPG does not govern land use for the project site; however the City of La Quinta Comprehensive General Plan is required to comply and is in compliance with the RCPG.

City of La Quinta – Comprehensive General Plan Land Use Element

The General Plan designates the Costco Wholesale parcel as Commercial Park (CP). The Komar parcels have a General Plan land use designation of Regional Commercial (CR). The Costco Wholesale and the Komar development projects are consistent with General Plan Commercial Goal 1 which states:

"The City strives for... "A balanced and varied economic base which provides a broad range of goods and services to the City's residents and the region."

Additionally, the development project is consistent with the General Plan Commercial Policy 1, which states:

"The City’s commercial land use designations shall allow a full range of retail, office, resort, and institutional businesses in the City."
4.0 Environmental Impact Analysis

The General Plan states the Commercial Park Land Use purpose as:

"The typical land uses under this designation are office and light industrial; warehousing and storage, office/warehouse combined uses, high technology light manufacturing and automobile repair."

The General Plan states the Regional Commercial Land Use purpose as:

"This land use designation supports major commercial land uses. These land uses serve not only the City, but neighboring jurisdictions as well. Land uses typical of this designation include...major department and specialty stores, supermarkets and drug stores...Smaller commercial retail facilities which support and are complementary to the primary land uses in this category are also permitted. These would include but not be limited to restaurants, services, and some automobile service related land uses. A Specific Plan is required for all lands under this designation."

The Proposed Project is consistent with the City of La Quinta General Plan.

City of La Quinta Zoning Code

The City of La Quinta Zoning Code, section 9.70.030, states that the purpose and intent of the Regional Commercial district is “[to] provide for the development and regulation of regionally oriented commercial areas located along the Highway 111 corridor, as shown on the General Plan.” In Section 9.70.040, the purpose of the Commercial Park District is “[to] provide for the development and regulation of heavy commercial and like industrial uses located within the Highway 111 corridor as shown on the General Plan.” Pursuant to Section 9.080.040, Table 801, retail stores over 50,000 square feet are conditionally permitted in both districts. The land uses within the Proposed Project are consistent with the applicable zoning provision in the La Quinta Municipal Code.

City of La Quinta – 2005-2006 Economic Development Plan

The Economic Development Plan lists many goals that directly relate to the development of the project site. Those include:

"The City must continue to enlarge the City’s revenue base in order to enhance and expand the quality of municipal services La Quinta residents expect."

The Economic Development Plan also details strategies and tasks to stimulate private investment in La Quinta, including:

"Attracting companies that employ the area’s diverse population on a year-round basis is a priority of the City and the Coachella Valley Economic Partnership."

"The diversity of the workforce in La Quinta and surrounding community enables businesses of all types to locate in La Quinta and staff operations with individuals who are appropriately skilled for the specific job."

"La Quinta is located near a federal Empowerment Zone and a state Enterprise Zone, both of which have tax benefits for area businesses."

The development potential of Retail Real Estate is discussed, including the following:

"The real estate development principle of “retail follows rooftops” definitely applies in La Quinta. In 1982, there was very limited retail activity in the city, but by 2001, there was almost 1.5 million square feet of commercial space generating $334 million in taxable sales. However, there is still opportunity for more retail expansion in La Quinta, as total retail sales are projected to reach $405 million per year by 2005 and $620..."
4.0 Environmental Impact Analysis

million per year by 2010. This sales growth will require an additional 192,000 to 233,000 square feet of retail/commercial real estate per year between now and 2010, which can be broken down as follows:

- Regional retail – 115,000 to 140,000 square feet GFA per year.
- Community retail – 58,000 to 70,000 square feet GFA per year.
- Neighborhood retail – 19,000 to 23,000 square feet GFA per year.

The mission statement of the Economic Development Effort in the City of La Quinta reads as follows:

“...to proactively recruit quality revenue-generating uses that diversify and expand the City’s economic base, offer a variety of products and services, increase employment opportunities, enhance City/Agency fiscal resources, preserve and enhance La Quinta’s unique environment, and contribute to the quality of life for La Quinta residents.”

The City lists several implementation policies for reaching the goals specified in the Economic Development Plan, which includes:

“In order to enhance commercial opportunities the City will work to secure a major retail anchor for the east end of the [Highway 111] corridor. In doing so this corridor will have major demand generating anchors located in corridor’s west, middle, and eastern sectors.”

The development of a Costco Wholesale, as well as supporting retail shops and restaurants would offer a variety of goods and services to the residents of the City of La Quinta and the surrounding communities. These goods and services would offer an increased variety of products to choose from, and would be conveniently located. Additionally, the Costco Wholesale is expected to employ up to 125 persons per shift. The number of employment opportunities will rise when considering the entire Komar Desert Center; however it is impossible to quantify a total number without knowing the tenants. The City of La Quinta General Plan contains general, guiding principles for the types of land uses and development that the City has targeted. The Economic Development Plan contains information about how the goals for economic development will be reached. The La Quinta Municipal Code contains regulatory requirement that determine and define what type of development will occur and how a development in the City may be implemented and built. Based on all these factors, the development of Komar Desert Center is consistent with and furthers the goals and policies of the City of La Quinta General Plan Land Use Element, as well as the City’s 2005-2006 Economic Development Plan. As stated above, the land uses within the Proposed Project are consistent with the zoning provisions of the City’s Municipal Code.

Land Use Compatibility

The overall extent to which a Proposed Project will be compatible with adjacent land uses will be a combination of specific environmental impacts, including air quality, noise, traffic, and visual, as well as the nature of the surrounding land uses and land use designations, and their proximity to the Proposed Project. Air quality impacts are analyzed in Section 4.1 of this Draft EIR and it is determined that air quality impacts during construction cannot be mitigated to a less than significant level, and will result in unavoidable, adverse impacts during project construction. Additionally, it was determined that operational, long-term air pollutant emissions for CO are projected to exceed the SCAQMD significance threshold in both 2007 and 2010. Consequently, it appears that regional operational emissions associated with the Proposed Project would result in significant air quality impacts for the operational phase; however, a micro-scale analysis further evaluated CO impacts generated by the Proposed Project and resulted in a determination that CO impacts are individually and cumulatively less than significant for the year 2007. The minor exceedance of the SCAQMD threshold in 2010 will remain significant. The
Proposed Project would significantly impact air quality during the operational phase because it will violate the SCAQMD significance threshold. Noise impacts are analyzed in Section 4.8, and it is determined that there will be no significant impacts. Traffic and Transportation Impacts are analyzed in Section 4.10. It is determined that traffic impacts cannot be mitigated to a less than significant level and will result in unavoidable, adverse impacts upon project implementation. Visual impacts are analyzed in Section 4.11, and it is determined that there will be no significant impacts.

The General Plan states that “the City has traditionally utilized the planning tools available in Specific Plans to encourage careful siting and land use compatibility within a project.” In addition, “Land use compatibility throughout the City, its sphere of influence, Planning Area No. 1 and Planning Area No. 2” is the first goal stated in the Land Use Element of the General Plan. Consistent with the General Plan Regional Commercial Land Use provision, a Specific Plan has been created for the Proposed Project. The Proposed Project is compatible with the Land Use Plan for the area, as designated in the General Plan.

Following is a brief discussion of land use compatibility with specific land uses proximate to the proposed development area.

Regional Commercial

The properties to the north of the project site, across Highway 111, are Regional Commercial. Additionally, some of the parcels to the east of the Proposed Project site are designated as Regional Commercial use. These parcels are only partially developed, however, it is anticipated that at General Plan buildout these areas would be developed in accordance with their full land use potential. Since the parcels to the north of the project are designated as the same land use as part of the Proposed Project, they are compatible with the Proposed Project.

Commercial Park

The adjacent northern property to the west of the Proposed Project site is designated as Commercial Park. This parcel is currently vacant. Since the vacant parcel is designated as the same land use as the Proposed Project, it is compatible with the Proposed Project.

City of Indio

The eastern boundary of the project abuts the City of Indio. The parcel adjacent to the Proposed Project in the City of Indio is zoned as mixed use and requires a Specific Plan. A Specific Plan for the adjacent site has been prepared and adopted by the City of Indio. The Specific Plan proposes commercial development that transitions to medium and high density residential development on the adjacent parcels. Because the development of that parcel would result in a commercial use being located next to another commercial use, the land uses are compatible. The parcel that is adjacent to the Proposed Project is currently undeveloped.

Medium Density Residential

The project is bounded on the southeast by the La Quinta Evacuation Channel, which is owned by the Coachella Valley Water District. The property on the other side of the channel is designated as Medium Density Residential (MDR). These parcels are currently developed. The Medium Density Residential designation “allows the development of single family attached and detached units on smaller lots. The clustering of smaller housing units, including condominiums and town homes, may be appropriate in this designation, with the provision of common area amenities and open space, when governed by a Specific Plan.” The residents of the Medium Density Residential parcels would be served by the proposed Costco Wholesale and Komar development. The closest residence to the project site is approximately 350 feet to the southeast.
4.0 Environmental Impact Analysis

The noise impacts of the Proposed Project are analyzed in Section 4.8. The nearest residential developments are at the outer edge of any construction noise envelope and are additionally shielded by solid perimeter walls that create an additional 6-8 dB of noise attenuation. Construction noise will be confined to the daytime hours of lesser noise sensitivity, and will comply with the City’s noise ordinance. These residences have a substantial distance separation between on-site sources when considering operational noise standards. It is expected that these uses will not be affected by commercial support activities, as the daytime noise standard of 60 dB is met within 50 feet and the nocturnal standard of 50 dB would be met within 170 feet under clear line of sight conditions.

The visual impacts of the Proposed Project are analyzed in Section 4.11. The Medium Density Residential development would have direct northerly views of the proposed commercial site. However, due to the combination of the distance from the project site and the La Quinta Evacuation Channel acting as a physical buffer, it has been determined in that no significant visual impacts would occur to the MDR development.

Air quality impacts and traffic and transportation impacts are analyzed in Sections 4.1 and 4.10 respectively. Although it has been determined that air quality impacts would be significant during construction and operation, and that traffic impacts would be significant during operation, these significant impacts will not affect the residents of the Medium Density Residential land uses. Since the residents are located at least 350 feet away, the air quality impacts will be less than significant. In addition, the traffic represents an indirect and less than significant impact, as no direct traffic conflicts will arise for the residents as a result of this project.

Major Community Facilities

The property to the south and southwest of the Proposed Project is designated as Major Community Facilities. The parcels to the south and southwest of the project are currently developed, and are the location of the Desert Sands Unified School District Headquarters. The Major Community Facilities designation is “applied to existing or planned municipal, educational, non-profit, and/or religious organizations, or public service facilities. Typical land uses within this designation include civic centers and other governmental offices, fire stations, schools, facilities for non-profit organizations, and utility sub-stations.” These uses are compatible with the Proposed Project.

The project site is bounded by Highway 111 on the north. Highway 111 is a major road in the City of La Quinta, and the land uses along it have been designated as different types of Commercial uses. The Proposed Project represents a compatible land use with the transportation corridor to the north.

Draft Coachella Valley Multiple Species Habitat Conservation Plan/Natural Community Conservation Plan (MSCHP/NCCP)

The public review and comment period for the Draft Coachella Valley MSHCP/NCCP closed on March 7, 2005. At present, the Draft Coachella Valley MSHCP has not been finalized. As such, the Proposed Project would not be subject to the guidelines of the Coachella Valley MSHCP/NCCP and impacts to sensitive plant and wildlife species would be analyzed under CEQA. However, the project is consistent with the draft provisions of the Coachella Valley MSHCP/NCCP, and does not fall within a protected conservation area of the draft plan.

4.7.3 Cumulative Impacts

The Proposed Project is consistent with the adjacent land uses surrounding the project site and with the developing character of the City of La Quinta. The Proposed Project will result in additional urban intensity for the project area and in conjunction with surrounding, developing areas.
4.0 Environmental Impact Analysis

Four other projects are under consideration for cumulative impacts, and include the Sam’s Club, Jefferson Plaza, the Pavilion, and La Quinta Corporate Center developments. These are identified in Table 3.5-1, which includes a description of each project, as well as development status. The surrounding land uses for each of the cumulative projects are detailed in Table 4.7-1.

Table 4.7-1. Cumulative Projects Surrounding Land Uses

<table>
<thead>
<tr>
<th>Project</th>
<th>Land Use</th>
<th>Surrounding Land Uses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sam’s Club</td>
<td>Regional Commercial</td>
<td>Regional Commercial</td>
</tr>
<tr>
<td>Jefferson Plaza (Home Depot –</td>
<td>Neighborhood Commercial, Regional</td>
<td>Regional Commercial, Water</td>
</tr>
<tr>
<td>Phase II)</td>
<td>Commercial</td>
<td></td>
</tr>
<tr>
<td>The Pavilion</td>
<td>Regional Commercial</td>
<td>Regional Commercial, Community Commercial</td>
</tr>
<tr>
<td>La Quinta Corporate Center</td>
<td>Regional Commercial, Community Commercial</td>
<td>Regional Commercial, Community Commercial, Water</td>
</tr>
</tbody>
</table>

The construction of the projects being considered for cumulative impacts would not create a division in any established communities. All of the projects are surrounded by similar land uses, and would increase the services for existing residents of the City of La Quinta and surrounding areas. The cumulative analysis projects would not result in the physical division of an established community.

The projects being considered for cumulative analysis are all compatible with their General Plan land use designations as shown in Table 4.7-1, and with the goals listed for those designations. The construction and operation of the cumulative analysis projects would not conflict with the City of La Quinta General Plan.

The Draft Coachella Valley MSHCP/NCCP has not been finalized. However, the Proposed Project was analyzed for compliance with the MSHCP/NCCP, and it was determined that the project is consistent with the draft provisions and does not fall within a protected conservation area of the draft plan. Although all of the cumulative projects shown in Table 4.7-1 are within the Draft Coachella Valley MSHCP/NCCP area, none of them fall within a protected conservation area of the draft plan, and therefore do not conflict with the potentially applicable habitat conservation plan and natural community conservation plan.

4.7.4 Regulatory Requirements and Conditions

The primary land use regulatory requirements are those incorporated into the City of La Quinta General Plan and the City of La Quinta Municipal Code Chapter on Planning and Zoning. The City’s practice is to allow some flexibility in development standards through the use of Specific Plans, in which detailed land use regulations unique to the development and site may be formulated. Thus, Komar Desert Center Specific Plan is permitted to contain regulations that differ slightly from the City’s standard development regulations contained in its Municipal Code. The City authorizes this flexibility through Specific Plans, for acceptable variations, as approved by the City Council. As an example, through the use of the Specific Plan, the Costco Wholesale is designed to have architectural features that extend to a height of 41 feet. The use of the Specific Plan authorizes these features, which would otherwise be required to be within the City’s 35-foot height limitation. Related air quality, noise, traffic, and visual regulations are delineated within the respective sections of this Draft EIR.
4.0 Environmental Impact Analysis

4.7.5 Level of Significance Before Mitigation

The Proposed Project does not divide an established community. Overall, the Proposed Project is consistent with and does not conflict with the environmental goals, objectives, or guidelines of the City of La Quinta General Plan. The Proposed Project is consistent with the adopted land use designation for the parcel, and does not convert general plan designated open space to a more intensive land use. Additionally, the Proposed Project does not conflict with any adopted environmental plans for the area. Therefore, no significant impacts to land use will result from the Proposed Project.

The Proposed Project was also considered on a cumulative level with the other proposed projects in the area. The cumulative effect of the projects would not result in the physical division of an established community, would not conflict with the City of La Quinta General Plan, and would not conflict with the potentially applicable habitat conservation plan. Therefore, no significant cumulative impacts to land use will result from the Proposed Project.

4.7.6 Environmental Mitigation Measures

No significant impacts are anticipated for the Proposed Project; therefore, no mitigation measures are required.

4.7.7 Level of Significance After Mitigation

Project-specific and cumulative impacts to land use would be less than significant.
4.8 NOISE

The following report has been prepared to analyze the impacts of the Proposed Project and is included in Appendix H on the attached CD:


This section addresses the potential noise effects that the construction and operation of a commercial center, including traffic-related impacts, would potentially have on the existing environment.

Introduction

Sound has two significant characteristics: pitch and loudness. At undesirable levels, pitch is generally an annoyance, while loudness can affect the ability to hear. The quality, referred to as pitch, is a function of the number of complete vibrations, or individual sound waves, striking our ears per unit of time. As this number (measured in cycles per second) increases, a rising pitch is heard while a deepening pitch is heard with a decrease. Loudness is a function of the amount of energy in a sound wave. This energy is, in turn, a function of sound pressure. A sound wave consists of a moving front of pressure that exceeds the ambient atmospheric pressure, followed by a trough that is below ambient atmospheric pressure. The more this pressure front varies from the ambient pressure, the louder, or more intense, the sound. The human ear is tuned to receive sound that is within a specific intensity range. Sound below that range is inaudible, while sound above that range can become painful and damaging to the ear.

The decibel (dB) is the accepted standard unit for measuring the amplitude (loudness) of sound because it accounts for the large variations in sound levels and reflects the manner in which people perceive changes in sound level. When the dB unit is adjusted to correct for relative frequency response within the human ear, it is referred to as the A-weighted decibel [dB(A)]. A-weighting de-emphasizes low frequencies and places greater emphasis upon mid and high frequencies, which is consistent with the low sensitivity of human hearing at low frequencies.

There are no absolute standards by which to gauge individual reactions to changes in background noise levels. Typically, a 1 dB increase in noise level is nearly imperceptible. Changes from 3 to 5 dB(A) may be noticed by some individuals who are sensitive to changes in noise. A 5 dB(A) increase is readily noticeable.

The decibel level of sound decreases (or attenuates) exponentially as the distance from the source of that sound increases. For a single point source such as a piece of mechanical equipment, the sound level normally attenuates by about 6 dB(A) for each doubling from the source. Other factors that typically affect sound propagation in an outdoor environment are structural barriers and atmospheric conditions.

Typically, noise levels are not sustained over long periods of time. Noise levels are not constant and fluctuate over time. The equivalent sound pressure level (Leq) is a measure of the equivalent constant sound level over a specified period of time that would produce the same energy as the actual sound produced. This measure quantifies time variations in noise exposure into a steady sound level and is commonly used as the unit of measurement in noise standards. Another measurement is the weighted 24-hour Community Noise Equivalent Level (CNEL). This artificial dB(A) increment is added to quiet time noise levels in a 24-hour noise descriptor to describe the community noise environment on a 24-hour basis in California. These adjustments are included to account for the general increased sensitivity of people to evening and nighttime noise levels.
4.0 Environmental Impact Analysis

4.8.1 Environmental Setting

Existing noise levels around the Proposed Project site are generated primarily by vehicular traffic on the surrounding roadways. From the roadways within the vicinity of the project site, the majority of vehicular traffic noise is generated from Highway 111 (EW) and Jefferson Street (NS), which are the main roadways that serve the project site. No additional sources of noise affect the Proposed Project site. A short-term site vicinity noise measurement analysis was conducted to obtain existing noise levels in the project vicinity. These levels are shown in Table 4.8-1.

Table 4.8-1 Existing Site Vicinity Noise Measurement Summary (dBA)

<table>
<thead>
<tr>
<th>Noise Parameter</th>
<th>100' S of Highway 111</th>
<th>50' W of Jefferson Street</th>
</tr>
</thead>
<tbody>
<tr>
<td>Energy Average (Leq)</td>
<td>66</td>
<td>65</td>
</tr>
<tr>
<td>1-Second Max. (Lmax)</td>
<td>84</td>
<td>78</td>
</tr>
<tr>
<td>1-Second Min. (Lmin)</td>
<td>54</td>
<td>44</td>
</tr>
<tr>
<td>10th Percentile Level (L10)</td>
<td>71</td>
<td>67</td>
</tr>
<tr>
<td>50th Percentile Level (L50)</td>
<td>65</td>
<td>60</td>
</tr>
<tr>
<td>90th Percentile Level (L90)</td>
<td>59</td>
<td>49</td>
</tr>
</tbody>
</table>

Source: Larson-Davis Model 700B Sound Level Meter; May 13, 2006

To obtain 24-hour CNEL levels, 1-2 dBA were added to the short-term Leq levels obtained above. Estimated CNEL contour levels for line-of-sight propagation across an irregular unpaved surface near the project site are shown in Table 4.8-2.

Table 4.8-2. Estimated CNEL Contour Levels

<table>
<thead>
<tr>
<th>Distance from Centerline</th>
<th>Highway 111 (dBA CNEL)</th>
<th>Jefferson Street (dBA CNEL)</th>
</tr>
</thead>
<tbody>
<tr>
<td>50 feet</td>
<td>72</td>
<td>67</td>
</tr>
<tr>
<td>100 feet</td>
<td>68</td>
<td>63</td>
</tr>
<tr>
<td>200 feet</td>
<td>63</td>
<td>58</td>
</tr>
<tr>
<td>400 feet</td>
<td>59</td>
<td>54</td>
</tr>
</tbody>
</table>

According to the Noise Element of the City of La Quinta General Plan 2002, the 65 CNEL contour is considered acceptable for noise-sensitive uses such as residential communities. For the project site, this contour extends approximately 150 feet south of Highway 111 and 75 feet on either side of the Jefferson Street centerline. The closest residential community is 350 feet south of the project site. The noise standard for commercial retail is much less stringent than for residential or other noise-sensitive uses. Levels of 80dBA CNEL are considered acceptable for commercial use without outdoor amenities such as dining patios facing arterial roadways. The existing on-site traffic noise in any areas proposed for development is 70 dBA CNEL or less. Therefore existing traffic noise levels are well below the commercial retail threshold.

Sensitive Receptors

Uses that are typically considered noise sensitive include residences, schools, hospitals, parks, and wildlife habitats. The Proposed Project site is currently undeveloped. Surrounding sensitive land uses include residential uses located to the east and south. However, these residences are buffered by either an intervening arterial roadway and/or a 350 feet distance separation.
4.0 Environmental Impact Analysis

4.8.2 Project Impacts

4.8.2.1 Thresholds of Significance

As defined in Appendix G (XI) of the CEQA Guidelines, project impacts from noise are considered significant if any of the following occur:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;
- A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; or
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

According to the Noise Element of the City of La Quinta General Plan 2002, 65 dB(A) CNEl exposure is considered the normally acceptable exterior noise level for noise sensitive land uses. For less noise-sensitive land uses, 80 dB(A) CNEl is an acceptable exterior noise level. For the purposes of the noise impact analysis, an increase of 3 dB(A) was considered a significant degradation of noise quality.

4.8.2.2 Environmental Impacts

Construction Noise Impacts

Varying levels of construction noise may be heard in different parts of the project site during the project's total construction period. The noise strength of construction equipment ranges widely as a function of the equipment used as well as the load carried.

Construction noise would occur in discrete phases dominated initially by earth-moving and/or demolition sources and later for finish construction. Construction equipment would generate both steady state and episodic noise that may be heard both on- and off-site, which could expose off-site sensitive receptors to short-term noise impacts.

Figure 4.8-1 summarizes the noise generation for typical construction activities. As shown, heavy equipment noise can exceed 90 dB(A) and averages about 85 dB(A) at 50 feet from the source when the equipment is operating at typical loads. However, noise levels would diminish rapidly with distance from the construction area at a rate of approximately 6 dB(A) per doubling distance.

Groundborne vibrations and noise levels could occur during the earthmoving activities of the construction phase. Point sources of noise emissions are atmospherically attenuated by a factor of 6 dB(A) per doubling of distance. The loudest construction activities conducted closes to the nearest residences south of the site (350 feet buffer distance) would create maximum noise levels of 68 dB(A) outside the existing perimeter walls. However, attenuation by the existing perimeter walls would reduce maximum construction equipment noise to near 60 dB(A). Inside these residences, maximum interior levels would be near 45 dB(A) with windows open. Construction equipment noise levels at the closest homes would not substantially interfere with exterior recreational activity or with interior peace and quiet. Construction activity noise impacts are, therefore, considered to be less than significant.

Building assembly and finish construction during later phases of site development would be less noisy, particularly as portions of completed structures will inhibit direct line-of-sight sound propagation. Such noise will further be confined to the daytime hours of lesser noise sensitivity in accordance with the City of La Quinta Development Code (Section 6.08.050 of the Municipal Code).
<table>
<thead>
<tr>
<th>Equipment Type</th>
<th>70</th>
<th>80</th>
<th>90</th>
<th>100</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compacters (Rollers)</td>
<td></td>
<td></td>
<td>●</td>
<td></td>
</tr>
<tr>
<td>Front Loaders</td>
<td></td>
<td></td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Backhoes</td>
<td></td>
<td></td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Tractors</td>
<td></td>
<td></td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Scrapers, Graders</td>
<td></td>
<td></td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Pavers</td>
<td></td>
<td>●</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Trucks</td>
<td></td>
<td></td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Concrete Mixers</td>
<td></td>
<td></td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Concrete Pumps</td>
<td></td>
<td>●</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cranes (Movable)</td>
<td></td>
<td></td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Cranes (Derrick)</td>
<td></td>
<td>●</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pumps</td>
<td></td>
<td></td>
<td>●</td>
<td></td>
</tr>
<tr>
<td>Generators</td>
<td></td>
<td></td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Compressors</td>
<td></td>
<td></td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Pneumatic Wrenches</td>
<td></td>
<td></td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Jack Hammers &amp; Rock Drills</td>
<td></td>
<td></td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Pile Drivers (Peaks)</td>
<td></td>
<td></td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Vibrator</td>
<td></td>
<td></td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>Saws</td>
<td></td>
<td></td>
<td>●</td>
<td>●</td>
</tr>
</tbody>
</table>
Operational Noise Impacts

Operational noise generated by the Proposed Project is anticipated to be generated by delivery/unloading heavy goods on loading docks, maintenance activities such as refuse collection or parking lot sweeping, stacking or retrieving temporary outdoor storage. Noise could also be generated from single events such as operation of forklifts, dropped pallets, trucks at low-speed and high-rpm shifting gears, trash pick-up, etc.

Measurements of diesel and jobber truck activity noise behind busy shopping centers have shown average noise levels of 65 dB(A) at 30 feet from the loading dock. For this reference noise level, the daytime noise standard of 60 dB(A) is met within 50 feet. The nocturnal standard of 50 dB(A) would be met within 170 feet under clear line of sight conditions. There are no existing sensitive receptors within either of these distances. The loading dock area is planned to contain a wing wall along its western edge to substantially shield tractor-trailers from view and block the line of sight noise propagation to possible adjacent rear yard residential use. The blocking benefit would reduce average hourly noise exposure by 6-7 dB(A). With the use of such a wall, average hourly noise levels will be reduced to very close to the nocturnal standard even during peak unloading activity levels. There are no reasonably foreseeable plans for residential development along the western site boundary. However, if a residential development should be built near the boundary line, the future developer may need to address potential noise conflicts by extending the Proposed Project’s loading dock wall perimeter with a height of 12 feet extending 80 feet northward from the western corner of the receiving area.

The proposed Costco Wholesale will feature additional amenities, such as the tire center and gas station that could be a potential source of noise nuisance. The tire center will face eastward. The nearest residences to the east will be almost 1,500 feet away with elevated background traffic noise to help mask tire center operations noise. Noise attenuation in 1,500 feet of atmospheric propagation will reduce tire center noise to a much less than significant level.

Noise monitoring was conducted near the Costco Wholesale service station in Chino Hills. Noise levels were only marginally higher near the gas station than along identical nearby locations adjacent to the nearest street (Peyton Drive). The reference noise level for gas station operation was well below 55 dB(A) Leq at 100 feet from the center of the pump islands. The nearest residential noise exposure will be 40 dB(A). These levels are less than significant. In addition, the gas station will likely open at 6:30 a.m. in a time period considered “nocturnal.” Gasoline delivery may occur at night, but such activities are very quiet since the transfer from the tanker truck to the underground storage tank is via gravity feed. Gas stations are not major noise generators in the absence of any on-site automotive repair, car wash or similar activities. Gas station operation will have no detectable noise implications.

Existing homes east and south of the site either have an intervening arterial roadway, perimeter walls, and/or substantial distance separation between on-site sources and these residences. It is expected that these uses will not be affected by commercial support activities.

Traffic Noise

Project-related traffic could increase the noise exposure of sensitive receptors in the vicinity of the project site.

The Federal Highway Administration’s (FHWA) Highway Traffic Noise Prediction Model was used to predict noise levels and perform a noise barrier analysis. The impact analysis was conducted with attention given to the peak hour traffic numbers based on the transportation impact analysis (Kittelson & Associates, Inc. 2005, Appendix J).

Fifteen roadway links were selected for analysis. Traffic noise levels were calculated for existing conditions without and with project and for future year without and with project scenarios. The input 24-hour traffic data and the CNEL at a 50-foot reference distance were calculated. Table 4.8-3 summarizes the noise level impact for the four traffic scenarios on the 48 roadway links analyzed.
## 4.0 Environmental Impact Analysis

### Table 4.8-3. Traffic-Related Noise (CNEL in dBA @ 50 feet to Centerline)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington Street (NS)</td>
<td>Avenue 48 – Highway 111</td>
<td>73.6</td>
<td>73.6</td>
<td>0</td>
<td>75.6</td>
<td>75.6</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Highway 111 – Channel</td>
<td>73.2</td>
<td>73.3</td>
<td>0.1</td>
<td>75.1</td>
<td>75.1</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Channel – Miles</td>
<td>73.6</td>
<td>73.7</td>
<td>0.1</td>
<td>75.6</td>
<td>75.7</td>
<td>0.1</td>
</tr>
<tr>
<td></td>
<td>Miles – Fred Waring</td>
<td>73.7</td>
<td>73.8</td>
<td>0.1</td>
<td>75.7</td>
<td>75.7</td>
<td>0</td>
</tr>
<tr>
<td>Jefferson Street (NS)</td>
<td>Avenue 48 – Highway 111</td>
<td>71.2</td>
<td>71.6</td>
<td>0.4</td>
<td>73.6</td>
<td>73.9</td>
<td>0.3</td>
</tr>
<tr>
<td></td>
<td>Highway 111 – Miles</td>
<td>69.8</td>
<td>70.1</td>
<td>0.3</td>
<td>72.4</td>
<td>72.6</td>
<td>0.2</td>
</tr>
<tr>
<td></td>
<td>Miles – Fred Waring</td>
<td>70.5</td>
<td>70.7</td>
<td>0.2</td>
<td>73.3</td>
<td>73.4</td>
<td>0.1</td>
</tr>
<tr>
<td>Highway 111 (EW)</td>
<td>Washington – Simon</td>
<td>73.1</td>
<td>73.4</td>
<td>0.3</td>
<td>74.0</td>
<td>74.3</td>
<td>0.3</td>
</tr>
<tr>
<td></td>
<td>Simon – La Quinta Center</td>
<td>73.1</td>
<td>73.5</td>
<td>0.4</td>
<td>74.1</td>
<td>74.3</td>
<td>0.2</td>
</tr>
<tr>
<td></td>
<td>La Quinta Center – Adams</td>
<td>73.1</td>
<td>73.4</td>
<td>0.3</td>
<td>74.0</td>
<td>74.3</td>
<td>0.3</td>
</tr>
<tr>
<td></td>
<td>Adams – La Quinta Drive</td>
<td>73.1</td>
<td>73.4</td>
<td>0.3</td>
<td>74.0</td>
<td>74.3</td>
<td>0.3</td>
</tr>
<tr>
<td></td>
<td>La Quinta Drive – Dune Palms</td>
<td>73.1</td>
<td>73.4</td>
<td>0.3</td>
<td>74.0</td>
<td>74.3</td>
<td>0.3</td>
</tr>
<tr>
<td></td>
<td>Dune Palms – Depot</td>
<td>73.1</td>
<td>73.4</td>
<td>0.3</td>
<td>74.1</td>
<td>74.4</td>
<td>0.3</td>
</tr>
<tr>
<td></td>
<td>Depot – Jefferson</td>
<td>73.1</td>
<td>73.9</td>
<td>0.8</td>
<td>74.0</td>
<td>74.6</td>
<td>0.6</td>
</tr>
<tr>
<td></td>
<td>Jefferson – Madison</td>
<td>72.2</td>
<td>72.4</td>
<td>0.2</td>
<td>73.9</td>
<td>74.0</td>
<td>0.1</td>
</tr>
</tbody>
</table>

Source: FHWA-RD-77-108 (Calverno mod.)

The maximum noise increase (CNEL) from implementation of the Proposed Project along each of the area streets as compared to no-project levels is an addition of 0.8 along Highway 111 between Depot and Jefferson. A 1 dBA increase in noise level is an almost imperceptible increase even under very quiet conditions. Therefore, there will be no perceptible degradation of the acoustic environment associated with traffic from the proposed project.

### 4.8.3 Cumulative Impacts

Cumulative increases will not exceed 3.0 dBA along any roadway within the analysis grid. Jefferson Street is anticipated to become a major north-south thoroughfare with forecast cumulative noise level including Project traffic increases of up to 2.9 dBA CNEL. In addition, the development along Jefferson Street has incorporated noise protection (set-back and perimeter noise walls) at sensitive uses along this roadway in
4.0 Environmental Impact Analysis

anticipation of achieving the build-out noise levels shown in Table 4.8-3. Cumulative traffic noise impacts are therefore considered less than significant.

4.8.4 Regulatory Requirements

State Regulations

The State Office of Noise Control's Department of Health Services (DHS) provides services to local agencies with coordination of State and Federal activities, research and public information. The Department of Health Services has prepared Land Use Compatibility Guidelines for evaluating community noise impacts. The DHS harmful noise levels are identified in Table 4.8-4.

**Table 4.8-4. Association Between Noise Levels and Harmful Effects**

<table>
<thead>
<tr>
<th>Harmful Effect</th>
<th>Noise Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hearing Loss</td>
<td>75-85 dB(A)</td>
</tr>
<tr>
<td>Extra Auditory-Physiological Effects</td>
<td>65-75 dB(A)</td>
</tr>
<tr>
<td>Speech Interference</td>
<td>50-65 dB(A)</td>
</tr>
<tr>
<td>Interruption of Sleep</td>
<td>35-45 dB(A)</td>
</tr>
</tbody>
</table>

An interior CNEL of 45 dB(A) is mandated by multiple family dwellings in Title 24 of the California Code of Regulations. In 1988, the State Building Standards Commission recommended that the 45 dB(A) CNEL interior standards be expanded to include all habitable rooms for all residential occupancy, including single-family.

Construction noise sources are not strictly relatable to a 24-hour community noise standard, because they only occur during selected times and the source strength varies sharply with time. Furthermore, construction activities would not represent a chronic permanent noise source.

Local Regulations, Plans and Policies

City of La Quinta General Plan

The City's General Plan Noise Element recommends noise guidelines based on the community noise compatibility guidelines established by the State of California DHS for use in assessing the impacts from transportation noise, such as vehicular traffic on various land use types with a range of noise levels. The California General Plan Guidelines (1987) have been adopted as the noise/land use compatibility guidelines for the City. For less noise-sensitive land uses, such as a discount warehouse store/gas station, or a multi-store shopping center, exterior standards are less stringent because most activities occur inside, and require only a limited amount of noise protection. While a 45 dB(A) CNEL interior noise level is desirable for residences to allow sleep and other quiet activities, interior levels of 55 dB(A) CNEL are more appropriate for commercial retail uses. Noise attenuation in commercial structures with few open doors or windows is 25-30 dB(A). The noise standard for commercial retail is much less stringent than for residential or other noise-sensitive uses. Levels of 80 dB(A) CNEL are considered acceptable for commercial use without outdoor amenities such as dining patios facing arterial roadways.

Table 1 of the Noise Impact Analysis shows the noise/land use compatibility guideline for City of La Quinta land uses. For nearby residences, schools, pre-schools, churches, etc., an exterior CNEL of 65 dB(A) is optimum, and 70 dB(A) is conditionally acceptable in any exterior recreation area.

City of La Quinta Noise Ordinance

The La Quinta Municipal Code provides performance standards and noise control guidelines for determining and mitigating non-transportation, or stationary, nuisance noise source impacts. The purpose
of the noise ordinance is to protect, create, and maintain an environment free from noise and vibration that may jeopardize health or welfare or degrade the quality of life. According to the stationary source exterior noise standards, no person shall operate or cause to operate, any source of sound at any location within the incorporated City or allow the creation of any noise on a property owned, leased, occupied, or otherwise controlled by such person, which causes the noise levels to exceed the exterior noise limits at the property boundary.

The Municipal Code establishes regulations regarding allowable increases in noise levels in terms of established noise guidelines which categorize noise levels occurring over a 24-hour period. Chapter 100.210 establishes noise performance criteria for those sources not preempted from local control. Project-related sources that might be regulated by ordinance include loading dock noise, mechanical equipment (heating/air conditioning, compressors, etc.), trash collection, parking lot sweeping, or other retail activities. Allowable hours for construction/demolition are also detailed in Section 6.08.050 of the La Quinta Municipal Code. Allowable hours of construction are as follows:

<table>
<thead>
<tr>
<th>Day of Week</th>
<th>October 1 – April 30</th>
<th>May 1 – September 30</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monday-Friday</td>
<td>7 a.m. – 5:30 p.m.</td>
<td>6 a.m. – 7 p.m.</td>
</tr>
<tr>
<td>Saturday</td>
<td>8 a.m. – 5 p.m.</td>
<td>8 a.m. – 5 p.m.</td>
</tr>
<tr>
<td>Sunday &amp; Code Holidays</td>
<td>None</td>
<td>None</td>
</tr>
</tbody>
</table>

Noise ordinance standards are stated in terms of a baseline level not to be exceeded for more than 30 minutes in any hour. Incremental variations from the baseline are allowed with higher variations restricted to progressively shorter periods. Section 100.210(B) of the ordinance establishes the following noise limits at any residential or other noise-sensitive use in La Quinta (dB[A]):

<table>
<thead>
<tr>
<th>Exposure Increment</th>
<th>Noise Sensitive Uses</th>
<th>Other Non-Residential</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>7 AM – 10 PM</td>
<td>10 PM – 7 AM</td>
</tr>
<tr>
<td>30 minutes</td>
<td>60</td>
<td>50</td>
</tr>
<tr>
<td>15 minutes</td>
<td>65</td>
<td>55</td>
</tr>
<tr>
<td>5 minutes</td>
<td>70</td>
<td>60</td>
</tr>
<tr>
<td>1 minute</td>
<td>75</td>
<td>65</td>
</tr>
<tr>
<td>At any time</td>
<td>80</td>
<td>70</td>
</tr>
</tbody>
</table>

In addition to any numerical ordinance standards, the California Health & Safety Code and the Municipal Code at Section 6.08.040 state that noise levels may be a nuisance by virtue of time of day, character of the noise or other factors if they offend persons with normal auditory sensitivity.

The Noise ordinance standards require the following measures be included as site improvements/use permit conditions to minimize site operation noise intrusion:

- A 10-foot-high masonry wall shall be constructed along the western perimeter of the drive aisle separating the truck drive aisle from the off-site residents
- Trucks should not pick up refuse before 7 AM.
- Parking lot sweeping with vacuum trucks should not occur after 10 PM or before 6 AM.
- Refrigeration trucks should not be parked in the drive aisle behind the store from 10 PM to 7 AM if their freezer units are running.
4.0 Environmental Impact Analysis

4.8.5 Level of Significance Before Mitigation

The City’s General Plan Noise Element specifies that levels of 80 dB(A) CNEL are considered acceptable for commercial use without outdoor amenities such as dining patios facing arterial roadways. For nearby residences, an exterior CNEL of 65 dB(A) is acceptable. During the construction phase, heavy equipment noise may exceed 90 dB(A) and averages about 85 dB(A) at 50 feet from the source with typical operation. This exceeds the standard of 80 dB(A); however, noise levels would diminish at the rate of approximately 6 dB(A) per doubling distance so noise levels would not exceed the threshold at sensitive receptor sites located 350 feet away. Construction-related impacts are therefore not significant.

During the operational phase, the daytime noise standard of 60dB(A) is met within 50 feet of the loading dock. The nocturnal standard of 50dB(A) would be met within 170 feet under clear line of sight conditions. There are no existing noise-sensitive uses within either of these distances.

Furthermore, the City’s Noise Ordinance specifies allowable hours for construction activities to take place. Normally, most construction activities end around 3:30 PM with very limited Saturday work. This would not result in a significant impact as the project would be in compliance with the City’s ordinance confining activities to hours of least noise sensitivity. Therefore generation of noise levels in excess of standards established in the local plans and ordinances is less than significant.

Groundborne vibrations and noise levels could occur during the earthmoving activities of the construction phase. However, compliance with the City of La Quinta Noise Ordinance would ensure groundborne vibration and/or noise levels are kept at a less than significant level.

The maximum vehicular noise project contribution is an additional 0.8 dB(A) above existing levels without the Proposed Project. There will be no significant impact to the acoustic environment associated with traffic from the Proposed Project because this contribution is less than the significance threshold of 3 dB(A) as identified in the Noise Impact Analysis. For other commercial activity, the General Plan daytime standard of 65 dB(A) can be met within 50 feet. The closest sensitive receptor is located beyond 350 feet. Therefore, a permanent increase in ambient noise levels due to implementation of the Proposed Project would be less than significant.

The nearest sensitive receptors are located at a distance of 350 feet, well outside the primary noise impact zone. They are at the outer edge of any construction noise envelope and are additionally shielded by solid perimeter walls that create an additional 6-8 dB(A) of noise attenuation. As specified above, construction-related noise will further be confined to the daytime hours of lesser noise sensitivity. Building assembly and finish construction during later phases of site development would be less noisy, particularly as portions of completed structures will inhibit direct line-of-sight sound propagation. Noise generated during the construction of the Proposed Project would not affect any surrounding sensitive receptors and therefore would not be significant.

Furthermore, cumulative increases will not exceed 3.0 dB(A) along any roadway within the analysis grid. With growth of Jefferson Street in the future, the forecasted cumulative noise level increases to 2.9 dB CNEL. Additionally, future development along Jefferson Street has incorporated noise protection including set-back and perimeter noise walls at sensitive uses along the roadway in anticipation of achieving build-out noise levels in compliance with applicable thresholds. Cumulative traffic noise impacts are therefore less than significant as well.

4.8.6 Environmental Mitigation Measures

No significant impacts are anticipated for the Proposed Project; therefore, no mitigation measures pertaining to noise are required.
4.0 Environmental Impact Analysis

4.8.7 Level of Significance After Mitigation

Project-specific and cumulative impacts to noise will be less than significant.
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4.9 PUBLIC SERVICES AND UTILITIES

The utility and public service issues addressed in this section relate to the commercial retail development as a whole. Existing utilities and public services used during construction and operation of the Proposed Project include water supply, natural gas, electricity, wastewater, fire protection, and police/emergency services. Service provider letters are included in Appendix I of this Draft EIR.

4.9.1 Environmental Setting

4.9.1.1 Water Supply

Regional Water Supply

Water supply to the developed portions of western Riverside County (i.e., the inland valley) is sustained primarily by water imported from northern California and the Colorado River, and secondarily by local groundwater. Riverside County incorporates four major watershed areas. The Proposed Project site lies within the Whitewater River watershed within eastern Riverside County and is part of the Colorado River Basin. A two-day to one-week water supply to meet peak demand is provided by many local water agencies within Riverside County. Long-term storage of large quantities of water is provided through Metropolitan Water District (MWD) and State of California Department of Water Resources (DWR) facilities.

The Proposed Project site is located within the water service area of the CVWD. CVWD’s service area includes nearly 640,000 acres lying mainly in Riverside County with territory in Imperial County and a small portion of San Diego County. CVWD’s fields of service include importation and distribution of domestic water; wastewater collection, reclamation, and redistribution; regional flood protection; importation and distribution of irrigation water; irrigation drainage collection; groundwater management; and, water conservation. Currently, CVWD has more than 2,267 miles of distribution pipelines to serve irrigation and domestic water services (CVWD website: www.cvwd.org).

According to the Coachella Valley Water District 2003 Annual Review, CVWD has 103 active wells and 61 reservoirs in operation to meet the needs of its more than 62,000 homes and businesses containing a population of about 229,065. Annual water consumption in the district is about 30 billion gallons. In the existing system, CVWD’s available storage capacity is 1,301 acre-feet for irrigation water storage and 105.8 million gallons for domestic water storage. While CVWD currently has an adequate supply of groundwater, a contract with the State of California delivers 23,100 acre-feet of Northern California water annually.

Project Area

There is an existing water line available at the northwest corner of the intersection of Highway 111 and Jefferson Street. The existing 24-inch water line will be extended to the south to serve the Proposed Project site. The waterline will extend east from the Proposed Project, across vacant property in the City of Indio, cross the La Quinta Evacuation Channel, ultimately connecting to the existing water line.

4.9.1.2 Sewer and Wastewater

Regional Facilities

Wastewater treatment facilities within Riverside County process millions of gallons of effluent daily. There are multiple wastewater collection and/or treatment districts that serve different geographical areas within the County. In addition, there are multiple areas within the County that do not have sewage systems and depend on septic tanks.
4.0 Environmental Impact Analysis

In addition to CVWD’s provision of public water service, the district also provides water reclamation (sanitation) to the region. The district has six water reclamation plants. CVWD’s largest wastewater reclamation facility is the Palm Desert Regional Wastewater Reclamation Plant opened in 1968 with modification in 1997. This plant as well as other regional facilities each has an ultimate capacity of handling 20 million gallons per day (MGD). The other major facility is the Mid-Valley Wastewater Reclamation Plant located near Thermal. This plant opened in 1986 and provides service to the communities from La Quinta to Mecca. The Mid-Valley Wastewater Reclamation Plant has been expanded to handle the growth in La Quinta from 7 mgd to 9.9 mgd. This expansion project began in July and is expected to take about one and a half years to complete. These two plus the four other facilities have a daily capacity of 31.8 acre-feet and serve a population of roughly 206,073.

Project Area

There are no existing sewer lines on the Proposed Project site. Sewer shall be connected via a proposed easement within adjacent property to the southwest of the Proposed Project site.

4.9.1.3 Solid Waste

Regional Facilities

Solid waste produced in the City of La Quinta is currently disposed of at the Coachella Valley and Edom Hill Transfer Stations. After sorting and processing, the waste is sent to either the Badlands or Lamb Canyon Landfills. The Badlands Landfill is located at 31125 Ironwood Avenue, Moreno Valley. The site is owned and operated by County of Riverside Waste Management Department. The Badlands Landfill is projected to reach its capacity between the years 2015 and 2016. The Lamb Canyon Landfill located at 16411 Lamb Canyon Road (State Hwy 79), Beaumont, is also owned and operated by County of Riverside Waste Management Department. The closure date for the Lamb Canyon Landfill is estimated at year 2023.

Solid waste produced in the City of La Quinta that can be recycled is currently taken to the California Bio-Mass Composting Facility, the Coachella Valley Composting Facility, the Coachella Valley Recycling and Transfer Station, Southern California Recycling, or Z Best Grinding.

Waste and recycling collection for the city is provided by Waste Management of the Desert.

