

**FINAL
ENVIRONMENTAL IMPACT REPORT**

FOR THE

DESERT HOT SPRINGS RESORT
CORNERSTONE
SPECIFIC PLAN
(SP-1-90)
(SCH: 90020556)

Prepared for

City of Desert Hot Springs
65950 Pierson Boulevard
Desert Hot Springs, CA 92240

Prepared by

Terra Nova Planning & Research, Inc.
275 North El Cielo, D-3
Palm Springs, CA 92262

May 1991

**RESPONSE TO COMMENTS
ON
DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE
DESERT HOT SPRINGS SPECIFIC PLAN (SP-1-90)**

State Clearinghouse Number 90020556

This document has been prepared in accordance with Sections 15088, 15089 and 15132 of the State CEQA Guidelines. Section I contains the letters of comment received during the public review period of the Draft EIR. Following each letter of comment is the response of the lead agency. Section II contains errata sheets which reflect clarifications and minor revisions made to the Draft EIR as a result of comments and recommendations. This document, together with the Draft EIR, constitutes the Final EIR for the project, as required by CEQA.

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I. LETTERS OF COMMENT AND RESPONSES

The Draft EIR was published on February 26, 1991, and was circulated through the State Clearinghouse (SCH:90020556). All governmental agencies and private parties known to have a direct interest in, or approval authority over the project, were mailed copies of the Draft EIR. In addition, the Draft EIR was advertised in local newspapers and copies of the Draft EIR were placed on the front counters at City Hall and the local library. The review period for the Draft EIR began February 26, 1991, and ended April 12, 1991. A public hearing, with both the Planning Commission and City Council present, was conducted in Desert Hot Springs on April 18, 1991. The public hearing conducted to certify the Final EIR was held on May 30, 1991.

Written comments regarding the project and the Draft EIR were received by the Desert Hot Springs City Planning Department during the public review period. These letters are reproduced in this section. Specific comments are numbered in the margins of each letter. On the page immediately after each letter, comments are repeated verbatim, and the Lead Agency response follows. Comments and responses have been numbered consecutively from 1 to 38. It should be noted that the proposed project is often referred to as "CornerStone", after the development company, throughout letters and responses.

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO, CA 95814



Apr 12, 1991

SHANE STUECKLE
CITY OF DESERT HOT SPRINGS
11-711 WEST DRIVE
DESERT HOT SPRINGS, CA 92240

Subject: SPECIFIC PLAN SP 1-90
SCH # 90020556

Dear SHANE STUECKLE:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that:

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation. These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact Russell Colliau at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

A handwritten signature in dark ink, appearing to read 'David C. Nunenkamp'.

David C. Nunenkamp
Deputy Director, Permit Assistance

Enclosures

cc: Resources Agency

Ms. Kimberly Davy
March 12, 1991
Page Two

If you have any questions, please contact Tom Meyers at (714) 383-6908 or FAX (714) 383-4936.

Very truly yours,

/s/HARVEY J. SAWYER

HARVEY J. SAWYER
Chief, Transportation Planning
Branch B

MA:jll

DEPARTMENT OF TRANSPORTATION

DISTRICT 8, P.O. BOX 231
SAN BERNARDINO, CALIFORNIA 92402
TDD (714) 383-4609



March 12, 1991

08-Riv-10-36.1
SCH #90020556

Ms. Kimberly Davy
Terra Nova
275 North El Cilo, Suite D3
Palm Springs, CA 92262

Dear Ms. Davy:

Draft Environmental Impact Report (DEIR)
for the Desert Hot Springs Resort
Cornerstone Specific Plan #1-90

We have reviewed the above-referenced document and request consideration of the following comments:

- o The DEIR indicates the need for improving the I-10/Palm Drive Interchange to mitigate the deficiency in the level of service (LOS) created by this development, and that the developer will contribute a fair-share to the funds needed to construct the improvements. Since the development will cause the LOS at I-10/Palm Drive to drop to less than the acceptable level of "D", the city should condition the project phasing to the construction of the needed improvements to maintain a LOS of "D" or better. 1
- o Palm Springs raceway developers will also be expected to contribute their fair-share to the improvements of Palm Drive/I-10 Interchange. We suggest that the City of Desert Hot Springs coordinate with the City of Palm Springs and Riverside County on the funding and timing of the needed improvements. 2

When available, we would like to receive the Notice of Determination, Final Environmental Impact Report, Conditions of Approval and the date of any public hearing on this project. Please send this information to:

Tom Meyers
California Department of Transportation
Transportation Planning, Branch B
P.O. Box 231
San Bernardino, CA 92402

Ms. Kimberly Davy
March 12, 1991
Page Two

If you have any questions, please contact Tom Meyers at (714) 383-6908 or FAX (714) 383-4936.

Very truly yours,

A handwritten signature in cursive script, reading "Harvey J. Sawyer". The signature is written in dark ink and is positioned above the typed name and title.

HARVEY J. SAWYER
Chief, Transportation Planning
Branch B

California Department of Transportation

1. **Comment:** Since the development will cause the LOS at I-10/Palm Drive to drop to less than the acceptable level of "D", the City should condition the project phasing to the construction of the needed improvements to maintain a LOS of "D" or better.