Project Area

The Proposed Project site is vacant and undeveloped. No solid waste is currently generated or collected from the site. Solid waste generated within the area of the Proposed Project is hauled to the Coachella Valley and Edom Hill Transfer Stations and then transferred to either the Badlands or Lamb Canyon Landfills. These facilities are permitted as Class III municipal landfills, which only accept non-hazardous municipal solid waste for disposal.

4.9.1.4 Fire Protection Services

The City of La Quinta contracts for fire services with the RCFD and the CDF. Fire stations that would serve the project area (Figure 4.9-1), listed in order of proximity, include:

- **Fire Station No. 88** (West Indio) located at 46-621 Madison Street, approximately 1.2 miles east of the project area;
- **Fire Station No. 93** (La Quinta North) located at 44-555 Adams Street, approximately 2.2 miles northwest of the project area;
- **Fire Station No. 55** (Indian Wells) located at 44-900 El Dorado Drive, approximately 2.5 miles west of the project area;
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- **Fire Station No. 86** (Indio) located at 46-990 Jackson Street, approximately 4 miles east of the project area, and;

- **Fire Station No. 32** (La Quinta) located at 78-186 Frances Hack Lane, approximately 5 miles southwest of the project area.

Each station listed above operates with a 24-hour crew of three personnel per unit, and a Type 1 fire engine with paramedics. All stations provide service for all emergencies. The RCFD maintains a regional mutual aid concept whereby three or more fire engines respond to any reported fire.

Average response times to the Proposed Project site from the closest (West Indio) to the furthest (La Quinta) station are between 3-10 minutes.\(^1\) The County of Riverside General Plan designates the area surrounding the Proposed Project as low for wildfire susceptibility. Currently the Proposed Project site is undeveloped and vacant without any infrastructure to support fire suppression activities such as a fire hydrant system. According to the Riverside County General Plan Safety Element, the Proposed Project area is located in an area of low wildfire susceptibility.

It is recognized that the City of La Quinta has development impact fees (DIFs) that are a one-time charge imposed on development projects to recover capital costs for public facilities needed to serve those new developments and the additional residents, employees, and visitors they bring to the community. Impact fees are associated with fire protection facilities required to serve future development in the city.

### 4.9.1.5 Police Protection Services

Police protection services are provided by the La Quinta Police Department (LQPD) under contract by the Riverside County Sheriff’s Department. Services include City police protection and the La Quinta safety patrol. The department also provides cooperative programs including community oriented policing, multi-unit crime-free housing, neighborhood watch, and other deterrents to crime. The LQPD/Indio Sheriff’s Station is located at 82-695 Dr. Carreon Boulevard in the City of Indio (Figure 4.9-1), which is approximately 3 miles from the project site. The station is staffed by 38 sworn deputy sheriff’s positions and 7 non-sworn positions for a total of 45 positions.\(^2\)

### 4.9.1.6 Schools

The City of La Quinta is currently served by both the Desert Sands Unified School District (DSUSD) and Coachella Valley Unified School District (CVUSD). There are 20 elementary schools, seven middle schools, and five high schools that serve the DSUD. Twelve elementary schools (two including grades 7 and 8), three middle schools, four high schools (one including grades 7 and 8), one adult school, and one alternative education school serve the CVUSD. There are no schools present on the project site.

The project is currently located within the attendance boundaries of Truman Elementary School, La Quinta Middle School, and La Quinta High School. For the 2004-05 school year there will be over 25,000 students attending school in the DSUSD. The growth in student enrollment, along with the impact of the Class Size Reduction program in grades kindergarten through three, has created a shortage of classroom space throughout the District. To alleviate overcrowding in the District’s elementary schools the Calle Tampico Elementary School in La Quinta and Country Club Elementary School in Palm Desert have recently been built. Darby Middle School and an alternative high school are also being built within the City of La Quinta.

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\(^1\) Per. comm., Fire Captain Specialist Scott DeForge, Riverside County Fire Department, July 8, 2005.

\(^2\) La Quinta Police Department, [http://www.laquintapd.org/patrol.html](http://www.laquintapd.org/patrol.html)
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4.9.1.7 Other Public Services

As stated above, the City has DIFs that are a one-time charge imposed on development projects to recover capital costs for public facilities needed to serve those new developments and the additional residents, employees, and visitors they bring to the community. Impact fees are associated with the La Quinta Civic Center and the City’s Maintenance Facilities that both require expansion to serve future development in the city.

4.9.2 Project Impacts

4.9.2.1 Thresholds of Significance

Water

According to CEQA Guidelines Appendix G (XVI), a significant impact on water supply would be identified if the Proposed Project is determined to result in one of the following:

- Require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Have insufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements.

Sewer

According to CEQA Guidelines Appendix G (XVI), a significant impact on sewer utilities would be identified if the Proposed Project is determined to result in one of the following:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; or
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments.

Solid Waste

According to CEQA Guidelines Appendix G (XVI), a significant impact to solid waste services would be identified if the Proposed Project is determined to result in the following:

- The project area is unable to be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs.
- Project development does not comply with federal, state, and local statutes and regulations related to solid waste.

Fire Protection Services

According to CEQA Guidelines Appendix G (XIII), a significant impact to fire protection services will result if project implementation results in one or more of the following:

- Increased need for fire protection services that are beyond the capabilities of fire protection personnel or equipment to handle.
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- Create or exacerbate an existing fire hazard, or expose people to high fire hazard conditions without adequate fire protection;
- Locate development in a High Fire Hazard Area that does not provide a community water system

**Police Protection Services**

According to CEQA Guidelines Appendix G (XIII), a significant impact to police protection services would be identified if the Proposed Project is determined to result in the following:

- A substantial need for sheriff services that cannot be adequately met by available Sheriff’s Department personnel or equipment.

**Schools**

According to CEQA Guidelines Appendix G (XIII), a significant impact to schools would be identified if the Proposed Project is determined to result in the following:

- Substantial adverse physical impacts associated with provision of new or physically altered school facilities, or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives.

**Other Public Services**

According to CEQA Guidelines Appendix G (XIII), a significant impact to other public services would be identified if the Proposed Project is determined to result in the following:

- A significant impact to public services would be identified if the existing or planned facilities are not adequate to serve the future residents generated by the Proposed Project.

**4.9.2.2 Environmental Impacts**

Implementation of the Proposed Project will result in the development of a 26.37-acre commercial development including Costco Wholesale as the major tenant, as well as nine smaller outlying commercial pads and associated parking.

**Water**

New connections to CVWD water services would be necessary to serve the Proposed Project. Per the CVWD Service Commitment Letter dated June 2005 (Appendix I), CVWD can provide adequate water service to meet projected water demands for the Proposed Project. There is an existing 24-inch water line located at the northwest corner of the intersection of Highway 111 and Jefferson Street. The existing water line will be extended to the south to serve the Proposed Project site. Additionally, the project applicant would be required to pay applicable fees and charges per CVWD regulations for connection fees to the CVWD system.

**Sewer**

New connections to CVWD wastewater services would be necessary to serve the Proposed Project. Per the CVWD Service Commitment Letter dated June 2005 (Appendix I), CVWD can provide adequate sewer service to meet projected wastewater demands for the Proposed Project. To obtain public sewer service, the Proposed Project area must be annexed to Improvement District No. 55. Wastewater in this area is conveyed to the Mid-Valley Reclamation Plant located on Avenue 63. As stated above, the current capacity of the plant is 9.9 mgd. Additionally, the project applicant would be required to pay for connection fees to the CVWD system.
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The minimum monthly service charge shall be one equivalent dwelling unit multiplied by the applicable sewer service charge or 93 cents per 100 cubic feet of water consumption through any meters used for domestic purposes, whichever is greater.

Solid Waste

Minor amounts of non-hazardous solid waste including wood and concrete would be generated in the short-term by construction of the project. The addition of approximately 400 employees would generate approximately 4.1 tons of solid waste a day (Table 4.9-1) in the long term. Project-generated solid waste would most likely be transported to the Coachella Valley and Edom Hill Transfer Stations for transfer and processing. Final disposal will likely be at either the Badlands or Lamb Canyon Landfills. These facilities are expected to accommodate the amount of daily solid waste generated by the Proposed Project. The life expectancy of the Badlands or Lamb Canyon Landfills exceeds the fifteen-year threshold established by the California Integrated Waste Management Board (CIWMB). Therefore, the combination of these two landfills is anticipated to accommodate the solid waste generated by the Proposed Project.

Table 4.9-1. Estimated Project Solid Waste Generation

<table>
<thead>
<tr>
<th>Generation Factor</th>
<th>Daily Solid Waste Generated (tons/day)</th>
<th>Yearly Solid Waste Generated (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>400 employees</td>
<td>20.4 (lbs/ employee/day)</td>
<td>4.1</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>1,489.2</td>
</tr>
</tbody>
</table>

Source: Riverside Local Agency Formation Commission, 2005

Additionally, the State of California requires that each city and county demonstrate a reduction of at least 50 percent in the amount of waste from that jurisdiction that had gone into landfills in the year 1990. The state requires that this level of reduction be sustained. The City of La Quinta has a recycling program as part of their requirements for solid waste disposal per Assembly Bill 939.

This city recycling program is in compliance with state law that mandates a reduction in solid waste through the recycling of certain items during construction and operation. Waste Management of the Desert (the City of La Quinta's waste collection and disposal service) would provide the Proposed Project with "dumpster" recycling or "roll-off" recycling containers at a minimal fee when the project applicant contracts for solid waste disposal. In addition, the project applicant shall recycle construction and demolition materials produced during construction of the Proposed Project.

Fire Protection Services

The aforementioned five fire stations would serve the Proposed Project area. The closest station, West Indio, is located less than two miles from the Proposed Project site and is equipped with one city engine and one city medic ambulance.

The Coachella Valley Water District performed a fire flow test for the Proposed Project. The minimum fire hydrant flow requirement will need to be 4,000 gpm at a pressure of 20 psi. Using data obtained by CVWD, the flow is estimated to be approximately 5,388 gpm, which will be available at the private fire hydrants. Once the Proposed Project is built, it will have adequate pressure, flow, and supply designed to meet requirements. It has been determined by CVWD that the proposed system would be able to provide fire flow to all hydrants to meet the fire protection system demand at the Proposed Project site and Riverside County Fire Department requirements (pers. comm., Julie Kretz).
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During construction and operation of the Proposed Project, compliance with all applicable fire codes and ordinances will be required. The Proposed Project will comply with applicable Riverside County Fire Code and RCFD requirements and standards for construction, access, water mains, fire flow, and fire hydrants.

Police Protection Services

The LQPD has indicated that the Proposed Project will most likely generate increased calls for service (approximately 700 annually). The existing staffing levels at the LQPD would be able to handle this increase in calls, which would average two calls per day (pers. comm., Walter Meyer).

According to Captain Walter Meyer, current approximate response times for calls located in the project area are 6 minutes, 42 seconds for emergency calls and 11 minutes, 27 seconds for routine calls. Adequate staffing is currently available to respond to the increase in calls that would be generated by the Proposed Project. Therefore, the Proposed Project would not significantly impact police protection services in the City of La Quinta.

Schools

The proposed commercial development project could indirectly add students to the DSUSD as the Proposed Project will generate approximately 400 employees. However, it is anticipated that the majority of employees would be from the existing labor force in the City or would live in the adjacent cities. School needs generated by implementation of the Proposed Project could be accommodated with existing resources. Further, the project applicant would be required to pay development fees to the DSUSD. Therefore, it is anticipated that implementation of the Proposed Project would not result in significant impacts on school services.

Other Public Services

For new developments, City policies require payment of DIFs for the La Quinta Civic Center and the City’s Maintenance Facilities. Therefore, through payment of DIFs by the project applicant there are no significant impacts.

4.9.3 Cumulative Impacts

Water Supply

Cumulative water demand is addressed by the CVWD in The Coachella Valley Water Management Plan (Plan) (September 2002). This Plan was prepared to address long-term concerns regarding the future availability of adequate groundwater supply. According to the Final Program Environmental Impact Report for Coachella Valley Water Management Plan and State Water Project Entitlement Transfer (September 2002), implementation of the Plan, which by definition incorporates projected future development when determining supply, assures there will be more than adequate water availability until 2035. Water purveyors cannot approve projects without demonstrating adequate water supplies. Approval of projects is contingent upon consistency with the Plan. Assessment of consistency with the Plan is performed through CVWD when determining whether or not there is adequate capacity to meet the needs generated by a Proposed Project. As CVWD has indicated it will be able to meet the project’s needs, the project is consistent with the Plan. Furthermore, as with the Proposed Project, proof of adequate project-specific water supply will be required for other development projects to assure adequate supplies are available to serve projects. The addition of the Proposed Project’s demand on water supply in addition to other development will not cumulatively impact the CVWD because all approved projects will be consistent with the Plan. CVWD will be able to meet the needs generated by cumulative development in the area. Therefore, the implementation of the Proposed Project will result in a less than significant impact with regard to water supply.
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Wastewater

The Coachella Valley Water Management Plan also incorporates a discussion of wastewater treatment facilities. As stated above, the Plan incorporates projected future development when determining the need for facilities expansion. While the Plan does not include construction of any new wastewater facilities, it outlines an appropriate process for facility expansion through a combination of population projections and increased wastewater recycling. Cumulative analysis within the Plan notes that future projects include planned expansion of existing facilities. The Proposed Project will cumulatively impact wastewater treatment facilities provided by the CVWD by increasing the amount of wastewater produced; however, this increased demand will be countered through planned-for expansion as identified in the Plan. CVWD will be able to meet the needs generated by cumulative development in the area. Therefore, the implementation of the Proposed Project will result in a less than significant impact with regard to wastewater facilities.

Solid Waste

The Riverside County Annual Report for 2000 (August 2001) documents that the County’s disposal facilities provide more than 15 years of disposal capacity, based on projected growth in disposal with a 50-percent diversion rate. The anticipated closure dates for the landfills likely to serve the project vicinity, Badlands, is 2018 and Lamb Canyon, is 2023. The addition of solid waste from the Proposed Project would not cumulatively impact the Badlands and Lamb Canyon landfills.

Fire Protection Services

Development of the Proposed Project along with future related development projects in the area will have a cumulative adverse impact on the Fire Department’s ability to provide an acceptable level of service due to the increased number of emergency and public service requests resulting from a growing population. Environmental review would be required for future projects and compliance with the Riverside County Fire Protection Master Plan would be required for approval. Payment of appropriate City DIFs will minimize cumulative impacts on fire protection services. The Fire Department will be able to meet the needs generated by cumulative development in the area. Therefore, implementation of the Proposed Project will have a less than significant impact on cumulative fire protection services.

Police Protection Services

Implementation of the Proposed Project and related or future projects could combine to generate demand for additional police protection services. This would be addressed through the respective jurisdictions’ overall planning and budgeting process (e.g., property taxes and general fund revenues). Implementation of the Proposed Project would not significantly affect the provision of police protection services. Therefore, the Proposed Project, in conjunction with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact to police protection services. The Police Department will be able to meet the needs generated by cumulative development in the area. Therefore, implementation of the Proposed Project will have a less than significant impact on cumulative police protection services.

Schools

Development associated with related or future projects, could combine to generate demand for additional school services, which would be addressed through the respective jurisdictions’ overall planning and budgeting process (e.g., property taxes, general fund revenues, and development fees). The Proposed Project will be required to pay applicable development fees levied by DSUSD pursuant to Education Code Section 17620 and Government Code, Sections 65995 et seq. to offset these impacts on school facilities resulting from new development. Implementation of the Proposed Project would not significantly affect the provision of school services. Therefore, the Proposed Project in conjunction with
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other past, present, and reasonably foreseeable future projects would not result in a significant cumulative impact to school services.

Other Public Services

Development of the Proposed Project along with future related development projects in the area will have a cumulative adverse impact on the La Quinta Civic Center and the City’s Maintenance Facilities due to the increased number of residents, employees, and visitors resulting from new residential communities and commercial uses. Because the Proposed Project and related new development within the City would be required to pay DIF for the Civic Center and Maintenance Facilities, the Proposed Project would not be considered a cumulatively significant impact.

4.9.4 Regulatory Requirements

Water

Senate Bill 901

Signed into law on October 16, 1995, SB 901 required every urban water supplier to identify as part of its Urban Water Management Plan (UWMP), the existing and planned sources of water available to the supplier over a prescribed 5-year period. The UWMP must include a description of all water supply projects and programs that may be undertaken to meet total project water use. A city or county, at the time it submits the NOP for an EIR for a project, shall request a letter from the urban water supplier stating whether the projected water demand was included as part of the most recent UWMP, and whether the project water demand will be met by the supplier. After receiving such information, cities and counties still retain the authority to approve a project when water availability is not firmly established.

Senate Bill 610

Signed into law October 9, 2001, SB 610 resulted in amendments to the Public Resources Code and the Water Code. Revising provisions established by SB 901, SB 610 requires that any city or county having determined that a Proposed Project is subject to CEQA to identify if the Proposed Project falls into one of the following thresholds:

- A proposed residential development of more than 500 dwelling units;
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 SF of floor area;
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 SF of floor area;
- A proposed hotel or motel, or both, having more than 500 rooms;
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 SF of floor area;
- A mixed-use project that includes one or more of the projects specified above;
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

If the Proposed Project meets one of the thresholds, the planning agency must then request that the urban water supplier prepare a water supply assessment. The assessment would include the identification of existing water entitlements, water rights, or water service contracts relevant to the water supply identified.
for the Proposed Project, and the amount of water received pursuant to such entitlements, rights, or contracts.

**Urban Water Management Planning Act**

Since 1984, the Urban Water Management Planning Act has required "urban water suppliers" to develop written "urban water management plans." While generally aimed at encouraging water suppliers to implement water conservation measures, it also created long-term planning obligations. In preparing urban water management plans, urban water suppliers must describe the following:

- Existing and planned water supply and demand
- Water conservation measures and a schedule for implementing and evaluating such measures
- Water shortage contingency measures

Urban water suppliers are required to use a 20-year planning horizon and to update the data in the urban water plans every 5 years. They must address future population growth and the existing and planned sources of water available to the supplier.

**Solid Waste**

**California Integrated Waste Management Board (CIWMB)**

CIWMB Model Ordinance (per AB 939) – With its passage, solid waste management practices were redefined by (1) requiring each California City and County to divert 50 percent of the solid waste that is disposed, and (2) local governments to prepare a Source Reduction and Recycling Element (SRRE) to its Solid Waste Management Plan that identifies how to improve waste resource management by integrating solid waste management principals including source reduction, reuse, recycling, and composting before landfill disposal or regulated incineration. This ordinance requires recycling conditions on new developments and adequate areas for collecting and loading recyclable materials in development projects. CIWMB also requires that all counties have an approved County-wide Integrated Waste Management Plan (CIWMP). To be approved, the CIWMP must demonstrate sufficient solid waste disposal capacity for at least fifteen years, or identify additional available capacity outside of the County’s jurisdiction.

**Riverside Countywide Integrated Waste Management Plan (CIWMP)**

Riverside CIWMP outlines the goals, policies, and programs the County and its cities will implement to create an integrated and cost-effective waste management system that complies with the provisions of AB939 and its diversion mandates. The CIWMP is composed of the Riverside Countywide Summary Plan, the SRRE, the Nondisposal Facility Element (NDFE) and Household Hazardous Waste Element (HHWE) for the County and each of its cities, and the Riverside Countywide Siting Element. For subdivisions of single-family detached homes, recycling areas are required to serve the needs of each home within that subdivision and meet certain criteria of compatibility and compliance with local building codes and all laws relating to fire, building, access, circulation, and safety.

**Fire Protection Services**

- **California Public Resources Code No. 4290** - Provides for the protection of areas that are designated as State responsibility areas.
- **Uniform Fire Code and the Uniform Building Code** – These codes prescribe performance characteristics and materials to be used to achieve acceptable levels of fire protection.
The following ordinances are also applicable as fire protection services are provided to the city as part of a mutual aid agreement with the RCFD and the CDF.

- **Riverside County Ordinance No. 787** - This ordinance is based on the Uniform Fire Code, and outlines fire protection standards for the safety, health, and welfare of the citizens of the County. Among the items regulated by Ordinance No. 787 are access to a project, storage of hazardous materials, building design, water supply, and brush clearance.

- **Riverside County Ordinance No. 671** - This ordinance sets forth fees for services and permits required under Ordinance 787. Riverside County also requires the payment of mitigation fees to collect revenue for the establishment of new stations. Riverside County currently requires new development applicants to pay mitigation fees to help offset the cost of providing new fire facilities.

The following ordinance is required by the City of La Quinta for fire protection services.

- **Ordinance 408** – This ordinance sets forth Development Impact Fees for new development in the City of La Quinta. The City of La Quinta requires the payment of mitigation fees to collect revenue for the impacts to the City of La Quinta public facilities, including establishment of new fire stations.

**Police Protection Services**

There are no regulatory requirements related to police protection services for the Proposed Project.

**Schools**

*School Facilities Act (SB 50, Stats. 1998, c.407)*

In 1998, the state legislature adopted SB 50, the historic school facility financing and reform legislation, which became operative with the passage of Proposition 1A by the state electorate on November 3, 1998.

SB 50 provides limitations on development exactions for school mitigation purposes. SB 50 substantially revamped the method of providing state monies for school construction by establishing a system by which the state will provide 50 percent of the cost of new school facilities from school bond proceeds, with school districts providing the other 50 percent matching share from development fees and other local funding sources such as local school bonds. SB 50 specifically provides that it is the exclusive method for financing school facilities and provides the exclusive method for mitigating environmental effects related to the adequacy of school facilities. Compliance with SB 50 is also to be full and complete mitigation of impacts on adequate school facilities.

SB 50 establishes tiers or levels of development fees that can be imposed upon new development. The basic state statutory fee, often referred to as a “Level 1 fee” which, as adjusted by the State Allocation Board (SAB) in January 2002, currently authorizes a charge of $2.14 per square foot of assessable space of residential construction. The SAB adjusts the amount of the Level 1 fee biannually in January of even numbered years.

**Other Public Services**

The following ordinance is also required by the City of La Quinta for the City's Civic Center and Maintenance Facilities.

- **Ordinance 408** – The City of La Quinta requires the payment of Development Impact Fees to collect revenue for the impacts to the City of La Quinta public facilities, including expansion of the La Quinta Civic Center and Maintenance Facilities.
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4.9.5 Level of Significance Before Mitigation

Water

An extension of the existing 24-inch water line located at Highway 111 and Jefferson Street would be necessary to serve the Proposed Project. To comply with SB 901, a letter stating that the project-related water demand will not significantly impair CVWD's ability to provide water service to the project and related projects within the district's service area was requested and obtained (Appendix I). Furthermore, the service letter states that water service to the project could be met. Therefore, the increased demand for services could be met by existing and/or planned resources. The Proposed Project does not meet any of the thresholds for SB 601; therefore, a water supply assessment was not required.

The Coachella Valley Water Management Plan accounts for significant expansion of facilities, ensuring adequate water supply will be available to meet demand with the incorporation of cumulative development. Additionally, each project applicant would be required to pay applicable fees and charges per CVWD regulations for connection fees to the CVWD system. Therefore, project-specific and cumulative impacts on water supply will be less than significant.

Sewer

The project's sewer and wastewater service demands will be met by the CVWD as specified in the service letter (Appendix I) provided all applicable fees are paid. Cumulatively, the Coachella Valley Water Management Plan addresses future planned expansion of wastewater facilities. Furthermore, the Plan is consistent with the wastewater treatment requirements of the Colorado River Basin RWQCB. Therefore, the Proposed Project is also consistent with the specified requirements through its consistency with the Coachella Valley Water Management Plan. The Proposed Project would not require the construction of new storm water drainage facilities; the planned storm water drainage system will cause minor alterations of the existing drainage pattern in the area. Project-specific and cumulative impacts to wastewater facilities are therefore less than significant.

Solid Waste

The Proposed Project would not significantly decrease the remaining capacity of either the Badlands or Lamb Canyon Landfills. Both the Badlands and Lamb Canyon Landfills are expected to accommodate the amount of daily solid waste generated by the Proposed Project which includes a 50 percent reduction in the amount of solid waste from the Proposed Project through recycling. The project applicant would also recycle construction and demolition waste during construction. Verification of recycling would be made to the Planning/Recycling Division of the Riverside County Waste Management Department in order to clear the Proposed Project for occupancy permits. Impacts to local landfills as a result of the Proposed Project and resulting from the Proposed Project’s solid waste generation would be less than significant.

Fire Protection Services

Per the RCFD, current staffing and equipment levels are sufficient to service the Proposed Project area. In addition, the Proposed Project is not located in a high fire hazard area. The project applicant shall participate in a City development impact fee program to provide funding for construction of new fire stations. Upon implementation of the applicable regulatory requirements and payment of mitigation fees directed under Ordinance 408, totaling $10,504, the Proposed Project’s specific and cumulative impacts to fire protection services would be less than significant.

Police Protection Services

The Proposed Project would not significantly impact the La Quinta Police Department by generating an additional two calls per day for service. Cumulative development would have the potential to create a
4.0 Environmental Impact Analysis

significant impact to police services in the City. These potential impacts would be addressed through the City of La Quinta’s overall planning and budgeting process (e.g., property taxes and general fund revenues). Therefore, project specific and cumulative impacts to police protection services would not be significant.

Schools

The proposed project will not result in a need for substantial expansion of existing school facilities. Under the provisions of SB 50, the project applicant would be required to pay school fees in order to obtain a certificate of compliance from the District. As a prerequisite to obtaining a building permit from the City, SB 50 is the exclusive method for considering and mitigating impacts of development on school facilities. Compliance with SB 50 by the payment of school impact fees is deemed to be full and complete mitigation of the impacts of any adjudicated act on the provision of adequate school facilities.

Other Public Services

The project applicant shall participate in a city development impact fee program to provide funding for capital improvements for expansion of the city’s Civic Center and Maintenance Facilities. Upon payment of mitigation fees directed under Ordinance 408, there are no significant impacts.

4.9.6 Environmental Mitigation Measures

No significant short-term or cumulative impacts to water, sewer, and solid waste facilities, or police protection services, are anticipated with the Proposed Project. Therefore, no mitigation measures are required.

Fire Protection Services

MM 4.9-1 The project applicant shall pay development impact fees per City of La Quinta Ordinance 408 to the RCFD for the purpose of developing new commercial facilities within the City. Since no significant adverse impacts to fire protection services would result from implementation of the Proposed Project, no additional mitigation measures would be required.

Schools

MM 4.9-2 The project applicant shall pay development fees to the Desert Sands Unified School District for the purpose of developing new school facilities within the City. The project applicant shall pay $0.36 per square foot in fees. Since no significant adverse impacts to school facilities would result from implementation of the Proposed Project, no additional mitigation measures would be required.

La Quinta Civic Center

MM 4.9-3 The project applicant shall pay development impact fees per City of La Quinta Ordinance 408 to the City for improvements to the City’s Civic Center.

La Quinta Maintenance Facility

MM 4.9-4 The project applicant shall pay development impact fees per City of La Quinta Ordinance 408 to the City for improvements to the Maintenance Facilities.

4.9.7 Level of Significance After Mitigation

Project-specific and cumulative impacts to water supply, wastewater and solid waste facilities, fire and police protection services, schools, and the City’s Civic Center and Maintenance Facilities will be less than significant.
4.0 Environmental Impact Analysis

4.10 TRANSPORTATION AND TRAFFIC

The following report has been prepared to analyze the impact the Proposed Project will have on the surrounding transportation system and is included in its entirety in Appendix J of this Draft EIR:


4.10.1 Environmental Setting

4.10.1.1 Applicable Plans

Local Plans and Policies

Riverside County Congestion Management Plan

Congestion Management Plans (CMPs) are required pursuant to California Proposition 111, passed in June 1990, which requires that a designated Congestion Management Agency develop and adopt a CMP for each county with a population of more than 50,000. The County of Riverside is responsible for the development, monitoring, and biennial updating of the County's CMP. The goals of the County's CMP are to reduce traffic congestion and to provide a mechanism for coordinating land use and development decisions. The CMP is also used as a method for proposing transportation projects that are eligible to compete for state gasoline tax funds.

In 1997, the Riverside County Transportation Commission (RCTC) significantly modified its original CMP to focus on meeting federal congestion management system guidelines. The focus of the CMP is the development of an enhanced traffic monitoring system in which real-time traffic count data can be accessed by RCTC, Coachella Valley Association of Governments, and Caltrans to evaluate the condition of the congestion management system, as well as meet other monitoring requirements at the State and Federal levels. In preparation of the 2001 CMP, there were no deficiencies found on the CMP system based upon the year 2001 monitoring effort. The CMP for Riverside County was developed through a cooperative effort involving local jurisdictions, public agencies, businesses, and community groups. The regional transportation system subject to the CMP is defined as all state highways and principal arterials. The current CMP was adopted by RCTC in November 2003. Of the roadways that directly serve the project site, Highway 111 is within the CMP designated highway system. Outside of the immediate vicinity, I-10 and SR 86 are also within the CMP system.¹

City of La Quinta General Plan Circulation Element

The City of La Quinta General Plan Circulation Element provides the definition of an intersection deficiency and therefore, the required Level of Service (LOS) for the City's circulation system. LOS is a qualitative measure that describes operational conditions in terms of the level of flow, congestion, or delay experienced by motorists. The LOS, which can range from A (best) through F (worst), rates traffic congestion at intersections and along roadway segments. The City of La Quinta General Plan states that peak hour intersection operations of LOS D or better are generally acceptable. Therefore, any intersection operating at LOS E and F will be considered deficient.

Caltrans

Highway 111 is currently under the jurisdiction of Caltrans through the City of La Quinta. The Caltrans Guide for the Preparation of Traffic Impact Studies states that an LOS of between C and D or better must be maintained for signalized and unsignalized intersections during the weekday PM peak hour. However,

¹ 2003 Riverside County Congestion Management Program. Chapter 2. Table 2-1.
if an existing state highway facility is operating at less than the appropriate LOS, the existing measures of effectiveness for LOS should be maintained. Per discussions with Caltrans staff, referenced in the Transportation Impact Analysis (TIA), Caltrans defers to the traffic operating standard adopted by the City through which the highway passes. The cities of La Quinta and Indio both have LOS D as their threshold for determining significant impacts. LOS results in this report are for the one hour weekday PM peak period. Traffic operations during the rest of the PM peak period and throughout the day should be even better than those shown in this analysis.

4.10.1.2 Existing Circulation System

Project Area Roadways

The Proposed Project is located in the City of La Quinta, west-southwest of the intersection of I-10 and Highway 86. Regional access is from I-10. Local access to the site is from two points on Highway 111. The existing roadway network and intersections for the traffic study area roadways within the project vicinity are shown in Figure 4.10-1, Existing Lane Configurations and Traffic Control Devices. The following roadway classifications are derived from the City of La Quinta General Plan Circulation Element:

- **Washington Street** – a six- to eight-lane north-south road that intersects with Highway 111. Washington Street is classified as a major/augmented major arterial.

- **Fred Waring Drive** – a six-lane east-west road that runs parallel to Miles Avenue. Fred Waring Drive is classified as a major arterial.

- **Miles Avenue** – a four-lane east-west road that runs parallel to Fred Waring Drive. Miles Avenue is classified as a primary arterial.

- **State Highway 111** – a six- to eight-lane east-west highway that provides local access to the project site. Highway 111 is classified as a major arterial to the east of Washington Street and as an augmented major arterial to the west of Washington Street.

- **Avenue 48** – a four-lane east-west road that runs parallel to Fred Waring Drive. Avenue 48 is classified as a primary arterial.

- **Adams Street** – a four-lane north-south road that runs parallel to Jefferson Street. Adams Street is classified as a primary arterial south of Highway 111 to Avenue 48 and as a secondary arterial north of Highway 111.

- **Dune Palms Road** – a four-lane north-south road that runs parallel to Jefferson Street. Dune Palms Road is classified as a primary arterial south of Highway 111 to Avenue 48 and as a secondary arterial north of Highway 111.

- **Jefferson Street** – a six-lane north-south road that is classified as a major arterial.

- **Madison Street** – a four-lane north-south road that runs parallel to Jefferson Street. Madison Street is classified as a primary arterial.

Study Intersections

The study intersections and overall study area for this project were selected based on a review of the local transportation system and discussions with City of La Quinta staff. The study area was broadened beyond what is typically required for similar developments per direction provided by City of La Quinta staff to
LEGEND

- STOP SIGN
- TRAFFIC SIGNAL

Existing Year (2005) Lane Configurations and Traffic Control Devices

FIGURE 4.10-1
4.0 Environmental Impact Analysis

ensure a comprehensive review of the transportation system. Operational analyses were performed at the following intersections:

- Washington Street at Fred Waring Drive
- Washington Street at Miles Avenue
- Washington Street at Channel Drive
- Washington Street at Highway 111
- Washington Street at Avenue 48
- Highway 111 at Simon Drive
- Highway 111 at La Quinta Center
- Highway 111 at Adams Street
- Highway 111 at La Quinta Drive
- Highway 111 at Dune Palms Road
- Highway 111 at Depot Road
- Highway 111 at Jefferson Street
- Highway 111 at Madison Street
- Jefferson Street at Fred Waring Drive
- Jefferson Street at Miles Avenue
- Jefferson Street at Avenue 48

Methodology

The following scenarios were identified by the City for evaluation:

- Existing (2005) traffic conditions
- Opening year (2006) without project
- Opening year (2006) with project
- Opening year (2006) with project and Highway 111 improvements Saturday peak hour sensitivity analysis
- Opening year (2006) with project and Highway 111 improvements
- Future year (2020) build out without project
- Future year (2020) build out with project
- Future year (2020) build out traffic conditions (a comparison between the General Plan Build Out/Post 2020 Traffic and the incremental increase in traffic associated with the Proposed Project.)

The LOS for traffic flow considers factors such as speed and travel time, freedom to maneuver, traffic interruptions, comfort, convenience and safety, types of roadway, and whether flow is interrupted or uninterrupted. LOS ranges from A through F, with LOS A representing uncongested, free-flowing conditions, and LOS F representing total breakdown with stop-and-go operation. Each LOS is defined by a range of volume-to-capacity (V/C) ratios that compare the level of traffic to the theoretical capacity of the facility. The definitions of LOS for uninterrupted flow (flow not restrained by traffic controls/devices such as stop signs and signals) include:
4.0 Environmental Impact Analysis

<table>
<thead>
<tr>
<th>LOS A</th>
<th>Represents free flow. Individual users are virtually unaffected by the presence of others in the traffic stream.</th>
</tr>
</thead>
<tbody>
<tr>
<td>LOS B</td>
<td>Is in the range of stable flow, but the presence of other users in the traffic stream begins to be noticeable. Freedom to select desired speeds is relatively unaffected, but there is a slight decline in the freedom to maneuver.</td>
</tr>
<tr>
<td>LOS C</td>
<td>Is in the range of stable flow, but marks the beginning of the range of flow in which the operation of individual users becomes significantly affected by interactions with others in the traffic stream.</td>
</tr>
<tr>
<td>LOS D</td>
<td>Represents high-density but stable flow. Speed and freedom to maneuver are severely restricted, and the driver experiences a generally poor level of comfort and convenience.</td>
</tr>
<tr>
<td>LOS E</td>
<td>Represents operating conditions at or near the capacity level. All speeds are reduced to a low, but relatively uniform value. Small increases in flow will cause breakdowns in traffic movement.</td>
</tr>
<tr>
<td>LOS F</td>
<td>Is used to define forced or breakdown flow. This condition exists wherever the amount of traffic approaching a point exceeds the amount that can traverse the point. Queues form behind such locations.</td>
</tr>
</tbody>
</table>

The definitions of LOS for interrupted traffic flow (flow restrained by traffic controls) differ slightly depending on the type of traffic control. LOS is typically dependent on the quality of traffic flow at the intersections along a roadway. The 2000 Highway Capacity Manual (HCM) methodology expresses the level of service at an intersection in terms of delay time for the various intersection approaches and uses different procedures depending on the type of intersection control.

<table>
<thead>
<tr>
<th>Level of Service Criteria for Signalized Intersections</th>
<th>Average Control Delay per Vehicle (seconds)</th>
</tr>
</thead>
<tbody>
<tr>
<td>LOS A</td>
<td>&lt;10.0</td>
</tr>
<tr>
<td>LOS B</td>
<td>&gt;10 and ≤ 20</td>
</tr>
<tr>
<td>LOS C</td>
<td>&gt;20 and ≤ 35</td>
</tr>
<tr>
<td>LOS D</td>
<td>&gt;35 and ≤ 55</td>
</tr>
<tr>
<td>LOS E</td>
<td>&gt;55 and ≤ 80</td>
</tr>
<tr>
<td>LOS F</td>
<td>&gt;80</td>
</tr>
</tbody>
</table>

Traffic volumes on the transportation network for the full build out year were taken from the approved 2002 La Quinta General Plan. In addition, a two and a half percent annual traffic volume growth rate was applied to existing volumes to account for system-wide traffic increases between 2005 and 2006.

The TRAFFIX software was used to analyze all signalized and unsignalized intersections. TRAFFIX has the ability to implement any level of service methodology for both signalized and unsignalized intersections and organize all intersections and scenarios in one database. This analysis was performed in accordance with the procedures stated in the HCM.

**Traffic Volumes and Intersection Conditions**

**Existing Roadway Levels of Service**

Existing average daily traffic (ADT) volumes on arterial highways throughout the study area are shown on Figure 4.10-2. Manual turning movement counts for ADT and intersection turning movements were conducted at each of the study intersections on a typical weekday afternoon in April 2005 to establish the weekday PM peak hour traffic volumes. The City of La Quinta identified the weekday PM peak hour between 4:30 PM and 5:30 PM as the study time period. The weekday AM peak hour was not analyzed as the proposed development is mainly retail and will not generate any significant traffic volumes during this time period. Similarly, no seasonal adjustment factor for traffic volumes was required for this study as April represents the higher months of traffic volumes generally experienced in the study area. During
LEGEND

CM - CRITICAL MOVEMENT (UNSignalized)
LOS - INTERSECTION LEVEL OF SERVICE
  (Signalized) CRITICAL MOVEMENT LEVEL
  OF SERVICES (UNSignalized)
CM - CRITICAL MOVEMENT DELAY (Signalized)
LOS - CRITICAL MOVEMENT DELAY (UNSignalized)
V/C - OPTICAL VOLUME TO CAPACITY RATIO

Existing Year (2005) Average Daily Traffic volumes (Weekly PM Peak Hour)

FIGURE 4.10-2
the time of the existing conditions traffic counts, Jefferson Street north of Highway 111 was only partially open due to repairs from being washed out. Some diversion of traffic was likely occurring onto Washington Street and other north-south roadways. Therefore, adjustments were made to obtain the Opening Year (2006) Without Project traffic conditions since repairs on Jefferson Street will be completed in 2006.

Saturday Peak Hour is not typically evaluated for the following reasons:

- Background traffic on the transportation system is typically higher during the weekday pm peak hour and therefore the combined traffic including the development is lower during a Saturday peak hour.
- Traffic patterns in retail areas include greater turning movements into retail developments and less through traffic than the weekday pm peak hour resulting in capacity improvements that do not benefit the daily commuter traffic.
- Transportation plans, including the transportation elements of the La Quinta General Plan and Indio General Plan, are based on designing the transportation system to accommodate the weekday am peak hour and weekday pm peak hour traffic.

Additionally, the TIA includes a Saturday sensitivity analysis on two intersections to ensure that a Saturday analysis was not necessary for the entire project. The analysis concluded that the Saturday peak hour generally will result in similar or better traffic operations than the weekday PM peak hour. Further details regarding the sensitivity analysis are discussed in Section 4.10.2.2 below.

**Existing Intersection Levels of Service**

Existing conditions volume-to-capacity ratios and LOS were analyzed for the PM peak hour conditions at the study intersections. Existing intersection LOS and acceptable LOSs based on City policy are summarized in Table 4.10-1. For existing traffic conditions, all study intersections currently operate at acceptable levels of service.

<table>
<thead>
<tr>
<th>Intersection</th>
<th>LOS</th>
<th>Critical V/C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington Street at Fred Waring Drive</td>
<td>D</td>
<td>0.705</td>
</tr>
<tr>
<td>Washington Street at Miles Avenue</td>
<td>C</td>
<td>0.576</td>
</tr>
<tr>
<td>Washington Street at Channel Drive</td>
<td>C</td>
<td>0.591</td>
</tr>
<tr>
<td>Washington Street at Highway 111</td>
<td>D</td>
<td>0.849</td>
</tr>
<tr>
<td>Washington Street at Avenue 48</td>
<td>C</td>
<td>0.587</td>
</tr>
<tr>
<td>Highway 111 at Simon Drive</td>
<td>C</td>
<td>0.536</td>
</tr>
<tr>
<td>Highway 111 at La Quinta Center</td>
<td>B</td>
<td>0.676</td>
</tr>
<tr>
<td>Highway 111 at Adams Street</td>
<td>C</td>
<td>0.785</td>
</tr>
<tr>
<td>Highway 111 at La Quinta Drive</td>
<td>C</td>
<td>0.698</td>
</tr>
<tr>
<td>Highway 111 at Dune Palms Road</td>
<td>D</td>
<td>0.886</td>
</tr>
<tr>
<td>Highway 111 at Depot Drive</td>
<td>A</td>
<td>0.527</td>
</tr>
<tr>
<td>Highway 111 at Jefferson Street</td>
<td>C</td>
<td>0.654</td>
</tr>
<tr>
<td>Highway 111 at Madison Street</td>
<td>D</td>
<td>0.730</td>
</tr>
<tr>
<td>Jefferson Street at Fred Waring Drive</td>
<td>C</td>
<td>0.480</td>
</tr>
<tr>
<td>Jefferson Street at Miles Avenue</td>
<td>C</td>
<td>1.039</td>
</tr>
<tr>
<td>Jefferson Street at Avenue 48</td>
<td>D</td>
<td>0.629</td>
</tr>
</tbody>
</table>

**Notes:**

LOS = Level of Service  
V/C = Volume to capacity (ratio)
Additional transportation features of the Proposed Project include parking and a bus stop. The impacts of these features are included in the Project Description section of this analysis.

4.10.2 Environmental Impacts

4.10.2.1 Thresholds of Significance

As defined in Appendix G of the CEQA Guidelines, project impacts to the transportation system are considered significant if any of the following occur:

Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

- Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways. Policy 3-2.1.3 of the Circulation Element establishes LOS D as the minimum peak hour standard for streets in La Quinta. Furthermore, the City considers operational impacts to be significant if intersections forecasted to operate at LOS E or F without the proposed development experience a 0.02 increase in volume to capacity (v/c) with site development.

- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

- Result in inadequate emergency access.

- Result in inadequate parking capacity.

- Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

4.10.2.2 Project Impacts

Construction-Related Impacts

Construction of Phase I is scheduled to begin as soon as the Final EIR is certified and the Proposed Project is approved by the City Council, and appropriate permits are obtained. Phase I should be completed by August 2006. Phase II is not scheduled to begin construction until tenants are secured and the site plan goes through individual site plan review with the City for each building to verify applicability with the site plan and building codes. Phase II should be completed by April 2007. Project construction could, therefore, potentially result in short-term traffic impacts. As the project site is mainly flat, implementation of the Proposed Project would involve a minimal grading program consisting of 59,500 cubic yards of cut and fill to be balanced onsite. Therefore, no import or export of fill material is anticipated. Heavy construction equipment would be delivered to the site and remain on-site during the grading and excavation phases. Traffic would be minimally affected along streets in the project vicinity, and grading and construction vehicles would affect traffic to varying degrees during these phases.

Operation Impacts – Level of Service

Trip Generation

Trip generation represents the amount of traffic that is attracted and produced by a development. For the Proposed Project, additional traffic to the area will be generated from the development of 233,439 SF of commercial development. The number of vehicle trips that would be generated by the Proposed Project

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2 To read more about project phasing, see Section 2.4: Construction Activities/Project Phasing in this EIR.
was estimated based on data collected by the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 7th edition and studies performed at existing Costco Wholesale stores by Kittelson & Associates, Inc. Daily PM peak hour trip generation for the Proposed Project is shown in Table 4.10-2, below.

### Table 4.10-2. Proposed Costco Wholesale/Komar Development Estimated Trip Generation

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Source</th>
<th>Size</th>
<th>Weekday PM Peak Hour Trips Total</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Phase I</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Internal Trips (5%)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pass-by Trips/Diverted Trips (64%)</td>
<td></td>
<td>149,739 sq. ft.</td>
<td>1,045</td>
</tr>
<tr>
<td>Primary Trips (31%)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Phase II</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Internal Trips (9%)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pass-by Trips/Diverted Trips (53%)</td>
<td></td>
<td>83,700 sq. ft.</td>
<td>555</td>
</tr>
<tr>
<td>Primary Trips (38%)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proposed Development Total Trips at site driveways (minus Internal Trips)</td>
<td></td>
<td></td>
<td>1,600</td>
</tr>
</tbody>
</table>

**Notes:**
1. The percentage of pass by and diverted trips is based on independent surveys and traffic counts at ten similar size Costco Wholesale stores within the United States.

Internal trips describe those taken between the different uses internal to the site and/or the area. Pass-by trips occur when a vehicle is already on the roadway system traveling for another purpose, but then stops at the development on the way to the final destination. Diverted trips are trips that also occur when a vehicle is already on the roadway system, but these vehicles divert from the road they are traveling to stop at the proposed development. Primary trips are trips that are new to the roadway system where the purpose of the trip is to visit the proposed development.

The trip generation estimates for Phase I are based on trip generation surveys conducted at several existing Costco Wholesale stores. The proposed development is projected to generate a total of approximately 1,500 non-internal PM peak hour trips with 995 trips generated by Phase I and 505 trips generated by Phase II.

**Project Trip Distribution**

Trip distribution percentages were based on a review of the marketing study conducted for the proposed Costco Wholesale development, the existing Costco Wholesale members in the site vicinity, a review of the surrounding transportation system including existing traffic patterns, and conversations with City. The traffic reducing potential of public transit was not considered in the Transportation Impact Analysis; therefore, the traffic projections are conservative. While it is improbable that the majority of Costco Wholesale shoppers would utilize public transit, ridership to the Komar parcel might further reduce traffic volumes. The trip distribution pattern for the 2006 total traffic scenario for the project is shown on Figure 4.10-3, Year 2006 Estimated Trip Distribution Pattern. Figure 4.10-4 shows the traffic volumes generated by the project site.
Trip Assignment

The assignment of traffic from the site to the adjoining roadway system is based upon the project site's trip generation, trip distribution and proposed arterial highway and local street systems that will be in place by the development of the Proposed Project. The assumed assignment of the site-generated trips is based on a review of the marketing study conducted for the proposed Costco Wholesale development, the existing Costco Wholesale members in the site vicinity, a review of the surrounding transportation system including existing traffic patterns; and conversations with City of La Quinta staff.

Other Development Traffic

To assess cumulative traffic, project traffic was combined with existing traffic and traffic from other area-wide growth. Projects included in area-wide growth are those approved by the City of La Quinta at the time the TIA was conducted (October 2005). The following projects were included in the short-term cumulative analysis:

- **Sam's Club** – located directly west of the Proposed Project and is anticipated to generate 500 PM peak hour trips, with 225 inbound and 275 outbound.

- **Jefferson Plaza (Home Depot – Phase II)** – located directly north of the Proposed Project site at the northwest corner of Jefferson Street at Highway 111. This development consists of 218,279 square feet of retail, restaurant, and gas station uses and is anticipated to generate 446 PM peak hour trips, with 223 inbound and 223 outbound.

- **Pavilion (Retail/Restaurants)** – located northwest of the Proposed Project site, west of the La Quinta Corporate Center, at the northeast corner of the intersection of Adams Street and Highway 111. This development is anticipated to generate 172 PM peak hour trips, with 98 inbound and 74 outbound.

- **La Quinta Corporate Center** – located to the northwest of the Proposed Project and is projected to include 91,600 square feet of business park uses, 79,300 square feet of commercial uses, 235,000 square feet of office uses, 7,000 square feet of restaurant uses, a 6,500 square foot bank, a 30,000 square foot fitness center, a 15 fueling position service station, 10.6 acres of industrial park uses, and 3.61 acres of self-storage. This development is located east of the Pavilion, north of Highway 111 between Adams Street and Dune Palms Road, and is anticipated to generate 1,417 PM peak hour trips, with 539 inbound and 878 outbound.

Site Access and Circulation

Kittelson & Associates evaluated the Proposed Project site plan to provide safe and efficient on-site circulation for pedestrians, automobiles and trucks. They worked with the Proposed Project to enhance the operational and safety aspects of the proposed driveways, on-site circulation, and parking lot design. As described in Section 2.3.3.4 of this EIR, the Proposed Project will provide sufficient parking in accordance with parking standards contained in the La Quinta Municipal Code. Access to the Proposed Project will occur via two driveways: a full access signalized intersection at Highway 111 at Depot Drive and a right-in/ right-out driveway along Highway 111. A potential significant impact may occur to the maintenance of steady flow of ingress and egress traffic. However, in order to receive approval from the City of La Quinta, the Proposed Project is required to provide a reciprocal easement of access at a location on the western edge of the development. In addition, the City of La Quinta will require separate right-turn lanes on Highway 111 at each of the two site driveways and a dual left-turn lane at the Depot Drive and Highway 111 signalized intersection. The traffic signal at the Highway 111/Depot Drive intersection will also need to be modified to accommodate the road widening and turn lanes on Highway 111. These measures will reduce the impact to site access and circulation to less than significant.
4.0 Environmental Impact Analysis

Truck access to the development will be accommodated via either driveway. The majority of deliveries to the Costco Wholesale will occur before 10 AM, when the businesses within the center are generally not open to the public. Fuel deliveries to the Costco Wholesale Fuel Center will be accommodated via the signalized intersections.

Preliminary sight distance was reviewed at the site-access driveways to evaluate any existing sight distance obstructions present. Based on a review of the area, all site driveways can be constructed to meet sight distance requirements. However, a potentially significant impact to safety exists if all landscaping along the site frontage and along the north side of Highway 111 is not trimmed and maintained.

Opening Year (2006) Without Project

Based on discussions with the City of La Quinta staff, four separate developments along Highway 111 are anticipated to reach build-out in 2006. These developments, as described above, will include new restaurants, a gas station, a business park, a bank, and retail, commercial, and office uses. Site-generated trips for these developments during the PM peak hour (totaling 3,167 total trips; 1,401 in, 1,766 out) were determined by a review of approved traffic impact studies provided by the City of La Quinta and were included in the Opening year (2006) without project analysis.

In addition to the trips that will be generated by the completion of the in-process developments along Highway 111, an annual growth rate of two and a half percent was applied to the existing 2005 traffic volumes to account for the near-term regional growth in the area and to develop the 2006 background traffic volumes. A summary of Opening Year (2006) with and without project LOS and v/c ratios during the PM peak hour are shown in Table 4.10-3. Figure 4.10-5 shows traffic conditions for opening year (2006) without project.

Opening year (2006) with project analysis includes traffic growth due to development within the study area, general growth in the region, and the build out of the Proposed Project. A summary of opening year (2006) with project LOS and v/c ratios for the study area intersections during the PM peak hour are shown in Table 4.10-3. Opening year (2006) with project total traffic volumes, level of service, and V/C ratios during the PM peak hour are shown on Figure 4.10-6. Opening year (2006) with project level of service worksheets are provided in Appendix F of the TIA.

For opening year (2006) with project traffic conditions, the following study area intersections are projected to operate at LOS E/F during the PM peak hour:

- Highway 111 at Dune Palms Road - Estimated to operate at LOS F with a 0.06 increase in the v/c ratio due to project development.
- Highway 111 at Jefferson Street - Estimated to operate at LOS E with a 0.212 increase in the v/c ratio due to project development.
- Jefferson Street at Miles Avenue - Estimated to operate at LOS F (v/c ratio increase is not available)

For opening year (2006) without project traffic conditions, the following study area intersections are projected to operate at LOS E/F during the PM peak hour:

- Highway 111 at Dune Palms Road
- Jefferson Street at Miles Avenue
- Opening year (2006) without project level of service worksheets are provided in Appendix E of the TIA.
Table 4.10-3. Opening Year (2006) V/C and Level of Service (LOS) PM Peak Hour

<table>
<thead>
<tr>
<th></th>
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<td>Critical v/c</td>
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<td>Critical v/c</td>
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<tr>
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<td>Critical v/c</td>
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<td>Critical v/c</td>
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<td>0.759</td>
<td>0.759</td>
<td>0.012</td>
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</tbody>
</table>

Notes:
1. The planned improvements to widen Highway 111 to six through lanes, with dual left-turn lanes and a separate right-turn lane will mitigate this intersection to below a level of significance.
2. As part of the proposed development, the Costco Wholesale/Komar development will construct a half strip improvement along the site frontage on Highway 111, including a third eastbound through lane, a right-turn lane at each of the site accesses and a dual left-turn lane for westbound traffic at the Highway 111/Depot Road intersection.
3. The planned improvements along Highway 111 and Jefferson Street to widen both roadways to six through lanes, with dual left-turn lanes and a separate right-turn lane in the north, south and west directions will mitigate this intersection to below a level of significance.
4. The planned improvement to signalize this intersection in 2006 will mitigate the intersection to within acceptable conditions.
Opening Year (2006) Background Traffic Conditions (Weekday PM Peak Hour)
A series of roadway improvements already planned by the City of La Quinta for 2006 along Highway 111 and Jefferson Street will improve the operation of these intersections for the year 2006 condition.

**Opening Year (2006) With Project**

Opening year (2006) with project and Highway 111 improvements analysis includes traffic growth due to development within the study area, general growth in the region, the build-out of the Proposed Project site, and the planned improvements along Highway 111 and Jefferson Street. A summary of opening year (2006) with project and Highway 111 improvements LOS and v/c for the study area intersections are shown in Table 4.10-3. Opening year (2006) with project and Highway 111 improvements traffic volumes are shown on Figure 4.10-7.

The City of La Quinta has planned roadway improvement projects for Jefferson Street and Highway 111 to be implemented in 2006. These planned improvements are as follows:

- Highway 111 will be widened to six through lanes from Jefferson Street to Adams Street and will have 400-foot dual left-turn lanes at La Quinta Drive, Dune Palms Road, and Depot Road. It will also include dual 300-foot left-turn lanes on eastbound Highway 111 at Jefferson Street. In addition, the improvements will include separate right-turn lanes on Highway 111 at Adams Street, Dune Palms Road, Depot Road, and Jefferson Street. No improvements are proposed to eastbound Highway 111 at Jefferson Street.

- A second southbound through lane and a second southbound left-turn lane will also be constructed at the intersection of Highway 111 at Adams Street.

- Jefferson Street will be widened to six through lanes, with dual left-turn lanes and a separate right-turn lane at all major intersections from Highway 111, north to Indio Boulevard.

It is anticipated that these improvement projects will be completed in 2006 and will result in acceptable LOS at the intersections of Highway 111 and Dune Palms Road and Jefferson Street, and the intersection of Jefferson Street and Miles Avenue. Therefore, for opening year (2006) with project and Highway 111 improvements, all of the study area intersections are projected to operate at acceptable LOS during the PM peak hour. (For more details on the impact of planned improvements on specific intersections, see the TIA.)

**Opening Year (2006) With Project and Highway 111 Improvements Saturday Peak Hour Sensitivity Analysis**

Since heavier retail traffic occurs on weekends than on weekdays, the traffic study includes a sensitivity analysis of Saturday peak hour traffic to determine whether a more comprehensive Saturday analysis was necessary to assess the relative impact of the Proposed Project on weekend traffic. Traffic counts were conducted in September 2005 on a typical Saturday from Noon-4PM and on a typical weekday PM peak hour at the Washington Street and Highway 111 and Jefferson Street and Highway 111 intersections to determine the relationship between the weekday PM peak period used in the analysis scenarios and the weekend peak hour. The two intersections were estimated to operate at LOS D during the weekday PM peak hour analysis and also during the Saturday peak hour. Therefore, it is assumed that traffic impacts in opening year (2006) with project and Highway 111 Improvements would be less than significant on Saturdays.

See Figure 4.10-8 for traffic conditions at the two intersections studied during Saturday peak hour.
Opening Year (2006) Total Traffic Conditions With Project and Roadway Improvements (Weekday PM Peak Hour)

FIGURE 4.10-7

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**Future Year (2020) Build Out Traffic Conditions**

The future traffic conditions analysis forecasts how the study area’s transportation system will operate with the inclusion of traffic from the proposed Costco Wholesale/Komar development when the City of La Quinta has reached full build-out. This future analysis extends beyond 2020 and includes the Jefferson Street widening as well as several additional transportation improvements as identified in the City of La Quinta General Plan “Full Build Out Preferred Option” and the City of Indio General Plan Circulation Element for 2020.

Three scenarios were analyzed to determine the impacts of the proposed development:

- Future year (2020) full build out traffic conditions without the project (includes the General Plan Build Out/Post 2020 traffic, and all future planned roadway improvements) and;
- Future year (2020) full build out traffic conditions with project (includes the General Plan Build Out/Post 2020 traffic, and all future planned roadway improvements)
- Future year (2020) build out traffic conditions (a comparison between the General Plan Build Out/Post 2020 Traffic and the incremental increase in traffic associated with the Proposed Project.)

**Roadway Improvements Planned for 2020**

The following roadway improvement projects are assumed to be completed by the year 2020, based on a review of the City of Indio General Plan Circulation Element for 2020.

- Highway 111 will be widened to six through lanes from Jefferson Street to Madison Street, and will have a single left-turn lane, two through lanes and a shared through/right turn lane at the major intersections.
- Madison Street south of Highway 111 will be widened to a single left turn-lane, two through lanes and a shared through/right turn lane at major intersections. (Madison Street north of Highway 111 is shown with the same cross-section as it exists today, one left-turn and a shared through/right-turn lane).
- Avenue 48 will be widened to a single left-turn lane, two through lanes and a shared through/right turn lane at major intersections.

**Future Year (2020) Full Build Out Without Project**

A summary of future without project LOS and v/c ratios for the study area intersections during the PM peak hour are shown in Table 4.10-4. Figure 4.10-9 shows future without project build out conditions total traffic volumes.

For future year (2020) without project traffic conditions, the following study area intersections are projected to operate at LOS E/F during the PM peak hour:

- Washington Street at Fred Waring Drive
- Washington Street at Highway 111
- Highway 111 at La Quinta Drive
- Highway 111 at Dune Palms Road
- Highway 111 at Madison Street
- Jefferson Avenue at Avenue 48
### Table 4.10-4. Future Year (2020) Full Build Out Traffic Conditions With and Without Project

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<th>Intersections</th>
<th>Measure</th>
<th>Future Year (2020) Without Project</th>
<th>Future Year (2020) With Project</th>
<th>Change in LOS/Incremental Increase in v/c</th>
<th>Mitigation Required</th>
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<td>Critical v/c</td>
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<td>Washington Street at Miles Avenue</td>
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<td>D</td>
<td>C to D</td>
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</table>
4.0 Environmental Impact Analysis

Future Year (2020) Build Out With Project Traffic Conditions

A summary of future year (2020) build out with project and improvements LOS and v/c ratios for the study area intersections during the PM peak hour are shown in Table 4.10-4. Figure 4.10-10 shows future with project build out conditions total traffic volumes.

Development of the Proposed Project results in a decrease in LOS at the following intersection and will require mitigation measures to achieve acceptable standards:

- Highway 111 and Jefferson Street—Estimated to operate at a LOS D without the project and a LOS E with a 0.156 increase v/c with the project.

The same six intersections that operate at an unacceptable LOS without implementation of the Proposed Project continue to operate at an unacceptable LOS with implementation of the Proposed Project. Three of the six intersections experience an increase of 0.02 or greater in the critical v/c ratio due to implementation of the Proposed Project, which is considered a significant impact. The following three intersections contribute to more than a 0.02 increase in v/c ratio and require mitigation to achieve acceptable standards:

- Washington Street at Highway 111 — Estimated to operate at LOS F with a 0.056 increase in the v/c ratio due to project development.
- Highway 111 at La Quinta Drive — Estimated to operate at LOS E with a 0.027 increase in the v/c ratio due to project development
- Highway 111 at Dune Palms Road — Estimated to operate at a LOS E with a 0.041 increase in v/c ratio due to project development.

It should be noted that two of the intersections that fall below acceptable operating standards with implementation of the Proposed Project in the future year (2020) are located partially or wholly within the City of Indio. Because the City of Indio has not established a threshold for significance for impacts to intersections that fail with and without the project, the 0.02 increase in v/c ratio threshold was also applied to intersections in Indio. Even though the Jefferson Street at Avenue 48 and Highway 111 at Madison Street intersections do not meet acceptable LOS thresholds, it is less than significant because the Proposed Project does not cause an increase in 0.02 in v/c ratio.

The Traffic Impact Analysis also includes a comparison between the future traffic conditions under the General Plan Build Out Scenario without the Proposed Project and future conditions under the General Plan Build Out Scenario with the Proposed Project. The comparison of trip generations and average daily traffic with and without the Proposed Project revealed that the Proposed Project will result in a slight increase of 137 trips compared to the predicted trip distribution by La Quinta General Plan. (For more details, see the TIA.)

4.10.3 Cumulative Impacts

The preceding analysis of the Proposed Project is based on methodologies that incorporate the cumulative effects of traffic from general growth and anticipated development in the area. This reflects background traffic and traffic from area wide growth already approved by the City of La Quinta, plus the development of the Proposed Project. As mentioned above, four intersections are significantly impacted as a result of the Proposed Project in future year 2020. Therefore cumulative impacts to the regional circulation grid are significant and require mitigation.
4.10.4 Regulatory Requirements

Development Impact Fee

Transportation Impact Fees are assessed as part of the City’s Development Impact Fees. The recommended impact fees are a funding mechanism for system-wide improvements and are based on the cost of improvements to major and primary arterial streets, bridges and interchanges, traffic signals, and sound attenuation walls required to serve future development in La Quinta. These fees are used to fund the construction of certain capital improvements, which are identified in the City of La Quinta Development Impact Fee Study and are summarized in Table S-1 of the study. The project-specific contribution of the cost of improvements is based on 1000 square feet of building area.

City of La Quinta Transportation Demand Management: Per section 9.180 et seq. of the City of La Quinta, California Municipal Code, the project applicant is required to submit a Transportation Demand Management Plan to encourage changes in individual traffic behavior. However, a project applicant may be exempt from this requirement, per Municipal Code 9.180.040 D, if the project applicant submits an active approved plan under the SCAQMD Regulation XV program requirements. The project applicant intends to meet this requirement and exemption by submitting its SCAQMD plan to the City of La Quinta.

South Coast Air Quality Management District (SCAQMD) Rule 2202: The SCAQMD’s Governing Board both rescinded Regulation XV and adopted Rule 2202 – On-Road Motor Vehicle on December 8, 1995. The purpose of this Rule is to provide employers with a menu of options to reduce mobile source emissions generated from employee commutes, to comply with federal and state Clean Air Act requirements, Health & Safety Code Section 40458, and Section 182(d)(1)(B) of the federal Clean Air Act. Rule 2202 applies to any employer who employs 250 or more employees on a full or part-time basis at a worksite for a consecutive six month period calculated as a monthly average. An employer subject to this Rule shall annually register with the SCAQMD to implement an emission reduction program that will obtain emission reductions equivalent to a worksite specific emission reduction target (ERT) specified for the compliance year. Rule 2202 provides employers with a menu of options that they can choose from to implement and meet the ERT for their worksite. The various emissions reduction strategies and trip reduction strategies currently contained in the Rule that employers can implement and receive credit towards their ERTs are listed below.

Emission Reduction Strategies (Subdivision (f))

- Clean On-Road Mobile Sources (Regulation XVI)
- Clean Off-Road Mobile Sources (Regulation XVI)
- Pilot Credit Generation Programs
- Air Quality Investment Program
- Short-Term Emission Reduction Credits (STERCs) From Stationary Sources (Regulation XIII)
- Area Source Credits (Regulation XXV)

Trip Reduction Strategies (Subdivision (g))

- Peak Commute Trip Reductions
- Other Work-Related Trip Reductions
- Vehicle Miles Traveled (VMT) Programs
- Off-Peak Commute Trip Reductions

The project applicant intends to meet the SCAQMD Rule 2202 requirements by implementing an emission reduction program that will obtain emission reductions equivalent to a worksite-specific ERT specified for the compliance year, as agreed upon with the SCAQMD.
Level of Significance Before Mitigation

Construction related impacts are less than significant because no import or export of fill material is anticipated for grading. Therefore, impacts associated with construction activities will be limited to the number of employees and materials being delivered to the site. The project would provide sufficient parking in accordance with parking standards contained in the La Quinta Municipal Code; therefore, there are no impacts associated with parking. Potentially significant impacts may occur to site access and circulation if identified mitigation measures are not implemented. There also exists a potentially significant impact to safety hazards unless maintenance and trimming of landscaping along the frontage of the site property occurs.

Under opening year (2006) without project conditions, two of the sixteen study intersections are projected to operate at an unacceptable LOS during the weekday PM peak hour (see Table 4.10-3). Under opening year (2006) with project conditions, three study intersections are projected to operate at an unacceptable LOS during the weekday PM peak hour (see Table 4.10-3). However, these three intersections will be mitigated to acceptable LOS through already planned for Highway 111 and Jefferson Street improvements in 2006. It is recognized that short term significant impacts will result because improvements to Highway 111 and Jefferson Street will not be completed before project development. Project-related impacts without highway improvements are therefore considered to be significant but temporary. Under Opening Year (2006) conditions with project and Highway 111 improvements, all of the sixteen study intersections are projected to operate at acceptable LOS during the weekday PM peak hour (Table 4.10-3). Therefore, project-related impacts would be less than significant with the planned for improvements. The Saturday peak hour analysis concluded that impacts to the study area intersections would be less than significant. Under future year without project build out traffic conditions, six of the sixteen study intersections are projected to operate at an unacceptable LOS during the weekday PM peak hour (see Table 4.10-4). With implementation of the Proposed Project, the identified LOS remains at the same level during the weekday PM peak hour at these six intersections (see Table 4.10-4). Three of the six intersections do experience a greater than 0.02 increase of the critical v/c ratio, which is considered significant. In addition, the Jefferson Street and Highway 111 intersection experiences a decrease in LOS level from D to E as a result of the Proposed Project. Project-related impacts in the future scenario are, therefore, significant and require mitigation for four intersections.

4.10.5 Environmental Mitigation Measures

MM 4.10-1 To provide for smooth ingress and egress from its site, the Proposed Project shall implement the following measures:

- Provide and maintain low growing landscaping in the vicinity of the site driveways and along the site frontage to Highway 111 for a distance of 12 to 15 feet back of curb to ensure adequate sight distance for safe and easy flow of traffic.

- Provide a half street improvement on Highway 111 along the site frontage including an additional eastbound through lane, a right-turn deceleration lane on Highway 111 at each of the site driveways, and dual left turn lanes on Highway 111 at Depot Road. Furthermore, the traffic signal at the Highway 111/Depot Road intersection will need to be modified to accommodate the road widening and turn lanes on Highway 111.

- Provide a reciprocal easement of access at a location on the western edge of the development.

MM 4.10-2 The following table summarizes mitigation measures required to minimize future and cumulative significant impacts.
## 4.0 Environmental Impact Analysis

### Table 4.10-5. Future/Cumulative Impact Mitigation Measures

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Intersection</th>
<th>Measures Required to Achieve General Plan LOS D</th>
<th>Measures to be Implemented</th>
<th>Conclusions</th>
</tr>
</thead>
</table>
| MM 4.10-2          | Highway 111 & Washington | **Westbound**  
- Add a separate right turn lane (retain 3 through lanes)  
**Eastbound**  
- Reconfigure the right-turn lane to be a free-flow lane.  
  (Requires a new southbound receiving lane on the south side of the intersection)  
**Southbound**  
- Add a third left-turn lane  
- Add a fourth through lane.  
  (Requires a taper to receive traffic on the south side of the intersection).  
**Northbound**  
- Add a third left-turn lane | Re-strip westbound approach to allow separate right-turn lane. | The mitigation measures to achieve LOS D have been determined to be infeasible due to the substantial construction cost and right-of-way restrictions.  
The project applicant shall provide funding to implement the re-stripe of the westbound approach to allow separate right-turn lane to mitigate the significant incremental impact.  
Therefore, Project impacts will be mitigated to less than significant, but cumulative significant impacts remain. |
| MM 4.10-3          | Highway 111 & La Quinta Dr. | **Eastbound**  
- Add a separate right-turn lane | Allow northbound right-turn overlap phasing | The City of La Quinta has confirmed that this improvement will be constructed by the City, using Measure A funds provided by the Riverside Transportation Commission, in conjunction with the Highway 111 improvement project scheduled for construction in 2007.  
Therefore, this impact will be mitigated to less than significant. |
| MM 4.10-4          | Highway 111 & Dune Palms | **Southbound**  
- Add a second left-turn lane | Add a second southbound left-turn lane | A commercial development (Sam’s Club) is currently in process southwest of this intersection and will be responsible for constructing northbound dual left turn lanes at this intersection. If Caltrans does not require the southbound improvement as part of the Sam’s Club improvements and the improvements are not otherwise completed by other development, the City has confirmed that the City of La Quinta will complete the improvements using Measure A provided by the Riverside Transportation Commission, in conjunction with its Highway 111 improvement project scheduled for construction in 2007.  
Therefore, the impact will be reduced to a less than significant level. |
<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Intersection</th>
<th>Measures Required to Achieve General Plan LOS D</th>
<th>Measures to be Implemented</th>
<th>Conclusions</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM 4.10-5</td>
<td>Highway 111 &amp; Jefferson</td>
<td>Eastbound: Allow right-turn overlap phasing; Westbound: Add a separate westbound right-turn lane</td>
<td>Add a separate westbound right-turn lane</td>
<td>These proposed mitigation improvements are located in the City of Indio. The Riverside County Transportation Commission has allocated $3.2 million in Measure A funds, and $1.5 million in Transportation Enhancement funds, which are currently available to the City of Indio for Highway 111 improvements that include the Highway 111/Jefferson Street intersection. As a result, the City of Indio should be able to construct these improvements. If for some reason beyond Indio's control, the public funding noted herein is not available to pay for these improvements, and Indio establishes an alternative program to spread the costs of these improvements across all new development that increases traffic volumes at this intersection, the developers of this project should be required to participate in such a program to fund their proportionate fair share cost of these improvements. Due to the uncertainty of funding, the impact remains significant and unmitigated.</td>
</tr>
</tbody>
</table>

4.10.6 Level of Significance After Mitigation

Mitigation measure 4.10-1 will ensure adequate ingress and egress from the project site thus minimizing all significant impacts related to site access and circulation and safety. Planned city improvements to Highway 111 and Jefferson Street will minimize all deficient LOS at the study intersections in opening year (2006) but will occur after the Proposed Project is developed. Therefore, there will be unavoidable significant but temporary project-related impacts in 2006. In addition, the Proposed Project will cause a decrease in LOS to unacceptable levels to one intersection and contribute by more than 0.02 v/c to already unacceptable LOS levels at three intersections in future year (2020) build out. Mitigation measure 4.10-2 will mitigate the incremental impact of the Proposed Project to the intersection of Highway 111 and Washington Street to a less than significant level. However, mitigation needed to return the Highway 111 and Washington Street intersection to an acceptable LOS has been deemed infeasible due to construction costs and right-of-way restrictions. Cumulative impacts will remain significant and unmitigated. Mitigation measures 4.10-3-4 will minimize the impacts to Highway 111 and La Quinta Drive and Highway 111 and Dune Palms Road to less than significant levels. Deficiencies at Highway 111 and Jefferson Street will remain a significant and unavoidable impact because of uncertainty of funding availability for projects in Indio. Even with mitigation measures 4.10-2-5, cumulative impacts to the transportation circulation grid will remain significant and unavoidable.
4.11 VISUAL RESOURCES

This section addresses the aesthetic resources of the Proposed Project area. The potential effects the commercial development may have on the visual character of the surrounding area will be addressed.

4.11.1 Environmental Setting

Regional Setting

The Western Coachella Valley area is characterized by a variety of contrasting and dramatic geographic features. Surrounded by the rugged San Jacinto, Santa Rosa, and Little San Bernardino Mountains, the Coachella Valley contains a series of low-lying desert flatlands, sloping dunes and rolling foothills. The Whitewater River runs the length of the Valley.

Local Setting

The project site is located adjacent to the foothills of the Santa Rosa Mountains in eastern Riverside County. Specifically, the project site is located within the northwestern portion of the City of La Quinta, just south of the Whitewater River. The project area is defined by two main roadways which will provide access to the project site: (1) I-10 to the north; and (2) State Highway 111 also to the north. The project site is currently vacant and is designated for commercial development.

The terrain within the Proposed Project area is generally flat with some small mounds and dunes, and slopes slightly from north to south characterized by disturbed Sonoran creosote bush scrub, scattered mesquite hummocks, and weedy vegetation. The vegetation on the site includes creosote bush, burrowed, brittle bush, and mesquite. The La Quinta Evacuation Channel is adjacent to the southern boundary of the project site. No bedrock outcrops or boulders are located on the parcel.

Land uses immediately surrounding the project site are primarily undeveloped. Undeveloped property zoned for commercial uses are located to the east of the project site; undeveloped land zoned for commercial and residential uses to the west; State Highway 111 immediately to the north, and; to the south, the La Quinta Evacuation Channel (Figure 4.7-1).

Viewer Groups

Sensitive visual land uses generally include homes, recreational areas, and designated “scenic” roads. The following description identifies sensitive viewers within the study area. For this project, the sensitive viewers include the residential users on the south side of the La Quinta Evacuation Channel and potential residential users to the west. Viewer responses to visual changes were inferred from a variety of factors including viewer exposures, type of viewer, number of viewers, duration of view, and viewer activities.

Mobile Viewers

Mobile viewers are observers on an official road/highway; recreational hiking trail; or recreational lake. Due to the passive land use activities associated with hiking trails and recreational parks, these users are considered to be sensitive visual receptors. Motorists traveling on scenic designated roadways are also considered to be sensitive visual receptors; however, there are no officially designated scenic road/highways within the project area. Sensitive mobile viewers within the project area include Highway 111 to the north.

Scenic Highways

Caltrans describes the purpose of designating a highway as a scenic highway is to protect and enhance California’s natural beauty and to protect the social and economic values provided by the State’s scenic resources. There are no officially designated state, county or city scenic routes within the project area (Caltrans 2004).
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4.11.2 Project Impacts

4.11.2.1 Significance Thresholds

Implementation of the Proposed Project would result in a significant impact upon aesthetics and visual resources, as defined in Appendix G (I) of the CEQA Guidelines, if any of the following occur:

- The Proposed Project would have a substantial adverse effect on a scenic vista;
- Project development would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- The project would substantially degrade the existing visual character or quality of the site and its surroundings; and/or
- Create a new source of substantial light or glare, which would adversely affect day or nighttime views of the area.

Environmental Impacts

Evaluation of project impacts with regard to aesthetics is related to the existing visual and aesthetic characteristics of the Proposed Project site and changes to views from areas surrounding the project site. As the project site is currently flat, topography would not be extensively modified during development, as shown on Figure 4.11-1, Conceptual Grading Plan. Implementation of the Proposed Project would incorporate building pads and would be designed to allow proper access, provision of services, and drainage; however, the primary natural topography of the site would not be impacted (Figure 4.6-3).

The proposed Costco Wholesale building is a large, wholesale style building. The Costco Wholesale fueling facility layout is generally consistent with Costco Wholesale’s master design criteria, with similar architectural features, subject to review and approval by the City of La Quinta. The proposed buildings on the Komar parcels will blend with Costco Wholesale, by applying similar materials and colors. These architectural details are illustrated on Figures 2-5 and 2-6. The proposed Costco Wholesale is anticipated to have a maximum height of 37 feet, with architectural elements extending as high as 41 feet, while the maximum height of the fueling facility structures are 18 feet in height.

The preliminary landscape plan for the Proposed Project proposes a number of drought tolerant landscape trees, shrubs and groundcover plants that are suitable for the climate and that integrate with the architectural theme of the site. Landscape elements and enlargements are shown on Figure 2-7, Conceptual Landscape Plan. The project applicant has developed the landscape plan to meet the City of La Quinta Municipal Code regulations, Highway 111 Design Guidelines, and CVWD General Landscape Guidelines and Irrigation System Design Criteria. Partial screening of the Proposed Project from Highway 111 and the surrounding parcels will be accomplished through the use of a variety of plant species along the perimeters of the property.

The Proposed Project would alter the aesthetic environment and the views of the site from that of an undeveloped, vacant area to that of a commercial area; however, the project would conform to the City’s design guidelines and would comply with the General Plan. Approval of the Proposed Project Design would occur prior to issuance of grading permits.

The majority of the direct views to the commercial development would be from the immediately surrounding land uses and extended views from the residential uses to the south. The closest residence to the project site is approximately 350 feet. The residential development would have direct northerly views of the proposed commercial site; therefore, immediate views from the south would be altered with implementation of the Proposed Project. However, the combination of the distance from the project site, the La Quinta Evacuation Channel acting as a physical buffer, and the presence of no General Plan designated viewsheds, would reduce the visual impact for viewers to the south.
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Mobile viewers on Highway 111 would also have direct views of the project site. Landscaping along the northern border of the project site adjacent to Highway 111 would provide partial screening.

The project site is not located within a scenic vista or near trees, rock outcroppings, or historic buildings. In addition, the project site is designated for commercial use and surrounded by existing commercial uses to the north, east, and west. Therefore, no significant impacts would occur to scenic vistas or resources.

There are no officially designated state scenic highways within the project area. Therefore, no impacts to scenic highways would occur. However, the City of La Quinta General Plan and the City of La Quinta Municipal Code both address City designated image corridors. In the General Plan, Highway 111 is identified as a primary image corridor. The La Quinta Municipal Code Section 9.90.040 defines the height and setback requirements along primary image corridors as 22 feet and 50 feet, respectively. The Proposed Project will conform to the setback requirements. However, in the Specific Plan, the height requirement has been slightly altered, to allow for a roof height of 24 feet. This does not represent a significant impact, as the Specific Plan allows for code relief, understood to be unique to the Specific Plan, and creates acceptable variations, as adopted by the City Council.

The majority of long distance views are available from the surrounding vicinity, which consists mainly of major community facilities and future residential development. However, due to the flat topography of the area, views of the project site from distant vantage points would be relatively obscure due to the intervening buildings and are not considered significant impacts.

Development of the project would modify the nighttime appearance of the area to that of a lighted commercial area. Downward pointing lighting will be placed on the Costco Wholesale building on the east, south, and west sides, at no more than 18 feet above the finished grade. The parking lot of the Costco Wholesale, Phase I, will be illuminated with downward pointing lights. Each light will be affixed to a pole that will be no more than 35 feet above the finished grade. The parking lot of the Komar parcels, Phase II, will also be illuminated with downward pointing lights, affixed to poles that are no taller than 22 feet above the finished grade, in compliance with the Highway 111 Design Standards. The lighting fixtures for both phases of the project are of a shoebox style with the bulbs recessed in the shoebox to minimize dispersion and glare that would affect adjacent residents. The locations of the lighting poles are sited in a uniform pattern across the entire site, approximately 100 feet apart. Lighting poles adjacent to the boundaries of the project site will consist of light fixtures with shields so as not to cause substantial glare to adjacent developments. The Costco Wholesale Fuel Facility will utilize recessed under-canopy-lighting. The City of La Quinta would approve the final lighting plan design.

The project would not introduce elements which will substantially detract from the existing aesthetic character or primary aesthetic resources of the area. The height and bulk of structural elements proposed by the commercial development would be compatible, and create a visual relationship with the existing commercial uses in the project vicinity. The Proposed Project would not obstruct views from designated scenic highways. Views from the residential development approximately 350 feet to the south of the project site would be considered non intrusive because of incorporation of a buffer (La Quinta Evacuation Channel), desert themed landscaping, architectural consistency with desert theme, and the presence of no General Plan designated viewsheds. Therefore, the Proposed Project’s impacts to aesthetics and visual resources from the development of the commercial development would be less than significant.

4.11.3 Cumulative Impacts

Implementation of the Proposed Project in conjunction with the projects identified in Table 3.5-1, would cumulatively add to the loss of vacant land, and the conversion of rural areas to developed areas in the project vicinity. While the project area is characterized by open space, in general, the natural characteristics are not considered dominant or unique. This is reflected by the City’s General Plan Land Use Plan that shows commercial development planned for the immediate surrounding area. Within this
context, cumulative regional impacts to the existing visual setting would be cumulatively less than significant. Implementation of the Proposed Project and related projects would add to the nighttime lighting levels in the area. Continued development and urbanization of the La Quinta area over time will result in a more urban setting. Given the evolving developed nature of the project locale, the Proposed Project’s contribution to the visual change is cumulatively less than significant.

4.11.4 Regulatory Requirements

Local Regulations

City of La Quinta General Plan

The City of La Quinta General Plan establishes policies and goals to preserve aesthetics and scenic resources within the City. In addition, the General Plan contains guidelines and policies to preserve open space; scenic vistas; and local scenic highway programs.

The General Plan establishes Highway 111 as a primary image corridor in the Traffic and Circulation Element, Policy 13, which reads:

"Continue to implement the Image Corridors in the City, and identify new image corridors for streets brought into the City through annexation. Primary Image Corridors shall include: Washington Street, Jefferson Street, Highway 111, Fred Waring Avenue, and Eisenhower Drive from Avenue 50 to Washington Street...Standards for all Image Corridors shall be maintained in the Development Code."

Landscaping is an important aspect of urban form in that it serves to link the city’s built environment with the natural environment. Landscape design guidelines from the City of La Quinta and the Coachella Valley Water District are established to provide minimum mature vegetation and establish continuity and enhance the aesthetics of the community. Regulations and requirements applicable to the Proposed Project are described briefly below.

Highway 111 Design Guidelines

These guidelines, prepared in 1997, incorporate measures covering both landscape and architectural design guidelines. Landscape guidelines aid the City of La Quinta in creating an enhanced water efficient and colorful landscape theme for Highway 111. It is imperative that landscaping, irrigation, grading, signage, and lighting should reinforce the objectives included in the guidelines. A specific plant palette has been developed for the area. Architectural specifications stress the need for the corridor to be sensitive to the natural background views. Like the landscape standards, architectural designs should reflect the City’s physical character and ensure architectural integrity and compatibility through scale, mass, materials, and colors. The Proposed Project is consistent with the Highway 111 Design Guidelines because the project incorporates a 50 foot landscaped setback along Highway 111, which is desert themed vegetation and an architectural theme consistent with the desert.

Coachella Valley Water District General Landscape Guidelines and Irrigation System Design Criteria

These guidelines provide landscaping standards for effective landscape areas. These guidelines specify landscape development in public right-of-ways, easements, setbacks, slope areas, areas adjacent to the public right-of-way and commercial/industrial on-site parking areas. All regulations included herein are consistent with the General Plan and are intended to:

- Enhance the aesthetic quality of the project area and compliment the surrounding area whether it is fully developed or designated as native open space;
- Encourage the preservation of existing mature trees and shrubs;
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- Incorporate water conservation principles such as: balanced use of turf, shrub/groundcover, and hardscape areas; use of native and drought tolerant plant materials, efficient irrigation methods such as drip irrigation, bubbler systems and dual irrigation to sustain trees and shrubs in future drought periods; and use of mulch in shrub/groundcover areas to provide water retention and reduce evaporation loss;

- Utilize tree planting to create shaded micro-climates that reduce heat in and around open spaces and parking lots; and

- Develop and utilize reclaimed wastewater for landscape irrigation to reduce demands on domestic water sources.

To ensure compliance with and adherence to the above stated regulations concerning visual and aesthetic resources, the following design guidelines will be incorporated into the Proposed Project:

- Paint schemes shall comply with the approved architectural elements designed for the project to ensure the development blends into the surrounding environment and that future development can sustain a sense of continuity.

- Landscaping shall be planted around the perimeter of the project site to partially screen views of the development from nearby residential viewers.

4.11.5 Level of Significance Before Mitigation

Because no scenic vistas are located within the immediate vicinity of the project site and no officially designated state scenic highways exist within or near the project area, the Proposed Project would not have a substantial adverse effect on a scenic vista. In addition, no scenic resources, including trees, rock outcroppings, or historic buildings, are present onsite. Therefore, no impacts would occur to scenic vistas or resources. The Highway 111 Image Corridor Design Guidelines have been, for the most part, adhered to. However, in the Specific Plan, the height requirement has been slightly altered, to allow for a roof height of 24 feet. This does not represent a significant impact, as the Specific Plan allows for code relief, understood to be unique to the Specific Plan, and creates acceptable variations, as adopted by the City Council. No significant impact would occur to the Primary Image Corridor.

The project would not substantially degrade the existing visual character or quality of the site and its surroundings. While the project area is currently characterized as vacant, in general, the natural characteristics of the project site are not considered dominant or unique. This is reflected by the City’s General Plan Land Use Plan and design guidelines that show future commercial development planned for the majority of the area. The Proposed Project is, therefore, consistent with the City of La Quinta General Plan. The Proposed Project would alter the existing aesthetic environment and the views from that of an undeveloped, open-space area to that of a commercial area; however, the height and bulk of structural elements proposed by the project would be compatible with other proposed development in the area and would therefore not introduce elements which will substantially detract from the existing aesthetic character of the area. Therefore, no significant impacts would occur to the visual quality of the project site or surrounding areas.

Lighting provided for the project would be consistent with the existing surrounding environment and Palomar Standards. Palomar Standards specifies special lighting policies for sites located within the 45-mile radius centered on Palomar Observatory (located on Palomar Mountain), as defined by Riverside County Ordinance No. 655. The Proposed Project is located outside of this 45-mile radius; therefore, lighting impacts would be less than significant.
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4.11.6 Environmental Mitigation Measures
No significant impacts are anticipated for the Proposed Project; therefore, no mitigation measures are required.

4.11.7 Level of Significance After Mitigation
Project-specific and cumulative impacts to aesthetic and visual resources would be less than significant.
4.12 WATER QUALITY

The following reports have been prepared to analyze the impact the Proposed Project will have on water quality and are included in their entirety in Appendix G of this Draft EIR:


4.12.1 Environmental Setting

The Proposed Project site lies within the Whitewater River watershed within eastern Riverside County and originates in northwest Riverside County, northeast of the Proposed Project site. The Proposed Project site is located within the City of La Quinta and is adjacent to the La Quinta Excavation Channel, which is maintained by the CVWD. Currently, the drainage from the eastern portion of the site drains to the excavation channel, which is tributary to the Coachella Valley Stormwater Channel, and eventually the Whitewater River located approximately 2,500 feet to the north of the site. The drainage from the western portion of the site drains into the City of La Quinta stormwater collection system.

4.12.1.2 Regulatory Setting

Regulatory Setting

The State of California RWQCBs provide state-level water quality policy for Riverside County. Federal NPDES mandates also serve to minimize adverse effects of pollution and to protect water quality.

Federal and State Regulations

Clean Water Act (CWA) Section 402(p)

The federal Water Pollution Control Act (also known as the CWA) was amended in 1972 to prohibit discharge of any pollutant into waters of the United States unless the discharge is authorized by an NPDES Permit. Originally, the NPDES program focused on reducing pollutants from discharges from industrial process wastewater and municipal sewage treatment plants. In 1987, the CWA was amended to require the U.S. EPA to regulate storm water discharges through use of NPDES storm water permits. Section 402(p) of the CWA established a framework for regulating discharges under the NPDES program.

In California, the EPA has delegated authority to issue NPDES permits to the SWRCB. The SWRCB and the California RWQCBs carry out the regulation, protection, and administration of water quality. The state is divided into nine regions related to water quality and quantity characteristics. Each regional board is required to adopt a Water Quality Control Plan that recognizes and reflects the regional differences in existing water quality, the beneficial uses of the region’s ground and surface water, and local water quality conditions and problems. The project site is located within the Santa Ana Region and in the Water Quality Control Plan for the Santa Ana Basin (Basin Plan). This Basin Plan is designed to preserve and enhance water quality and to protect the beneficial uses of all regional waters.

Beneficial uses are defined in the Basin Plan as the uses of water necessary for the survival or well being of humans, plants and wildlife. These uses of water serve to promote the tangible and intangible economic, social, and environmental goals of mankind. Examples are drinking, swimming, industrial and
agricultural water supply, and the support of fresh and saline aquatic habitats (RWQCB Colorado River Basin Water Quality Control Plan, November 2002).

California Water Code, Division 7 (Porter-Cologne Act)

The California Water Code contains provisions regulating water and its use. Division 7 establishes a program to protect water quality and beneficial uses of the state water resources including groundwater and surface water. The SWRCB and RWQCBs administer the program and are responsible for control of water quality. They establish waste discharge requirements, water quality control planning and monitoring, enforcement of discharge permits, and ground and surface water quality objectives.

Riverside County Municipal Stormwater NPDES Permit

Federal regulations implementing CWA Section 402 (p) require operators of municipal separate storm sewer systems (MS4s) serving urbanized areas with populations of 100,000 or greater to obtain NPDES permits for municipal stormwater discharges (MS4). In May 1996, the Colorado River Basin RWQCB issued an initial "first-round" NPDES municipal stormwater permit to the County of Riverside, the Riverside County Flood Control and Conservation District (RCFCCD), the CVWD, and ten incorporated cities including La Quinta. The permit expired on May 22, 2001; however, until a new permit is adopted by the RWQCB, the permittee will continue to operate under the existing permit.

Local Plans and Policies

City of La Quinta General Plan

The adopted La Quinta General Plan includes the following policies to reduce or minimize water quality impacts. As stated in Water Resources Policy 4, the City of La Quinta shall ensure that surface water resources are protected following federal, regional, and local standards pertaining to the discharge and treatment of pollutants in surface water, both on private lands and in public facilities. Coordination with the Coachella Valley Water District (CVWD) shall continue in review of projects impacting drainage channels. Policy 6 states that the City and appropriate agencies shall review potentially significant impacts associated with surface and ground water pollution in new development proposals.

Riverside County Stormwater Quality Best Management Practice Design Handbook

This handbook was prepared by Riverside County Flood Control and Water Conservation District and dated July 6, 2004. The purpose of the handbook is to provide design procedures for structural BMPs for new development and redevelopment within Riverside County. This report expands on the BMP information given in the attachment to Supplement A of the Riverside County DAMP (1996). Design procedures are based on guidance manuals from Ventura County (2002) and the City of Modesto (2001) with some criteria taken from the California BMP Handbook (2003). BMP design concepts were combined and adapted to provide a straight-forward method for designing BMPs within Riverside County.

4.12.1.2 Existing Conditions

Whitewater Watershed

The Whitewater River watershed is generally situated in Riverside County within the Coachella Valley Planning Area of the Colorado River Basin RWQCB. The watershed is generally defined by the boundaries of the Whitewater Hydrologic Unit as described in the Water Quality Control Plan for the Colorado River Basin RWQCB (Basin Plan). Much of the watershed consists of sparsely populated mountains, desert, and agricultural lands. Urbanized areas are principally located on the valley floor between Banning and Indio along Interstate 10, and from Palm Springs to Coachella along State Highway 111.
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Water Quality

Surface Water

The western portion of the Proposed Project site drains into a low point in the center of the site where it drains to the city stormwater system. The eastern portion drains into the La Quinta Evacuation Channel which ultimately conveys runoff to the Coachella Valley stormwater channel (Whitewater River). The La Quinta evacuation channel is not listed as impaired on the 2002 CWA Section 303(d) List of Water Quality Limited Segments. The Coachella Valley stormwater channel (Whitewater River) is listed as an impaired water for pathogens.

With respect to the watershed, the following intermittent beneficial uses have been identified by the RWQCB, as associated with “sashes,” inclusive of the Coachella Valley stormwater channel:

Freshwater Replenishment (FRSH)

Uses of water for natural or artificial maintenance of surface water quantity or quality.

Groundwater Recharge (GWR)

Uses of water for natural or artificial recharge of ground water for purposes of future extraction, maintenance of water quality, or halting salt water intrusion into fresh water aquifers.

Water Contact Recreation (REC I)

Uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water skiing, skin and scuba diving, surfing, whitewater activities, fishing, and use of natural hot springs.

Water Non Contact Recreation (REC II)

Uses of water for recreational activities involving proximity to water, but not normally involving contact with water where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.

Warm Freshwater Habitat (WARM)

Uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.

Wildlife Habitat (WILD)

Waters support wildlife habitats that may include, but are not limited to, the preservation and enhancement of vegetation and prey species used by waterfowl and other wildlife.

Preservation of Rare, Threatened, or Endangered Species (RARE)

Uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened, or endangered.

The federal CWA further requires that a list of water quality limited segments be developed to identify those water bodies that do not meet water quality standards. The law requires that action plans, referred to as Total Maximum Daily Loads (TMDLs), be developed by regulatory agencies to improve water quality for these limited segments. On July 25, 2003, the U.S. EPA gave final approval to California’s 2002 Section 303(d) list of Water Quality Limited Segments and TMDLs priority schedule. The La Quinta evacuation channel is not listed as a 303 (d) impaired water, but the Coachella Valley stormwater channel is listed and has established TMDLs as a receiving water body.
4.0 Environmental Impact Analysis

Ground Water
The project site lies within the Coachella Valley Planning Area, Whitewater Hydrologic Unit (719.00), Coachella hydrologic subunit (719.40). The following beneficial uses for groundwater are reported from the Region 7 Water Quality Control Plan:

Municipal and Domestic Supply (MUN)
Uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply.

Industrial Service Supply (IND)
Uses of water for industrial activities that do not depend primarily on water quality including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, and oil well re-pressurization.

Agriculture Supply (AGR)
Uses of water for farming, horticulture, or ranching including, but not limited to, irrigation, stock watering, or support of vegetation for range grazing.

4.12.2 Project Impacts

4.12.2.2 Thresholds of Significance
According to CEQA Guidelines Appendix G, a significant water quality impact will result if implementation of the project is determined to result in the following:

- Violate any water quality standards or waste discharge requirements.
- Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of a local groundwater table level.
- Substantially degrade or alter groundwater or surface water quality.
- Result in runoff from the project area that would adversely impact designated beneficial uses in the runoff-receiving watershed, or substantially impact public agency efforts to improve any currently recognized conditions of water quality impairment.

4.12.2.3 Environmental Impacts

Construction-Related Impacts
Erosion and sedimentation due to construction-related activities will potentially impact surface water quality within the watershed. Erosion can occur when protective vegetation is removed and cuts and fills are left unprotected. If appropriate mitigation measures are not implemented, such erosion can create local problems (downstream sediment damage). In addition, improper handling of construction materials and/or equipment could result in accidental spills that could affect surface water quality.

An SWPPP will be prepared in accordance with NPDES requirements to outline a comprehensive program to protect water quality from various sources of pollution generated before and during construction. Erosion, discharge of pollutants and sediment, and drainage flows generated during construction will be controlled with implementation of structural (e.g., silt fences, sandbags, spill control) and non-structural (e.g., scheduling) BMPs to be detailed in the SWPPP.
4.0 Environmental Impact Analysis

Long-Term Operational Impacts

As noted in the Draft WQMP, the Proposed Project has the potential to result in long-term impacts on water quality due to the addition of pollutants typical of commercial/industrial development, restaurants, and parking lots, including:

- Oil and Grease
- Metals
- Trash and Debris
- Organic Compounds
- Nutrients
- Bacteria and viruses
- Oxygen demanding substances
- Sediment/turbidity
- Pesticides

The existing, vegetated, unvegetated, and disturbed, open space will be replaced by a commercial development with commercial buildings and parking lots. With the addition of impervious surfaces on the site, storm water runoff would be expected to increase along with the potential for urban-related sediment and pollutants.

Impacts resulting from the project may include increased runoff volume and velocity; reduced infiltration; increased flow frequency, duration, and peaks; faster time to reach peak flow; and water quality degradation. Under certain circumstances, changes could also result in the reduction in the amount of available sediment for transport and storm flows could fill this sediment-carrying capacity by eroding the downstream channel. These changes have the potential to permanently impact downstream channels and habitat integrity.

A change to the hydrologic system of the project site would be considered a hydrologic condition of concern if the change would have a significant impact on downstream erosion compared to the pre-development condition or have significant impacts on stream habitat, alone or as part of a cumulative impact from development in the watershed. Currently, there are no hydrological conditions of concern for the Proposed Project site. The CVWD as owners of the La Quinta evacuation channel, will allow the increase in storm water flow discharging from the project site into the channel because the channel has enough capacity to handle the flow without flooding.

Proposed Water Quality Management Plan (WQMP)

A project-specific WQMP will be implemented to address storm water runoff management and water quality treatment objectives. This plan was prepared by Fuscoe Engineering (August 2005). The WQMP sets forth an integrated approach involving the utilization of BMPs designed to: (1) function with the drainage plan for the project site and flood control channel to carry flows generated by offsite areas tributary to the project; and (2) to address treatment of urban and storm water runoff from the developed portions of the project site. The plan is based on a combination of onsite flow-based and volume-based treatment controls.

The on-site and off-site drainage plan (Figure 4.5-3, Project Drainage and Flood Control Plan) demonstrates that the storm water runoff from the buildings and parking areas will be carried through a conveyance system to a hydrodynamic separator device (CDS unit), and on to the La Quinta evacuation channel. This CDS unit is proposed to be installed on the southeastern perimeter of the project site to
4.0 Environmental Impact Analysis

remove pollutants typically associated with parking lots (i.e., trash, sediment, oil, and grease). Unit specifications, including sizing, are included in Appendix 4 of the WQMP.

In accordance with the Riverside County Model WQMP method for determining the Storm Water Quality Design Flow (SQDF), the site is required to be able to treat 2.9 cfs of storm water runoff and is sized in order to treat 6 cfs.

Groundwater

Impervious surfaces will be created with development of the Proposed Project. The project site is currently undeveloped and vacant, absorption rates can be potentially affected by development of commercial uses. However, regional absorption and infiltration rates should not be significantly affected, given the limited size of the project site and because on-site soils are not particularly suited for groundwater recharge due to the presence of alluvium consisting of gravel, sand, silt, and clay at lower depths. Regional absorption shall continue after development at relatively similar rates as existing conditions. Drainage and storm runoff patterns will not be significantly affected by the proposed actions. Additionally, the Proposed Project is located within the service area of the CVWD and is eligible for water service (CVWD Service Commitment Letter, Appendix I). Any future development on the project site would not use groundwater supplies. Therefore, there is no impact from the Proposed Project on groundwater supplies or recharge.

4.12.3 Cumulative Impacts

The cumulative total of all related project development in the City of La Quinta, as identified in Table 3.5-1, creates the potential to impact water quality. However, all projects in the vicinity will be required to prepare project-specific WQMPs to address storm water runoff management and water quality treatment objectives. The objectives of the WQMPs are to prevent adverse water quality impacts. WQMPs will include BMPs and PDFs that will ensure development of all cumulative projects will be less than significant. With these additional WQMPs in place, and the specified BMPs, additional development is not expected to adversely impact water quality. Therefore, implementation of the Proposed Project will result in a less than significant cumulative impact on water quality.

4.12.4 Level of Significance Before Mitigation

There is a potential for polluted runoff during construction and operation. Because a SWPPP will be prepared and implemented during construction, including installation and maintenance of BMPs to minimize discharge of pollutants and sedimentation, construction-related water quality impacts would be reduced to less than significant. In addition to construction level BMPs, the project must install and maintain post-construction BMPs to treat runoff from the project site. Therefore, no long term impacts would occur.

Implementation of the Proposed Project would not significantly alter groundwater quality because the on-site soils are not particularly suited for groundwater recharge and the Proposed Project would be serviced by the CVWD and would not use groundwater supplies.

Post-development storm water flows will be conveyed through the on-site drainage collection system to the La Quinta evacuation channel and implementation of water quality BMPs as outlined above would remove pollutants before runoff enters the channel. The specifics of these plans are outlined in the site specific WQMP. Because the proposed water quality control plan and applicable regulations would be implemented, project-related impacts to water quality would be reduced to less than significant levels.

4.12.5 Environmental Mitigation Measures

No significant impacts are anticipated for the Proposed Project; therefore, no mitigation measures pertaining to water quality are required.
4.0 Environmental Impact Analysis

4.12.6 Level of Significance After Mitigation

Project-specific and cumulative impacts to water quality will be less than significant.
5.0 Project Alternatives

5.0 PROJECT ALTERNATIVES

5.1 OVERVIEW

The identification and analysis of alternatives is a fundamental concept under CEQA. This is evident in that the role of alternatives in an EIR is set forth clearly and forthrightly within the CEQA Statutes. Specifically, CEQA Statute Section 21002.1(a) states:

"The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."

The CEQA Guidelines require an EIR to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." (CEQA Guidelines Section 15126.6(a)). The CEQA Guidelines direct that selection of alternatives focus on those alternatives capable of eliminating any significant environmental effects of the project or of reducing them to a less than significant level, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly. In cases where a project is not expected to result in significant impacts after implementation of recommended mitigation, review of project alternatives is still appropriate.

The range of alternatives required within an EIR is governed by the "rule of reason" which requires an EIR to include only those alternatives necessary to permit a reasoned choice. The discussion of alternatives need not be exhaustive. Furthermore, an EIR need not consider an alternative whose implementation is remote and speculative or whose effects cannot be reasonably ascertained.

Alternatives that were considered but were rejected as infeasible during the scoping process should be identified along with a reasonably detailed discussion of the reasons and facts supporting the conclusion that such alternatives were infeasible.

Based on the alternatives analysis, an environmentally superior alternative is designated among the alternatives. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6(e)(2)).

5.1.1 Criteria for Alternative Analysis

As stated above, pursuant to CEQA, one of the criteria for defining project alternatives is the potential to attain the project objectives. Established objectives of the project applicant and the City for the Proposed Project are detailed below:

- Develop a typical Costco Wholesale of an average size of 150,000 square feet to meet demands of its membership base through providing commercial services including, but not limited to, home improvement products and equipment, personal supplies, pharmacy, optical exams and sales, gasoline, office and pet supplies, eating establishments, financial services, and tire and auto services.

- Develop a retail center to provide goods and services to the community, create jobs, and generate increased property and sales taxes to benefit the City of La Quinta.

- Offer retail merchandise at a scope and price not currently offered in the trade area.

- Service a portion of the retail market that is currently traveling outside of the City of La Quinta.

- Create an attractive, viable project, and realize a reasonable return on investment.
5.0 Project Alternatives

City of La Quinta

- Create a development compatible with, and sensitive to, existing surrounding land uses in the project area.
- Complement the development of commercial centers and ancillary uses that convey a high-quality visual image and character.
- Enhance the existing retail uses located on Highway 111 and provide local residents with convenient access to a retail use which is highly desired by local residents, thereby eliminating the need for these residents to drive long distances for the same shopping experience.
- Continue to enlarge the City’s revenue base in order to enhance and expand the quality of municipal services La Quinta residents expect.
- Diversify and expand the City’s economic base, offer a variety of products and services, increase employment opportunities, enhance City/Agency fiscal resources, preserve and enhance La Quinta’s unique environment, and contribute to the quality of life for La Quinta residents.
- Provide for necessary transportation improvements and strategies to accommodate the demands of new and existing development.
- Balance the City’s immediate needs for commercial property, but also maintain long-term needs for adequate open space and recreational areas.
- Ensure adequate utility infrastructure and public services for new development, and ensure that timing and funding of improvements are closely correlated with development phasing.
- Mitigate the potential impacts to the surrounding area to the greatest extent practicable, while still allowing for the market-driven commercial development, which will enhance the tax base of the City and provide employment opportunities for area residents.

Based on comments received from circulation of the NOP and meetings with the project applicant, the following alternatives have been considered for evaluation:

- No Project/No Development Alternative
- Commercial Development with Reduced Square Footage Alternative
- Commercial Development at Alternative Location

5.1.2 Alternatives Eliminated from Detailed Consideration

In addition to specifying that the EIR evaluate “a range of reasonable alternatives” to the Proposed Project, Section 15126.6(c) of the CEQA Guidelines requires that an EIR identify any alternatives that were considered but were rejected as infeasible. No additional alternatives were considered beyond those presented in Section 5.2 through 5.4 below.

5.1.3 Evaluation of Alternatives

This section provides an analysis of the environmental impacts anticipated for each alternative in comparison to the Proposed Project. The comparison assumes that mitigation equivalent to those for the Proposed Project would be implemented for each alternative, unless otherwise indicated. Therefore, the analysis below focuses on the ability of the alternatives analyzed to reduce or eliminate the environmental impacts associated with the Proposed Project. In addition, each alternative is evaluated on its ability to meet the project objectives.
5.0 Project Alternatives

5.2 NO PROJECT/NO DEVELOPMENT ALTERNATIVE

Under the No Project/No Development Alternative, it is assumed that no further development within the project area would occur. The Project site would remain undeveloped and in its current condition.

Environmental Impact

Air Quality: Under the No Project/No Development Alternative, there would be no air emissions due to project construction or operation, and no air quality impact would occur. Compared to the Proposed Project, this alternative would eliminate the significant ROG and NOx emission impacts.

Biological Resources: The No Project/No Development Alternative would not result in the loss of existing vegetation communities that are found on-site, and would therefore not affect local populations of on-site plant and wildlife species. Temporary indirect impacts would not occur to adjacent vegetation communities. This alternative would not result in permanent and temporary impact to CDFG-regulated “waters of the State” and USACE-regulated “waters of the U.S.” within the La Quinta evacuation channel. Therefore, this alternative does not result in an impact to biological resources. Compared to the Proposed Project, this alternative eliminates the significant biological impacts.

Cultural Resources: Since there would be no development under the No Project/No Development Alternative, there would not be any soil disturbance or potential impact to cultural or paleontological resources. Therefore, no impact is identified for this alternative for cultural and paleontological resources. Compared to the Proposed Project, this alternative will reduce any potentially significant impacts to cultural or paleontological resources.

Geology and Soils: Since there would be no increase in population at the project site under the No Project/No Development Alternative, there would be no additional exposure to seismic risk. In addition, no grading would occur. Therefore, similar to the Proposed Project, no impacts to geology and soils would occur under this alternative.

Hazards and Hazardous Materials: Since there would be no increase in population at the project site under the No Project/No Development, there would be no additional exposure to agricultural pesticides found on the project site or construction and operational hazards related to development. Therefore, similar to the Proposed Project, no impacts related to hazards and hazardous materials would occur.

Hydrology: The No Project/No Development Alternative would not result in modifications to the existing drainage patterns or volume of storm water runoff as the total impervious area on-site would remain unchanged from present conditions. Therefore, similar to the Proposed Project, no impacts to hydrology would occur.

Land Use: The No Project/No Development Alternative would not result in the modification of any land use on the project site. The site would remain vacant while being surrounded by development. The No Project/No Development Alternative would not result in the physical division of an established community, would not conflict with any applicable land use plan, and would not conflict with any applicable habitat conservation plan. Therefore, similar to the Proposed Project, no impacts to land use would occur.

Noise: Since there would be no construction and no future project operations on the site, the No Project/No Development Alternative would not increase noise in the vicinity, and no significant noise impacts would occur. Compared to the Proposed Project, this alternative would reduce the amount of noise generated; however, both this alternative and the Proposed Project would have no noise impact.

Public Services: The No Project/No Development Alternative would not require increased public services or utilities to the site, since there would not be any development that would require police or fire protection services, water, wastewater or landfill/recycling services. Therefore, no impact on public
services or utility systems is identified for this alternative. Compared to the Proposed Project, this alternative eliminates the need for these services and utilities to the Project site.

Transportation/Traffic: Since there would be no development under the No Project/No Development Alternative, no increase in vehicular trips due to project construction or project operation are identified for this alternative, and no impact is noted. However, under this alternative, the City would not benefit from the half street improvement on Highway 111 along the site frontage of the project site including an additional eastbound through lane, a right-turn deceleration lane on Highway 111 at each of the site driveways, dual left turn lanes on Highway 111 at Depot Road, and modification to the traffic signal at the Highway 111 and Depot Road intersection to accommodate the road widening and turn lanes on Highway 111. Under this alternative the City of La Quinta would still implement the planned 2006 road improvements to Highway 111 and Jefferson Street. Compared to the Proposed Project, which identified significant and unmitigated short-term traffic impacts, this alternative would eliminate those impacts.

Visual Quality: Since the No Project/No Development Alternative would not modify the existing project site, or add construction on the project site, no changes to the visual character of the site would occur. Therefore, no visual quality impacts would occur. Compared to the Proposed Project, this alternative would have less of a visual impact; however visual impacts under the Proposed Project were concluded to be less than significant.

Water Quality: Implementation of the No Project/No Development Alternative would not result in the modification to the existing treatment of stormwater runoff. No changes with regard to water quality would occur; therefore, no water quality impacts would occur. While the water quality impacts for the Proposed Project were determined to be less than significant, this alternative would further reduce those impacts.

Conclusion: Implementation of the No Project/No Development Alternative would result in reduced impacts for all environmental issues areas as compared to the Proposed Project.

Comparison of the No Project/No Development Alternative to Project Objectives

The No Project/No Development Alternative would not meet any of the objectives of the project applicant or the City. Specifically, this alternative would not allow for the provision of commercial services, nor would it develop a retail center to provide goods and services to the community, create jobs, and generate increased property and sales taxes to benefit the City. Furthermore, this alternative would not enhance the existing retail uses on Highway 111. Given the fact that this alternative does not meet any of the basic objectives of the Proposed Project, the No Project/No Development Alternative is rejected.

5.3 REDUCED SQUARE FOOTAGE

Under the Reduced Square Footage Alternative, it is assumed that the Proposed Project would be developed with a 40 percent reduction of the entire project site including the building and parking areas. Under this alternative, the project site would be developed with approximately 140,000 square feet and 15.7 acres of commercial uses, compared to 233,439 square feet and 26.2 acres proposed under the project. This reduction was intended to respond to significant impacts identified for air quality and traffic.

Environmental Impact

Air Quality: Reducing the square footage by 40 percent would reduce all finish construction activity including painting by 40 percent. As a result, the Reduced Square Footage Alternative would not result in a significant impact to ROG emissions. In addition, with a reduced square footage the building area would also be reduced to 40 percent of the acreage of the Propose Project, thus reducing the amount of construction and grading activities required. With less grading required, this alternative would therefore
result in a less than significant impact to NOx emissions. Compared to the Proposed Project, this alternative would reduce emissions and eliminate the significant and unmitigated air quality impacts identified for the Proposed Project.

**Biological Resources:** Similar to the Proposed Project, the Reduced Square Footage Alternative would affect on-site vegetation communities, wildlife species, CDFG-regulated "waters of the State," and USACE-regulated "waters of the U.S." Temporary indirect impacts may potentially occur from the associated construction activities adjacent to native habitat areas in the form of vegetation trampling and/or disturbance by construction workers and construction vehicles outside the limits of grading, erosion into off-site areas, increased traffic, increased noise, and dust. Similar to the Proposed Project, implementation of mitigation measures would reduce site impacts to less than significant. Overall, the impacts associated with the Reduced Square Footage Alternative are the same as those identified for the Proposed Project.

**Cultural Resources:** The Reduced Square Footage Alternative would not result in impacts to cultural resources. Section 4.3 of the Draft EIR concluded that the Proposed Project would not result in significant impacts. Since this alternative would create a smaller footprint of development than the Proposed Project on the same location, less than significant impacts are expected under this alternative as well.

**Geology and Soils:** Even with a smaller project footprint, an increase in population at the project site is expected under this alternative, resulting in exposure to seismic risk. In addition, grading would still occur, although the total area graded would be reduced as compared to the Proposed Project. Compliance with all recommendations and design features set forth in the geotechnical reports would ensure project-related and cumulative impacts would be less than significant. No significant short-term or cumulative geological impacts will occur as a result of the Reduced Square Footage Alternative.

**Hazardous Materials:** Based on the results of the limited environmental soil sampling conducted by Kleinfelder, limited exposure of maintenance or construction workers to the project site does not pose an unacceptable health concern. Furthermore, as with the Proposed Project, the Reduced Square Footage Alternative will not pose an unacceptable risk to the general public. Additionally, should a fuel facility be proposed as part of the alternative, it would be required to implement PDFs and BMPs that would reduce any impacts resulting from construction and operation of the fuel facility to a less than significant level. Therefore, impacts resulting from construction and operation of the Reduced Square Footage Alternative would be similar to the Proposed Project, and would be considered less than significant.

**Hydrology:** Implementation of the Reduced Square Footage Alternative would result in similar drainage patterns and reduced storm water runoff as compared to the Proposed Project. It is anticipated that more landscaping would be proposed, as compared to the amount of impervious surfaces associated with the Proposed Project. The 100-year flood zone is confined to the La Quinta evacuation channel located immediately adjacent to the southeastern margin of the site. Similar to the Proposed Project, this alternative would not place structures within this area so that flood flow is restricted.

Development of this alternative would cause minor alteration of the existing drainage pattern in the area; however, the proposed improvements are consistent with the objectives and requirements for reducing the potential for flooding of the site. Therefore, impacts are not significant. With improvements, the Reduced Square Footage Alternative would not create or contribute on- or off-site runoff water that would exceed the capacity of the planned storm water drainage system. Furthermore, the site storm drain system will be designed to convey such storm events without impact to the constructed environment. On-site and off-site runoff will be controlled and will not subject onsite or downstream uses to sedimentation or damage from water forces. Therefore, impacts under this alternative are less than significant.
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The proposed drainage system onsite and the La Quinta evacuation channel have the capacity to carry the anticipated storm flows. Therefore, this alternative would not expose people or structures to a significant risk of loss, injury, or death involving flooding (including flooding as a result of the failure of a levee or dam) or inundation by seiche, tsunami, or mudflow because the system is designed to accommodate the combination of on- and off-site flow during storm events. In conclusion, this alternative is expected to have the same level of impact as the Proposed Project.

Land Use: The Reduced Square Footage Alternative would not result in the modification of any land use on the project site. The Reduced Square Footage Alternative would not result in the physical division of an established community, since the parcels on the east and west sides of the project area are vacant, and the north side of the parcel is bounded by a highway. The Reduced Square Footage Alternative would not conflict with the City of La Quinta General Plan, as the project uses would be consistent with the designated land uses. Additionally, the Reduced Square Footage Alternative does not conflict with any applicable habitat conservation plans for the area, as the project area does not fall within a conservation area of the Draft Coachella Valley MSHCP/NCCP. Therefore, the implementation of Reduced Square Footage Alternative would result in no impacts to land use, the same as the implementation of the Proposed Project.

Noise: Similar to the Proposed Project, the Reduced Square Footage Alternative would result in the development of a commercial center. No significant off-site noise impacts deriving from changes to the traffic patterns or increases in traffic volumes were identified. Because no impacts were identified, no mitigation measures would be required. Construction activity noise under this alternative will not exceed local background noise levels at adjacent noise-sensitive land uses. Construction noise impacts would be further minimized by compliance with City of La Quinta Noise Ordinance (6.08.050) limiting allowable hours of construction activities. In addition, site operational activity noise impacts will not have any significant impact because there are no existing noise-sensitive land uses within any zone of possible impact. Therefore, the implementation of Reduced Square Footage Alternative would not result in significant impacts to noise, similar to the findings made for the Proposed Project.

Public Services: The Reduced Square Footage Alternative would require similar types of public services and utilities to the site as for the Proposed Project. However, based on the footprint of development being reduced by 40 percent, it is assumed that the need for public services would also be reduced by 40 percent. However, it should be recognized that some infrastructure would still need to be constructed.

Water: An extension of the existing 24-inch water line located at Highway 111 and Jefferson Street would be necessary to serve this alternative; however, the water demand would not significantly impair CVWD's ability to provide water service to the project and related projects within the district's service area. Therefore, the increased demand for services could be met by existing and/or planned resources, and a less than significant impact is identified, which is similar to the Proposed Project.

Sewer: Sewer and wastewater service demands under this alternative will be met by the CVWD provided all applicable fees are paid. Cumulatively, the Coachella Valley Water Management Plan addresses future planned expansion of wastewater facilities. Furthermore, the Plan is consistent with the wastewater treatment requirements of the Colorado River Basin RWQCB. Therefore, the Reduced Square Footage Alternative is also consistent with the specified requirements through its consistency with the Coachella Valley Water Management Plan. This alternative would not require the construction of new storm water drainage facilities. Therefore, similar to the Proposed Project, impacts to wastewater facilities under this alternative would therefore, be less than significant.

Solid Waste: Similar to the Proposed Project, the Reduced Square Footage Alternative would utilize the Coachella Valley and Edom Hill Transfer Stations for transfer and processing and final disposal would likely be at either the Badlands or Lamb Canyon Landfills. Solid waste generated for commercial
5.0 Project Alternatives

development with Reduced Square Footage Alternative would be less than the Proposed Project. This alternative would also participate in the City of La Quinta’s recycling program. Impacts resulting from the commercial development’s solid waste generation would be similar to the Proposed Project, and would be less than significant.

Fire Protection Services: As discussed in Section 4.9 of the Draft EIR, current fire protection staffing and equipment levels are sufficient to service the Proposed Project. Since this alternative reduces the amount of development, the staffing and equipment levels would be adequate to serve this alternative. In addition, this alternative is not located in a high fire hazard area. Upon implementation of the applicable regulatory requirements and payment of mitigation fees, the impacts of this alternative to fire protection services would be similar to the Proposed Project, and would be less than significant.

Police Protection Services: The Proposed Project would increase projected calls for service by two calls per day. This increase would not significantly impact the LQPD. It is expected that the Reduced Square Footage Alternative would require equal to or less than two calls per day and, therefore, not significantly impact the LQPD. While, cumulative development would create a need for additional police services and could be considered a significant impact, it is believed that the City can manage the need for increases in police services through their budgeting process. Therefore, similar to the Proposed Project, implementation of the Reduced Commercial Square Footage Alternative would not result in significant impacts to the police department.

Transportation/Traffic: Implementation of this alternative would result in a 40 percent reduction in average daily trips resulting in 10,284 total ADT and 4,722 net ADT as compared to the Proposed Project’s projection of 17,140 total ADT and 7,870 net ADT. With such a reduction of traffic, there would be less impact on the City’s roadway system as a result of the project. Furthermore, the City of La Quinta’s planned-for improvements on Highway 111 and Jefferson Street would mitigate all deficient LOS’s at the study intersections for opening year (2006) for the Reduced Square Footage Alternative as it does for the Proposed Project. With possible need for mitigation measures for Future Year 2020 intersections due to cumulative traffic growth in the region, this alternative would not result in unmitigated significant impacts to transportation. Furthermore, this alternative would avoid the significant and unmitigated short-term and cumulative traffic impacts identified for the Proposed Project.

Visual Quality: No scenic vistas are located within the immediate vicinity of the Project site, and no officially designated state scenic highways exist within or near the project area. In addition, no scenic resources, including trees, rock outcroppings, and historic buildings, are present onsite. Therefore, no impacts would occur to scenic resources with development of the Reduced Square Footage Alternative.

Development of this alternative would alter the existing aesthetic environment and the views from that of an undeveloped, vacant area to that of a commercial area. The majority of the direct views to the site would be from the immediately surrounding land uses and extended views from the residential uses to the south. The closest residence to the project site is approximately 350 feet. The residential development would have direct northerly views of the proposed commercial site; therefore, immediate views from the south would be altered with implementation of the commercial development with reduced square footage. However, the combination of the distance from the project site, the La Quinta evacuation channel acting as a physical buffer, and the presence of no General Plan-designated viewsheds, would reduce the visual impact for viewers to the south and result in less than significant impacts.

While the project area is currently characterized as vacant, in general, the natural characteristics of the project site are not considered dominant or unique. This is reflected by the City’s General Plan Land Use Plan and design guidelines that show future commercial development planned for the majority of the area. Implementation of the Reduced Square Footage Alternative is, therefore, consistent with the City of La Quinta General Plan and impacts to visual character and/or quality of the project site would be less than significant.
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Lighting provided for this alternative would be consistent with the existing surrounding environment as design would minimize dispersion and glare that could affect adjacent developments. Lighting impacts would be less than significant, as the City must review and approve the final lighting plan, and ensure that it will not contribute light that could affect adjacent developments.

In summary, aesthetics and visual resource impacts from development of Reduced Square Footage Alternative would be similar to the Proposed Project, and would be less than significant.

**Water Quality:** Development of this alternative would require preparation and implementation of a SWPPP during construction, including installation and maintenance of BMPs to minimize discharge of pollutants and sedimentation. These measures would reduce construction-related water quality impacts under this alternative to less than significant level. Post-development storm water flows would be conveyed through the on site drainage collection system and implementation of water quality BMPs. Impacts to water quality would be reduced to less than significant levels through implementation of applicable regulations and the proposed water quality control plan. New development in the surrounding area will be subject to State regulatory agency and City requirements.

There is a potential for polluted runoff from this alternative due to the construction of parking lots and building surfaces; however, with the implementation of PDFs and BMFs the impacts will be below a level of significance. Therefore, similar to the Proposed Project, this alternative would result in less than significant impacts to water quality.

**Conclusion:** Development of the Reduced Square Footage Alternative will result in a similar level of impacts for the following environmental issue areas: biological resources, cultural resources, geology/soils, hazards/hazardous materials, hydrology, land use, noise, public services, visual quality and water quality. This alternative will reduce the level of impacts compared to the Proposed Project in the following issue areas: air quality and traffic. Under this alternative, the air quality and traffic impacts would be reduced to less than significant as compared to the significant and unmitigated levels identified for the Proposed Project.

**Comparison to Project Objectives**

Development of the Reduced Square Footage Alternative would not meet one of the Project Applicants’ primary objective to provide a typical Costco Wholesale with services including, but not limited to home improvement products and equipment, personal supplies, pharmacy, optical exams and sales, gasoline, office and pet supplies, eating establishments, financial services, and tire and auto services. In order to meet market demand and the expectation of its membership base, a typical Costco Wholesale building area is an average of 150,000 square feet. This alternative reduces the total building size by 40 percent to approximately 90,000 square feet. Costco Wholesale would not be able to accommodate the demand and expectations of its membership by offering only 60 percent of the usual services. In addition, a Retail and Commercial Center reduced by 40 percent of the typical square footage would not meet the City of La Quinta’s goal of allowing for market-driven commercial development because it would not meet the market demands of its consumer base. Therefore, this alternative, while reducing some of the environmental impacts of the Proposed Project, is rejected because it does not achieve the project objectives.

5.4 **ALTERNATIVE SITE**

Under the Alternative Site scenario, it is assumed that the Proposed Project would be developed on an alternative location, at the same level of final build-out. The site chosen for this alternative is on the northeast corner of Washington Avenue and Fred Waring Drive as shown in Figure 5-1 (Commercial Development at Alternative Location Site Map). The site was chosen for consideration based on land use compatibility (Community Commercial), frontage on a major arterial road, and size of the site (25.11 acres).
8.0 Persons and Organizations Consulted and References

8.0 PERSONS AND ORGANIZATIONS CONSULTED AND REFERENCES

8.1 PERSONS AND ORGANIZATIONS CONSULTED

8.1.1 Preparation of EIR

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Riverside County Fire Department – Fire Captain Specialist Scott DeForge

Southern California Gas Company – Technical Supervisor Frank J. Vargas

8.2 REFERENCES


Personnel Communication with Tom Brohard, P.E. September 1.
8.0 Persons and Organizations Consulted and References


Harris Archaeological Consultants. 2005. *Results of a Cultural Resources Phase I Survey Report for the Costco Project, City of La Quinta, California*. October 06.

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_________. 2005. *Phase I Environmental Site Assessment*. Costco La Quinta Site; South of the Intersection of Highway 111 and Depot Drive and Northwest of the La Quinta Evacuation Channel; La Quinta, California. April 14.
8.0 Persons and Organizations Consulted and References


Natural Resources Assessment, Inc. 2005. *Focused Small Mammal Surveys for the Costco Retail Center and Adjacent Waterline Connection, La Quinta, California.* July.


Internet

California Air Resources Board (CARB) Fact Sheet May 6, 2005 (www.arb.ca.gov/aqs/aaqs2.pdf)


Coachella Valley Water District (CVWD) Web site – www.cvwd.org

South Coast Air Quality Management District (SCAQMD) Web site – www.aqmd.gov
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APPENDIX A.2
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Environmental Impact

Air Quality: Implementation of Alternative Site would require similar amounts of grading and other construction activities requiring heavy machinery during construction as the Proposed Project. The Proposed Project is anticipated to generate significant short-term ROG and NOx impacts during the construction phase. While construction-related emissions are temporary and do not represent a long-term impact, construction-related impacts remain significant until the construction phase ends. As with the Proposed Project, mitigation measures to reduce air related impacts for construction of this alternative would be required. However, even with implementation of the reduction measures, it is likely that construction-related activities would still result in NOx emissions in exceedance of the identified significance threshold, creating significant impacts after mitigation. In addition, the development on the alternative site location would also result in long term CO emissions in excess of the SCAQMD threshold. Similar to the Proposed Project, this would be a significant and unmitigated impact. Unlike the Proposed Project, the alternative site is located much closer to potential sensitive receptors in the neighboring residential communities 205 feet to the east and 290 feet to the south. CARB recommends a 300-foot setback between large gas stations and the closest homes. The separation distance between the proposed gas station and the nearest homes at the alternative site location is less than 300 feet and would result in a significant impact to diesel exhaust exposure. Implementation of Alternative Site would result in impacts during operation that would be less than significant, which is similar to the Proposed Project. Because the scale of the development is the same, the expected traffic circulation generated by the project at this site is anticipated to be similar to that of the Proposed Project; therefore, impacts associated with vehicle emission would not significantly degrade air quality. Therefore, similar to the Proposed Project, implementation of Alternative Site would result in temporary but significant unmitigated short-term NOx emissions, long-term CO emissions and would exceed CARB guidelines for CARB diesel exhaust exposure.

Biological Resources: The location identified for this alternative supports disturbed Sonoran creosote bush scrub, similar to the Proposed Project. Therefore, it is assumed that sensitive biological resources could also occur on the site. Further field studies and reconnaissance would be required. Development of this site would require substantial disturbance to the area. Mitigation measures, similar to those identified for the Proposed Project would be applicable to this alternative, and would reduce the impact to below a level of significance. The Alternative Site parcel is located in the area covered by the Draft Coachella Valley MSHCP/NCCP. The alternative is consistent with the draft provisions of the Coachella Valley MSHCP/NCCP, and does not fall within a protected area of the Draft Plan. Therefore, it would not conflict with any potentially applicable habitat conservation plan or natural community conservation plan.

Cultural Resources: Due to the location of the Alternative Site in relation to the Proposed Project site, it is assumed that cultural resources could occur on the site, as the two sites are closely located. Further field studies and reconnaissance would be needed to determine if the site contains evidence of prehistoric use or habitation. Development of this site would require substantial disturbance to the area and would require surveys to determine the presence of cultural resources. Should cultural resources be present on site, it is likely that these resources could be mitigated through either a redesign or a data recovery program. Therefore, impacts to cultural resources would be less than significant, or mitigated to a level of less than significant.

Geology and Soils: Because the Alternative Site would result in full buildout of a commercial center, it is assumed that grading would be required. Similar to the Proposed Project it is expected that, compliance with recommendations and design features set forth in a site specific geotechnical report would reduce project-related and cumulative impacts to below a level of significance. No significant short-term or cumulative geological impacts will occur as a result of implementation of the Alternative Site.
5.0 Project Alternatives

**Hazards and Hazardous Materials:** Due to the location of this alternative in relation to the Proposed Project site and its similar historic uses, it is assumed that environmentally persistent pesticides may have been stored at and/or applied to the site. As such, a limited environmental soil sampling report would need to be performed at the property to assess whether these potential environmental concerns may have impacted the Alternative site. Further field studies and reconnaissance would be needed to determine the presence of hazards and hazardous materials. Development of this site would require substantial disturbance to the area. Should hazards and hazardous materials be present on site, it is likely that they would pose significant impacts, but that the impacts could be mitigated. Therefore, similar to the Proposed Project, impacts to hazards and hazardous materials would be less than significant.

**Hydrology:** It is assumed that implementation of Alternative Site would not place structures within the 100-year flood zone. Therefore, no impact is identified.

It is assumed that implementation of this alternative would cause minor alteration of the existing drainage pattern in the area; however, the improvements would be required to be consistent with the objectives and requirements for reducing the potential for flooding of the site. Therefore, impacts would not be significant. With improvements, this alternative would not create or contribute to on- or off-site runoff water that would exceed the capacity of the planned storm water drainage system. Furthermore, the site storm drain system would be designed to convey such storm events without impact to the constructed environment. On-site and off-site runoff will be controlled and will not subject onsite or downstream uses to sedimentation or damage from water forces. Therefore, impacts to drainage patterns under this alternative would be less than significant.

Since the drainage system onsite would be designed to have the capacity to carry the anticipated storm flows, this alternative would not expose people or structures to a significant risk of loss, injury, or death involving flooding (including flooding as a result of the failure of a levee or dam) or inundation by seiche, tsunami, or mudflow because the system is designed to accommodate the combination of on- and off-site flow during storm events. Therefore, similar to the Proposed Project, implementation of the Alternative Site would result in less than significant impacts to hydrology.

**Land Use:** Aerial photography was used for a review of the existing uses of the Alternative Site parcel and the surrounding areas. Additionally, the County of Riverside RCIP Land Use GIS layer was used to determine the land use designations of the surrounding parcels. The land to the north of the Alternative Site is located in unincorporated Riverside County, and is vacant with a designated land use of Commercial Office. To the northeast, also in unincorporated Riverside County, the vacant parcel is designated High Density Residential. To the east, located in the City of La Quinta, the land is developed with residential uses, and designated as Medium Density Residential. To the south, also in the City of La Quinta, the area is developed with multi-family residential condominium uses, and is designated as High Density Residential. This development also contains large amounts of vacant land, designated as Open Space – Reserve. The parcel to the southwest is located in the City of Indian Wells and contains a church, and has a land use designation of Commercial Retail. To the southwest and west of the Alternative Site, in the City of Palm Desert, the land is developed with residential uses, and is designated as Medium Density Residential.

Development of the Alternative Site project would not result in the physical division of an established community. The adjacent residential areas are not linked in ways that development of the alternative would affect the division of said residential areas. This would include development consistent with plans for the area.

The Alternative Site parcel is designated Community Commercial (CC) in the Land Use Element of the General Plan, as well as in the Municipal Zoning Code. According to the La Quinta General Plan, this land use designation provides for larger, community-scale shopping centers on parcels ranging from 20 to
5.0 Project Alternatives

30 acres in size, along major arterial roadways. These centers include large scale anchors as well as a variety of retail outlets and restaurant and entertainment uses to meet the needs of multiple neighborhoods. The uses proposed under this alternative are consistent with the General Plan land use designation.

According to the City Municipal code, development of the Proposed Project at the Alternative Site would be allowed in the CC zone with a CUP. After obtaining the CUP, this alternative would be consistent with the zoning code. Therefore, the implementation of the Alternative Site would not result in a conflict with any applicable land use plan or policy.

The Alternative Site parcel is located in the area covered by the Draft Coachella Valley MSHCP/NCCP. The alternative is consistent with the draft provisions of the Coachella Valley MSHCP/NCCP, and does not fall within a protected area of the draft plan. Therefore, it would not conflict with any potentially applicable habitat conservation plan or natural community conservation plan.

The Alternative Site parcel would not result in the physical division of an established community, a conflict with an applicable land use plan or policy, or any applicable habitat conservation plan. Therefore, similar to the Proposed Project, implementation of the Alternative Site would not result in land use impacts.

Noise: Similar to the Proposed Project, the Alternative Site would result in the development of a commercial center. Short-term construction activities may result in potentially significant impacts to neighboring residences, located 205 feet from the site. However, as long as the project complies with the City of La Quinta Noise Ordinance dictating times for construction activities, there would not be significant impacts to noise during construction. Noise from the operation of the Alternative Site would primarily result from traffic generated by the commercial center. Noise associated with the functioning of the commercial center would be mitigated through design elements, including building of sound protection walls and enclosing facility components (i.e., loading docks and trash compactors) in a parapet. Due to the proximity of the residential community to the alternative site location, the noise nuisances may occur through early morning delivery truck traffic. Similar to the Proposed Project, mitigation measures and careful program design features would be required to reduce these impacts to less than significant levels. Therefore, similar to the Proposed Project, implementation of the Alternative Site would not result in significant impacts to noise.

Public Services: It is assumed that the Alternative Site would require similar public services and utilities to the site as for the Proposed Project.

Water: An extension of an existing water line would most likely be necessary to serve the project at the Alternative Site. Due to the similar scale and location of the alternative location to the Proposed Project site, it is anticipated that the project-related water demand would not significantly impair CVWD’s ability to provide water service to the project and related projects within the district’s service area. Therefore, the increased demand for services could be met by existing and/or planned resources.

The Coachella Valley Water Management Plan accounts for significant expansion of facilities that ensures adequate water supply will be available to meet demand with the incorporation of cumulative development. Additionally, each project applicant would be required to pay applicable fees and charges per CVWD regulations for connection fees to the CVWD system. Therefore, project-specific and cumulative impacts on water supply would be less than significant.

Sewer: The Alternative Site’s sewer and wastewater service demands would be met by the CVWD provided all applicable fees are paid. Since the Alternative Site would be served by CVWD, and would create similar demands for sewer and wastewater services, it is assumed that the demands would be met. Coachella Valley Water Management Plan addresses future planned expansion of wastewater facilities, thus minimizing any potential cumulative impacts. Furthermore, the Coachella Valley Water
5.0 Project Alternatives

Management Plan is consistent with the wastewater treatment requirements of the Colorado River Basin Regional Water Quality Control Board. Therefore, the Alternative Site would also be consistent with the specified requirements through its consistency with the Coachella Valley Water Management Plan. It is assumed that the alternative location would not require the construction of new storm water drainage facilities. The planned storm water drainage system will cause minor alterations of the existing drainage pattern in the area. Project-specific and cumulative impacts to wastewater facilities would therefore be similar to the Proposed Project, and at a less than significant level.

Solid Waste: Similar to the Proposed Project, the Alternative Site would use the Coachella Valley and Edom Hill Transfer Stations for transfer and processing and final disposal would likely be at either the Badlands or Lamb Canyon Landfills. Solid waste generated for the alternative location would be similar to the Proposed Project. This alternative would also participate in the City of La Quinta’s recycling program. Therefore, similar to the Proposed Project, this alternative would result in less than significant impact to solid waste services and landfills.

Fire Protection Services: Per the RCFD, current staffing and equipment levels are sufficient to service the Proposed Project area. Since the Alternative Site is similar and nearby, it is assumed that the staffing and equipment levels needed would be commensurate to the needs of the Proposed Project. Upon implementation of the applicable regulatory requirements and payment of mitigation fees, implementation of this alternative would result in less than significant to fire protection services.

Police Protection Services: The Proposed Project would not impact the La Quinta Police Department by increasing the number of projected calls for service by two calls a day. Since the Alternative Site is similar to the Proposed Project, it is assumed that there would be no significant impact to the Police Department. While, cumulative development would create a need for additional police services and could be considered a significant impact, it is believed that the City can manage the need for increases in police services through their budgeting process. Therefore, impacts to police protection services under this alternative would be less than significant.

Transportation/Traffic: As part of the traffic evaluation for the Proposed Project, Kittleson & Associates conducted a review of the Alternative Site located at the intersection of Washington Street and Fred Waring Drive. Access to Highway 111 would be to the south, down Washington Street. The alternative location is currently zoned Community Commercial (CC) which allows a mixture of small retail (less than 10,000 square feet) and general and medical office uses. Therefore, a Conditional Use Permit (CUP) will be necessary for a large retail store, such as Costco Wholesale.

While the Community Commercial zoning would generate similar trips to the Alternative Site as the Proposed Project site, the trips to the Alternative Site would likely be longer distance destination trips that will access the site via Fred Waring Drive and Washington Street. These longer distance destination trips would likely result in a significant impact on Fred Waring Drive, which would experience a substantial percentage increase in traffic volumes. In addition, the intersection of Washington Street/Fred Waring Drive will be impacted, which will worsen the existing deficiencies at this intersection.

To mitigate for these impacts, it may be necessary to install additional upgrades to the traffic system beyond those identified in the General Plan. Additionally, due to the location of the site at a busy intersection, the possibility of insufficient driveway access exists. The location of the parcel near intersections creates only one opportunity for a right-in, right-out driveway. Due to the large amounts of traffic anticipated to visit this site, this would be insufficient. Traffic impacts and roadway and intersection improvements associated with Alternative Site would be equal to or greater than for the Proposed Project, and would possibly be unmitigable.

Visual Quality: According to the La Quinta General Plan, no scenic vistas are located within the immediate vicinity of the Alternative Site. Nor are any scenic resources, including trees, rock
outcroppings, and historic buildings present onsite. No officially designated state scenic highways exist within or near the alternative project site. Therefore, no significant impacts would occur to scenic resources and a less than significant impact is identified.

Development of this alternative would alter the existing aesthetic environment from that of an undeveloped, vacant area to that of a commercial area. The height and bulk of structural elements proposed under this alternative would be required to comply with existing architectural restrictions and conditions to ensure that it would be compatible with other development in the area and not introduce elements which would substantially detract from the existing aesthetic character of the area.

Furthermore, the alternative site is in an urbanized area as evidenced by being developed on two sides with residential uses and on a third with a church. The City’s General Plan Land Use Plan and design guidelines show future commercial development planned for the parcel. Therefore, this alternative is consistent with the City of La Quinta General Plan and impacts to visual character and/or quality of the project site would be less than significant.

Lighting provided for the Alternative Site would be consistent with the existing surrounding environment as design would minimize dispersion and glare that could affect adjacent developments. Lighting impacts would be less than significant, as the City must review and approve the final lighting plan, and ensure that it will not contribute light that could affect adjacent developments. In summary, Implementation of the Alternative Site would be less than significant to aesthetics and visual resources.

**Water Quality:** The Alternative Site would require preparation and implementation of a SWPPP during construction, including installation and maintenance of BMPs to minimize discharge of pollutants and sedimentation. These measures would reduce construction-related water quality impacts to less than significant. Post-development storm water flows would be conveyed through the on site drainage collection system and implementation of water quality BMPs. Project-related impacts to water quality would be reduced to less than significant levels through implementation of applicable regulations and the proposed water quality control plan. New development in the surrounding area will be subject to State regulatory agency, and City requirements.

There is a potential for polluted runoff from the parking lots and building surfaces proposed under this alternative; however, with the implementation of PDDs and BMPs the impacts would be reduced to below a level of significance. Therefore, implementation of the Alternative Site would result in a less than significant impact to water quality.

**Conclusion:** The Alternative Site would not result in any appreciable reduction in identified impacts. Rather, the Alternative Site would lead to additional impacts. There would be likely controversy associated with these impacts. The Alternative Site would create longer distance destination trips and contribute to already heavily congested intersections, resulting in additional significant impacts to traffic. Additionally, due to the proximity of sensitive receptor sites, additional significant impacts to air quality are likely to occur. Because of the close proximity of residential uses, the Alternative Site would fail to realize the City of La Quinta’s objectives of creating a development compatible with, and sensitive to, existing surrounding land uses in the project area. Furthermore, the Alternative Site, located on Fred Waring Drive and Washington Street, would not accomplish the City of La Quinta’s objective to enhance the existing retail uses located on Highway 111. Finally, by adding additional significant impacts, this alternative would not meet the City’s objective of mitigating the potential impacts to the surrounding area to the greatest extent practicable, while still allowing for the market-driven commercial development. For these reasons, the Alternative Site is not environmentally superior to the proposed project.
5.0 Project Alternatives

Comparison to Project Objectives

The Alternative Site would meet many of the project applicant's objectives for the Proposed Project. However, this alternative has been determined to be a less desirable alternative due to the above discussed reasons.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines require the designation of an environmentally superior alternative to the Proposed Project and, if the environmentally superior alternative is the No Project Alternative, selection of an environmentally superior alternative from among the remaining alternatives. An environmentally superior alternative is a project that would reduce and/or eliminate unmitigated, significant environmental impacts associated with a Proposed Project without creating other significant impacts and without substantively reducing and/or eliminating environmental benefits attributable to the Proposed Project. Table 5-1 compares the impacts of the Proposed Project to the Alternatives.

Based upon the analysis provided in Section 5.2, 5.3, and 5.4 of this Draft EIR, along with the comparison in Table 3.5-1, the No Project/No Development Alternative would eliminate the adverse environmental impacts of the Proposed Project and is considered to environmentally superior alternative. Other than the No Project Alternative, the Reduced Square Footage Alternative is environmentally superior when compared to the Proposed Project. However, for reasons discussed in Section 5.3, this alternative was rejected because it does not achieve the project objectives.

Table 5-1. Comparison of Proposed Project and Project Alternatives

<table>
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<tr>
<th>Issue Area</th>
<th>Proposed Project</th>
<th>No Project/No Development Alternative</th>
<th>Commercial Development with Reduced Square Footage</th>
<th>Commercial Development at Alternative Location</th>
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<td>Less than Significant</td>
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</tbody>
</table>
6.0 Growth Inducing Impacts

6.0 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires that an EIR . . .

"discuss the ways in which the Proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment."

The Proposed Project could foster population growth by providing jobs. Commercial uses do provide economic conditions to support population growth; however in this case the project responds to the demands for more commercial development in the City because of the existing population demand. The project does not include any major infrastructure improvements which would be of service to vacant, off-site properties. In addition, project employees are expected to reside in the surrounding areas of the City of La Quinta, the City of Indio, and unincorporated Riverside County where substantial housing opportunities currently exist. The Proposed Project is consistent with the existing City of La Quinta General Plan land use and zoning designations and the regional infrastructure has been planned with the proposed land use. The project is consistent with the General Plan, constructing a commercial center on parcels that are designated as Regional Commercial and Commercial Park in the General Plan. The General Plan is prepared to balance the population growth and the needs of that growth for commercial and economic uses. Infrastructure improvements included as part of the project are aimed at meeting only the local needs of the project. Additionally, the Proposed Project improvements would be relatively minor and would not be expected to foster development in the areas that would not otherwise occur under the existing general plan land use and zoning designations.

Implementation of the Proposed Project will result in direct economic growth to the region, as approximately 450-500 employees total are projected to be needed for the entire commercial development. Additionally, it is expected that substantial sales tax revenue will generated by the retail commercial lands uses.
7.0 Inventory of Unavoidable Adverse Impacts

7.0 INVENTORY OF UNAVOIDABLE ADVERSE IMPACTS

In accordance with CEQA Guidelines, Section 15126(b), EIRs must include a discussion of significant environmental effects that cannot be avoided if the Proposed Project is implemented. The impact analysis, as detailed in Section 4.0 of this Draft EIR, concludes that the following impacts will remain significant after mitigation for the Proposed Project:

Air Quality

- Construction-related NOx emissions are projected to exceed SCAQMD significance thresholds due to exhaust emissions generated by construction vehicles during grading activities. This impact would be considered adverse and unavoidable.

- Operational phase CO emissions will exceed the SCAQMD threshold in 2010. This impact would be considered adverse and unavoidable.

- Cumulative, long-term air quality impacts are also considered adverse and unavoidable.

Transportation and Traffic

- Planned-for city improvements to Highway 111 and Jefferson Street will mitigate all deficient LOS at the study intersections in Opening Year (2006) but will occur after the Proposed Project is developed. Therefore, there will be unavoidable significant but temporary project-related impacts in 2006.

- The Proposed Project will contribute by more than 0.02 increase to v/c ratio to the deficient intersection of Washington Street and Highway 111 in future year (2020). Mitigation measures will minimize project related impacts but cumulative impacts to this intersection remain adverse and unavoidable.

- Traffic from the Proposed Project leads to an unacceptable LOS level at the Highway 111 and Jefferson Street intersection in future year (2020). Due to the uncertainty of mitigation measures proposed in the adjacent City of Indio, this impact would be considered adverse and unavoidable.

Based on the analysis, all other environmental impacts associated with the Proposed Project will either be less than significant or mitigated to less than significant with the implementation of appropriate mitigation measures.
December 23, 2005

TO: Mr. Steve Copenhaver, Community Development Director  
City of Indio  
Planning and Local Assistance  
100 Civic Center Mall  
Indio, CA 92201

FROM: City of La Quinta  
Community Development Department  
PO Box 1504  
78-495 Calle Tampico  
La Quinta, CA 92253  
Contact: Les Johnson, Planning Manager

SUBJECT: RESPONSE TO LATE RECEIVED COMMENT LETTER FOR THE KOMAR DESERT CENTER DRAFT ENVIRONMENTAL IMPACT REPORT SCH NO. 2005081060

The City of La Quinta, as the Lead Agency, has prepared an Environmental Impact Report (EIR) for the above-referenced project. The La Quinta City Council will consider certifying the Final EIR and approving the project at the conclusion of a public hearing scheduled for 7:00 p.m. on January 3, 2006.

The City of La Quinta welcomes and appreciates all comments received on the Draft EIR. In accordance with Section 21092.5 of the California Environmental Quality Act, the City has prepared and included within the Final EIR a written response to each public agency and interested party that commented on the Draft EIR and submitted correspondence within the Public Review Comment Period ending December 9, 2005. The City of Indio letter was not submitted within the Comment Period. It was hand delivered on December 12, 2005, at 4:28 p.m. As a result, the City has not included the City’s letter or a response thereto in the Final EIR. However, as a courtesy, please find enclosed a copy of your letter along with the City’s responses to the late comments. The City of La Quinta looks forward to working with Indio on ways to improve this project and other projects of joint interest.

If you have any questions or concerns about these responses or any other aspect of the project, please feel free to contact Fred Baker, Principal Planner, or Les Johnson, Planning Manager at (760) 777-7125.

Sincerely,

Douglas R. Evans  
Community Development Director

Enclosure

c: Les Johnson, Planning Manager  
Fred Baker, Principal Planner
Mr. Fred Baker, Principal Planner  
Community Development Department  
City of La Quinta  
78-495 Calle Tampico  
La Quinta, CA 92253

Subject: City of Indio Comments on the Konmar Desert Center Draft EIR

Dear Mr. Baker:

The City of Indio appreciates the opportunity to provide comments on the October 25, 2005 Draft Environmental Impact Report (Draft EIR) prepared by HDR for the proposed Konmar Desert Center Project on Highway 111 just west of Jefferson Street in the City of La Quinta. We have also reviewed and are providing comments on the October 2005 Transportation Impact Analysis (Traffic Study) prepared by Kittelson & Associates, Appendix J to the Draft EIR.

Inadequate Project Description:

When a project is part of a larger project, the EIR project description and impact analysis must address the larger project. A lead agency may not segment a project into pieces thereby avoiding an analysis that may lead to findings of greater impacts than may occur with the segment of project the lead agency is evaluating (CEQA Guidelines, Section 15165).

An EIR must describe and analyze "reasonably foreseeable future phases" of a project if the larger project is inevitable rather than remote or speculative. In this case, the larger project is the whole of the Konmar Investments project, not just that portion located within the City of La Quinta. Konmar Investments has prepared a site plan for additional property located adjacent to the project site being evaluated in the Draft EIR that is a logical extension of that project. In addition, Konmar Investments is actively advertising to lease commercial space in that portion of the project located within the City of Indio. The property is posted with a sign stating such, there is a trailer on-site, and potential lessees have visited the Indio Community Development Department requesting information about the status of the Konmar Investments project. For all of the aforementioned reasons, we believe that the project description set forth in the Draft EIR is inadequate because it does not describe the whole of the project which is actually a commercial site of approximately 34 acres in the cities of La Quinta and Indio.
Because the project description does not include the whole of the project that is reasonably foreseeable, the analysis of environmental issues is not adequate. Once the project description has been revised to identify the whole project and all of its phases, an analysis of environmental impacts must be completed and the Draft EIR re-circulated for public review (CEQA Guidelines Section 15088.5).

Once the whole of the project is identified in the Project Description, the City of Indio will determine what entitlements are required for the portion of the project within the City’s jurisdiction and provide input to the City of La Quinta and its consultant, on the potential environmental impacts that could occur within the City of Indio. We will also provide a list of recently approved or reasonably foreseeable projects within an established radius from the project site to be used to evaluate cumulative impacts (see below). The City of Indio would then use the EIR prepared for the whole of the project to support its consideration of entitlements for the project within its jurisdiction.

**Inadequate Cumulative Project Analysis**

The Draft EIR includes a short discussion on Cumulative Projects and list a total of four projects that, together with the proposed project, were evaluated for potentially significant cumulative impacts. The list appears to be made up of reasonably foreseeable projects within a one-mile radius of the project site solely within the City of La Quinta. There are no projects within the City of Indio listed in Table 3.5.1, nor presented on Figure 3-4 even though the project site is adjacent to the City of Indio. The City of Indio has a number of proposed or recently approved projects that may be located within the one-mile radius that should be included in the Cumulative Projects list and therefore, the list is incomplete. The project’s incremental effects may still be individually limited even when evaluating the whole of the project, but cumulatively considerable when evaluated in conjunction with the revised Cumulative Projects list that includes recently approved or reasonably foreseeable projects within a reasonable radius of the project site in the City of Indio.

In addition, because the major tenant of the project is a Costco, and because such a tenant routinely draws shoppers from the region and not just locally, the radius used to establish the cumulative projects list should be expanded to better represent potential cumulative impacts. The existing Costco store in Palm Desert currently draws shoppers from throughout the Coachella Valley.

Of particular concern to the City of Indio is the potential impact to our roads and existing circulation system. Our review of the Draft EIR and the Traffic Study disclosed the
1) **Traffic Analysis Is Inconsistent with “Phased” Project Description** – Page 2-18 of the Draft EIR states “Development of the Proposed Project is anticipated to occur over approximately two years. Build out is projected for approximately early to mid 2007, and will occur in two distinct phases. Construction of Phase I (the Costco Wholesale parcel)...should be completed by August 2006. Phase II (the Komar parcels)...should be completed by April 2007”. Chapter 4.10 of the Draft EIR, Transportation and Traffic, analyzes “Opening Year” conditions for the entire project in 2006, and adds “…an annual growth rate of two and a half percent...to account for near term regional growth in the area and to develop the 2006 background traffic volumes”.

Existing traffic counts made in 2005 were factored by the assumed annual growth rate out to 2006 but the entire project will not be constructed and occupied until 2007. The Draft EIR and Traffic study incorrectly analyzed both phases of the project as a single phase to be completed in 2006. The traffic analysis in the Traffic Study and the Draft EIR do not reflect the proper baseline traffic volumes at Opening Year for the entire project in 2007.

2) **Opening Year Traffic Volumes Do Not Include All Approved Developments** – Page 4.10-12 of the Draft EIR lists four approved projects in the City of La Quinta that have been approved and are anticipated to be completed and occupied in 2006. Projected traffic volumes from each of these four projects were added to the existing traffic counts made in 2005; that were factored by two and one half percent for regional growth to incorrectly establish “Opening Year” baseline conditions.

According to the Project Description in Chapter 2 of the Draft EIR as pointed out above, the phased project will not be completed until 2007. Factoring the existing traffic volumes by only two and one half percent for only one year does not accurately represent regional growth in traffic volumes over two years out to 2007. No-traffic volumes from major development projects approved by the City of La Quinta that will be occupied between 2006 and 2007, or from approved developments in the City of Indio, were considered in the traffic analysis. These omissions and the addition of only one year of regional growth understate “Opening Year” baseline conditions in 2007.

3) **Project Trip Reductions Are Not Technically Supported** – Table 4.10-2 on Page 4.10-9 of the Draft EIR forecasts trips during the typical weekday PM peak hour for the proposed project. The table includes a reduction of 64 percent for trips from the Costco portion of the proposed project, with Footnote 1 to this table stating “The percentage of pass by and diverted trips is based upon independent surveys and traffic counts at ten similar size Costco Wholesale stores within the United States”. The Traffic Study fails to include any documentation of this analysis for the other ten Costco Wholesale stores so the reduction for pass by and diverted trips can be reviewed. As a result, the public and decision makers cannot verify if conditions at these other Costco Wholesale stores are similar or applicable in any way to those that will be experienced at the proposed project.
The same significant reduction for pass by and diverted trips was also used in the brief analysis of traffic conditions in the Draft EIR for Saturdays. From personal experience, very few Costco shoppers on weekends appear to be pass by or diverted trips that pick up only a very few items. To the contrary, the vast majority of weekend shoppers at Costco make major purchases of many items on long shopping lists, clearly a planned trip rather than a spur of the moment diversion while passing by to pick up only a few items.

If the project trip reductions for weekdays and/or weekends are too high, then the new project traffic has been significantly underestimated and potentially significant traffic impacts have been omitted from the Draft EIR.

4) Additional Intersections in Indio Require Evaluation — Figure 4.10-3 on Page 4.10-10 of the Draft EIR assigns 25 percent of project trips on Highway 111 to and from the City of Indio. In contrast, trip assignments on roadways in the City of La Quinta have been defined down to 5, 10, or 15 percent of the project trips. The analysis of conditions with project traffic at only Highway 111 and Madison Street, with all project trips assigned to Highway 111, does not properly evaluate traffic impacts at this intersection or at any other intersections in the City of Indio.

5) Intersection Levels of Service Are Incorrect — Table 4.10-1 on Page 4.10-7 of the Draft EIR summarizes the Level of Service (LOS) in the PM peak hour at each of the study intersections, together with the critical v/c (volume to capacity) ratio. In this table as well as all subsequent tables in the Draft EIR and throughout the Traffic Study, the LOS letter "grade" provided relates to the intersection delay on the calculation sheets included in the Appendix to the Traffic Study, not to the volume to capacity ratio.

Since significant project traffic impacts are determined based upon the change in the volume to capacity ratio as outlined on Page 4.10-8 of the Draft EIR, the LOS letter “grade” values must also be related to the volume to capacity ratio, not to average intersection delay. The Level of Service letter “grades” in the tables throughout the Draft EIR and the Traffic Study must be related to the volume to capacity ratios for the following ranges:

<table>
<thead>
<tr>
<th>Level of Service</th>
<th>Volume to Capacity Ranges</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Less than 0.60</td>
</tr>
<tr>
<td>B</td>
<td>0.61 to 0.70</td>
</tr>
<tr>
<td>C</td>
<td>0.71 to 0.80</td>
</tr>
<tr>
<td>D</td>
<td>0.81 to 1.00</td>
</tr>
<tr>
<td>E</td>
<td>Greater than 1.00</td>
</tr>
</tbody>
</table>

Incorrectly mixing the two measures has led to the failure of the Draft EIR to disclose significant traffic impacts at many intersections as outlined below.
Incorrectly mixing the two measures has led to the failure of the Draft EIR to disclose significant traffic impacts at many intersections as outlined below.

6) **Significant Impacts Have Not Been Properly Identified for Opening Year** – By correcting the LOS letter "grades" to those applicable to the volume to capacity ratio and applying the definitions of Thresholds of Significance shown on Page 4.10-8 of the Draft EIR, the following intersections are significantly impacted in Table 4.10-3 on Page 4.10-14 for Opening Year Conditions:

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Corrected LOS Without Project</th>
<th>Corrected LOS With Project</th>
<th>Increment Increase</th>
<th>Significant Impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington/111</td>
<td>E</td>
<td>E</td>
<td>0.056</td>
<td>YES</td>
</tr>
<tr>
<td>111/Adams</td>
<td>E</td>
<td>E</td>
<td>0.049</td>
<td>YES</td>
</tr>
<tr>
<td>111/La Quinta</td>
<td>E</td>
<td>E</td>
<td>0.048</td>
<td>YES</td>
</tr>
<tr>
<td>111/Depot</td>
<td>B</td>
<td>E</td>
<td>B to E</td>
<td>YES</td>
</tr>
</tbody>
</table>

The four intersections identified above, in addition to those already reported in the Draft EIR, are significantly impacted in the Opening Year. Measures must be developed to mitigate project traffic impacts at each of these intersections in the Opening Year. These mitigation measures must be added to the Draft EIR and must be required to be implemented as part of the entitlement process for the Komar Desert Center Project.

7) **Significant Saturday Impacts Have Not Been Fully Identified** – Page 4.10-17 summarizes a sensitivity analysis for expected traffic conditions on Saturdays for the Opening Year, with capacity calculations included in the Traffic Study Appendix. By correcting the LOS letter "grades" to those applicable to the volume to capacity ratio and applying the definitions of Thresholds of Significance shown on Page 4.10-8 of the Draft EIR, both intersections in the Sensitivity Analysis are significantly impacted on Saturdays for Opening Year conditions as follows:

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Corrected LOS Without Project</th>
<th>Corrected LOS With Project</th>
<th>Increment Increase</th>
<th>Significant Impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington/111</td>
<td>D</td>
<td>E</td>
<td>D to E</td>
<td>YES</td>
</tr>
<tr>
<td>111/Jefferson</td>
<td>C</td>
<td>E</td>
<td>C to E</td>
<td>YES</td>
</tr>
</tbody>
</table>

Only Washington Street at Highway 111 and Jefferson Street at Highway 111 were included in the Sensitivity Analysis for Saturdays. As indicated above, both these intersections are significantly impacted by project traffic on Saturdays. The conclusion on Page 4.10-17 of the Draft EIR “…that traffic impacts in opening year (2006) with project and Highway 111 improvements would be less than significant on Saturdays” cannot be sustained without further evaluation of all other intersections in the vicinity of the project.
8. Significant Impacts Have Not Been Properly Identified at Build Out (2020) – By correcting the LOS letter “grades” to those applicable to the volume to capacity ratio and applying the definitions of Thresholds of Significance shown on Page 4.10-8 of the Draft EIR, the following intersections are significantly impacted in Table 4.10-4 on Page 4.10-21 at Build Out (2020):

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Corrected LOS Without Project</th>
<th>Corrected LOS With Project</th>
<th>Increment Increase</th>
<th>Significant Impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington/Miles E</td>
<td>E</td>
<td>E</td>
<td>0.028</td>
<td>YES</td>
</tr>
<tr>
<td>111/Simon</td>
<td>D</td>
<td>E</td>
<td>D to E</td>
<td>YES</td>
</tr>
<tr>
<td>111/Adams</td>
<td>D</td>
<td>E</td>
<td>D to E</td>
<td>YES</td>
</tr>
<tr>
<td>111/Depot</td>
<td>B</td>
<td>E</td>
<td>B to E</td>
<td>YES</td>
</tr>
</tbody>
</table>

The four intersections identified above, in addition to those already reported in the Draft EIR, are significantly impacted at Build Out (2020). Measures must be developed to mitigate project traffic impacts at each of these intersections at Build Out (2020). These mitigation measures must be added to the Draft EIR and required to be implemented as part of the entitlement process for the Komar Desert Center Project.

9. Significant Impacts May Occur at 111/Madison and Jefferson/Avenue 48 – In describing build out conditions, Page 4.10-23 of the Draft EIR states “Even though the Jefferson Street at Avenue 48 and Highway 111 at Madison Street intersections do not meet acceptable LOS thresholds, it is less than significant because the Proposed Project does not cause an increase in 0.02 in v/c ratio.” Table 4.10-4 on Page 4.10-21 of the Draft EIR reports an increase in the volume to capacity ratio of 0.012 at Jefferson Street and Avenue 48 and an increase in the volume to capacity ratio of 0.17 at Highway 111 and Madison Street.

Addressing the prior comments in this report will yield higher baseline traffic volumes and higher project trip generation. Decreasing the assumed reductions for pass by and diverted trips as well as further study of Saturday traffic will likely result in significant project traffic impacts at Jefferson Street and Avenue 48, Highway 111 and Madison Street, and other intersections. The resulting significant project traffic impacts at these and other intersections require implementation of mitigation measures funded by the Komar Desert Center Project.

10. Inconsistent Mitigation Identified at 111/Jefferson at Opening Year – Footnote 3 to Table 4.10-3 on Page 4.10-14 of the Draft EIR states “The planned improvements:
In describing the City of La Quinta planned roadway improvements for Highway 111 and Jefferson Street, Page 4.10-17 states "Highway 111 will be widened to six through lanes from Jefferson Street to Adams Street...It will also include dual 300 foot left turn lanes on eastbound Highway 111 at Jefferson Street...In addition, the improvements will include separate right turn lanes on Highway 111 at...Jefferson Street. No improvements are proposed to eastbound Highway 111 at Jefferson Street."

Capacity calculations in the Traffic Study Appendix for Opening Year conditions on Highway 111 at Jefferson Street are based upon dual left turn lanes, three through lanes, and a separate right turn lane for northbound, southbound, and eastbound traffic. Westbound traffic lanes at this intersection include a single left turn lane, an exclusive westbound through lane, and a westbound shared through/right turn lane.

The two improvement scenarios for Highway 111 at Jefferson Street described in the Draft EIR are different from each other, and the capacity calculations in the Traffic Study Appendix are based upon a geometric configuration that does not match either of the improvements described in the text. These inconsistencies must be reconciled.

11) Questionable Mitigation Identified at 111/Jefferson at Build Out (2020) – Table 4.10-5 on Page 4.10-28 of the Draft EIR recommends two mitigation measures at Highway 111 and Jefferson Street at build out in 2020 including allowing an eastbound right turn overlap green arrow traffic signal phase and the addition of a separate westbound right turn lane.

Installation of an eastbound right turn overlap green arrow would require the prohibition of northbound to southbound U-turns at this intersection, a measure that could adversely impact the gas station on the southwest corner as well as other future developments on the west side of Jefferson Street just south of Highway 111. The impacts of the necessary U-turn prohibition to accommodate the eastbound right turn green arrow overlap must be considered, and alternate access to replace the U-turn movement must be developed as part of this proposed mitigation.

Review of the capacity calculations in the Traffic Study Appendix indicates the westbound right turn is not a critical movement in the operation of this intersection at build out. As a result, adding a westbound right turn lane which involves the costly widening of the existing bridge, will not improve the operation of the intersection during the PM peak hour. From review of the capacity calculations, it would be beneficial instead to add a second westbound left turn lane as this is a critical movement in the calculations.

As discussed above, the Draft EIR must develop appropriate mitigation measures for Highway 111 at Jefferson Street at build out. Furthermore, the City of La Quinta must require the Komar Desert Center to financially participate in the cost of these and other necessary project mitigation measures in the City of Indio. Only the City of La...
Quinta can require this financial participation as the City of Indio has no jurisdiction or authority to establish such requirements outside its boundaries as was suggested on Page 4.10-28 of the Draft EIR.

12) **Highway 111 East of Jefferson Street Is Significantly Impacted** — While the Draft EIR does not discuss mid-block segment traffic impacts, there is a brief analysis in Appendix I to the Traffic Study. Table 12 indicates the Komar Desert Center Project will add 1,928 daily trips to Highway 111 from Jefferson Street to Madison Street, the difference between 37,296 trips with the project and 35,328 trips without the project. The Footnote to this table states “The scenario with Costco/Komar includes 15,970 additional trips based on Costco/Komar daily trip generation.”

The value shown for daily trips on Highway 111 east of Jefferson Street in Table 12 is erroneous. Figure 4.10-3 on Page 4.10-10 of the Draft EIR assigns 25 percent of the project trips to Highway 111 east of Jefferson Street. With the project forecast to generate 15,970 daily trips, 3,993 daily trips will use Highway 111 east of Jefferson Street. When 3,993 daily trips are added to the 35,328 daily trips in the 2006 baseline daily trips on this segment before the project, a total of 39,321 daily trips results. This corrected total of daily trips exceeds the daily capacity of 38,000 trips for a four lane roadway, indicating a significant traffic impact on the mid-block roadway segment of Highway 111 from Jefferson Street to Madison Street. The Komar Desert Center Project must mitigate this significant traffic impact.

The City of La Quinta must require the Komar Desert Center to financially participate in the cost of widening Highway 111 from four lanes to six lanes and other necessary project mitigation measures in the City of Indio. Only the City of La Quinta can require this financial participation as the City of Indio has no jurisdiction or authority to establish such requirements outside its boundaries as was suggested on Page 4.10-28 of the Draft EIR.

The City of Indio looks forward to working with the City of La Quinta to resolve the various issues raised in this comment letter.

Sincerely,

[Signature]

Steve Copenhaver
Community Development Director

cc: Glenn Southard, City Manager
    Jim Smith, Director of Public Works
    Grant Elkhound, City Engineer
Response to Late Comment Letter

City of Indio

December 12, 2005

Response 1

The City of La Quinta received the City of Indio's hand delivered letter in response to the Komar Desert Center DEIR and Transportation Impact Analysis on December 12, 2005, at 4:28 PM. Since it was delivered three days after the close of the Comment Period (December 9, 2005) the City has not included Indio's letter or the City's response in the Final EIR. It was necessary to send the Final EIR to the printer on December 21, 2005. However, even though the City is not legally required to respond to the late comments, as a courtesy, the City is providing the following written responses to the City of Indio's comments.

Response 2

The City of Indio has asserted that the ultimate development of 21-acre parcel owned by Komar Investments ("Komar") within the City of Indio (the "Indio Property"), which is adjacent to the La Quinta Komar Desert Center/Costco project, should be considered part of the project.

As an initial matter, we note that the City of La Quinta provided the City of Indio (and all other interested agencies and person) with the project description when the Notice of Preparation (NOP) was circulated. While the City of Indio provided extensive comments and suggestions on the scope of the analysis, the City of Indio at no time suggested that the development of the Indio Property should be considered as part of the project. Nor did the City of Indio request or recommend that the two cities jointly prepare a single EIR to cover all future development in the general vicinity.

More fundamentally, the City of La Quinta has investigated Indio's comments and has reconfirmed the City's conclusion that the Indio Property cannot properly be considered part of this project for, among others, the following reasons:

- The Indio Property consists of approximately 21 acres of undeveloped land, approximately 7 acres of which is located northwest of the La Quinta Evacuation Channel that bisects the property, and approximately 14 acres that are located to the southeast of the Channel.

- Indio's suggestion that the ultimate development of the 21 acres should be treated as a single project with the Costco/Komar site ignores the existence of the La Quinta Evacuation Channel. Connecting the Costco/Komar site to the easterly 14 acres of the Indio Property would require one or more crossings of the La Quinta Evacuation Channel. Bridge construction is extremely expensive. In connection with determining the feasibility of an access road from the Costco/Komar Center to Jefferson Street, engineering estimates were prepared for the costs of one bridge structure. Based upon current estimates, the costs of connecting the east and west sides of the Indio Property with a 120 foot long bridge is approximately $2.16 million. Numerous studies and governmental approvals would be needed for such a project. These could include: hydrology studies, habitat impact studies, CVWD permits, Bureau of Reclamation permits, Regional Water Quality Control Board permits, a Corps of Engineer permit (i.e., 404 permit), and a Department of Fish & Game Permit (Section 1602). As a result, the City has determined that a connection to Jefferson Street across the Evacuation Channel is unlikely to occur. Therefore, the City of La Quinta has assumed that none of the traffic from Costco/Komar site will exit the property via the Indio Property. The layout of the Costco/Komar project is such that it is a stand alone project. It is not dependent upon the ultimate development of the Indio Property.

- Moreover, the Indio Property consists of separate legal parcels from the parcels encompassing the Costco/Komar Site. As such, the parcels within the Indio Property are subject to being bought, sold, and developed wholly independent of the Costco/Komar site. While the Costco/Komar site is located...
within the City of La Quinta, the Indio Property is located within the City of Indio, and if and when it is development, the City of Indio will serve as the Lead Agency for environmental review. Given the fact that the City of Indio is the agency which will control all land use decisions within it borders, the City of La Quinta is not in a position to predict what the City of Indio will or will not approve on the Indio Property or when it will take any action with regard to the Indio Property.

- Beyond the issue of jurisdiction, the City of La Quinta is not aware of any defined plans for the Indio Property at this time. Komar has informed the City of La Quinta that it does not have any particular plans for the Indio Property. Komar has informed the City that it has owned the Indio Property for approximately 10 years. Komar representatives have further informed the City of La Quinta that they have had informal discussions with City of Indio representatives at various points in time as to the potential for development of the Indio Property with hotel, commercial and/or residential uses, consistent with applicable zoning. However, according to Komar, no application has been submitted to the City of Indio for approval of any proposed use or site plan, and no application for development of any kind has been submitted to the City of Indio. In connection with an inquiry arising from the City of Indio’s comment, Komar has informed the City of La Quinta that a conceptual plan has been created by Komar to assist with planning discussions with the City of Indio and to aid in marketing efforts. Komar has stated that these plans do not demonstrate proposed uses of the Indio Property. Komar has indicated that it continues to review different analyses to evaluate the potential uses for the Indio Property. However, to this point, the nature, scope and timing of any development of the Indio Property is entirely speculative.

- Komar has represented to the City of La Quinta that it is not under any contract to sell, lease or develop any portion of the Indio Property. It has further stated that there are no letters of intent in existence as to the Indio Property. Its current contract is the contract it has for the sale of land within the City of La Quinta to Costco as a part of the Komar Desert Center in La Quinta. According to Komar and Costco, Costco will not be acquiring the right to acquire, develop or expand in the future into any portion of the Indio Property. Komar has indicated that it does not anticipate the Indio Property being developed within 2006.

- Regarding its signage comment, Komar has informed the City of La Quinta that due to the nature of Komar’s business as a real estate developer, it is Komar’s policy to place for sale/lease and information available signs on all of its properties, including the Indio Property and Komar’s La Quinta property, at all times during its ownership of these properties. According to Komar, the signage does not indicate specific plans for the property site. As an example, Komar has maintained signage on Indio Property since Komar purchased the property in 1997.

- Since Komar remains in the marketing phase of the Indio Property, it would be speculative at this point, and was certainly speculative at the point the (NOP) was prepared on August 5, 2005, to include the ultimate development of the Indio Property as part of this project. While the Indio Property was not included within the project, the impacts of the ultimate development of the Indio Property have been taken into account in the EIR. The EIR assumed that the Indio Property would ultimately be developed as mixed use commercial. Since it is highly unlikely that the Indio Property will be developed and fully operational by 2006, it would not have been reasonable to assign trips to the vacant property for the opening year (2006) analysis. As required by CEQA, the Draft EIR analyzed the Indio Property to the highest level of specificity possible. Sections 2.0 Project Description, 3.0 General Environmental setting, 4.7 Land Use and Planning, and 4.11 Visual Resources describe the Indio Property as having the General Plan designation of Mixed Use Specific Plan 300 (MUSP 300). Buildout of the property site in accordance with this General Plan designation was considered in the Cumulative traffic analysis for Future Buildout 2020.
Thus, the analysis is based upon the level of specificity at the time of the analysis. Section 15146 of the CEQA Guidelines states that “an EIR need not engage in a speculative analysis of environmental consequences for future and unspecified development.”

Response 3:

Response 2 addresses the City of Indio’s concern regarding the inadequacy of the project description. The project description for the Komar Desert Center is complete and has considered all reasonably foreseeable aspects of the Project. Therefore, the project description will not be revised and the Draft EIR will not be recirculated for public review. When Komar has determined how it plans develop the Indio Property, Komar will be required to apply to and work directly with the City of Indio as the Lead Agency regarding environmental review, entitlements, etc.

Regarding the comment about providing a list of recently approved or reasonably foreseeable projects in Indio, the City of La Quinta notes that the appropriate time for the City of Indio to provide this information was in response to the NOP. Nonetheless, as is set forth below, the City of La Quinta is responding to all of the information the City of Indio has now made available.

Response 4:

The State CEQA Guidelines define cumulative effects as “two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts.” The CEQA Guidelines further state that the individual effects can be the various changes related to a single project or the changes involved in a number of other closely related past, present, and reasonable foreseeable probable future projects (Section 15355). The CEQA Guidelines allow for the use of two alternative methods to determine the scope of projects for the cumulative impact analysis:

- List Method - A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency.

- Regional Growth Projections Method - A summary of projections contained in an adopted general plan or related planning document which is designed to evaluate regional or area wide conditions (CEQA Guidelines Section 15130).

The methodology is tailored to the issue under consideration. The Draft EIR employs both methods as explained below:

List Method

The City of La Quinta identified a list of projects to be used for near-term 2006 background traffic analysis. This list was based on projects located within proximity to the Proposed Project that are expected to open near the time the Costco will open in 2006. Table 3.5-1 in the Draft EIR identifies these projects and is included below. A column has been added to indicate the status of each of these projects at the time the EIR went out for public review and current status.

<table>
<thead>
<tr>
<th>Map ID</th>
<th>Project</th>
<th>Description</th>
<th>Status in DEIR</th>
<th>Status December 19, 2005</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Sam’s Club</td>
<td>136,000 square feet of commercial development, plus a fueling station.</td>
<td>Under building and precise grading review.</td>
<td>Final plan check is currently underway. Permit issuance projected to occur by January or February</td>
</tr>
<tr>
<td>2</td>
<td>Jefferson Plaza (Home Depot – Phase II)</td>
<td>218,279 square feet of retail, restaurant, and gas.</td>
<td>Under construction.</td>
<td>Significant majority of site is now built.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>station uses.</td>
<td>Occupancy of most stores are underway. Approximately 0.89 acres remain, which represents approximately 8,000 square feet of retail space.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>The Pavilion</td>
<td>164,000 square feet of retail, restaurant and grocery store. Grading and building permit review in process. Approximately 80% of this development has been issued building permits and is currently under construction. Permit issuance on the remaining building is expected by February or March.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>La Quinta Corporate Center</td>
<td>91,600 SF of business park uses, 79,300 SF of commercial uses, 235,000 SF of office uses, 7,000 SF of restaurant uses, 6,500-square-foot bank, a 30,000 SF fitness center, a 15 fueling position service station, 10.6 acres of industrial park uses, and 3.61 acres of self-storage. All but approximately 3.5 acres of the Center has been constructed. Three office buildings are about to commence construction on approximately 2 of the remaining 3.5 acres. At this time it is uncertain as to what might be constructed on the remaining 1.5 acres. Approximately 65% of this development area has been constructed with the majority of the buildings being occupied. Permits have been recently issued for three professional office buildings located on Corporate Center Drive. Permits for additional professional office space immediately North of Gold’s Gym are currently in plan check. The remaining area, which will likely include retail, professional office and/or industrial park uses, has yet to submit any development permits.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The City of Indio did not provide the City of La Quinta with a list of related project with its NOP letter, which was received after the notice date nor with their late response to the Draft EIR. A telephone call was placed by Wendy Worthey of HDR on September 19, 2005 to the Planning Department at the City of Indio, requesting input regarding cumulative projects, which was never returned. A review of the State
Clearinghouse Web site, City of Indio website and field visits did not reveal any new projects being developed in Indio within a one mile radius that represented changes to General Plan designations as shown in the table below. However, to take into account projects that were proceeding with/or without CEQA review, the EIR increased the traffic numbers to accommodate this growth by adding a 2½% annual growth rate to the 2005 existing traffic conditions. Given the nature, location and distribution of the projects listed, the trip generation from the Indio projects is expected to be within the 2½% annual growth rate.

**Indio Projects within a One Mile Radius**

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Location</th>
<th>Description</th>
<th>Status</th>
<th>General Plan Designation*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heritage-Court</td>
<td>South East corner of Jefferson Street and Fred Waring Drive</td>
<td>Neighborhood Shopping Center</td>
<td>Approved - Under Construction</td>
<td>Neighborhood Commercial</td>
</tr>
<tr>
<td>Hog Wild Restaurant</td>
<td>North side of Shields Road/ Highway 111</td>
<td>Restaurant</td>
<td>Approved</td>
<td>Mixed Use</td>
</tr>
<tr>
<td>The Bridge@ Jefferson</td>
<td>Southeast corner of Jefferson Street/ Avenue 48</td>
<td>124 single family homes on 40 acres</td>
<td>Approved, under construction</td>
<td>Low Density Residential</td>
</tr>
<tr>
<td>Walgreen’s</td>
<td>Southwest corner of Madison Street and Highway 111</td>
<td>Retail Commercial</td>
<td>Pending</td>
<td>Mixed Use</td>
</tr>
<tr>
<td>The Orchard</td>
<td>Northeast corner of Shields Road and Avenue 49</td>
<td>93 single family homes on 40 acres</td>
<td>Approved, under construction</td>
<td>Medium Density Residential</td>
</tr>
<tr>
<td>Estacio</td>
<td>Shields Road/ Avenue 49</td>
<td>73 single family homes approximately 40 acres</td>
<td>Approved, under construction</td>
<td>Medium Density Residential</td>
</tr>
<tr>
<td>Valley Center Children’s Medical Center</td>
<td>Shields Road/ Highway 111</td>
<td>11,312 square feet professional office building</td>
<td>Approved</td>
<td>Mixed Use</td>
</tr>
</tbody>
</table>

*Source: Community Development Status Report, City of Indio Website
Indio General Plan Land Use Diagram 2004, City of Indio Website
- Medium Density Residential = 2-5 units per acre
- Neighborhood Commercial = convenient small scale shopping and personal service uses in close proximity to residential neighborhoods

There are two projects in Indio listed on the California State Clearinghouse Web site as being in the environmental review process. Both of those projects are located more than two miles from the Costco/Kmart site. However, they are discussed below.

**Indio Fashion Mall**

This project is located approximately 2.3 miles away from the Project site which is outside of the one mile radius used to analyze cumulative impacts. This project represents a change in General Plan land use designations by proposing a Specific Plan. According to Table 5A of the Indio Fashion Mall Traffic Impact Analysis, the Fashion Mall would generate an additional 4,558 trips over and above the existing land use.
However, the Fashion Mall Traffic Impact Analysis indicates that impacts associated with project traffic do not extend beyond Clinton Street in the City of Indio. The study does not analyze any impacts within the City of La Quinta. Therefore, the City of La Quinta can only assume that there are no cumulative impacts that will occur in La Quinta’s jurisdiction. The Komar/Costco TIA study area extended out one mile into the City of Indio. The Komar/Costco TIA did not identify significant impacts at the intersection of Highway 111 and Madison Street in 2006 after Highway 111 improvements or 2020 full build out. It should also be noted that the Indio Fashion Mall traffic impact analysis does not identify any significant cumulative impacts that could not be mitigated. Therefore, it is concluded that neither project would result in cumulatively significant impacts.

**Jefferson Street Commercial Plaza**

The Jefferson Street Commercial Plaza is located approximately three miles north of the Costco/Komar site. A Negative Declaration for the Jefferson Street Commercial Plaza is listed on the State Clearinghouse Web site. The City of Indio has submitted a Negative Declaration for public review on September 14, 2005. Communications with the City of Indio has indicated that the project has not gone to Planning Commission as of December 15, 2005.

The Draft Traffic Impact Analysis report for the Jefferson Street Commercial Plaza identified one significant impact located at the intersection of Avenue 42 and Monroe Street. It was fully mitigated with the installation of a traffic signal. This intersection is approximately 4.5 miles from the proposed Costco/Komar site. The analysis conducted for the Costco/Komar site indicated that there were no significant impacts associated with traffic at the point of Fred Waring Drive and Jefferson Street. This intersection is located approximately 1.8 miles south of the Jefferson Street Commercial Plaza. Therefore, it can be concluded that changes in the traffic circulation for both projects (i.e. cumulative impacts) would not be significant.

**Regional Growth Projections Method**

Because the geographic scope of cumulative impacts to some issue areas is broader than the immediate area where the listed projects are located, the list method cannot accurately address a project’s potential cumulative impacts to some issue areas. Therefore, a regional growth projections model was also used to evaluate cumulative effects in the Draft EIR.

The Future Year 2020 analysis conducted in the TIA is based on the City of La Quinta traffic model (using Transplan software package) which incorporates regional data from CVATS 2020 Regionally Developed Socio-Economic and Land Use data including input from the City of Indio. The model assumes full build out within the City of La Quinta and land use data from the CVATS model which includes the City of Indio. Specifically the model includes La Quinta TAZ 904, which includes the Komar’s Indio Property referenced in Response 2 and 3. La Quinta TAZ 904 is part of a larger regional transportation zone CVATS TAZ 152. Ten percent of the traffic from CVATS TAZ 152 was assigned to TAZ 904 and is comprised of the following approximate land designations percentages which were used for traffic assignments: 49 percent residential and 34 percent commercial, the remainder comprised of 14 percent Parks and Open space and 2.5 percent Schools. Therefore, full build out of the Komar’s Indio Property, as well as the rest of Indio, is included in the Future year 2020 analysis if developed in accordance to the Indio General Plan designation.

**Response 5**

The TIA studied three intersections within the City of Indio: Jefferson Street and Miles Avenue, Highway 111 and Jefferson Street, and Highway 111 and Madison Street. With the Highway 111 and Jefferson Street improvement project scheduled to occur in 2006, there are no significant impacts identified to any of the intersections located within the City of Indio. Furthermore, in the Year 2020, there are no significant impacts resulting from the project at the intersections of Jefferson Street and Miles Avenue and Highway 111 and Madison Street. Both of these intersections are located
approximately one mile from the Project site. (See response 20 for further discussion of Highway 111/Jefferson Street.) Therefore, the conclusions reached in the TIA demonstrate that project traffic dissipates within one mile. As a result of using the previously described list method, the radius of one mile was used for identifying cumulative impacts.

Response 6

The TIA analyzed the traffic impacts for the proposed Costco/Komar development in 2006, the expected year that the Costco will open, and 2020, the future year of the City of La Quinta GP. The year 2006 was chosen as the first analysis year that is when the initial phase of the project is expected to open.

The TIA and Draft EIR identified necessary mitigation measures for each intersection in the study area where the Costco/Komar resulted in a significant impact. The planned projects to widen Highway 111 and Jefferson Street in 2006 will reduce the impacts from the proposed development to below a level of significance because all intersections will operate at acceptable operating standards for the City of La Quinta for the year 2006. The City of La Quinta has disclosed that temporary significant impacts exist in 2006 before the Highway 111 project is completed. The methodology used in the EIR is a worst case traffic scenario in opening year 2006. For additional explanation see Response 7.

The 2020 analysis evaluates full buildout of the cities of La Quinta and Indio. Three intersections are identified where there is a significant impact related to the Costco/Komar development: Highway 111/Washington Street, Highway 111/La Quinta Drive, and Highway 111/Dune Palms Road. Mitigation is identified for each of these impacts. (For an explanation of Highway 111/Jefferson Street, see response 20) This assumes that there will not be additional roadway improvements on Highway 111 in the City of La Quinta beyond the 2006 project, and assumes that Highway 111 in the City of Indio will be widened to 6 through lanes, consistent with their 2020 GP and conversations with their interim traffic engineer.

As mitigation measures are identified to ensure that the roadway system operates within the City of La Quinta operation standard in both years 2006 and 2020, the intervening years will also operate acceptably.

Response 7:

The four developments that were assumed for the background traffic in 2006 were added to the 2005 weekday PM peak hour traffic volumes, and then the total background volumes were increased by two and a half percent to represent the estimated weekday PM peak hour traffic volumes in 2006. Although the Komar shops are not expected to open until 2007, the 2006 analysis assumed total traffic volumes expected with both the Costco and the Komar shops open. Therefore, the 2006 analysis over-estimated the amount of traffic expected from the Project in 2006.

Additionally, it should be noted that the 233,400 square feet of development associated with Costco/Komar is estimated to generate 535 primary (new) trips to the roadway system during the weekday PM peak hour. The four approved developments are estimated to generate 2,535 primary (new) trips weekday PM peak hour to the roadway system. It is likely that the traffic generation rate used for the four approved developments is higher than what will be realized as it appears that there has not been a reduction for pass-by and diverted trips in this traffic volume. As a result, it is very possible that the traffic volumes related to the four approved developments is much lower than the traffic volumes reported in the TIA.

As mentioned in Response 6, any projects opening in 2007 or beyond would have been analyzed as part of the Future Year 2020 Buildout analysis. Since the 2006 analysis was conducted conservatively, using higher traffic volumes from the four developments and combining both projects trip generation in 2006, Opening Year conditions have been overstated.
Response 8:

Table 4.10-2 on Page 4.10-9 of the Draft EIR includes trip generation rates for Costco and Komar. The 64% reduction in Pass-by Trips/Diverted Trips for Costco is based on independent surveys and traffic counts at ten similar size Costco Warehouses with fuel stations for the weekday PM peak hour throughout the United States. Attached to this letter are two memoranda from Kittelson & Associates dated October 19 and December 22 that include the data used to calculate the trip generation for Costco in the TIA. (See attachments 1 and 2.) The following table shows a summary of the data that supports the 64% Pass-by/Diverted trip reduction.

<table>
<thead>
<tr>
<th>Location</th>
<th>Primary</th>
<th>Pass-By</th>
<th>Diverted</th>
</tr>
</thead>
<tbody>
<tr>
<td>California #1</td>
<td>20%</td>
<td>53%</td>
<td>18%</td>
</tr>
<tr>
<td>California #2</td>
<td>35%</td>
<td>60%</td>
<td>5%</td>
</tr>
<tr>
<td>California #3</td>
<td>42%</td>
<td>10%</td>
<td>48%</td>
</tr>
<tr>
<td>Oregon #1</td>
<td>55%</td>
<td>17%</td>
<td>28%</td>
</tr>
<tr>
<td>Oregon #2</td>
<td>34%</td>
<td>20%</td>
<td>46%</td>
</tr>
<tr>
<td>Colorado</td>
<td>22%</td>
<td>45%</td>
<td>33%</td>
</tr>
<tr>
<td>Florida</td>
<td>32%</td>
<td>42%</td>
<td>26%</td>
</tr>
<tr>
<td>New York</td>
<td>35%</td>
<td>67%</td>
<td>8%</td>
</tr>
<tr>
<td>Virginia</td>
<td>5%</td>
<td>42%</td>
<td>53%</td>
</tr>
<tr>
<td>Washington</td>
<td>34%</td>
<td>26%</td>
<td>37%</td>
</tr>
<tr>
<td>Average</td>
<td>32%</td>
<td>38.5%</td>
<td>29.5%</td>
</tr>
</tbody>
</table>

Trip distribution for Costco has been overestimated compared to what the ITE Trip Generation Handbook identifies. Independent studies prepared by Kittelson & Associates for Costco Wholesale identify a weekday trip rate of 6.99 trips/thousand square feet of development for Costco Wholesale with a fuel center. In the ITE Trip Manual, Costco would fall under the “861 Discount Club” category, which lists an average trip rate of 4.24 per 1,000 square feet during the weekday PM peak hour based on 25 study locations. According to the ITE trip rate, a store of 149,739 square feet results in 634 trips as compared to the 1,045 trips identified with the Costco Wholesale in the TIA. The ITE Trip Generation Handbook does not have any data available for primary, pass-by and diverted trips for this category. The closest comparison is data for a Home Improvement Superstore and an Electronics Superstore, which identifies a primary trip percentage of 27 to 32 percent.

The “861 Discount Club” category in the ITE Trip manual does not include a fuel center. The ITE trip rate for a stand alone fuel center “944” is 13.86 trips per fueling location. With 16 fueling locations proposed with the Costco development, this would result in 222 additional trips during the weekday PM peak hour. However, the primary trips associated with this use range from 6 to 23 percent. (The combination of the Costco fuel center traffic with the Costco warehouse traffic results in an even lower number of primary trips because the trips between the two uses are often shared).

Applying the “861 Discount Club” trip rate for the Costco Warehouse, and “944” trip rate for the fuel center would result in 856 total trips, and assuming 32 percent primary trips for the warehouse and 23 percent primary trips for the fuel center would result in 254 primary trips for the weekday p.m. peak hour. The TIA identifies 325 primary trips associated with the Costco development, an increase of 28% over the number of weekday p.m. peak hour trips based on combining land uses from the ITE manual.
Response 9:

It is true that more primary trips would be expected during Saturday peak hour. The primary trips associated with the Costco development during the Saturday peak hour represent 53 percent as compared to 31 percent primary (new) trips during the weekday PM peak hour. This information was considered when conducting the Saturday sensitivity analysis in addition to taking into account alternative peak hour periods. The analysis concluded that the Saturday peak hour generally will result in similar or better traffic operations than the weekday PM peak hour.

Response 10:

Response 8 and 9 indicate that the project trip reductions for weekdays and weekends are correct. Therefore, new project traffic has not been underestimated and there are no potentially significant traffic impacts which have been omitted from the Draft EIR.

Response 11:

The study evaluated Highway 111/Jefferson Street, which is primarily in Indio except for the northwest corner that is in La Quinta, and then evaluated the next signalized intersection over one mile away, Highway 111/Madison. Highway 111 is a state highway corridor that links the cities within the valley. Trips constantly cross from one jurisdiction to another, from La Quinta into Indio and from Indio into La Quinta. The assumed assignment, as stated on page 29 of the TIA is based on a review of the marketing study conducted for the proposed Costco Wholesale development, the existing Costco members in the site vicinity, a review of the surrounding transportation system including existing traffic patterns; and conversations with City of La Quinta staff. The assignment of 25% of project trips on Highway 111 to and from the City of Indio is valid.

Response 12:

The City of La Quinta utilized two thresholds to determine significance. First, it identified LOS D based on average intersection delay as the minimum acceptable operating standard for intersections. Next, the City of La Quinta applied a secondary threshold for intersections that were already operating at LOS E or F without the Proposed Project. In this case, significance was determined by a 0.02 increase in volume to capacity ratio. The methods for calculating volume to capacity ratio for this secondary threshold should not be confused with the method used to calculate LOS. The two measures were not mixed and did not lead to the failure of the Draft EIR to disclose significant impact.

The City of Indio claims that the LOS for signalized intersections must be related to the volume to capacity ratio, not to the average intersection delay. This type of analysis (volume to capacity) was used extensively prior to 1985 and was based on the Transportation Research Board "Circular 212." This methodology was replaced in 1985 with the Highway Capacity Manual, and is based on average delay. This methodology and the operational software, TRAFFIX that accompanies it is supported by Caltrans and is included in the 2001 "Guide for the Preparation of Traffic Impact Studies." Furthermore Caltrans reviewed both the Draft EIR and the TIA and did not question the methodology used to identify significant impacts. Therefore, the LOS used throughout the TIA is correct and correctly identifies significant impacts.

Furthermore, the Traffic Impact Analysis conducted for the City of Indio Fashion Center Specific Plan also calculates LOS in the same manner that the Komar Desert Center TIA does. Table 4-2-1 of the Traffic Impact Analysis for the Fashion Center is taken from the Highway Capacity Manual and is based on intersection delay. Table 3 on page 19 of the Traffic Impact Analysis and Table 2-2 on page 2-11 of the Draft Program Environmental Impact Report identify the results of the intersection analysis in the study area based on the HCM intersection delay methodology. The Draft Traffic Impact Analysis Report for the Jefferson Street Commercial Plaza also utilizes the HCM intersection delay methodology, which is what was used in the Costco/Komar TIA.
Response 13:

See response 12 for an explanation of the methodology used to calculate LOS based on intersection delay as accepted by 2001 Caltrans "Guide for the Preparation of Traffic Impact Studies".

The City of Indio identifies additional intersections with significant impacts using the pre-1985 methodology. The methodology accepted by Caltrans using LOS calculated by intersection delay would reflect the following changes to the City of Indio's table as shown on page 4.10-14, Table 4.10-3. Utilizing the adopted methodology, these intersections do not have significant impacts during Opening Year 2006 conditions because the Proposed Project does not degrade the LOS to below LOS D. Therefore, there are no new impacts that have not been disclosed.

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Correct LOS without Project</th>
<th>Correct LOS with Project</th>
<th>Incremental Increase in v/c ratio</th>
<th>Significant Impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington Street/ Highway 111</td>
<td>D</td>
<td>D</td>
<td>0.056</td>
<td>No</td>
</tr>
<tr>
<td>Highway 111/ Adams Street</td>
<td>D</td>
<td>D</td>
<td>0.049</td>
<td>No</td>
</tr>
<tr>
<td>Highway 111/ La Quinta Drive</td>
<td>D</td>
<td>D</td>
<td>0.48</td>
<td>No</td>
</tr>
<tr>
<td>Highway 111/ Depot Drive</td>
<td>B</td>
<td>D</td>
<td>0.202</td>
<td>No</td>
</tr>
</tbody>
</table>

Response 14:

See response 12 for an explanation of the methodology used to calculate LOS based on intersection delay as accepted by 2001 Caltrans "Guide for the Preparation of Traffic Impact Studies".

The City of Indio identifies additional impacts to the intersections studied for the Saturday sensitivity analysis using the pre-1985 methodology. The methodology accepted by Caltrans using LOS calculated by intersection delay would reflect the following changes to the City of Indio's table as shown on page 4.10-17. Utilizing the adopted methodology, these intersections do not have significant impacts during Saturday conditions because the Project does not degrade the LOS to below LOS D. Therefore, there are no new impacts that have not been disclosed.

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Correct LOS Without Project</th>
<th>Correct LOS with Project</th>
<th>Change in LOS</th>
<th>Significant Impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington Street/ Highway 111</td>
<td>D</td>
<td>D</td>
<td>D to D</td>
<td>No</td>
</tr>
<tr>
<td>Highway 111/ Jefferson Street</td>
<td>D</td>
<td>D</td>
<td>D to D</td>
<td>No</td>
</tr>
</tbody>
</table>

Response 15:

See response 12 for an explanation of the methodology used to calculate LOS based on intersection delay as accepted by 2001 Caltrans "Guide for the Preparation of Traffic Impact Studies".

The City of Indio identifies additional impacts to the intersections studied for the Future Year 2020 Buildout Scenario using the pre-1985 methodology. The methodology accepted by Caltrans using LOS calculated by intersection delay would reflect the following changes to the City of Indio's table as shown on Table 4.10-4,
Page 4.10-21. Utilizing the adopted methodology these intersections do not have significant impacts in the future year analysis because the Project does not degrade the LOS to below LOS D. Therefore, there are no new impacts that have not been disclosed.

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Correct LOS Without Project</th>
<th>Correct LOS with Project</th>
<th>Incremental Increase in v/c ratio</th>
<th>Significant Impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington Street/ Miles Avenue</td>
<td>C</td>
<td>D</td>
<td>0.028</td>
<td>No</td>
</tr>
<tr>
<td>Highway 111/ Simon Drive</td>
<td>C</td>
<td>C</td>
<td>0.041</td>
<td>No</td>
</tr>
<tr>
<td>Highway 111/ Adams Street</td>
<td>D</td>
<td>D</td>
<td>0.040</td>
<td>No</td>
</tr>
<tr>
<td>Highway 111/ Depot Drive</td>
<td>B</td>
<td>D</td>
<td>0.207</td>
<td>No</td>
</tr>
</tbody>
</table>

Response 16:

See Responses 6 and 7 regarding an explanation of why the volumes for 2006 are correct. See Response 8 and 9 and the attached memoranda for an explanation of how the project trip generation was determined for the Proposed Project. Finally, response 12 explains that the methodology used to identify LOS is correct and does not yield additional significant impacts above and beyond those that have been disclosed. Due to these explanations, the TIA correctly concludes that there are no significant impacts at Highway 111 and Madison Avenue and Jefferson Street and Avenue 48.

Response 17:

The City of Indio has identified an inconsistency between the Draft EIR and TIA resulting from a typographical error. The last sentence of the first bullet on page 4.10-17 of the Draft EIR states, “No improvements are proposed to eastbound Highway 111 at Jefferson Street.” The TIA on page 32 correctly states “No improvements are proposed to westbound Highway 111 at Jefferson Street.”

The analysis for the Highway 111 and Jefferson intersection in Appendix E is consistent with the lane configurations shown in Figure 7 and the analysis output shown in Figure 9 for 2006 Total Traffic Conditions. The capacity calculations are based on the configuration for Highway 111 and Jefferson Street in 2006 prior to the planned for Highway 111 improvements.

The analysis for the Highway 111 and Jefferson Street intersection in Appendix F is consistent with the lane configurations shown in Figure 10 and the analysis output shown in Figure 11 for 2006 Total Traffic Conditions with the planned for Highway 111 improvements.

Response 18

The City of Indio correctly notes that the analysis is inconsistent regarding the intersection of Jefferson Street and Highway 111. A memorandum from Kittelson and Associates is included in the Final Environmental Impact Report addressing this issue. The long-term projections by the City of La Quinta show a substantial increase in traffic throughout the roadway system for buildout of the surrounding area. The projections identified a background traffic growth of approximately 60% on Highway 111 at Jefferson Street, with substantial growth in the eastbound and southbound right-turn volumes. While recently reviewing the analysis and recommendations presented in the TIA, an error was identified with respect to the recommended mitigation at the Highway 111/Jefferson Street intersection for the “Pull Buildout with Costco/Komar” scenario. The study recommended a westbound right-turn lane on the Indio side of the
Jefferson Street/Highway 111 intersection when the recommendation should have been for a southbound right-turn overlap signal phase. The table below shows a summary of the revised analysis and recommendations for the future conditions:

**Revised Full Build Out Traffic Conditions**

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Measure</th>
<th>Build Out (1)</th>
<th>Build Out with Costco/Komar (1)</th>
<th>Increase in LOS &amp; V/c</th>
<th>Mitigation Required</th>
<th>Mitigated Conditions (1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Highway 111 &amp; Jefferson</td>
<td>LOS</td>
<td>D</td>
<td>E</td>
<td>D-E</td>
<td>Yes</td>
<td>D (2)</td>
</tr>
<tr>
<td></td>
<td>Critical</td>
<td>0.894</td>
<td>0.975</td>
<td>0.09</td>
<td></td>
<td>0.944</td>
</tr>
</tbody>
</table>

(1) An analysis summary sheet for the scenario is attached.
(2) With EB and SB Right-turn signal overlap phases.

Therefore, the only two improvements recommended to mitigate future conditions are the addition of an eastbound right-turn overlap phase and a southbound right-turn overlap signal phase, which are signal operations and timing and not geometric improvements to the intersection. This will require the restriction of the northbound and eastbound U-turn movements in the intersection and modification to some of the traffic signal equipment. Since overlap phasing can be accommodated through the signal modifications that will accompany the Highway 111 widening and are not physical roadway improvements, the Costco/Komar development does not have a significant unmitigable impact because LOS D can be maintained without physical roadway improvements at the Jefferson Street/Highway 111 intersection.

**Response 19:**

Appropriate mitigation has been identified along with the funding source and responsible party. There are no significant impacts identified in the City of Indio. The signal change required for future year 2020 at the intersection of Jefferson Street and Highway 111 will be accomplished either by Caltrans or the City of La Quinta as modernization of that intersection occurs. Therefore the Project is not required to pay funds to the City of Indio for its planned for Highway 111 improvements. Furthermore, the Riverside County Transportation Commission has allocated $3.2 million in Measure A funds, and $1.5 million in Transportation Enhancement funds, which are currently available to the City of Indio for Highway 111 improvements that include the Highway 111/Jefferson Street intersection. As a result, the City of Indio should be able to construct these improvements.

**Response 20:**

This analysis would assume that every trip to the Costco/Komar during the entire course of the day is an entirely new trip on the roadway network with a single trip purpose; to travel only to Costco/Komar and to return without any other stops along the way.

The analysis in the TIA, Appendix I, assumes the following:

- Approximately 50 percent of the trips throughout the day (50 percent of 15,970 = 7,985) are primary trips destined to the Costco/Komar are for a single purpose to stop at the Costco/Komar and return.
- The other 50 percent of the trips are already on the roadway for a related or some other purpose (considered either a pass-by or a diverted trip).

As a result, the 1,968 represents 25 percent of the primary (new trips on the roadway) trips. (25 percent of 7,985 = 1,996). 1,996 + 35,328 = 37,324 as compared to 37,296, an additional 28 trips over what is shown in.
Table I-2. Therefore, the segment analysis is correct and a significant impact does not occur on this segment as stated in the letter from the City of Indio.

From the Costco/Komar TIA Appendix I, Highway 111 Segment Analysis;

"In addition to analyzing the intersection capacity performance of the study intersections, this analysis evaluated the segments along Highway 111 within the study area as required by Caltrans. A segment analysis is typically used for planning purposes to identify the general size of the roadway facilities utilizing Average Daily Traffic (ADT) volumes. Therefore the segment analysis is not as accurate as a peak hour analysis because it does not consider traffic volume peaking characteristics or need for turn lanes".

Response 21:

As indicated in Response 19, the Proposed Project will not result in a significant impact in the City of Indio other than at the intersection of Jefferson and Highway 111, which is located primarily in Indio with the northwest corner of the intersection being located in La Quinta. The mitigation required to return this intersection to below a level of significance is a minor signal adjustment that can be implemented by the City of La Quinta.

Also as mentioned in Response 19, The Riverside County Transportation Commission has allocated $3.2 million in Measure A funds, and $1.5 million in Transportation Enhancement funds, which are currently available to the City of Indio for Highway 111 improvements that include the Highway 111/Jefferson Street intersection. As a result, the City of Indio should be able to construct these improvements and not require projects in La Quinta to fund their already planned for and funded improvements.
Date: October 19, 2005

To: Wendy Worthey, HDR

Cc: Les Johnson, City of La Quinta Planning Manager
    Kathy Jenson, City of La Quinta

From: Del Huntington and John Ringert, P.E.

Project: La Quinta Costco/Komar Development

Subject: Costco Trip Type Characteristics

In response to your request, we have prepared the following table showing the Costco Warehouse trip characteristics. The data is based on counts and surveys taken at Costco Warehouses for the weekday p.m. peak hour throughout the United States. Table 1 shows the survey result on percentages of primary, pass-by and diverted trips for total trips that access Costco warehouses with gas stations during this time period.

<table>
<thead>
<tr>
<th>Location</th>
<th>Primary</th>
<th>Pass-By</th>
<th>Diverted</th>
</tr>
</thead>
<tbody>
<tr>
<td>California #1</td>
<td>29%</td>
<td>53%</td>
<td>18%</td>
</tr>
<tr>
<td>California #2</td>
<td>35%</td>
<td>60%</td>
<td>5%</td>
</tr>
<tr>
<td>California #3</td>
<td>42%</td>
<td>10%</td>
<td>48%</td>
</tr>
<tr>
<td>Oregon #1</td>
<td>58%</td>
<td>17%</td>
<td>26%</td>
</tr>
<tr>
<td>Oregon #2</td>
<td>34%</td>
<td>20%</td>
<td>46%</td>
</tr>
<tr>
<td>Colorado</td>
<td>22%</td>
<td>45%</td>
<td>33%</td>
</tr>
<tr>
<td>Florida</td>
<td>32%</td>
<td>42%</td>
<td>26%</td>
</tr>
<tr>
<td>New York</td>
<td>25%</td>
<td>67%</td>
<td>8%</td>
</tr>
<tr>
<td>Virginia</td>
<td>9%</td>
<td>42%</td>
<td>49%</td>
</tr>
<tr>
<td>Washington</td>
<td>34%</td>
<td>29%</td>
<td>37%</td>
</tr>
<tr>
<td><strong>Average</strong></td>
<td>32%</td>
<td>38.5%</td>
<td>29.5%</td>
</tr>
</tbody>
</table>
Primary trips are trips that are new to the roadway system where the purpose of the trip is to visit the proposed development. Pass-by trips occur when a motorist is traveling along a roadway that is adjacent to the development for some other purpose, but stops at the development while on the way to their final destination. Diverted trips occur when a motorist is on the roadway system (does not include roads that are adjacent to the development) for some other purpose but diverts from the road they are traveling on to stop at the proposed development.

The variability in primary, pass-by and diverted trip percentages is dependant on the characteristics of the surrounding transportation network of the individual survey location. The sum of the average pass-by and diverted trip percentages should be divided between the two trip types based on the characteristics of the transportation network around the proposed site. If you have any questions, please call Del at 503-228-5230 or John at 208-338-2683.
MEMORANDUM

Date: December 22, 2005

To: Wendy Worthey, HDR

CC: Kathy Jenson, City of La Quinta

From: John Ringert, P.E.

Project #: 7118.0

Subject: Costco Trip Generation Data

This memorandum provides more detail regarding the Costco Warehouse data provided previously that was used to estimate the trip generation for the La Quinta Costco and supplements the memorandum previously prepared on October 19, 2005.

The trip generation estimates for the proposed La Quinta Costco were based on data collected at ten other Costco Warehouses with fuel stations across the U.S. Detailed trip generation data from the weekday p.m. peak hour is provided in Table 1.

### Table 1

<table>
<thead>
<tr>
<th>Location</th>
<th>Size (sf)</th>
<th>Total Trips</th>
<th>In</th>
<th>Out</th>
<th>Passby</th>
<th>Diverted</th>
<th>Primary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Altamonte, FL¹</td>
<td>135,229</td>
<td>648</td>
<td>316</td>
<td>332</td>
<td>41.9%</td>
<td>25.8%</td>
<td>32.3%</td>
</tr>
<tr>
<td>Aurora, CO²</td>
<td>133,711</td>
<td>789</td>
<td>338</td>
<td>406</td>
<td>44.4%</td>
<td>33.3%</td>
<td>22.2%</td>
</tr>
<tr>
<td>West Henrico, VA³</td>
<td>126,976</td>
<td>660</td>
<td>370</td>
<td>310</td>
<td>42.4%</td>
<td>48.5%</td>
<td>9.1%</td>
</tr>
<tr>
<td>Simi Valley, CA¹</td>
<td>136,296</td>
<td>1,209</td>
<td>566</td>
<td>643</td>
<td>60.0%</td>
<td>5.0%</td>
<td>35.0%</td>
</tr>
<tr>
<td>Spokane, WA¹</td>
<td>156,987</td>
<td>1,055</td>
<td>504</td>
<td>551</td>
<td>28.6%</td>
<td>36.7%</td>
<td>34.7%</td>
</tr>
<tr>
<td>Staten Island, NY¹</td>
<td>121,216</td>
<td>755</td>
<td>322</td>
<td>433</td>
<td>66.7%</td>
<td>8.3%</td>
<td>25.0%</td>
</tr>
<tr>
<td>Vallejo, CA³</td>
<td>125,434</td>
<td>1,011</td>
<td>489</td>
<td>522</td>
<td>53.6%</td>
<td>17.9%</td>
<td>28.5%</td>
</tr>
<tr>
<td>Eugene, OR²</td>
<td>140,700</td>
<td>1,224</td>
<td>*</td>
<td>*</td>
<td>20.0%</td>
<td>46.0%</td>
<td>34.0%</td>
</tr>
<tr>
<td>Medford, OR²</td>
<td>136,144</td>
<td>1,086</td>
<td>*</td>
<td>*</td>
<td>17%</td>
<td>25%</td>
<td>59%</td>
</tr>
<tr>
<td>Santa Clara, CA³</td>
<td>135,444</td>
<td>972</td>
<td>478</td>
<td>494</td>
<td>10.0%</td>
<td>47.5%</td>
<td>42.2%</td>
</tr>
<tr>
<td>Average</td>
<td>134,814</td>
<td>943</td>
<td>467</td>
<td>461</td>
<td>38.5%</td>
<td>29.4%</td>
<td>32.1%</td>
</tr>
</tbody>
</table>

*No data available

¹Data provided by Kimley-Horn and Associates, Inc.

²Data collected by Kittelson & Associates, Inc.
The resulting trip rate from the ten warehouses is 6.99 trips per thousand square-feet. This is based on the average square footage of the warehouses and the average of the total generated trips.

Data for seven of the Costco Warehouses was provided by Kimley-Horn and Associates, Inc. and data for the remaining three Costco Warehouses was collected by Kittelson & Associates, Inc. The remainder of this memorandum summarizes the data collection that was conducted for the various Costco Warehouses.

Data for seven of the ten Costco Warehouses for which we have data was obtained through studies conducted by Kimley-Horn and Associates, Inc. in 2001. The Kimley-Horn study is included in Appendix A. Only the data collected for the Costco Warehouses with fuel stations during the weekday p.m. peak hour is included in Table 1.

Data for the Eugene and Medford Costco Warehouses was collected in November and December 2001, respectively, by Kittelson & Associates, Inc. The data collection consisted of trip type surveys at both the warehouse and fuel station during the weekday p.m. peak hour and a trip generation survey at the fuel station during the weekday p.m. peak hour. A sample trip type survey is included in Appendix B along with a summary of the data collection.

Data for the Santa Clara Costco Warehouse was collected in November 2002 by Kittelson & Associates, Inc. Trip type surveys were collected at both the warehouse and fuel station during the weekday p.m. peak hour and Saturday midday peak hour. The data collection effort also included a trip generation study, parking study, and queuing study. The data collection summary for the trip generation study and trip type surveys is included in Appendix B.

I trust this memorandum provides the requested data for the trip generation estimates. Please contact me at (208) 338-2683 if you have any questions.
Appendix A

Kimley-Horn Study
Memorandum

To: Heidi Macomber
Costco Wholesale Corporation

From: Katherine W. Falk, P.E., PTOE
Edward Y. Papazian, P.E.
Kimley-Horn and Associates

Date: August 3, 2001

RE: Costco Trip Generation Study
(KHA #016276002)

INTRODUCTION

Kimley-Horn and Associates was retained by Costco Wholesale Corporation to conduct a trip generation study for a sample of existing Costco Wholesale locations. The purpose of the study was to collect information regarding the number and types of trips generated by the sites. The study consisted of collecting site traffic volumes through the use of seven-day automatic data recorders and conducting customer surveys at Wholesale Clubs. The overall study included ten locations, some with and others without integrated Costco Gasoline stations.

Following this introduction is a description of the methodology used in conducting the study. The next section presents summaries of the data collected and is followed by key findings and recommendations for trip generation rates and application of primary, pass-by, diverted-link, and internal capture percentages as well as comparisons of resulting study trip rates with other land uses. Finally, the last section presents conclusions of the study.

STUDY METHODOLOGY

Study Locations
Costco staff selected ten locations for this study. The selected sites were deemed to represent a cross-section of typical Costco Warehouses and were intended to be located in such a manner that they were not connected with adjacent properties and land uses. As a result, traffic counts would include only those trips associated with the Costco site. Table 1 lists the locations that were studied and the gross square feet of floor area for each location.
Table 1: Study Locations

<table>
<thead>
<tr>
<th>Location</th>
<th>Total gross floor area in square feet</th>
</tr>
</thead>
<tbody>
<tr>
<td>Altamonte Springs, Florida</td>
<td>135,229</td>
</tr>
<tr>
<td>Aurora, Colorado</td>
<td>133,711</td>
</tr>
<tr>
<td>Melville, New York</td>
<td>135,404</td>
</tr>
<tr>
<td>West Henrico, Virginia</td>
<td>126,976</td>
</tr>
<tr>
<td>Salt Lake City, Utah</td>
<td>119,760</td>
</tr>
<tr>
<td>Simi Valley, California</td>
<td>136,296</td>
</tr>
<tr>
<td>Spokane, Washington</td>
<td>156,987</td>
</tr>
<tr>
<td>Staten Island, New York</td>
<td>121,216</td>
</tr>
<tr>
<td>Vallejo, California</td>
<td>125,434</td>
</tr>
<tr>
<td>Westminster, Colorado</td>
<td>134,800</td>
</tr>
<tr>
<td><strong>Average size</strong></td>
<td><strong>132,581</strong></td>
</tr>
</tbody>
</table>

Traffic Counts
Driveway traffic counts were taken at each location over a continuous seven-day period. These counts were conducted using automatic data recorders placed on each driveway to capture inbound and outbound vehicles. The data from these counts were used to determine trip generation rates. Copies of the traffic counts are included in a separate data collection appendix to this report.

Surveys
Customer surveys were conducted at each site inside the warehouse during one weekday afternoon peak period (4:00PM to 6:00PM) and on one Saturday peak period (10:30AM to 2:00PM). In addition, gas station customers were surveyed at the locations shown in Table 2.

Table 2: Gas Station Survey Locations

<table>
<thead>
<tr>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Altamonte Springs, Florida</td>
</tr>
<tr>
<td>Aurora, Colorado</td>
</tr>
<tr>
<td>Simi Valley, California</td>
</tr>
<tr>
<td>Staten Island, New York</td>
</tr>
<tr>
<td>Vallejo, California</td>
</tr>
</tbody>
</table>

The purpose of both the warehouse and gas station surveys was to obtain information about customers’ trip types. Trip types of particular interest for this study were primary, pass-by, diverted link, and internal capture trips.

Analysis Techniques
The analysis for this study included determining trip rates for Costco Wholesale locations with and without integrated gasoline stations using driveway traffic counts. Weekday trip rates were calculated by averaging data for typical weekdays using only those data that seemed reasonable. Summaries of the data are included in the following sections, while data for each location is included in the technical appendix of this report.
DATA COLLECTION SUMMARY

The tables on the following pages summarize the data collected as part of this study.

**Driveway Counts**
Tables 3 through 6 show driveway counts at each location under a variety of conditions. Table 3 shows the average of Monday through Friday weekday driveway counts, while Table 4 shows the average of Tuesday through Thursday driveway counts. These two summaries are included to provide as much information as possible. Generally, for the purpose of traffic impact studies, weekday counts are collected mid-week, since Monday and Friday counts are not typical weekdays from the standpoint of trip generation. The ITE Trip Generation Report, however, includes Mondays and Fridays in the trip generation calculations. Saturday and Sunday driveway counts are included in Tables 5 and 6, respectively.

**Costco Transactions**
Costco provided information regarding transactions at the locations with gasoline stations. Table 7 shows a comparison of the 24-hour driveway counts with the daily number of warehouse and gasoline station transactions.

**Trip Types**
The data from the surveys were used to determine trip patterns associated with customers, and are categorized into four types of trips: primary, pass-by, diverted link, and internal capture trips. Primary trips are defined as those customers who drove specifically to the site and returned directly to their point of origin. Pass-by trips represent customers who stopped at the site on their way to another destination and who did not alter their trip pattern. Diverted link trips represent customers who altered their trip pattern to get to Costco. Internal capture trips represent those patrons who were customers of both the warehouse and the gasoline pumps on the same trip.

Tables 8 and 9 show a summary of the surveys of trip characteristics of warehouse patrons during the weekday PM and Saturday peak hours, respectively. Internal capture trips in Tables 8 and 9 represent warehouse patrons who also patronized the gas pumps. Tables 10 and 11 show a summary of survey results of gas station customers during the weekday PM and Saturday peak hour respectively. Primary trips in Tables 10 and 11 represent gas station patrons who took the trip specifically to purchase gasoline. Internal capture trips in Tables 10 and 11 represent gas pump patrons who also shopped at the warehouse. The peak hours are the weekday commuter peak hours that occur between 7:00AM and 9:00AM and between 4:00PM and 6:00PM and the Saturday and Sunday mid-day peak hours between 10:30AM and 2:00PM. It should be noted that the surveys of trip types were independent of the driveway traffic counts. As a result, locations that were not included in the trip generation calculations, due to unreliability of the data, were included in the tabulation of the different types of trips.
### Table 3: Weekday Average Driveway Volumes (Monday through Friday)

<table>
<thead>
<tr>
<th>Locations without Gas Stations</th>
<th>AM Peak Hour</th>
<th>PM Peak Hour</th>
<th>24-Hour Hour</th>
</tr>
</thead>
<tbody>
<tr>
<td>Melville, New York</td>
<td>8:00-9:00</td>
<td>5:00-6:00</td>
<td>3722</td>
</tr>
<tr>
<td>Salt Lake City, Utah</td>
<td>8:00-9:00</td>
<td>5:00-6:00</td>
<td>3722</td>
</tr>
<tr>
<td>Westminster, Colorado</td>
<td>7:45-8:45</td>
<td>4:30-5:30</td>
<td>2463</td>
</tr>
<tr>
<td><strong>Locations with Gas Stations</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Altamonte, Florida</td>
<td>8:00-9:00</td>
<td>4:00-5:00</td>
<td>3550</td>
</tr>
<tr>
<td>Aurora, Colorado</td>
<td>8:00-9:00</td>
<td>4:15-5:15</td>
<td>4061</td>
</tr>
<tr>
<td>West Henrico, Virginia</td>
<td>8:00-9:00</td>
<td>4:45-5:45</td>
<td>4515</td>
</tr>
<tr>
<td>Simi Valley, California</td>
<td>8:00-9:00</td>
<td>4:15-5:15</td>
<td>4515</td>
</tr>
<tr>
<td>Spokane, Washington</td>
<td>8:00-9:00</td>
<td>4:45-5:45</td>
<td>4515</td>
</tr>
<tr>
<td>Staten Island, New York</td>
<td>8:00-9:00</td>
<td>4:45-5:45</td>
<td>4515</td>
</tr>
<tr>
<td>Vallejo, California</td>
<td>8:00-9:00</td>
<td>5:00-6:00</td>
<td>6584</td>
</tr>
</tbody>
</table>

### Table 4: Weekday Average Driveway Volumes (Tuesday through Thursday)

<table>
<thead>
<tr>
<th>Locations without Gas Stations</th>
<th>AM Peak Hour</th>
<th>PM Peak Hour</th>
<th>24-Hour Hour</th>
</tr>
</thead>
<tbody>
<tr>
<td>Melville, New York</td>
<td>7:15-8:15</td>
<td>4:00-5:00</td>
<td>3,746</td>
</tr>
<tr>
<td>Salt Lake City, Utah</td>
<td>8:00-9:00</td>
<td>4:45-5:45</td>
<td>3,312</td>
</tr>
<tr>
<td>Westminster, Colorado</td>
<td>7:30-8:30</td>
<td>4:00-5:00</td>
<td>3,098</td>
</tr>
<tr>
<td><strong>Locations with Gas Stations</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Altamonte, Florida</td>
<td>8:00-9:00</td>
<td>4:00-5:00</td>
<td>3,217</td>
</tr>
<tr>
<td>Aurora, Colorado</td>
<td>8:00-9:00</td>
<td>5:00-6:00</td>
<td>4,118</td>
</tr>
<tr>
<td>West Henrico, Virginia</td>
<td>8:00-9:00</td>
<td>5:00-6:00</td>
<td>4,342</td>
</tr>
<tr>
<td>Simi Valley, California</td>
<td>8:00-9:00</td>
<td>5:00-6:00</td>
<td>6,217</td>
</tr>
<tr>
<td>Spokane, Washington</td>
<td>8:00-9:00</td>
<td>4:15-5:15</td>
<td>5,656</td>
</tr>
<tr>
<td>Staten Island, New York</td>
<td>8:00-9:00</td>
<td>4:45-5:45</td>
<td>3,581</td>
</tr>
<tr>
<td>Vallejo, California</td>
<td>8:00-9:00</td>
<td>5:00-6:00</td>
<td>6,223</td>
</tr>
</tbody>
</table>
### Table 5: Saturday Driveway Volumes

<table>
<thead>
<tr>
<th>Locations without Gas Stations</th>
<th>Peak Hour</th>
<th>24-Hour</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Peak Hour</td>
<td>Entry</td>
<td>Exit</td>
</tr>
<tr>
<td>Melville, New York</td>
<td>12:15-1:15</td>
<td>487</td>
<td>469</td>
</tr>
<tr>
<td>Salt Lake City, Utah</td>
<td>10:30-11:30</td>
<td>607</td>
<td>299</td>
</tr>
<tr>
<td>Westminster, Colorado</td>
<td>11:15-12:15</td>
<td>495</td>
<td>276</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Locations with Gas Stations</th>
<th>Peak Hour</th>
<th>24-Hour</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Peak Hour</td>
<td>Entry</td>
<td>Exit</td>
</tr>
<tr>
<td>Altamonte, Florida</td>
<td>1:00-2:00</td>
<td>597</td>
<td>517</td>
</tr>
<tr>
<td>Aurora, Colorado</td>
<td>12:00-1:00</td>
<td>642</td>
<td>636</td>
</tr>
<tr>
<td>West Henrico, Virginia</td>
<td>11:15-12:15</td>
<td>303</td>
<td>230</td>
</tr>
<tr>
<td>Simi Valley, California</td>
<td>12:00-1:00</td>
<td>1,329</td>
<td>874</td>
</tr>
<tr>
<td>Spokane, Washington</td>
<td>1:00-2:00</td>
<td>803</td>
<td>870</td>
</tr>
<tr>
<td>Staten Island, New York</td>
<td>12:30-1:30</td>
<td>556</td>
<td>647</td>
</tr>
<tr>
<td>Vallejo, California</td>
<td>12:00-1:00</td>
<td>902</td>
<td>773</td>
</tr>
</tbody>
</table>

### Table 6: Sunday Driveway Volumes

<table>
<thead>
<tr>
<th>Locations without Gas Stations</th>
<th>Peak Hour</th>
<th>24-Hour</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Peak Hour</td>
<td>Entry</td>
<td>Exit</td>
</tr>
<tr>
<td>Melville, New York</td>
<td>12:45-1:45</td>
<td>520</td>
<td>449</td>
</tr>
<tr>
<td>Salt Lake City, Utah</td>
<td>12:00-1:00</td>
<td>632</td>
<td>591</td>
</tr>
<tr>
<td>Westminster, Colorado</td>
<td>11:00-12:00</td>
<td>409</td>
<td>168</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Locations with Gas Stations</th>
<th>Peak Hour</th>
<th>24-Hour</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Peak Hour</td>
<td>Entry</td>
<td>Exit</td>
</tr>
<tr>
<td>Altamonte, Florida</td>
<td>1:00-2:00</td>
<td>549</td>
<td>549</td>
</tr>
<tr>
<td>Aurora, Colorado</td>
<td>1:00-2:00</td>
<td>451</td>
<td>617</td>
</tr>
<tr>
<td>West Henrico, Virginia</td>
<td>1:00-2:00</td>
<td>248</td>
<td>242</td>
</tr>
<tr>
<td>Simi Valley, California</td>
<td>12:00-1:00</td>
<td>1,015</td>
<td>1,149</td>
</tr>
<tr>
<td>Spokane, Washington</td>
<td>1:00-2:00</td>
<td>744</td>
<td>706</td>
</tr>
<tr>
<td>Staten Island, New York</td>
<td>1:00-2:00</td>
<td>598</td>
<td>622</td>
</tr>
<tr>
<td>Vallejo, California</td>
<td>11:30-12:30</td>
<td>801</td>
<td>882</td>
</tr>
<tr>
<td>Location</td>
<td>Weekday (Monday-Friday) Transactions</td>
<td>Drive away Volumes</td>
<td>Gas</td>
</tr>
<tr>
<td>---------------------</td>
<td>--------------------------------------</td>
<td>-------------------</td>
<td>------</td>
</tr>
<tr>
<td>Altamonte, Florida</td>
<td>7,513</td>
<td>2,324</td>
<td>710</td>
</tr>
<tr>
<td>Aurora, Colorado</td>
<td>8,925</td>
<td>2,928</td>
<td>1,257</td>
</tr>
<tr>
<td>West Henrico, Virginia</td>
<td>8,237</td>
<td>2,453</td>
<td>947</td>
</tr>
<tr>
<td>Simi Valley, California</td>
<td>14,586</td>
<td>2,912</td>
<td>1,982</td>
</tr>
<tr>
<td>Spokane, Washington</td>
<td>11,496</td>
<td>3,222</td>
<td>1,091</td>
</tr>
<tr>
<td>Staten Island, New York</td>
<td>8,590</td>
<td>3,669</td>
<td>479</td>
</tr>
<tr>
<td>Vallejo, California</td>
<td>13,172</td>
<td>2,690</td>
<td>1,976</td>
</tr>
</tbody>
</table>
Table 8: Trip-Type Percentages, Warehouse Surveys — Weekday PM Period

<table>
<thead>
<tr>
<th>Location</th>
<th>Peak Hour b/wn 4:00PM and 6:00PM</th>
<th>Total b/wn 4:00 PM and 6:00 PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Altamonte, FL</td>
<td>32.3% 41.9% 25.8% 16.1%</td>
<td>42.6% 36.1% 21.3% 18.0%</td>
</tr>
<tr>
<td>Aurora, CO</td>
<td>22.2% 44.4% 33.3% 12.5%</td>
<td>28.6% 40.5% 31.0% 21.4%</td>
</tr>
<tr>
<td>West Henrico, VA</td>
<td>9.1% 42.4% 48.5% 17.9%</td>
<td>17.5% 40.6% 36.5% 14.3%</td>
</tr>
<tr>
<td>Melville, NY</td>
<td>52.5% 20.0% 27.5% N/A</td>
<td>47.0% 23.5% 29.5% N/A</td>
</tr>
<tr>
<td>Salt Lake City, UT</td>
<td>31.7% 39.0% 29.3% N/A</td>
<td>40.8% 31.6% 27.6% N/A</td>
</tr>
<tr>
<td>Simi Valley, CA</td>
<td>35.0% 60.0% 5.0% 39.1%</td>
<td>39.5% 55.8% 4.7% 44.2%</td>
</tr>
<tr>
<td>Spokane, WA</td>
<td>34.7% 28.6% 36.7% 37.8%</td>
<td>34.3% 31.5% 34.3% 30.6%</td>
</tr>
<tr>
<td>Staten Island, NY</td>
<td>25.0% 66.7% 8.3% 14.3%</td>
<td>34.2% 55.7% 10.1% 17.1%</td>
</tr>
<tr>
<td>Vallejo, CA</td>
<td>28.6% 53.6% 17.9% 77.8%</td>
<td>34.8% 45.7% 19.6% 52.2%</td>
</tr>
<tr>
<td>Westminster, CO</td>
<td>26.5% 67.3% 6.1% N/A</td>
<td>31.3% 61.4% 7.2% N/A</td>
</tr>
<tr>
<td>Average</td>
<td>29.8% 46.4% 23.8% 30.8%</td>
<td>35.1% 42.8% 22.2% 28.3%</td>
</tr>
<tr>
<td>Weighted Average</td>
<td>33.2% 42.5% 24.3% 28.1%</td>
<td>36.6% 39.8% 23.6% 26.9%</td>
</tr>
</tbody>
</table>

N/A — Not applicable, no gas station.

Table 9: Trip-Type Percentages, Warehouse Surveys — Saturday Period

<table>
<thead>
<tr>
<th>Location</th>
<th>Peak Hour b/wn 10:30AM and 2:00PM</th>
<th>Total b/wn 10:30AM and 2:00PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Altamonte, FL</td>
<td>81.3% 18.8% 25.8% 10.0%</td>
<td>66.0% 26.4% 7.5% 19.8%</td>
</tr>
<tr>
<td>Aurora, CO</td>
<td>43.3% 36.7% 19.4% 25.8%</td>
<td>46.7% 24.3% 29.0% 28.0%</td>
</tr>
<tr>
<td>West Henrico, VA</td>
<td>50.0% 26.5% 23.5% 26.5%</td>
<td>39.7% 32.8% 27.5% 21.4%</td>
</tr>
<tr>
<td>Melville, NY</td>
<td>50.0% 40.9% 9.1% N/A</td>
<td>54.6% 32.6% 12.8% N/A</td>
</tr>
<tr>
<td>Salt Lake City, UT</td>
<td>60.6% 15.2% 24.2% N/A</td>
<td>56.3% 17.5% 26.2% N/A</td>
</tr>
<tr>
<td>Simi Valley, CA</td>
<td>75.0% 16.7% 8.3% 37.5%</td>
<td>68.9% 24.6% 6.6% 29.5%</td>
</tr>
<tr>
<td>Spokane, WA</td>
<td>43.8% 27.1% 29.2% 20.8%</td>
<td>50.0% 26.2% 23.8% 18.9%</td>
</tr>
<tr>
<td>Staten Island, NY</td>
<td>49.2% 49.2% 1.6% 10.4%</td>
<td>53.8% 44.9% 1.3% 10.7%</td>
</tr>
<tr>
<td>Vallejo, CA</td>
<td>57.9% 36.8% 4.8% 33.3%</td>
<td>51.4% 35.7% 12.9% 32.9%</td>
</tr>
<tr>
<td>Westminster, CO</td>
<td>48.6% 33.3% 18.1% N/A</td>
<td>49.4% 33.8% 16.9% N/A</td>
</tr>
<tr>
<td>Average</td>
<td>56.0% 30.1% 13.8% 23.5%</td>
<td>53.7% 29.9% 16.4% 23.0%</td>
</tr>
<tr>
<td>Weighted Average</td>
<td>52.2% 33.5% 14.3% 23.1%</td>
<td>52.8% 31.7% 15.5% 20.2%</td>
</tr>
</tbody>
</table>

N/A — Not applicable, no gas station.
### Table 10: Trip-Type Percentages, Gas Station Surveys – Weekday PM Period

<table>
<thead>
<tr>
<th>Location</th>
<th>Peak Hour b/w 4:00PM and 6:00PM</th>
<th>Total b/w 4:00 PM and 6:00 PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Altamonte, FL</td>
<td>9.1%</td>
<td>22.7%</td>
</tr>
<tr>
<td>Aurora, CO</td>
<td>14.3%</td>
<td>14.3%</td>
</tr>
<tr>
<td>Simi Valley, CA</td>
<td>8.8%</td>
<td>26.5%</td>
</tr>
<tr>
<td>Staten Island, NY</td>
<td>10.7%</td>
<td>28.6%</td>
</tr>
<tr>
<td>Vallejo, CA</td>
<td>23.1%</td>
<td>34.6%</td>
</tr>
<tr>
<td>Average</td>
<td>13.2%</td>
<td>25.3%</td>
</tr>
<tr>
<td>Weighted Average</td>
<td>12.3%</td>
<td>26.0%</td>
</tr>
</tbody>
</table>

### Table 11: Trip-Type Percentages, Gas Station Surveys – Saturday Period

<table>
<thead>
<tr>
<th>Location</th>
<th>Peak Hour b/w 10:30AM and 2:00PM</th>
<th>Total b/w 10:30AM and 2:00PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Altamonte, FL</td>
<td>6.5%</td>
<td>19.4%</td>
</tr>
<tr>
<td>Aurora, CO</td>
<td>12.5%</td>
<td>25.0%</td>
</tr>
<tr>
<td>Simi Valley, CA</td>
<td>8.7%</td>
<td>30.4%</td>
</tr>
<tr>
<td>Staten Island, NY</td>
<td>8.3%</td>
<td>35.4%</td>
</tr>
<tr>
<td>Vallejo, CA</td>
<td>8.0%</td>
<td>44.0%</td>
</tr>
<tr>
<td>Average</td>
<td>8.8%</td>
<td>30.8%</td>
</tr>
<tr>
<td>Weighted Average</td>
<td>8.0%</td>
<td>29.3%</td>
</tr>
</tbody>
</table>
PRESENTATION OF RESULTS

Definition of Trip Generation
Trip generation is generally defined as the number of vehicle trips attracted by a specific land use. For the purposes of this study, we are interested in the number of vehicles attracted to a Costco Wholesale site. Trip generation is often calculated using average trip rates. Average trip rate is defined as "the weighted average of the number of vehicle trips or trip ends per unit of independent variable using a site's driveway(s)." The weighted average is calculated by summing all data and all independent variable units where paired data are available, and then dividing the sum of the data points by the sum of the independent variable units. Weighted averages are often calculated to determine the influence of data sets with large variances. The most meaningful independent variable for a land use such as Costco Wholesale locations is generally 1,000 square feet of gross floor area (GFA). In most traffic impact studies, trip rates are applied to the peak hours of adjacent street traffic. This represents the one-hour trip generation rate at the site between the traditional commuting periods of 7:00AM to 9:00AM and 4:00PM to 6:00PM. Other peak hours of trip generation are the Saturday and Sunday mid-day peak hours of retail activity, which generally occur between 10:30AM and 2:00PM. Another important measure of trip generation is the daily trip rate. This is important for planning purposes for comparing levels of activity at different locations.

Based on observations taken at the locations studied and the traffic count results, it appears that some sites provide better data than others do. For example, the counts taken at the Simi Valley, California site are significantly higher than the range of counts at the other sites. Conversations with the traffic counters indicated that the configuration of the driveways is such that cars may have passed over the traffic counting tubes diagonally, thus artificially inflating the number of vehicles counted. Only a manual count would be able to facilitate better counts at that particular location. In addition, there are two outparcels that have been constructed adjacent to the Westminster, Colorado location. These two outparcels share driveway access with the Costco Wholesale Club, therefore the counts include traffic from all three uses. The Aurora, Colorado and Salt Lake City, Utah sites also have shared access with neighboring restaurants; thus the counts include traffic volumes for the restaurants in addition to the wholesale clubs.

Trip Generation Rates

Using the traffic volume counts and the information regarding the size of each location, trip generation rates were calculated for each location. These trip rates are expressed as trips per 1,000 square feet of gross floor area. Tables 12 and 13 show weekday trip generation rates.

Table 12: Weekday Trip Generation Rates – Locations without Gas Stations

<table>
<thead>
<tr>
<th>Location</th>
<th>AM Peak Hour</th>
<th>PM Peak Hour</th>
<th>24-Hour</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>In</td>
<td>Out</td>
<td>Total</td>
</tr>
<tr>
<td>Melville, NY</td>
<td>0.19</td>
<td>0.17</td>
<td>0.38</td>
</tr>
<tr>
<td>Salt Lake City, UT</td>
<td>1.36</td>
<td>0.37</td>
<td>1.73</td>
</tr>
<tr>
<td>Westminster, CO</td>
<td>0.62</td>
<td>0.39</td>
<td>1.01</td>
</tr>
<tr>
<td>Average</td>
<td>0.19</td>
<td>0.17</td>
<td>0.38</td>
</tr>
</tbody>
</table>

1 Not included in AM average due to presence of adjacent land uses.

Table 13: Weekday Trip Generation Rates – Locations with Gas Stations

<table>
<thead>
<tr>
<th>Location</th>
<th>AM Peak Hour</th>
<th></th>
<th></th>
<th></th>
<th>PM Peak Hour</th>
<th></th>
<th></th>
<th></th>
<th>24-Hour</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>In</td>
<td>Out</td>
<td>Total</td>
<td></td>
<td>In</td>
<td>Out</td>
<td>Total</td>
<td></td>
<td>In</td>
<td>Out</td>
<td>Total</td>
<td></td>
</tr>
<tr>
<td>Altamonte, FL</td>
<td>0.35</td>
<td>0.49</td>
<td>0.84</td>
<td></td>
<td>2.46</td>
<td>2.64</td>
<td>5.10</td>
<td></td>
<td>26.25</td>
<td>29.31</td>
<td>55.56</td>
<td></td>
</tr>
<tr>
<td>Aurora, CO</td>
<td>0.52</td>
<td>0.56</td>
<td>1.08</td>
<td></td>
<td>2.75</td>
<td>3.14</td>
<td>5.89</td>
<td></td>
<td>30.37</td>
<td>36.38</td>
<td>66.75</td>
<td></td>
</tr>
<tr>
<td>West Henrico, VA</td>
<td>0.83</td>
<td>0.45</td>
<td>1.28</td>
<td></td>
<td>3.06</td>
<td>2.7</td>
<td>5.76</td>
<td></td>
<td>35.56</td>
<td>29.31</td>
<td>64.87</td>
<td></td>
</tr>
<tr>
<td>Simi Valley, CA</td>
<td>0.31</td>
<td>0.20</td>
<td>0.51</td>
<td></td>
<td>4.74</td>
<td>5.55</td>
<td>10.29</td>
<td></td>
<td>54.96</td>
<td>52.06</td>
<td>107.02</td>
<td></td>
</tr>
<tr>
<td>Spokane, WA</td>
<td>0.60</td>
<td>0.62</td>
<td>1.22</td>
<td></td>
<td>3.30</td>
<td>3.52</td>
<td>6.82</td>
<td></td>
<td>36.96</td>
<td>36.27</td>
<td>73.23</td>
<td></td>
</tr>
<tr>
<td>Staten Island, NY</td>
<td>0.21</td>
<td>0.32</td>
<td>0.53</td>
<td></td>
<td>2.84</td>
<td>3.65</td>
<td>6.49</td>
<td></td>
<td>30.76</td>
<td>40.11</td>
<td>70.87</td>
<td></td>
</tr>
<tr>
<td>Vallejo, CA</td>
<td>1.62</td>
<td>1.13</td>
<td>2.75</td>
<td></td>
<td>4.18</td>
<td>4.67</td>
<td>8.85</td>
<td></td>
<td>52.52</td>
<td>52.49</td>
<td>105.01</td>
<td></td>
</tr>
<tr>
<td><strong>Average</strong></td>
<td>0.63</td>
<td>0.54</td>
<td>1.17</td>
<td></td>
<td>3.33</td>
<td>3.70</td>
<td>7.03</td>
<td></td>
<td>38.19</td>
<td>39.43</td>
<td>77.61</td>
<td></td>
</tr>
</tbody>
</table>

Tables 14 and 15 show the resulting trip rates associated with the driveway volume counts on weekends.

Table 14: Weekend Driveway Trip Generation Rates – Locations without Gas Stations

<table>
<thead>
<tr>
<th>Location</th>
<th>Saturday Pk</th>
<th></th>
<th></th>
<th></th>
<th>Saturday 24-Hour</th>
<th></th>
<th></th>
<th></th>
<th>Sunday Peak</th>
<th>Sunday 24-Hour</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>In</td>
<td>Out</td>
<td>Total</td>
<td></td>
<td>In</td>
<td>Out</td>
<td>Total</td>
<td></td>
<td>In</td>
<td>Out</td>
<td>Total</td>
<td></td>
<td>In</td>
</tr>
<tr>
<td>Melville, NY</td>
<td>3.60</td>
<td>3.46</td>
<td>7.06</td>
<td></td>
<td>24.46</td>
<td>24.53</td>
<td>48.99</td>
<td></td>
<td>3.84</td>
<td>3.32</td>
<td>7.16</td>
<td></td>
<td>25.14</td>
</tr>
<tr>
<td>Salt Lake City, UT¹</td>
<td>5.07</td>
<td>2.50</td>
<td>7.57</td>
<td></td>
<td>35.30</td>
<td>33.40</td>
<td>68.70</td>
<td></td>
<td>5.28</td>
<td>4.93</td>
<td>10.21</td>
<td></td>
<td>41.39</td>
</tr>
<tr>
<td>Westminster, CO</td>
<td>3.67</td>
<td>2.05</td>
<td>5.72</td>
<td></td>
<td>29.77</td>
<td>21.53</td>
<td>51.30</td>
<td></td>
<td>3.03</td>
<td>1.25</td>
<td>4.28</td>
<td></td>
<td>20.96</td>
</tr>
<tr>
<td><strong>Average</strong></td>
<td>3.63</td>
<td>2.76</td>
<td>6.39</td>
<td></td>
<td>27.12</td>
<td>23.03</td>
<td>50.14</td>
<td></td>
<td>3.44</td>
<td>2.28</td>
<td>5.72</td>
<td></td>
<td>23.05</td>
</tr>
</tbody>
</table>

¹ Not included in averages due to presence of adjacent land uses.

Table 15: Weekend Driveway Trip Generation Rates – Locations with Gas Stations

<table>
<thead>
<tr>
<th>Location</th>
<th>Saturday Pk</th>
<th></th>
<th></th>
<th></th>
<th>Saturday 24-Hour</th>
<th></th>
<th></th>
<th></th>
<th>Sunday Peak</th>
<th>Sunday 24-Hour</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>In</td>
<td>Out</td>
<td>Total</td>
<td></td>
<td>In</td>
<td>Out</td>
<td>Total</td>
<td></td>
<td>In</td>
<td>Out</td>
<td>Total</td>
<td></td>
<td>In</td>
</tr>
<tr>
<td>Altamonte, FL</td>
<td>4.41</td>
<td>3.83</td>
<td>8.24</td>
<td></td>
<td>33.80</td>
<td>34.99</td>
<td>68.79</td>
<td></td>
<td>4.06</td>
<td>4.06</td>
<td>8.12</td>
<td></td>
<td>27.89</td>
</tr>
<tr>
<td>Aurora, CO</td>
<td>4.80</td>
<td>4.76</td>
<td>9.56</td>
<td></td>
<td>37.96</td>
<td>44.84</td>
<td>82.80</td>
<td></td>
<td>3.37</td>
<td>4.62</td>
<td>7.99</td>
<td></td>
<td>25.94</td>
</tr>
<tr>
<td>West Henrico, VA</td>
<td>2.39</td>
<td>1.81</td>
<td>4.20</td>
<td></td>
<td>35.76</td>
<td>45.81</td>
<td>81.57</td>
<td></td>
<td>1.95</td>
<td>1.91</td>
<td>3.86</td>
<td></td>
<td>31.36</td>
</tr>
<tr>
<td>Simi Valley, CA</td>
<td>9.75</td>
<td>6.41</td>
<td>16.16</td>
<td></td>
<td>55.66</td>
<td>52.50</td>
<td>108.16</td>
<td></td>
<td>7.45</td>
<td>8.43</td>
<td>15.88</td>
<td></td>
<td>52.65</td>
</tr>
<tr>
<td>Spokane, WA</td>
<td>5.12</td>
<td>5.54</td>
<td>10.66</td>
<td></td>
<td>40.86</td>
<td>43.20</td>
<td>84.06</td>
<td></td>
<td>4.74</td>
<td>4.50</td>
<td>9.24</td>
<td></td>
<td>33.28</td>
</tr>
<tr>
<td>Staten Island, NY</td>
<td>4.59</td>
<td>5.33</td>
<td>9.92</td>
<td></td>
<td>40.04</td>
<td>47.79</td>
<td>87.83</td>
<td></td>
<td>4.93</td>
<td>5.13</td>
<td>10.06</td>
<td></td>
<td>33.50</td>
</tr>
<tr>
<td>Vallejo, CA</td>
<td>7.19</td>
<td>6.16</td>
<td>13.35</td>
<td></td>
<td>59.77</td>
<td>58.24</td>
<td>118.01</td>
<td></td>
<td>6.39</td>
<td>7.03</td>
<td>13.42</td>
<td></td>
<td>57.60</td>
</tr>
<tr>
<td><strong>Average</strong></td>
<td>5.46</td>
<td>4.84</td>
<td>10.30</td>
<td></td>
<td>43.41</td>
<td>46.76</td>
<td>90.17</td>
<td></td>
<td>4.70</td>
<td>5.10</td>
<td>9.79</td>
<td></td>
<td>37.46</td>
</tr>
</tbody>
</table>

Gas Station Trip Types
One of the purposes of conducting the patron surveys and gathering the transaction information was to determine the effects of the gas stations on trip generation. Of particular interest was the determination of the percentage of driveway traffic that represented trips associated purely with the gas station. The survey results were also used to determine the types of trips associated with the gas station, such as primary trips, pass-by trips, and combined gas station/warehouse trips. Tables 16 and 17 show comparisons of driveway counts to gas station volumes in the PM and Saturday peak periods, respectively.
Table 16: Comparison of PM Peak Period (4:00PM to 6:00PM) Driveway Counts to Gas Station Trips

<table>
<thead>
<tr>
<th>Location</th>
<th>Overall Site 2-Way Driveway Volume</th>
<th>Gasoline Transactions and Vehicle Volumes</th>
<th>Trip-Types</th>
<th>Trip-Types</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td># of Transactions</td>
<td>Vehicle Volume (1)</td>
<td>% of Driveway Volume</td>
<td>Primary + Diverted Link</td>
</tr>
<tr>
<td>Altoimonte, FL</td>
<td>1,342</td>
<td>177</td>
<td>354</td>
<td>26</td>
</tr>
<tr>
<td>Aurora, CO</td>
<td>1,561</td>
<td>222</td>
<td>444</td>
<td>28</td>
</tr>
<tr>
<td>Simi Valley, CA</td>
<td>2,747</td>
<td>281</td>
<td>562</td>
<td>20</td>
</tr>
<tr>
<td>Staten Island, NY</td>
<td>1,554</td>
<td>79</td>
<td>158</td>
<td>10</td>
</tr>
<tr>
<td>Vallejo, CA</td>
<td>2,195</td>
<td>298</td>
<td>596</td>
<td>27</td>
</tr>
<tr>
<td>Average (2)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
(1) Vehicle volume calculated by multiplying number of transactions by two. Each transaction represents an entering and exiting movement.
(2) Average does not include the Staten Island, NY location, which appears to have unusually low gasoline transaction figures.

Table 17: Comparison of Saturday Peak Period (10:30AM to 2:00PM) Driveway Counts to Gas Station Trips

<table>
<thead>
<tr>
<th>Location</th>
<th>Overall Site 2-Way Driveway Volume</th>
<th>Gasoline Transactions and Vehicle Volumes</th>
<th>Trip-Types</th>
<th>Trip-Types</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td># of Transactions</td>
<td>Vehicle Volume (1)</td>
<td>% of Driveway Volume</td>
<td>Primary + Diverted Link</td>
</tr>
<tr>
<td>Altoimonte, FL</td>
<td>3,654</td>
<td>359</td>
<td>718</td>
<td>20</td>
</tr>
<tr>
<td>Aurora, CO</td>
<td>4,006</td>
<td>567</td>
<td>1134</td>
<td>28</td>
</tr>
<tr>
<td>Simi Valley, CA</td>
<td>5,710</td>
<td>510</td>
<td>1020</td>
<td>18</td>
</tr>
<tr>
<td>Staten Island, NY</td>
<td>3,787</td>
<td>188</td>
<td>376</td>
<td>10</td>
</tr>
<tr>
<td>Vallejo, CA</td>
<td>5,528</td>
<td>533</td>
<td>1066</td>
<td>19</td>
</tr>
<tr>
<td>Average (2)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
(1) Vehicle volume calculated by multiplying number of transactions by two. Each transaction represents an entering and exiting movement.
(2) Average does not include the Staten Island, NY location, which appears to have unusually low gasoline transaction figures.
KEY FINDINGS AND RECOMMENDED TRIP GENERATION RATES.

The key findings of these driveway counts and surveys are as follows:

1. The daily trip generation rates shown in Tables 12 through 15 indicate that the Costco Warehouses with gas stations have higher trip rates than Costco Warehouses without gas stations.

2. These higher daily trip generation figures are consistent with the results in Tables 16 and 17, which show that gasoline transactions generally represent approximately 25 percent of total transactions for the facility.

3. In terms of increases in trips on the adjacent roadway, the figures in Tables 16 and 17 show that the gas station would result in approximately five percent more trips. This is based on the figures shown in the columns for “primary and diverted link” trips.

4. The peak hour figures shown in Tables 12 through 15 also indicate the higher trip generation rates for facilities with gas stations compared with those without gas stations.

5. Table 8 shows that the percentage of pass-by trips for warehouse patrons during the PM commuter peak hour and for the two-hour PM period is approximately 40 percent. The percentage of primary trips during both periods is approximately 35 percent.

6. Table 9 shows that the percentage of pass-by trips for warehouse patrons during the Saturday mid-day peak hour and the three and one-half mid-day period is approximately 32 percent compared to 40 during the weekday PM commuter period, while the percentage of primary trips is approximately 52 percent, compared to 35 percent during the weekday PM commuter period.

7. Tables 10 and 11 show that the percentages of primary trips among gas station patrons range from 8 to 13 percent, with an average figure of 10 percent.

8. The recommended trip generation rates and in/out distribution percentages resulting from this study are as follows:

<table>
<thead>
<tr>
<th>Time Period</th>
<th>Without Gas Station Rate</th>
<th>Without Gas Station In/Out</th>
<th>With Gas Station Rate</th>
<th>With Gas Station In/Out</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weekday AM Peak Hour</td>
<td>0.38</td>
<td>51/49</td>
<td>1.17</td>
<td>54/46</td>
</tr>
<tr>
<td>Weekday PM Peak Hour</td>
<td>4.13</td>
<td>52/48</td>
<td>7.03</td>
<td>47/53</td>
</tr>
<tr>
<td>Weekday Daily</td>
<td>47.02</td>
<td>50/50</td>
<td>77.61</td>
<td>50/50</td>
</tr>
<tr>
<td>Saturday Mid-day Peak Hour</td>
<td>6.39</td>
<td>57/43</td>
<td>10.30</td>
<td>53/47</td>
</tr>
<tr>
<td>Saturday Daily</td>
<td>50.14</td>
<td>50/50</td>
<td>90.17</td>
<td>50/50</td>
</tr>
<tr>
<td>Sunday Mid-day Peak Hour</td>
<td>5.72</td>
<td>60/40</td>
<td>9.79</td>
<td>48/52</td>
</tr>
<tr>
<td>Sunday Daily</td>
<td>41.56</td>
<td>50/50</td>
<td>77.49</td>
<td>50/50</td>
</tr>
</tbody>
</table>

9. The recommended pass-by trip percentages are shown in Table 19. Also shown on this table are recommended percentages that could be used for other types of trips.
Table 19: Potential Trip-Type Percentages

<table>
<thead>
<tr>
<th>Time Period</th>
<th>Wholesale Trips</th>
<th></th>
<th></th>
<th>Gasoline Station Trips</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Weekday PM</td>
<td>35% 40% 25% 25%</td>
<td>14% 30% 8% 53%</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Saturday</td>
<td>54% 32% 14% 20%</td>
<td>12% 25% 11% 50%</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mid-day</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The trip-types shown for the gasoline station are based on those for which the purchase of gasoline was deemed to be the reason for the visit. The remainder of the gas station patrons represent those whose primary purpose was to shop at the Costco warehouse and are shown as internal capture trips.

Comparisons Of Data Results With Similar Uses

The following table shows a comparison of trip generation volumes for an average Costco Warehouse site using trip rates from this study and trip generation equations from the ITE Trip Generation report for comparable land uses, including those land uses that Costco is typically asked to use in traffic studies. The ITE land use codes are as follows:

Code 861 – Discount Club
Code 820 – Shopping Center, non-holiday
Code 850 – Supermarket
Code 813 – Free-Standing Discount Superstore

Table 20 shows the trip generation comparisons per thousand square feet for the Costco locations and for the other land uses based on the average size of the Costco facilities that were surveyed.

Table 20: Trip Rate Comparisons

<table>
<thead>
<tr>
<th>Trip Rate</th>
<th>Costco Without Gas</th>
<th>Costco With Gas</th>
<th>Code 861 Discount Club</th>
<th>Code 820 Shopping Center</th>
<th>Code 850 Grocery</th>
<th>Code 813 Discount Superstore</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weekday AM Peak</td>
<td>0.38</td>
<td>1.17</td>
<td>0.65</td>
<td>1.43</td>
<td>7.23</td>
<td>1.84</td>
</tr>
<tr>
<td>Weekday PM Peak</td>
<td>4.13</td>
<td>7.03</td>
<td>3.88</td>
<td>5.70</td>
<td>9.65</td>
<td>3.82 (1)</td>
</tr>
<tr>
<td>Weekday 24-hour</td>
<td>47.02</td>
<td>77.61</td>
<td>41.80</td>
<td>61.64</td>
<td>111.51</td>
<td>46.96</td>
</tr>
<tr>
<td>Sat. Peak</td>
<td>6.39</td>
<td>10.30</td>
<td>6.46</td>
<td>7.90</td>
<td>12.22</td>
<td>4.91 (1)</td>
</tr>
<tr>
<td>Sat. 24-hour</td>
<td>50.14</td>
<td>90.17</td>
<td>53.75</td>
<td>82.35</td>
<td>177.59</td>
<td>55.06</td>
</tr>
<tr>
<td>Sun. Peak</td>
<td>5.72</td>
<td>9.79</td>
<td>5.62</td>
<td>3.12</td>
<td>18.93</td>
<td>4.27</td>
</tr>
<tr>
<td>Sun. 24-hour</td>
<td>41.56</td>
<td>77.49</td>
<td>33.67</td>
<td>47.42</td>
<td>166.44</td>
<td>43.45</td>
</tr>
</tbody>
</table>

(1) In our judgement, these figures are unusually low and possibly unreliable. These numbers are based on a small and limited sample.
Table 21 shows the pass-by trip percentages obtained from the Costco surveys compared to other land uses as shown in the ITE Trip Generation Manual.

<table>
<thead>
<tr>
<th>Time Period</th>
<th>Costco</th>
<th>Code 861</th>
<th>Code 820</th>
<th>Code 850</th>
<th>Code 813</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weekday PM Peak</td>
<td>40%</td>
<td>N/A</td>
<td>34%</td>
<td>36%</td>
<td>N/A</td>
</tr>
<tr>
<td>Saturday Peak</td>
<td>32%</td>
<td>N/A</td>
<td>26%</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

CONCLUSIONS

Conclusions
The information presented in this study can be used by Costco Wholesale to forecast traffic volumes at new sites based on the size of the facility as well as the anticipated market and/or sales volume. The trip rate comparisons included in this study indicate that the locations studied have higher trip rates than some land uses against which Costco is sometimes compared, but in some cases the trip rates are lower. The pass-by trip percentages derived as part of this study show that for those land uses for which there was a comparison, Costco pass-by trip percentages are higher. The technical appendix to this report contains spreadsheets with detailed information that may be of additional help.

Regarding trip generation rates, Costco may desire to use the information provided as part of this study on a case-by-case basis. For the most part, the ITE Land Use Code 861 (Discount Clubs) is favorable to Costco, in that the average trip rates are somewhat lower than those observed in this study. On the other hand, using anticipated sales volumes and geography as additional variables, Costco may wish to use the results of this study to forecast driveway volumes.

The trip-type figures obtained in this study may be of greater use by Costco in its work to secure approvals by local jurisdictions. These jurisdictions may be more willing to accept results of such surveys as opposed to accepting trip rate calculations that may be different than those contained in the ITE Trip Generation report.
Appendix B

KAI Data Summary
<table>
<thead>
<tr>
<th>Approach the Patron and ask &quot;Can I ask you a few questions about your trip to Costco Wholesale Club today?&quot;</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. How did you travel to Costco Today?</strong></td>
</tr>
<tr>
<td>A. Car, Truck or Motorcycle</td>
</tr>
<tr>
<td>B. Walk or Bicycle</td>
</tr>
<tr>
<td>C. Bus or Transit</td>
</tr>
<tr>
<td><strong>2. Will you be visiting both the fuel station and warehouse on this trip?</strong></td>
</tr>
<tr>
<td><strong>3. Where were you before coming here?</strong></td>
</tr>
<tr>
<td>A. Home</td>
</tr>
<tr>
<td>B. Work</td>
</tr>
<tr>
<td>C. Other</td>
</tr>
<tr>
<td><strong>4. Will you go directly back there when you are finished here?</strong></td>
</tr>
<tr>
<td>(if yes - done)</td>
</tr>
<tr>
<td><strong>5. If Costco were not here would you have passed by this block on Coleman Avenue? (if yes - done)</strong></td>
</tr>
<tr>
<td><strong>6. If Costco were not here would you have been traveling in this area? If so what is the closest intersection to Costco you would have passed through?</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>If No, Place check for</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Already Surveyed</strong></td>
</tr>
<tr>
<td><strong>Doesn't want to be surveyed</strong></td>
</tr>
</tbody>
</table>

| Record time survey was completed |
Santa Clara Costco Warehouse Data

### Weekday PM Peak

<table>
<thead>
<tr>
<th>Day</th>
<th>Time Span</th>
<th>Date</th>
<th>In</th>
<th>Out</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mon</td>
<td>4:00 PM</td>
<td>5:00 PM</td>
<td>11/11/2002</td>
<td>735</td>
<td>508</td>
</tr>
<tr>
<td>Tues</td>
<td>5:00 PM</td>
<td>6:00 PM</td>
<td>11/12/2002</td>
<td>464</td>
<td>489</td>
</tr>
<tr>
<td>Wed</td>
<td>4:30 PM</td>
<td>5:30 PM</td>
<td>11/14/2002</td>
<td>538</td>
<td>393</td>
</tr>
<tr>
<td>Thur</td>
<td>4:00 PM</td>
<td>5:00 PM</td>
<td>11/15/2002</td>
<td>432</td>
<td>600</td>
</tr>
<tr>
<td>Fri</td>
<td>4:00 PM</td>
<td>5:00 PM</td>
<td>11/16/2002</td>
<td>388</td>
<td>682</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>% in</th>
<th>% out</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Average</td>
<td>48.9%</td>
<td>51.1%</td>
<td>511</td>
<td>535</td>
<td>1046</td>
</tr>
<tr>
<td>Mid-week Avg</td>
<td>49.2%</td>
<td>50.8%</td>
<td>478</td>
<td>494</td>
<td>972</td>
</tr>
</tbody>
</table>
### Weekday PM Warehouse Surveys - Santa Clara Costco

<table>
<thead>
<tr>
<th>Date of Survey</th>
<th>11/12/2002</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of surveys responded to</td>
<td>398</td>
</tr>
<tr>
<td>People Refusing Surveys</td>
<td>11</td>
</tr>
<tr>
<td>Percent Acceptance</td>
<td>89%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Department</th>
<th>Number of Surveys</th>
<th>Number of Usable Surveys</th>
</tr>
</thead>
<tbody>
<tr>
<td>Men's</td>
<td>100</td>
<td>92</td>
</tr>
<tr>
<td>Women's</td>
<td>191</td>
<td>169</td>
</tr>
<tr>
<td>Deli</td>
<td>20</td>
<td>18</td>
</tr>
<tr>
<td>Bakery</td>
<td>14</td>
<td>13</td>
</tr>
<tr>
<td>Pharmacy</td>
<td>12</td>
<td>12</td>
</tr>
<tr>
<td>Produce</td>
<td>5</td>
<td>4</td>
</tr>
<tr>
<td>General</td>
<td>166</td>
<td>166</td>
</tr>
</tbody>
</table>

Total: 75 usable surveys.
January 3, 2005

VIA HAND DELIVERY

Honorable Mayor and Members of the City Council
City of La Quinta
78-495 Calle Tampico
La Quinta, CA 92253

Re: Komar Desert Center EIR.

Honorable Mayor and Members of the City Council:

This law firm represents the City of Indio in connection with the Komar Desert Center project and its Environmental Impact Report (“EIR”). By letter dated December 6, 2005, Indio submitted comments on the draft EIR. This letter sets forth additional comments for consideration at the hearing on January 3rd. As explained more fully below, the EIR as drafted is legally inadequate. Indio opposes approval of the project based on the inadequate CEQA analysis. Before approving the Komar project, the City of La Quinta must correct the EIR’s deficiencies and re-circulate the document for additional public review and comment.

I. The District Improperly Pieced with the Project by Excluding the Indio Component of Komar’s Proposed Development.

The development described in the EIR is only one component of the overall development currently planned by the property owner Komar Investments. Komar Investments owns approximately 34 acres of contiguous vacant property, including both the La Quinta parcels described in the EIR and an adjacent parcel in the City of Indio. Komar has specific plans to develop the adjacent Indio parcels with commercial development. As explained in Indio’s December 6 comment letter and confirmed in La Quinta’s response thereto, Komar has developed a site plan for the Indio parcel which describes specific commercial development. Moreover, Komar is actively pursuing this development through marketing efforts.

The EIR is inadequate because it “piecemeals” the overall project and its impacts into separate components. CEQA prohibits agencies from conducting such piecemeal review, because breaking up a project for purposes of environmental review disguises the project’s overall effects. (See, e.g., Rio Vista Farm Bureau Center v. County of Solano, 5 Cal.App.4th 351, 370-71 (1992); Kings County Farm Bureau v. City of Hanford, 221 Cal.App.3d 692, 716 (1990).) Here, each component of the overall Komar development project will increase the project’s environmental impacts, including but not limited to traffic and air pollution impacts.
The aggregate effects of both the La Quinta component and the Indio component must be identified, disclosed, and mitigated to insignificance where feasible before La Quinta approves the La Quinta portion of the project.

In addition, by deferring review of the Indio component to a later time, La Quinta has violated CEQA’s mandate that environmental effects be considered “as early in the planning process as possible.” (Bozung v. Local Agency Formation Comm. (1975) 13 Cal.3d 263, 277-79 [118 Cal.Rptr. 249].) This policy ensures both that environmental considerations will effectively influence the agency’s “project, program or design” (id.), and that environmental effects will be considered at the outset “before a project gains irreversible momentum.” (City of Antioch v. City Council (1986) 187 Cal.App.3d 1325, 1333 [232 Cal.Rptr. 507].)

Finally, by failing to describe and analyze the Indio component, the EIR has failed to present an adequate project description as required by CEQA. A “project” for purposes of CEQA includes the “whole of an action” with potential physical changes in the environment. (14 C.C.R. § 15378.) Here, the “whole of the action” includes all planned development for the contiguous Komar parcels, not just that portion of the development within the City of La Quinta.

Without an accurate project description, the EIR is legally inadequate. It is well established that "[a]n accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity." (McQueen v. Midpeninsula Regional Open Space Dist., 202 Cal.App.3d 1136, 1143 (1988).) An accurate project description has been described as the “sine qua non of an informative and legally sufficient EIR." (County of Inyo v. City of Los Angeles, 71 Cal.App.3d 185, 193 (1977) (emphasis in original).) An EIR that does not describe all components of an overall project is legally inadequate. (San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus, 27 Cal.App.4th 713, 730 (1994).) As explained by the court in the San Joaquin Raptor case:

"'Project' is given a broad interpretation in order to maximize protection of the environment." (McQueen v. Board of Directors (1988) 202 Cal.App.3d 1136, 1143 [249 Cal.Rptr. 439].) This ensures "that environmental considerations do not become submerged by chopping a large project into many little ones, each with a potential impact on the environment, which cumulatively may have disastrous consequences." (Burbank-Glendale-Pasadena Airport Authority v. Hensler (1991) 233 Cal.App.3d 577, 592 [284 Cal.Rptr. 498]; see also Bozung v. Local Agency Formation Comm. (1975) 13 Cal.3d 263, 283-284 [118 Cal.Rptr. 249, 529 P.2d 1017].)

By separating environmental review of the La Quinta and Indio components of the Komar development into two separate EIRs, La Quinta has improperly piecemealed the overall project. La Quinta’s treatment of the Komar development is similar to the city’s treatment of a residential development in Arviv Enterprises Inc. v. South Valley Area Planning Commission, 101 Cal.App.4th 1333 (2002). In that case, a developer proposed a total of 21 homes on
different lots scattered through the same neighborhood. The developer filed a number of different permit applications, and CEQA review was conducted separately for each home. The court held that the city must lawfully require one EIR for all 21 construction projects. According to the court, the "entire case is the direct result of inadequate, or misleading, project descriptions," because the individual homes were presented as separate projects rather than one overall, integrated project. (Id. at 1346.) The court upheld the City's requirement that one EIR be prepared in order to ensure that cumulative impacts were properly addressed. (Id.) ("[t]he significance of an accurate project description is manifest, where, as here, cumulative environmental impacts may be disguised or minimized by filing numerous, serial applications.") In fact, the case against piecemeal review is even more compelling here than in the Arviv case, because the project site here consists of two immediately adjacent parcels. In Arviv the project site consisted of a number of parcels scattered throughout one neighborhood, which were not necessarily adjacent to each other.

In its December 23 response to Indio's comments, La Quinta attempts to argue that Komar's overall development should be treated as two separate projects because (1) the La Quinta and Indio components are on separate legal parcels, and will be "bought, sold, and developed independently"; (2) the La Quinta and Indio components are subject to two separate approvals, one from the City of La Quinta and one from the City of Indio, and "La Quinta cannot predict what Indio will do or when"; (3) a separate EIR will be performed for the Indio portion of the development; and (4) the impacts from the Indio development are purportedly "speculative." These arguments are entirely incorrect under the applicable CEQA statutes, regulations, and case law.

First, the facts that the La Quinta and Indio components on located on separate legal parcels, and will be bought, sold, and developed independently, does not mean that they are separate projects for purposes of CEQA review. In the Arviv case discussed above, one developer planned to construct a number of residential homes in the same neighborhood. There, as here, the homes were on separate legal parcels, and were or would be bought, sold, and developed independently. Nonetheless, the court held that the construction of numerous homes in the same neighborhood constituted one collective project. The same reasoning applies here, and requires that the La Quinta and Indio components be treated as one project for purposes of CEQA review.

Second, the fact that the Komar development is subject to two separate approvals does not mean that it should be treated as two separate projects. The state CEQA Guidelines clearly state as follows:

"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." (14 C.C.R. § 15378(c) (emphasis added).)
Third, the fact that an EIR may be done later for the Indio portion of the Komar development does not transform the Indio component into a separate project. In the Arviv case, for example, the court held that construction of individual homes in the same neighborhood constituted one overall project despite the fact that environmental review was or would be conducted for each individual home.

Finally, the Indio component’s impacts cannot be considered “speculative” under CEQA. As explained above, La Quinta has acknowledged that Komar has developed a conceptual site plan identifying specific commercial uses for the Indio component of the development. Since a conceptual site plan is all that is required to undertake CEQA review, La Quinta has all of the information that it needs to identify the Indio component’s impacts. (Dry Creek Citizens Coalition v. Tulare, 70 Cal.App.4th 20, 36 (1999) (rejecting contention that a general description of project components is inadequate under CEQA.).)

Moreover, it is well established under California Supreme Court case law that a future project component must be analyzed if it is “reasonably foreseeable.” (Laurel Heights Improvement Ass’n v. Regents, 47 Cal.3d 376 (1988).) The fact that a future project component is not certain does not excuse an agency from considering all reasonably foreseeable impacts. In Laurel Heights, for example, the California Supreme Court held that an EIR for a university’s medical research facility improperly deferred review of a proposed future expansion to a later time. When opened, the facility was to occupy 100,000 feet. The university had tentative plans, however, to expand the facility to the entire 354,000 square feet available in the structure. The university argued that it was not required to study the environmental effects of the expansion because it had not yet formally approved the expansion. The Court rejected this argument, however, emphasizing that early review of possible effects allows an EIR to serve its critical function as an “environmental alarm bell” to alert agencies and the public of environmental effects “before they have reached ecological points of no return.” (Id. at 392.) Thus, the Court concluded that an EIR must analyze the environmental effects of a future expansion or other action if it is reasonably foreseeable. (Id. at 396 (emphasis added).) In reaching this conclusion, the Court in Laurel Heights stated as follows:

“We believe the [University] can provide meaningful, reliable data in the EIR as to future activity at Laurel Heights and thus must do so. . . . [The University] should have discussed in the EIR at least the general effects of the reasonably foreseeable future uses of the Laurel Heights facility, the environmental effects of those uses, and the currently anticipated measures for mitigating those effects.” (Id. at 398.)

The same reasoning applies here, and requires La Quinta to analyze fully the impacts of the Indio component of Komar’s development project before approving the La Quinta portion.
II. The EIR Analysis of Cumulative Impacts is Inadequate

An EIR must identify and analyze any “cumulative” effects to which the project will contribute. (14 C.C.R. §§ 15065, 15130; Pub. Res. Code § 21083(b); Citizens to Preserve the Ojai v. County of Ventura, 176 Cal.App.3d 421, 432 (1985).) If the lead agency finds that a project has potential environmental effects which are “individually limited,” but “cumulatively considerable,” CEQA requires the agency to find that the project will have a significant effect on the environment. Cumulative effects are considered significant when “the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” (14 C.C.R. §§ 15065, 15130.) The agency must address cumulative effects in a variety of other ways, by making detailed findings on the feasibility of alternatives or mitigation measures to reduce or avoid significant effects, and in making feasible changes in the project to lessen adverse environmental effects. (Discussion to 14 C.C.R. § 15065.)

An EIR’s analysis of cumulative impacts depends critically on the identification of related projects. If a list of related projects is underinclusive, all of the ensuing cumulative impacts analysis will be inaccurate. The list of related projects set forth in the EIR here is woefully underinclusive for a number of reasons. Thus, the cumulative impacts analysis is inadequate under CEQA because it understates the true cumulative impacts of the Komar development project.

First, the EIR’s list of related projects is underinclusive because it is limited to projects within the City of Indio. The CEQA Guidelines specifically state that a list of related projects “must consider projects outside the control of the agency.” (14 C.C.R. § 15130(b)(1)(A).) As explained in Indio’s prior comment letter, there are number of projects within a one-mile radius of the Komar development site that are located within the City of Indio, and must be considered related projects for purposes of cumulative impacts analysis.

Second, the EIR’s list of related projects is underinclusive because it is limited to projects that have received discretionary approval and/or are already under construction. It is well established under CEQA that a cumulative impacts discussion must consider all projects that are reasonably foreseeable, and cannot be limited to projects that have received discretionary approval or are under construction. (San Franciscans for Reasonable Growth v. City and County of San Francisco, 151 Cal.App.3d 61, 75 (1984).)

Third, the EIR’s cumulative impacts analysis is inadequate because it does not explain or justify the one-mile radius in any meaningful way. An EIR must provide a “reasonable explanation” for the geographic scope used in its cumulative impacts analysis. (14 C.C.R. § 15130(b)(3).) Without a reasonable explanation of the geographic scope, an EIR’s cumulative impacts analysis is legally inadequate. (Bakersfield Citizens for Local Control v. City of Bakersfield, 124 Cal.App.4th 1184, 1216 (2004).) In the Bakersfield Citizens case, for example, the court held that two EIRs prepared for two shopping center projects to be constructed 3.6 miles apart were both inadequate because they did not consider the cumulative impacts of the
other project. In reaching this conclusion, the court emphasized that cumulative impacts could include traffic, noise, air quality, urban decay and growth inducement impacts. (Id. at 1218.) The same reasoning applies here. Related projects in the City of Indio and elsewhere will have similar cumulative impacts that the EIR must identify, consider, and mitigate where feasible.

III. The EIR Does Not Account for the Indio Component’s Impacts.

La Quinta’s December 23 response to Indio’s initial comments on the Draft EIR incorrectly states that the EIR takes into account the Indio component’s impacts. The response explains that the Indio component would not be developed by 2006, and therefore no trips could be assigned for the 2006 analysis. This reasoning begs the question. If the Indio component is considered part of the overall project (as it must), and the Indio component will not be built out by 2006, then the projection of project build-out must be extended based on a reasonable estimate of when the Indio component will be completed.

Even more importantly, by focusing solely on traffic impacts, the response ignores many other types of impacts that the Indio component of the project will likely have. In addition to traffic impacts, the Indio component will have impacts in many other areas, including but not limited to air quality, noise, and aesthetics. The EIR has not begun to analyze these impacts, and is therefore inadequate.

IV. The EIR’s Traffic Analysis is Based on Fatally Flawed Assumptions.

Indio’s Traffic Engineer Mr. Tom Brohard has identified numerous flawed assumptions made by the EIR’s traffic analysis. A copy of Mr. Brohard’s most recent comments are attached hereto. Among many other flaws, the EIR’s traffic analysis substantially undercounts the traffic along Jefferson Street, making all of the EIR’s conclusions regarding traffic impacts erroneous.

In conclusion, the EIR as drafted is legally inadequate under CEQA and must be revised. The revised EIR must be recirculated for public comment before the City Council may lawfully approve the Komar development project.

Very truly yours,

WOODRUFF, SPRADLIN & SMART
A Professional Corporation

BRADLEY R. HOGIN

BRH:brh
Enclosure
January 3, 2006

Mr. Edward Z. Kotkin, City Attorney
City of Indio
100 Civic Center Mall
Indio, California 92201

SUBJECT: Komar Desert Center Project – Further Comments to Responses on Our December 6, 2005 Draft EIR Traffic Comments

Dear Mr. Kotkin:

As requested, I have reviewed the City of La Quinta December 23, 2005 responses to our traffic comments made on the Draft EIR for the Komar Desert Center Project. In addition, I have also reviewed supplemental traffic information provided by Kittelson & Associates and the Final EIR prepared by HDR.

While the City of La Quinta has adequately responded to some of the traffic issues raised in our letter, many of our prior comments have not been adequately addressed. Before addressing these technical traffic issues, it must be pointed out that the entire EIR traffic analysis is based on inaccurate baseline data.

Baseline traffic volumes for the weekday PM peak hour at Highway 111 and Jefferson Street were counted on Tuesday, April 19, 2005. According to the enclosed reprint from the April 27, 2005 Desert Sun, Jefferson Street was “... still CLOSED due to damage from winter storms...” at the wash 1,000 feet north of Highway 111 (not partially open as reported in the Traffic Study). The traffic counts on which the traffic study is based dramatically understate traffic volumes on Jefferson Street under normal conditions.

The traffic study purports to account for the abnormal conditions reflected in the April 19, 2005 traffic counts by manually shifting vehicles from Washington Street to Jefferson Street. These arbitrary adjustments to Jefferson Street added 400 weekday PM peak hour trips north of Highway 111 and 100 weekday PM peak hour trips south of Highway 111. The subjective experience of any driver familiar with Jefferson Street and the following objective empirical data below illustrate that these manual adjustments are too low.

CVAG made traffic counts on Jefferson Street north and south of Highway 111 on Wednesday, February 9, 2005 when Jefferson Street was OPEN at the wash. CVAG weekday PM peak hour counts were SIGNIFICANTLY higher on Jefferson Street near Highway 111 than those considered and relied upon in the Final EIR as follows:

81905 Mountain View Lane, La Quinta, California 92253-7611
Phone (760) 398-8885  Fax (760) 398-8897
Email brohard@earthlink.net
Mr. Edward Z. Kotkin, City Attorney  
Komar Desert Center Project – Further Comments to Responses  
January 3, 2006

<table>
<thead>
<tr>
<th></th>
<th>North of Highway 111</th>
<th>South of Highway 111</th>
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</thead>
<tbody>
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<td>CVAG Actual Counts</td>
<td>1,464</td>
<td>2,538</td>
</tr>
<tr>
<td>Estimates from the EIR</td>
<td>835 (57%*)</td>
<td>1,221 (48%*)</td>
</tr>
<tr>
<td>Underestimated Volumes</td>
<td>629</td>
<td>1,317</td>
</tr>
</tbody>
</table>

* Estimates from the EIR are expressed as percentages of the CVAG counts.

Furthermore, all traffic analyses in the EIR builds upon the fatally flawed traffic volume estimates the EIR developed for Highway 111 and Jefferson Street. The closure of Jefferson Street at the wash at the time of the Traffic Study and continuing until Friday, April 29, 2005 also disrupted traffic patterns and created abnormal traffic volumes at other intersections throughout the study area. Existing traffic volumes at ALL other study intersections were also counted on April 19 or April 20, 2005 during the Jefferson Street closure at the wash.

As part of the EIR’s weekend sensitivity analysis, additional traffic counts were made in September 2005 after Jefferson Street reopened. According to CVAG traffic counts conducted in 2005, summer season traffic volumes are at least 25 percent less than during the winter season. As a result, the September 21, 2005 counts at Highway 111 and Jefferson Street cannot be used directly to remedy the inaccurate traffic forecasts in the EIR.

The entire Final EIR traffic analysis is INVALID and it cannot be relied upon to identify, analyze, or mitigate the significant traffic impacts that will be created by the Komar Desert Center Project.

Education and Experience

Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained over 35 years of professional engineering experience, all of which has occurred in California. I am licensed as both a Professional Civil Engineer and as a Professional Traffic Engineer in California. I formed Tom Brohard and Associates in 2000 and now serve “on call” as Consulting Transportation Engineer for the City of San Fernando and as the City Traffic Engineer for the City of Indio. During my career, I have reviewed numerous environmental documents and traffic studies for various projects. Several recent assignments are highlighted in the enclosed resume.

My review disclosed additional technical deficiencies and inadequacies regarding the EIR traffic analysis for the Komar Desert Center Project as follows:
1) Analysis Remains Inconsistent with Project Description and Baseline Traffic Volumes Do Not Include All Approved Developments (Responses 6 and 7) – The EIR Project Description states the Komar Desert Center Project will have two distinct phases, with Costco Wholesale completed in August 2006 and the Komar shops completed by April 2007.

The Traffic Study fails to analyze baseline traffic conditions in 2007 when both phases of the project are planned to be completed. To properly account for regional growth, the Traffic Study must add 2 ½ percent annual growth to baseline traffic volumes to reflect regional growth between 2006 and 2007.

Traffic generated by other major projects in the area, beyond the four projects in the City of La Quinta that will be completed by 2006, must also be added to properly forecast Opening Day baseline traffic volumes in 2007. Adding 2 ½ percent for regional traffic growth does not properly account for significant traffic volumes from other major projects in the area completed by 2007.

As acknowledged in Response 2 from the City of La Quinta, the EIR does not contain analyses of the traffic impacts associated with near term development of the 21 acres in the City of Indio owned by Komar immediately adjacent to the 26 acres in the Komar Desert Center Project in the City of La Quinta. The seven acres of the Komar property in the City of Indio north of the channel are clearly an integrated part of the Komar Desert Center in the City of La Quinta, and development of this parcel must also be assumed for the near term.

2) Trip Reductions Are Inconsistent with Approved Studies (Response 7) – For each of the four major projects now under construction in the City of La Quinta, Response 7 states traffic studies have NOT included any reductions for pass by and diverted trips. It is inconsistent to apply trip reductions of 64 percent to the Costco portion of the Komar Desert Center when other traffic studies approved by the City of La Quinta have not used any reductions for pass by and diverted weekday PM peak hour trips. As a point of reference regarding the extent of these reductions, the Caltrans Guide for the Preparation of Traffic Impact Studies states “Reductions greater than 15 percent requires consultation and acceptance by Caltrans”.

3) Weekday Peak Hour Trip Forecasts Are Too Low (Responses 7 and 8) – Review of the August 3, 2001 Costco Trip Generation Study prepared by Kimley-Horn and Associates (attached to the December 22, 2005 memorandum from Kittelson & Associates) indicates three of the ten Costco Wholesale sites did NOT include Costco gas stations. The weekday PM peak hour rate of 7.03 trips per 1,000 square feet is significantly higher for the seven sites with gas stations than the weekday PM peak hour rate of 4.13 trips per 1,000 square feet for the three sites without gas stations.
Two of the seven Costco sites with gas stations were in California, with the others located in Florida, Colorado, Virginia, Washington, and New York. The two sites in California had the highest weekday PM peak hour trip generation rates including 8.85 trips per 1,000 square feet in Vallejo and 10.29 trips per 1,000 square feet in Simi Valley.

The weekday PM peak hour rate used in the EIR is significantly less than either of the two Costco Warehouse sites in California as reported in the Costco Trip Generation Study. The weekday PM peak hour trip rate used in the EIR ignores higher trip rates recorded in California and understates the weekday PM peak hour trips that will be generated by the La Quinta Costco. Response 8 states the trip forecasts for Costco have been overestimated compared to data published by the Institute of Transportation Engineers, ITE. As explained below, faulty methodology has been used to reach this conclusion. We disagree that trips are overestimated and believe to the contrary that trips for the La Quinta Costco have been underestimated.

For the record, ITE average trip rates cannot be directly applied to forecast trips for the proposed project. For Land Use Category 861, Discount Club, ITE includes stores ranging in size between 90,000 and 140,000 square feet. With the La Quinta Costco proposed at 149,739 square feet, the store will be larger than the upper end of the range of data presented by ITE. Accordingly, Page 14 of the User’s Guide to ITE’s Trip Generation, 7th Edition states “The plots presented in Trip Generation cover only the range of independent variables for which data are available. Caution should be used if extrapolating the data beyond the ranges provided, since no information has been supplied to document trip generation characteristics beyond the given ranges”. In contradiction to the ITE User’s Guide, Response 8 used faulty methodology by going beyond the range of data provided by ITE to support its claim.

4) Saturday Peak Hour Trip Forecasts Are Too Low (Response 9) – The Costco Trip Generation Study reports the two sites in California had the highest weekend peak hour trip generation rates including 13.35 trips per 1,000 square feet in Vallejo and 16.16 trips per 1,000 square feet in Simi Valley. Using the national average Saturday peak hour trip rate ignores higher trip rates recorded in California and understates the Saturday peak hour trips that will be generated by the La Quinta Costco.

Primary trip percentages at the two California locations were among the highest of the sites with 57.9 percent reported as new trips at Vallejo and 75.0 percent reported as new trips at Simi Valley. Using the average Saturday peak hour primary trip percentage ignores the higher percentage of new trips recorded in California and understates the Saturday peak hour trips that will be generated by the La Quinta Costco.
5) **Trip Generation Forecasts Are Too Low (Response 10)** – Trip reductions used in the EIR (64 percent) are inconsistent with the approved traffic studies in the City of La Quinta for four nearby developments where NO trip reductions were taken. Weekday and Saturday trip rates in the EIR are significantly less than those recorded at other Costco Warehouse stores with gas stations in California. The percentage of new trips on Saturdays recorded at other Costco Warehouse stores with gas stations in California is significantly higher than used in the EIR. In combination, the new project traffic has been significantly underestimated and potentially significant traffic impacts have been omitted from the EIR for the Komar Desert Center. The trip generation forecasts must be revised and the resulting significant traffic impacts must be disclosed, analyzed, and mitigated by the Komar Desert Center Project.

6) **Additional Intersections in Indio Require Evaluation (Response 11)** – The assignment of 25 percent of the project trips on Highway 111 to and from the City of Indio does not demonstrate that project traffic dissipates within one mile as stated in Response 4. The EIR retains all these trips on Highway 111 through Madison Street, with none of the trips turning to or from Madison Street. It is likely some project trips will use Madison Street, especially with Madison Street being extended in the very near future south of Avenue 48. If 25 percent of the project trips remain on Highway 111 as forecast in the EIR, then there will be significant project traffic impacts at other Highway 111 intersections in the City of Indio such as Monroe Street. The EIR must refine the distribution of project trips down to less than 25 percent in the City of Indio as the EIR has done in the City of La Quinta. The resulting significant traffic impacts must be disclosed, analyzed, and mitigated by the Komar Desert Center Project.

7) **Significant Traffic Impacts Occur in the City of Indio (Response 16)** – Addressing the further comments in this letter will yield higher baseline traffic volumes and higher project trip generation. Increasing the number of primary (new) trips during the weekday PM and Saturday peak hours will result in significant project traffic impacts at intersections in the City of Indio. These resulting significant project traffic impacts must be disclosed, analyzed, and mitigated by the Komar Desert Center Project.

8) **Three Eastbound Lanes Are Needed On Highway 111 (Response 17)** – The EIR assumes a third eastbound lane will be constructed on Highway 111 east of Jefferson Street. The third eastbound lane on Highway 111 is required to receive traffic from the three eastbound lanes to be constructed in the City of La Quinta west of Jefferson Street. However, the existing bridge just east of Jefferson Street is too narrow to provide three eastbound lanes.
Mr. Edward Z. Kotkin, City Attorney
Komar Desert Center Project – Further Comments to Responses
January 3, 2006

The City of Indio plans to provide six through lanes on Highway 111 from Jefferson Street to Madison Street in the future in accordance with the City’s General Plan. However, available funding is not sufficient to widen the existing bridge immediately east of Jefferson Street in the near term.

Widening of the bridge on Highway 111 is needed to receive traffic from the three lanes to be constructed in the City of La Quinta to the west. Further widening of this bridge is necessary to properly align the left turn lanes on Highway 111 at Jefferson Street, particularly with eastbound dual left turn lanes. The City of La Quinta must require the Komar Desert Center Project to fully mitigate their significant traffic impacts at Highway 111/Jefferson Street.

9) Mitigation at Jefferson Street/Highway 111 Is Insufficient (Response 18) – The required mitigation at Highway 111 and Jefferson Street for significant project traffic impacts in future year 2020 has been changed in the Final EIR. The Draft EIR previously proposed adding a separate westbound right turn lane in the City of Indio, together with fair share financial participation from Komar Desert Center. Now, the Final EIR proposes to install right turn green arrows for southbound and eastbound traffic. As the supporting calculations have several errors, the proposed traffic signal modifications do not mitigate the significant project traffic impacts under build out conditions in 2020.

In their December 19, 2005 letter, Kittelson & Associates states “The long term projections by the City of La Quinta show a substantial increase in traffic throughout the roadway system for buildout of the surrounding area. The projections identified a background traffic growth of approximately 60% on Highway 111 at Jefferson Street, with substantial growth in the eastbound and southbound right turn volumes...”

Weekday PM peak traffic volumes for year 2020 used by Kittelson & Associates in their analysis of Highway 111 at Jefferson Street under buildout conditions were compared with existing traffic counts recorded by CVAG in February 2005. For northbound Jefferson Street south of Highway 111, the weekday PM peak hour traffic volumes used in the 2020 calculations are five percent less than the EXISTING traffic volumes recorded by CVAG in early 2005. In addition, weekday PM peak traffic volumes on Highway 111 in the calculations are between 20 and 40 percent higher than today, also too low in comparison to the long term projections made by the City of La Quinta. The use of low weekday PM peak hour volumes for buildout conditions in 2020 is a fatal flaw in the analysis of mitigation measures for the Komar Desert Center Project.

In the review of the year 2020 calculations, the percentage of heavy vehicles (trucks) has also been grossly underestimated by assuming between 1 and 2 percent trucks on both Highway 111 and on Jefferson Street. This assumption
is unreasonable since Caltrans recorded 8.6 percent trucks on Highway 111 at Washington Street in 2004. This error causes the calculation to predict better operating conditions than will occur with higher percentages of trucks.

To determine potential mitigation measures at Highway 111 and Jefferson Street, the Kittelson & Associates calculations were replicated. Northbound weekday PM peak traffic volumes on Jefferson Street were then increased 30 percent higher than the 2005 CVAG traffic counts to account for future traffic growth. To mitigate their significant traffic impacts under buildout volumes in year 2020, the Komar Desert Center Project must be required to construct additional improvements at Highway 111 and Jefferson Street. In addition to the southbound and eastbound right turn green arrows, widening the east leg to provide two westbound left turn lanes, three westbound through lanes, and a westbound right turn lane is necessary. Financial participation in the cost of these improvements must be required by the City of La Quinta as the City of Indio has no jurisdiction or authority to establish such requirements outside its boundaries.

The Final EIR acknowledges new right turn green arrows will require prohibition of northbound to southbound as well as eastbound to westbound U-turns. Prohibition of northbound to southbound U-turns would adversely impact the gas station on the southwest corner as well as other future developments on the west side of Jefferson Street just south of Highway 111. The impacts of this U-turn prohibition to accommodate the eastbound right turn green arrow must be considered, and alternate access to replace the U-turn movement must be developed as part of the proposed mitigation.

In sum, the traffic analysis for the Komar Desert Center Project contains many significant errors and fatal flaws as identified throughout this letter. As a result, the EIR fails to accurately disclose and mitigate the project's significant traffic impacts in the City of Indio.

If you have questions regarding these comments, please contact me at your convenience.

Respectfully submitted,

Tom Brohard, PE
City Traffic Engineer

Enclosures
Music festival to clog routes by Indio venue

Lois Gormley
Staff
The Desert Sun

Officials recommend locals plan for delays
By Lois Gormley

The Desert Sun

INDIO - If you’re short on patience, don’t plan on driving through Indio this weekend.

And if you are among the more than 100,000 people expected to come streaming into the city as early as Friday for the two-day Coachella Valley Music and Arts Festival, that patience will be a must.

Police say residents and festivalgoers alike should be prepared for congestion, plan ahead and avoid certain streets if at all possible.

The festival, which is held at the Empire Polo Club at 81-800 Avenue 51, begins at 11 a.m. Saturday and wraps up at midnight Sunday. It will feature 50 bands, including Coldplay and Nine Inch Nails.

Especially heavy traffic will likely start as much as two hours before the festival and continue for two hours after it wraps up each day at midnight, said Ben Gutron, Indio Police Department public information officer.

The department and its volunteers will once again be out in force to ensure a smooth event that poses as little inconvenience as possible for surrounding neighborhoods and residents, he said.

To that end, the department has a few suggestions for helping all motorists to move about the city:

If you aren’t going to the concert, avoid Jefferson Street from Indio Boulevard to Avenue 52. This is the main road to and from the event.

Jefferson at the Whitewater River storm channel in La Quinta is still closed due to damage from winter storms, and Gutron said Tuesday he didn’t know whether it would reopen before the festival.

La Quinta Mayor Don Adolph said Tuesday it’s his understanding that the road will be reopened by Friday.

Avoid Monroe Street.

Avoid Avenue 50. The street will be closed from Jackson to Madison streets to everyone but residents, law enforcement and event staffers.

Gutron said the department suggests non-concert traffic use Jackson Street, Golf Center Parkway and Van Buren Street to travel north or south in the city.

For east and west travel, use Miles Avenue, Fred Waring Drive and Indio Boulevard east of Clinton Street, he said.

“Everyone should plan out their routes for those two days and give themselves a little more time,” Gutron said.

http://nl.newsbank.com/nl-search/we/Archives?p_action=print&p_docid=109CFB0AE0A1BBD4
Festival promoter Paul Tollet said initial plans to provide shuttle service to the event were scrapped when organizers determined they would have to dedicate a lane for the vehicles, closing it to other traffic and defeating the purpose.

Instead, festival organizers have obtained more land on the outer edge of the concert field this year, which has enabled them to break parking up into several smaller lots instead of two big ones.

That means there will be more arteries out of the venue, and although there will still be heavy traffic, organizers believe it will prevent motorists from being stuck in gridlock for hours as happened last year.

"Saturday of last year was horrific," Tollet said. "Everyone really worked hard to fix Sunday. The police really helped. The police's plan was correct, but it got varied on the first night."

There will also be a couple of streets that will be converted to one-way avenues to facilitate the mass exodus each night.

It will still be congested, however, Tollet warned.

"We always encourage car pooling and getting their early," he said. "If your favorite band is going on at 2 p.m., I wouldn't arrive at 2 p.m. There are plenty of things to do until your band comes on."

Glance: CONCERT TRAVEL AND SAFETY TIPS

Leave early and be prepared for delays along Interstate 10 and in the city of Indio.

Use landmarks to find your car after the show. Count rows of cars, light standards or any other stationary objects to help you remember. Organizers say there will be a lot of signs indicating the area you parked in, as well.

If you have a remote car alarm, use the device to find your car. Write down your license plate number and the make and model of the vehicle so police can help you find it if necessary.

Don't leave valuables in sight, and lock your vehicle.

Drink water and eat regular meals. Keep extra water in your car.

Report traffic accidents or other obstacles in the roadway to Indio police by calling 347-6522.

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Tom Brohard, PE

**Licenses:**
- 1976 / Professional Engineer / California – Civil, No. 24577
- 1977 / Professional Engineer / California – Traffic, No. 724

**Education:**
- BS / Civil Engineering / Duke University / 1969

**Experience:**
- 35 Years

**Memberships:**
- Institute of Transportation Engineers - Member
- Orange County Traffic Engineers Council - Chair 1979-1980
- American Public Works Association - Member

**Expertise:**
Tom is a recognized expert in the field of traffic engineering and transportation planning. His background also includes responsibility for leading and managing the delivery of various contract services to numerous cities in Southern California. Since forming Tom Brohard and Associates in 2000, Tom has reviewed many traffic impact reports and environmental documents for various projects across the state.

Tom has extensive experience in providing transportation planning and traffic engineering services across Southern California. From 1972 through 1978, he conducted all traffic engineering investigations in the Second Supervisorial District in Los Angeles County. He has served as City Traffic Engineer/Transportation Manager/Engineer as follows:

- Bellflower ........................................ 1997 - 1998
- Bell Gardens ...................................... 1982 - 1995
- Huntington Beach ............................... 1998 – 2004
- Indio ............................................... 2005 - present
- Lawndale .......................................... 1973 - 1978
- Los Alamitos .................................... 1981 - 1982
- Oceanside ........................................ 1981 - 1982
- Paramount ....................................... 1982 - 1988
- Rancho Palos Verdes ............................ 1973 - 1978
- San Fernando ...................................... 2003 - present
- San Marcos ........................................ 1981
- Santa Ana ......................................... 1978 - 1981
- Westlake Village ................................ 1983 - 1994

While serving Huntington Beach, Tom oversaw a staff of 20 including traffic engineers and transportation planners, traffic signal and street lighting personnel, and the signing, striping, and marking crews. He secured $3.5 million in grant funding, managed the initial West Orange County Rail Feasibility Study, and recently oversaw the consultant selection for the City’s Traffic Model and Circulation Element Update.

Tom Brohard and Associates
Selected significant accomplishments during the last four years include the following:

- Conducted Traffic Impact Analyses for the Sacred Heart Church and School Master Plan in the City of Palm Desert including presentations to community residents and testimony at Public Hearings before the City Council (3/2005 to 7/2005)

- Prepared preliminary critique of the Draft EIR and traffic study for the Prewett Ranch Project in the City of Brentwood for Adams Broadwell Joseph & Cardozo (7/2005)


- Prepared critique of the traffic and circulation sections of the Draft Subsequent EIR of the County of Ventura Focused General Plan Update and prepared rebuttal to responses for Shute, Mihaly, & Weinberger and the Community of Somis (12/2004 to 1/2005; 6/2005)

- Prepared response to Initial Study and Notice of Preparation of a Draft EIR for 483 condominiums proposed in three high rise towers in Century City in the City of Los Angeles for Tract No. 7260 Association (6/2005)

- Prepared critique of the traffic and parking impacts identified in the Draft EIR and Traffic Impact Analysis for the Long Beach Memorial Medical Center Expansion in the City of Long Beach for Weinberg, Roger & Rosenfeld (2/2005 to 5/2005)


- Prepared critique of the traffic, circulation, and parking impacts identified in the Traffic Impact Analysis for Los Angeles Unified School District Valley High School #5 in the City of San Fernando (4/2005)

- Prepared critique of the transportation, circulation, and parking impacts identified in the Draft EIR and the Final EIR for the Wood Street Project in the City of Oakland for the East Bay Community Law Center (3/2005)

- Conducted City wide engineering and traffic surveys confirming enforceable speed limits on 31 street segments for the City of San Fernando (1/2005 to 3/2005)

• Checked plans for traffic signal installations and modifications as well as signing and striping revisions for various projects for Engineering Resources of Southern California and the Cities of Hemet and Palm Springs (12/2003 to 3/2005)

• Prepared critique of the Initial Study and traffic study prepared for the Hidden Canyon (Greenfield) Quarry Use Permit and Reclamation Plan in Monterey County for Weinberg, Roger & Rosenfeld (2/2005)


• Prepared critique of the Traffic Study for the 450-460 North Palm Drive Senior Housing Residential Project in the City of Beverly Hills for Luna & Glushon (11/2004)

• Prepared critique of the Draft EIR and traffic study and provided testimony at a public hearing regarding the West Los Angeles College Facilities Master Plan in Los Angeles County for Culver Crest Neighborhood Association (10/2004 to 12/2004)

• Prepared critique of the Draft EIR and the associated traffic impact analysis as well as subsequent rebuttal to responses to these comments in the Final EIR for The Ranch Plan in the County of Orange for the Endangered Habitats League (6/2004 to 7/2004 and 10/2004)

• Prepared preliminary critique of the Draft EIR and traffic study for the Chandler Ranch Specific Plan Project in the City of Paso Robles for Adams Broadwell Joseph & Cardozo (9/2004)

• Prepared critique of the Draft EIR and traffic report associated with the Magnolia Park Project in the City of Oakley for Adams Broadwell Joseph & Cardozo (9/2004)

• Prepared critique of the traffic impacts identified in the Recirculated Draft EIR and traffic study for the McKean Road Sports Complex in Santa Clara County for Shute, Mihaly, & Weinberger (9/2004)

• Prepared critique of the Environmental Assessment for Robie Ranch Reclamation Project in Calaveras County for Weinberg, Roger & Rosenfeld (9/2004)

• Provided expert assistance to residents in the City of La Mirada during settlement negotiations regarding litigation involving the Big T Residential Development Project in the City of Buena Park (6/2004 to 9/2004)

• Prepared critique of the traffic impacts identified in the Recirculated Draft EIR and the associated traffic study for the Lake Jennings Ralph's Shopping Center in San Diego County for SOFAR and Shute, Mihaly, & Weinberger (8/2004)

Tom Brohard and Associates

Prepared critique of the Negative Declaration for the Brisbane Recycling Project in the City of Brisbane for Weinberg, Roger & Rosenfeld (6/2004)

Reviewed various alternative alignments for the extension of Lexington Drive from Cerritos Avenue to Katella Avenue, a proposed secondary highway, for the City of Los Alamitos; provided expert assistance to the City of Los Alamitos during settlement negotiations regarding litigation of the proposed Cottonwood Christian Center Project in the City of Cypress (4/2004 to 6/2004)

Prepared critique of the Draft EIR and the associated traffic impact study for the Jaxon Enterprises Mine and Reclamation Expansion Project in the County of Merced for Weinberg, Roger & Rosenfeld (5/2004)


Conducted the Traffic Study of Two Parking Alternatives for the City of San Dimas to provide on street parking to complement potential retail/residential development on the east side of San Dimas Avenue north of Arrow Highway (12/2003 to 4/2004)

Prepared trip generation calculations for various retail and “Big Box” stores in conjunction with a March 2004 ballot measure in Contra Costa County for Mark R. Wolfe & Associates (1/2004 to 2/2004)
✓ Prepared critique of the Initial Study/Mitigated Negative Declaration and the associated transportation impact analysis for the S&S Farms and Hancock Property Residential Development Plan in the City of Brentwood for Adams Broadwell Joseph & Cardozo (2/2004)

✓ Prepared critiques of the traffic impacts identified in the Mitigated Negative Declarations as well as subsequent rebuttal to responses to these comments for the Bayfront Live Work Project in the City of Hercules for Adams Broadwell Joseph & Cardozo (4/2003, 10/2003, and 2/2004)

✓ Conducted the City Wide Traffic Calming Study of Residential Streets in the City of San Fernando including development of traffic calming guidelines and specific recommendations addressing over 70 "Hot Spots" throughout the City including monthly presentations at Transportation & Safety Commission meetings and a presentation of the Final Report to the City Council (5/2003 to 1/2004)

✓ Prepared critique of the Initial Study/Mitigated Negative Declaration and the associated transportation analysis for the Cottonwood Christian Center in the City of Cypress for the City of Los Alamitos (1/2004)

✓ Prepared critique of the Recirculated Draft EIR and the associated transportation analysis for the Sand Creek Specific Plan in the City of Antioch for Adams Broadwell Joseph & Cardozo (1/2004)


✓ Prepared critiques of the Initial Study and the Recirculated Initial Study/General Plan Amendment and Rezoning for the Jack Parker Trucking Site in the City of San Pablo for Adams Broadwell Joseph & Cardozo (9/2003 and 11/2003)

✓ Prepared critique of the traffic impacts identified in the Draft EIR and rebuttal to responses to comments in the Final EIR for the proposed Wal-Mart in the City of Fremont for Mark R. Wolfe & Associates (7/2002 to 10/2003)

✓ Prepared critique of the traffic impacts identified in the Draft EIR, rebuttal to responses in the Final EIR, and testimony at a public hearing regarding the Alpine Village Shopping Center in San Diego County for Shute, Mihaly, & Weinberger (6/2002 to 10/2003)

✓ Prepared critique of the traffic impacts identified in the Draft EIR, rebuttal to responses in the Final EIR, testimony at public hearings, and assistance during settlement negotiations regarding the 2000 Avenue of the Stars Project in Century City in the City of Los Angeles for Tract No. 7260 Association (9/2002 to 10/2003)
• Prepared critique of the traffic impacts identified in the Draft EIR for the Glen Loma Ranch Project in the City of Gilroy for Adams Broadwell Joseph & Cardozo (9/2003)

• Prepared critique of the traffic impacts identified in the Initial Study and the Traffic Impact Analysis for the Ryder Homes Project in the City of Oakley for Adams Broadwell Joseph & Cardozo (9/2003)


• Prepared critique of the traffic impacts identified in the Draft Subsequent EIR for the proposed Boronda Crossing Commercial Project in the City of Salinas for Mark R. Wolfe & Associates (8/2002 to 9/2003)

• Prepared four grant applications to Caltrans for $1,115,000 of Hazard Elimination Safety funding to modify traffic signals and to upgrade regulatory, warning, and street name signs in the City of Santa Ana (3/2003 to 8/2003)


• Prepared critique of the traffic impacts identified in the Draft EIR for the Clark Road Residential Project in the City of Richmond for Adams Broadwell Joseph & Cardozo (8/2003)


• Prepared critique of the traffic impacts identified in the Draft EIR for the Cal Poly Student Housing North Project in the City of San Luis Obispo for Adams Broadwell Joseph & Cardozo (7/2003)

• Prepared critique of the traffic impacts identified in the Final EIR for the Lake Jennings Ralph’s Shopping Center in San Diego County for SOFAR and Shute, Mihaly, & Weinberger (3/2003 to 7/2003)

• Prepared critique of the traffic impacts identified in the Draft EIR for the Cypress Grove Residential Project in the City of Oakley for Adams Broadwell Joseph & Cardozo (6/2003)

• Prepared critique of the traffic impacts identified in the Draft EIR for the McKean Road Sports Complex in Santa Clara County for Shute, Mihaly, & Weinberger (5/2003)

Tom Brohard and Associates
• Prepared grant application to Caltrans for $448,000 of Safe Route to School funding to upgrade all school signs at 68 public and private schools in the City of Santa Ana (3/2003 to 5/2003)


• Prepared critique of the traffic impacts identified in the Draft EIR and the Traffic Impact Analysis for the Bettencourt Ranch Aggregate Mining Project in Merced County for Weinberg, Roger & Rosenfeld (4/2003)

• Conducted a complete review of the General Plan Circulation Element for the City of Huntington Beach including comparisons to the Orange County Transportation Authority’s Master Plan of Arterial Streets and drafted a Request for Proposal to update the City’s Circulation Element (8/2002 to 4/2003)


• Prepared critique of the traffic impacts identified in the Draft EIR for the Waterfront/Downtown Mixed Use Project in the City of Vallejo for Adams Broadwell Joseph & Cardozo (2/2003)

• Provided expert witness evaluation of the traffic impacts caused by simultaneous construction of various Alameda Corridor Transportation Authority projects for Sullivan, Workman, & Dee (12/2002 to 2/2003)


• Prepared critique of the traffic impacts identified in the Transportation Impact Study for the Western Research Campus in the City of Richmond in Contra Costa County for Adams Broadwell Joseph & Cardozo (11/2002)

• Evaluated Conditions of Approval for the proposed intersection of Mulholland Highway and Hazel Nut Court in Los Angeles County and provided testimony to the Board of Supervisors for Seminole Springs Mobile Home Park (11/2002)

• Reviewed the Traffic Impact Analysis prepared for the Pacific City Project for the City of Huntington Beach (9/2002)

• Prepared critique of the traffic impacts identified in the Draft EIR for North Yorba Linda Estates in the City of Yorba Linda for Shute, Mihaly, and Weinberger (9/2002)
Conducted the Hacienda Road Traffic Calming Study and presented the final report at locally televised meetings of the Traffic Committee and the City Council in the City of La Habra Heights (10/2001 to 9/2002)

Prepared critique of the traffic impacts identified in Initial Studies with Traffic Impact Analyses for three residential subdivisions in the City of Pittsburg for Adams Broadwell Joseph & Cardozo (8/2002)

Conducted the City Wide Traffic Safety Study and presented the final report at meetings of the Traffic Committee and the City Council in the City of Rolling Hills Estates (4/2001 to 5/2002)

Prepared critique of the traffic impacts identified in the Draft EIR, rebuttal to responses, and testimony at a public hearing regarding extensions of Corona and Valley View Avenues in the City of Norco for C. Robert Ferguson (1/2002 to 4/2002)

Prepared critique of the traffic impacts identified in the Draft Initial Study and Environmental Assessment, rebuttal to responses, and testimony at public hearings before the Ventura County Board of Supervisors regarding intersection improvements proposed by Caltrans at State Route 118/State Route 34 in Ventura County for the Community of Somis (12/2000 to 10/2001)
TO: Tim Jonasson, Director of Public Works

FROM: Nazir Lalani, City Traffic Engineer

DATE: January 3, 2006

RE: REVIEW OF RESPONSE TO LATE RECEIVED COMMENT LETTER FOR THE KOMAR DESERT CENTER DRAFT ENVIRONMENTAL IMPACT REPORT SCH NO. 2005081060

At your request, I reviewed the response to late received comment letter for the Komar Desert Center Draft Environmental Impact Report SCH No. 2005081060. The key issues covered in the City of Indio comment letter dated December 6, 2005, and the responses prepared by the City dated December 12, 2005, have been summarized in this memo in preparation for the January 3, 2006 City Council meeting.

The responses prepared by the City of La Quinta address all the issues raised by the City of Indio in a comprehensive and thorough manner. Extensive backup data has been provided by the project applicant to justify the assumptions made in the Traffic Impact Analysis (TIA) and communications with the City of Indio staff during its preparation. To prepare comprehensive response to the City of Indio, the City of La Quinta planning staff numbered the comments listed in the City of Indio letter dated December 6, 2006. The same numbering system has been used to summarize the key issues raised by the City of Indio.

Comments 1-3: These three comments address the issue of inadequate project description. The City of La Quinta’s detailed responses are provided on pages 9 and 10 of the response letter. The City of Indio feels that the Environmental Impact Report (EIR) should have included the adjacent parcel on the east side of the proposed project which is located in the City of Indio and is separated from the Desert Center project by the Evacuation Channel. The responses prepared by the City of La Quinta indicate that there are no firm proposals for this site. Absent any reliable information on land uses, including this site in the EIR would be based on a speculative set of assumptions which is inappropriate. This is consistent with the practices used by other public agencies.

Comments 4-5: These two comments address the issues of cumulative project analysis and the size of the study area. The City of La Quinta’s detailed responses are provided on pages 11, 12, 13 and 14 of the response letter. The responses indicate that the City of La Quinta used the best sources available for identifying the future projects within 1 mile of the Desert Center project. The City of Indio did not provide any information during the Notice of Preparation process. However, the City of Indio staff was
contacted and the City of Indio’s web site was accessed. The practice in most public agencies is to use a list of projects that have already been approved but not built. Projects for which applications have been submitted are also included. This was done for the Desert Center EIR.

To take into account increased traffic from future development in the area surrounding the Desert Center project, the EIR increased traffic numbers to accommodate this growth by adding 2.5% annual growth to the 2005 existing traffic conditions. This is also in consistent with the practices of other public agencies. At the January 3rd, 2006 City Council meeting, the City of Indio may question how the 2.5% factor was derived.

Comments 6-7: These two comments address the issue of project build out and how that was handled in the TIA. The City of La Quinta’s responses to these two comments are provided on page 15 and indicate that the EIR disclosed temporary significant impacts in 2006 until the Highway 111 project is completed between Adams and Jefferson. The methodology used in the EIR is a worst cased traffic scenario with all uses in the project opening by year 2006. The EIR reasonably assumes that Hwy 111 in the City of Indio will be widened to 6 through lanes consistent with the City’s 2020 General Plan and conversations with their interim traffic engineer, Tom Brohard.

Comments 8-10: These three comments address the issue of trip generation and trip reduction factors used to take into account, pass by trips. The City of La Quinta’s responses to these two comments are provided on pages 16 and 17. The responses indicate that the 64% trip reduction factor was based on data collected at other Costco Warehouses with fuel stations. Attachments 1 and 2 provide backup data. The trip generation estimated for the Desert Center project was compared to ITE trip generation rates and found to be higher than any trip generation estimates using the ITE rates.

Comment 11: This comment relates to the fact that 25% of the trips from the Desert Center project were assigned to Hwy 111 east of Jefferson in the City of Indio and no additional breakdown of the 25% was done on other Indio street such as Madison, Clinton and Avenue 48. The City of La Quinta’s response to this comment is provided on page 17. The response essentially says that the 25% assignment is based on the marketing analysis done by Costco. This response should also have reference the response to comment 16 which indicates that impacts to the intersections of Hwy 111/Madison as well as Jefferson/Avenue 48 were found not be significant. Therefore, it was not necessary to analyze additional intersections further away from the Desert Center project. It should also be noted the at the Indio Fashion Mall project DEIR did not address any impacts on Hwy 111 west of Clinton Street even though 10-15% of the traffic was assigned to this segment.

Comments 12-16: These three comments address the issues of the methodology used to calculate intersection levels of service in the EIR and the thresholds of significance. The City of La Quinta’s responses to these two comments are provided on pages 17 and 18. The City of Indio staff used the volume to capacity ratios based on critical lane approach volumes to arrive at different levels of service. The EIR uses the Highway Capacity Manual (HCM) Intersection Delay method. Both methods are valid and used by many agencies. The State of California also endorses the HCM method. These comments by the City of Indio are inappropriate.

The Level of Service D threshold is consistent with the City of La Quinta’s General Plan methodology.
The secondary threshold of 0.02 volume to capacity ratio is consistent with the threshold used by other public agencies and should be incorporated in the City’s Initial Study Guidelines that are to be developed over the next 12 months.

**Comment 17:** This comment correctly points out a typographical error in transposing the information regarding improvements to Hwy 111 from the TIA to the EIR. The City of La Quinta’s response to this comment is provided on page 19 and indicates that the EIR should have stated that there are no proposed improvements to westbound Hwy 111 at Jefferson instead of eastbound Hwy 111.

**Comment 18:** This comment correctly points out an error in the analysis for the Hwy 111/Jefferson Street intersection. The City of La Quinta’s response to this comment is provided on pages 19 and 20 and indicates that the EIR should have identified the proposed improvements to Hwy 111 at Jefferson as a southbound to westbound right-turn overlap and not a westbound to northbound right-turn lane. This change makes sense and its feasibility was discussed extensively with the project applicant’s traffic consultant prior the response to this comment being finalized.

**Comment 19:** This comment addresses the need to fund improvements to Hwy 111. The City of La Quinta’s response to this comment is provided on page 20 and indicates the City of Indio already has $4.7 million in funding to construct Hwy 111 improvements. The City of Indio failed to identify if this funding is insufficient and if so, the amount that the Desert Center project should contribute to this deficiency. There is no indication in any communications provided by the City of Indio that any detailed cost estimate has been prepared for the Hwy 111 improvements so any comments made at the January 3, 2006 City Council meeting may be speculative.

**Comments 20-21:** These comments address the segment impacts on Hwy 111 east of Jefferson from traffic generated by the Desert Center project. The City of La Quinta’s responses to these comments provided on page 21 and indicate that the City of Indio did not take into account the trip reduction factors when calculating the average daily traffic that would use Hwy 111 east of Jefferson Street. The City of La Quinta’s response shows that the capacity of Hwy 111 will not be exceeded. The response to Comment 21 regarding funding of improvements to Hwy 111 was already addressed in Comment 19 and is restated on page 21.

This concludes my summary of the City of La Quinta’s response to late received comment letter for the Komar Desert Center Draft Environmental Impact Report SCH No. 200508106. If you have any questions, please call me at (805) 701-2021.
Mr. Fred Baker, Principal Planner  
Community Development Department  
City of La Quinta  
78-495 Calle Tampico  
La Quinta, CA 92253  

Subject: City of Indio Comments on the Komar Desert Center Draft EIR

Dear Mr. Baker:

The City of Indio appreciates the opportunity to provide comments on the October 25, 2005 Draft Environmental Impact Report (Draft EIR) prepared by HDR for the proposed Komar Desert Center Project on Highway 111 just west of Jefferson Street in the City of La Quinta. We have also reviewed and are providing comments on the October 2005 Transportation Impact Analysis (Traffic Study) prepared by Kittelson & Associates, Appendix J to the Draft EIR.

Inadequate Project Description.

When a project is part of a larger project, the EIR project description and impact analysis must address the larger project. A lead agency may not segment a project into pieces thereby avoiding an analysis that may lead to findings of greater impacts that may occur with the segment of project the lead agency is evaluating (CEQA Guidelines Section 15165).

An EIR must describe and analyze “reasonably foreseeable future phases” of a project if the larger project is inevitable rather than remote or speculative. In this case, the larger project is the whole of the Komar Investments project, not just that portion located within the City of La Quinta. Komar Investments has prepared a site plan for additional property located adjacent to the project site being evaluated in the Draft EIR that is a logical extension of that project. In addition, Komar Investments is actively advertising to lease commercial space in that portion of the project located within the City of Indio. The property is posted with a sign stating such, there is a trailer on-site, and potential leasees have visited the Indio Community Development Department requesting information about the status of the Komar Investments project. For all of the aforementioned reasons, we believe that the project description set forth in the Draft EIR is inadequate because it does not describe the whole of the project which is actually a commercial site of approximately 34 acres in the cities of La Quinta and Indio.
Because the project description does not include the whole of the project that is reasonably foreseeable, the analysis of environmental issues is not adequate. Once the project description has been revised to identify the whole project and all of its phases, an analysis of environmental impacts must be completed and the Draft EIR re-circulated for public review (CEQA Guidelines Section 15088.5).

Once the whole of the project is identified in the Project Description, the City of Indio will determine what entitlements are required for the portion of the project within the City's jurisdiction and provide input to the City of La Quinta and its consultant, on the potential environmental impacts that could occur within the City of Indio. We will also provide a list of recently approved or reasonably foreseeable projects within an established radius from the project site to be used to evaluate cumulative impacts (see below). The City of Indio would then use the EIR prepared for the whole of the project to support its consideration of entitlements for the project within its jurisdiction.

**Inadequate Cumulative Project Analysis**

The Draft EIR includes a short discussion on Cumulative Projects and list a total of four projects that, together with the proposed project, were evaluated for potentially significant cumulative impacts. The list appears to be made up of reasonably foreseeable projects within a one-mile radius of the project site solely within the City of La Quinta. There are no projects within the City of Indio listed in Table 3.5.1, nor presented on Figure 3-4 even though the project site is adjacent to the City of Indio. The City of Indio has a number of proposed or recently approved projects that may be located within the one-mile radius that should be included in the Cumulative Projects list and therefore, the list is incomplete. The project's incremental effects may still be individually limited even when evaluating the whole of the project, but cumulatively considerable when evaluated in conjunction with the revised Cumulative Projects list that includes recently approved or reasonably foreseeable projects within a reasonable radius of the project site in the City of Indio.

In addition, because the major tenant of the project is a Costco, and because such a tenant routinely draws shoppers from the region and not just locally, the radius used to establish the cumulative projects list should be expanded to better represent potential cumulative impacts. The existing Costco store in Palm Desert currently draws shoppers from throughout the Coachella Valley.

Of particular concern to the City of Indio is the potential impact to our roads and existing circulation system. Our review of the Draft EIR and the Traffic Study disclosed the
1) **Traffic Analysis Is Inconsistent with “Phased” Project Description** – Page 2-18 of the Draft EIR states “Development of the Proposed Project is anticipated to occur over approximately two years. Build out is projected for approximately early to mid 2007 and will occur in two distinct phases. Construction of Phase I (the Costco Wholesale parcel)...should be completed by August 2006. Phase II (the Komar parcels)...should be completed by April 2007” . Chapter 4.10 of the Draft EIR, Transportation and Traffic, analyzes “Opening Year” conditions for the entire project in 2006, and adds “...an annual growth rate of two and a half percent...to account for near term regional growth in the area and to develop the 2006 background traffic volumes”.

Existing traffic counts made in 2005 were factored by the assumed annual growth rate out to 2006 but the entire project will not be constructed and occupied until 2007. The Draft EIR and Traffic study incorrectly analyzed both phases of the project as a single phase to be completed in 2006. The traffic analysis in the Traffic Study and the Draft EIR do not reflect the proper baseline traffic volumes at Opening Year for the entire project in 2007.

2) **Opening Year Traffic Volumes Do Not Include All Approved Developments** – Page 4.10-12 of the Draft EIR lists four approved projects in the City of La Quinta that have been approved and are anticipated to be completed and occupied in 2005. Projected traffic volumes from each of these four projects were added to the existing traffic counts made in 2005 that were factored by two and one half percent for regional growth to incorrectly establish “Opening Year” baseline conditions.

According to the Project Description in Chapter 2 of the Draft EIR as pointed out above, the phased project will not be completed until 2007. Factoring the existing traffic volumes by only two and one half percent for only one year does not accurately represent regional growth in traffic volumes over two years out to 2007. No traffic volumes from major development projects approved by the City of La Quinta that will be occupied between 2006 and 2007, or from approved developments in the City of Indio, were considered in the traffic analysis. These omissions and the addition of only one year of regional growth underestimate “Opening Year” baseline conditions in 2007.

3) **Project Trip Reductions Are Not Technically Supported** – Table 4.10-2 on Page 4.10-9 of the Draft EIR forecasts trips during the typical weekday PM peak hour for the proposed project. The table includes a reduction of 64 percent for trips from the Costco portion of the proposed project, with Footnote 1 to this table stating “The percentage of pass by and diverted trips is based upon independent surveys and traffic counts at ten similar size Costco Wholesale stores within the United States”. The Traffic Study fails to include any documentation of this analysis for the other ten Costco Wholesale stores so the reduction for pass by and diverted trips can be reviewed. As a result, the public and decision makers cannot verify if conditions at these other Costco Wholesale stores are similar or applicable in any way to those that will be experienced at the proposed project.
The same significant reduction for pass by and diverted trips was also used in the brief analysis of traffic conditions in the Draft EIR for Saturdays. From personal experience, very few Costco shoppers on weekends appear to be pass by or diverted trips that pick up only a very few items. To the contrary, the vast majority of weekend shoppers at Costco make major purchases of many items on long shopping lists, clearly a planned trip rather than a spur of the moment diversion while passing by to pick up only a few items.

If the project trip reductions for weekdays and/or weekends are too high, then the new project traffic has been significantly underestimated and potentially significant traffic impacts have been omitted from the Draft EIR.

4) **Additional Intersections in Indio Require Evaluation** — Figure 4.10-3 on Page 4.10-10 of the Draft EIR assigns 25 percent of project trips on Highway 111 to and from the City of Indio. In contrast, trip assignments on roadways in the City of La Quinta have been defined down to 5, 10, or 15 percent of the project trips. The analysis of conditions with project traffic at only Highway 111 and Madison Street, with all project trips assigned to Highway 111, does not properly evaluate traffic impacts at this intersection or at any other intersections in the City of Indio.

5) **Intersection Levels of Service Are Incorrect** — Table 4.10-1 on Page 4.10-7 of the Draft EIR summarizes the Level of Service (LOS) in the PM peak hour at each of the study intersections, together with the critical V/C (volume to capacity) ratio. In this table as well as all subsequent tables in the Draft EIR and throughout the Traffic Study, the LOS letter “grade” provided relates to the intersection delay on the calculation sheets included in the Appendix to the Traffic Study, not to the volume to capacity ratio.

Since significant project traffic impacts are determined based upon the change in the volume to capacity ratio as outlined on Page 4.10-8 of the Draft EIR, the LOS letter “grade” values must also be related to the volume to capacity ratio, not to average intersection delay. The Level of Service letter “grades” in the tables throughout the Draft EIR and the Traffic Study must be related to the volume to capacity ratios for the following ranges:

<table>
<thead>
<tr>
<th>Level of Service</th>
<th>Volume to Capacity Ranges</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Less than 0.60</td>
</tr>
<tr>
<td>B</td>
<td>0.61 to 0.70</td>
</tr>
<tr>
<td>C</td>
<td>0.71 to 0.80</td>
</tr>
<tr>
<td>D</td>
<td>0.81 to 0.90</td>
</tr>
<tr>
<td>E</td>
<td>0.91 to 1.00</td>
</tr>
<tr>
<td>F</td>
<td>Greater than 1.00</td>
</tr>
</tbody>
</table>

Incorrectly mixing the two measures has led to the failure of the Draft EIR to disclose significant traffic impacts at many intersections as outlined below.
Incorrectly mixing the two measures has led to the failure of the Draft EIR to disclose significant traffic impacts at many intersections as outlined below.

6) Significant Impacts Have Not Been Properly Identified for Opening Year – By correcting the LOS letter “grades” to those applicable to the volume to capacity ratio and applying the definitions of Thresholds of Significance shown on Page 4.10-8 of the Draft EIR, the following intersections are significantly impacted in Table 4.10-3 on Page 4.10-14 for Opening Year Conditions:

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Corrected LOS Without Project</th>
<th>Corrected LOS With Project</th>
<th>Increment</th>
<th>Significant Impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington/111</td>
<td>E</td>
<td>E</td>
<td>0.056</td>
<td>YES</td>
</tr>
<tr>
<td>111/Adams</td>
<td>E</td>
<td>E</td>
<td>0.049</td>
<td>YES</td>
</tr>
<tr>
<td>111/La Quinta</td>
<td>E</td>
<td>E</td>
<td>0.048</td>
<td>YES</td>
</tr>
<tr>
<td>111/Depot</td>
<td>B</td>
<td>E</td>
<td>B to E</td>
<td>YES</td>
</tr>
</tbody>
</table>

The four intersections identified above, in addition to those already reported in the Draft EIR, are significantly impacted in the Opening Year. Measures must be developed to mitigate project traffic impacts at each of these intersections in the Opening Year. These mitigation measures must be added to the Draft EIR and must be required to be implemented as part of the entitlement process for the Komar Desert Center Project.

7) Significant Saturday Impacts Have Not Been Fully Identified – Page 4.10-17 summarizes a sensitivity analysis for expected traffic conditions on Saturdays for the Opening Year, with capacity calculations included in the Traffic Study Appendix. By correcting the LOS letter “grades” to those applicable to the volume to capacity ratio and applying the definitions of Thresholds of Significance shown on Page 4.10-8 of the Draft EIR, both intersections in the Sensitivity Analysis are significantly impacted on Saturdays for Opening Year conditions as follows:

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Corrected LOS Without Project</th>
<th>Corrected LOS With Project</th>
<th>Increment</th>
<th>Significant Impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington/111</td>
<td>D</td>
<td>E</td>
<td>D to E</td>
<td>YES</td>
</tr>
<tr>
<td>111/Jefferson</td>
<td>C</td>
<td>E</td>
<td>C to E</td>
<td>YES</td>
</tr>
</tbody>
</table>

Only Washington Street at Highway 111 and Jefferson Street at Highway 111 were included in the Sensitivity Analysis for Saturdays. As indicated above, both these intersections are significantly impacted by project traffic on Saturdays. The conclusion on Page 4.10-17 of the Draft EIR “...that traffic impacts in opening year (2006) with project and Highway 111 improvements would be less than significant on Saturdays” cannot be sustained without further evaluation of all other intersections in the vicinity of the project.
8) **Significant Impacts Have Not Been Properly Identified at Build Out (2020)** – By correcting the LOS letter “grades” to those applicable to the volume to capacity ratio and applying the definitions of Thresholds of Significance shown on Page 4.10-8 of the Draft EIR, the following intersections are significantly impacted in Table 4.10-4 on Page 4.10-21 at Build Out (2020):

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Corrected LOS Without Project</th>
<th>Corrected LOS With Project</th>
<th>Increment Increase</th>
<th>Significant Impact?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington/Miles E</td>
<td>E</td>
<td>E</td>
<td>0.028</td>
<td>YES</td>
</tr>
<tr>
<td>111/Simon</td>
<td>D</td>
<td>E</td>
<td>D to E</td>
<td>YES</td>
</tr>
<tr>
<td>111/Adams</td>
<td>D</td>
<td>E</td>
<td>D to E</td>
<td>YES</td>
</tr>
<tr>
<td>111/Depot</td>
<td>B</td>
<td>E</td>
<td>B to E</td>
<td>YES</td>
</tr>
</tbody>
</table>

The four intersections identified above, in addition to those already reported in the Draft EIR, are significantly impacted at Build Out (2020). Measures must be developed to mitigate project traffic impacts at each of these intersections at Build Out (2020). These mitigation measures must be added to the Draft EIR and required to be implemented as part of the entitlement process for the Komar Desert Center Project.

9) **Significant Impacts May Occur at 111/Madison and Jefferson/Avenue 48** – In describing build out conditions, Page 4.10-23 of the Draft EIR states “Even though the Jefferson Street at Avenue 48 and Highway 111 at Madison Street intersections do not meet acceptable LOS thresholds, it is less than significant because the Proposed Project does not cause an increase in 0.02 in v/c ratio.” Table 4.10-4 on Page 4.10-21 of the Draft EIR reports an increase in the volume to capacity ratio of 0.012 at Jefferson Street and Avenue 48 and an increase in the volume to capacity ratio of 0.17 at Highway 111 and Madison Street.

Addressing the prior comments in this report will yield higher baseline traffic volumes and higher project trip generation. Decreasing the assumed reductions for pass by and diverted trips as well as further study of Saturday traffic will likely result in significant project traffic impacts at Jefferson Street and Avenue 48, Highway 111, and Madison Street, and other intersections. The resulting significant project traffic impacts at these and other intersections require implementation of mitigation measures funded by the Komar Desert Center Project.

10) **Inconsistent Mitigation Identified at 111/Jefferson at Opening Year** – Footnote 3 to Table 4.10-3 on Page 4.10-14 of the Draft EIR states “The planned improvements
In describing the City of La Quinta planned roadway improvements for Highway 111 and Jefferson Street, Page 4.10-17 states “Highway 111 will be widened to six through lanes from Jefferson Street to Adams Street...It will also include dual 300 foot left turn lanes on eastbound Highway 111 at Jefferson Street. In addition, the improvements will include separate right turn lanes on Highway 111 at Jefferson Street. No improvements are proposed to eastbound Highway 111 at Jefferson Street.”

Capacity calculations in the Traffic Study Appendix for Opening Year conditions on Highway 111 at Jefferson Street are based upon dual left turn lanes, three through lanes, and a separate right turn lane for northbound, southbound, and eastbound traffic. Westbound traffic lanes at this intersection include a single left turn lane, an exclusive westbound through lane, and a westbound shared through/right turn lane.

The two improvement scenarios for Highway 111 at Jefferson Street described in the Draft EIR are different from each other, and the capacity calculations in the Traffic Study Appendix are based upon a geometric configuration that does not match either of the improvements described in the text. These inconsistencies must be reconciled.

11) Questionable Mitigation Identified at 111/Jefferson at Build Out (2020) — Table 4.10-5 on Page 4.10-28 of the Draft EIR recommends two mitigation measures at Highway 111 and Jefferson Street at build out in 2020 including allowing an eastbound right turn overlap green arrow traffic signal phase and the addition of a separate westbound right turn lane.

Installation of an eastbound right turn overlap green arrow would require the prohibition of northbound to southbound U-turns at this intersection, a measure that could adversely impact the gas station on the southwest corner as well as other future developments on the west side of Jefferson Street just south of Highway 111. The impacts of the necessary U-turn prohibition to accommodate the eastbound right turn green arrow overlap must be considered, and alternate access to replace the U-turn movement must be developed as part of this proposed mitigation.

Review of the capacity calculations in the Traffic Study Appendix indicates the westbound right turn is not a critical movement in the operation of this intersection at build out. As a result, adding a westbound right turn lane which involves the costly widening of the existing bridge, will not improve the operation of the intersection during the PM peak hour. From review of the capacity calculations, it would be beneficial instead to add a second westbound left turn lane as this is a critical movement in the calculations.

As discussed above, the Draft EIR must develop appropriate mitigation measures for Highway 111 at Jefferson Street at build out. Furthermore, the City of La Quinta must require the Komar Desert Center to financially participate in the cost of these and other necessary project mitigation measures in the City of Indio. Only the City of La...
Quinta can require this financial participation as the City of Indio has no jurisdiction or authority to establish such requirements outside its boundaries as was suggested on Page 4.10-28 of the Draft EIR.

12) **Highway 111 East of Jefferson Street Is Significantly Impacted** – While the Draft EIR does not discuss mid-block segment traffic impacts, there is a brief analysis in Appendix I to the Traffic Study. Table I2 indicates the Komar Desert Center Project will add 1,928 daily trips to Highway 111 from Jefferson Street to Madison Street, the difference between 37,296 trips with the project and 35,328 trips without the project. The Footnote to this table states “The scenario with Costco/Komar includes 15,970 additional trips based on Costco/Komar daily trip generation.”

The value shown for daily trips on Highway 111 east of Jefferson Street in Table I2 is erroneous. Figure 4.10-3 on Page 4.10-10 of the Draft EIR assigns 25 percent of the project trips to Highway 111 east of Jefferson Street. With the project forecast to generate 15,970 daily trips, 3,993 daily trips will use Highway 111 east of Jefferson Street. When 3,993 daily trips are added to the 35,328 daily trips in the 2006 baseline daily trips on this segment before the project, a total of 39,321 daily trips results. This corrected total of daily trips exceeds the daily capacity of 38,000 trips for a four lane roadway, indicating a significant traffic impact on the mid-block roadway segment of Highway 111 from Jefferson Street to Madison Street. The Komar Desert Center Project must mitigate this significant traffic impact.

The City of La Quinta must require the Komar Desert Center to financially participate in the cost of widening Highway 111 from four lanes to six lanes and other necessary project mitigation measures in the City of Indio. Only the City of La Quinta can require this financial participation as the City of Indio has no jurisdiction or authority to establish such requirements outside its boundaries as was suggested on Page 4.10-28 of the Draft EIR.

The City of Indio looks forward to working with the City of La Quinta to resolve the various issues raised in this comment letter.

Sincerely,

![Signature]

Steve Copenhaver
Community Development Director

cc: Glenn Southard, City Manager
    Jim Smith, Director of Public Works
    Grant Eklund, City Engineer