Response: Comment noted. Conditions of approval will include the provision that phasing of the project and/or the payment of fair-share roadway funds will be on a schedule which allows the necessary improvements for the I-10/Palm Drive interchange to be constructed before LOS falls below "D".

2. **Comment:** We suggest that the City of Desert Hot Springs coordinate with the City of Palm Springs and Riverside County on the funding and timing of the needed improvements.

Response: The Palm Springs International Raceway Draft EIR (SCH: 88062710) was released during the comment period of the CornerStone Draft EIR. The City of Desert Hot Springs has reviewed that Draft EIR and sent a letter of comment to the City of Palm Springs, for inclusion in their Final EIR. The measures specified in the Raceway EIR to mitigate impacts to I-10/Palm Drive, [referred to as I-10/Gene Autry Trail in that document], are as follows:

- Reconstruct the I-10/Gene Autry Trail eastbound off-ramp to provide three lanes, two of which are dedicated right-turn lanes;
- At Gene Autry Trail/I-10 westbound on-ramp, provide a signal and three northbound lanes;
- Install traffic meters at the I-10 westbound on-ramps at Indian and Gene Autry Trail.

The measures specified in the Palm Springs International Raceway DEIR are more extensive than those specified in the CornerStone DEIR, due to the magnitude of the Raceway project. In the event that both projects are approved, the City of Desert Hot Springs will work closely with the City of Palm Spring, Riverside County and the California Department of Transportation to determine the funding and timing of the needed improvements.

Memorandum

To : Douglas P. Wheeler
Secretary for Resources

Date : April 1, 1991

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

Subject: Draft Environmental
Impact Report for the
Cornerstone Specific
Plan (SP-1-90),
SCH# 90020556

From : Department of Conservation—Office of the Director

The Department of Conservation's Division of Mines and Geology (DMG) has reviewed the Draft Environmental Impact Report (DEIR) for the Cornerstone Specific Plan. Based on our review of the DEIR, we offer the following comments.

The DEIR states on page III-44, that the peak ground acceleration for the 1/100 annual level (0.052) may be considered for design of residential and light commercial structures. However, the peak acceleration for the 1/100 annual risk level is stated as 0.52 g in Table III-2, page III-42 of the DEIR, and Table I, page 14 of the Geotechnical Study by Leighton and Associates, Inc. DMG recommends that this apparent typographical error be corrected in the Final EIR.

3

If you have any questions regarding these comments, please contact Roger Martin, Division of Mines and Geology Environmental Review Project Manager, at (916) 322-2562.

Dennis J. O'Bryant
Dennis J. O'Bryant
Environmental Program Coordinator

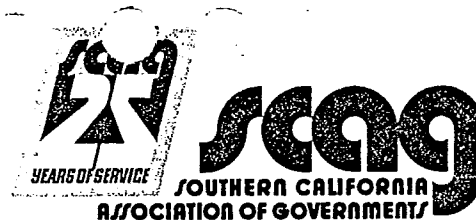
cc: Roger Martin, Division of Mines and Geology
Catherine Gaggini, Division of Mines and Geology

California Department of Conservation

3. **Comment:** The DEIR states on page II-44, that the peak ground acceleration for the 1/100 annual level (0.052) may be considered for design of residential and light commercial structures. However, the peak acceleration for the 1/100 annual risk level is stated as **0.52 g** in Table III-2, page III-42 of the DEIR, and Table I, page 14 of the Geotechnical Study by Leighton and Associates, Inc. DMG recommends that this apparent typographical error be corrected in the Final EIR.

Response: Correction noted. Page III-44, second mitigation measure, last sentence should be changed to:

"The peak acceleration for the 1/100 annual level (0.52 g) may be considered for design of residential and light commercial structures."



818 West Seventh Street, 12th Floor • Los Angeles, California 90017-3435 ☐ (213) 236-1800 • FAX (213) 236-1825

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April 2, 1991

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

RE: Draft EIR, Cornerstone Specific Plan (SP1-90)
SCAG Clearinghouse Number RI-54714-EDR

Dear Ms. Davy:

Thank you for submitting the Draft EIR for the Cornerstone Specific Plan to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG assists cities, counties and other agencies to review projects and plans for consistency with the Regional Housing Needs Assessment (RHNA), the Regional Mobility (RMP), Growth Management (GMP), and Air Quality Management (AQMP) Plans, all of which are included in the State Implementation Plan (SIP).

The attached comments are meant to provide guidance for completing the proposed project within the context of our regional goals and plans, which are based in part upon state and federal mandates. While neither the project sponsor nor the lead agency is required to undertake the specific actions recommended by SCAG or other agencies through the Inter-Governmental Review Process, there are requirements in state and federal laws for consistency with regional goals and plans.

If you have any questions about the attached comments, please contact Jim Birckhead, (213) 236-1915, or Paul Hatanaka, (213) 236-1809. They will be happy to work with you to address the comments presented herein and, if necessary, develop a mitigation plan which meets regional, state and federal requirements.

Sincerely,

Anne Baker

ANNE BAKER
Director of Environmental Planning

Ms. Kimberly Davy
April 2, 1991
Page 2

SCAG Comments on the Draft EIR, Cornerstone Specific Plan

GROWTH MANAGEMENT

The project consists of a mixed use residential resort community generating new employment and housing opportunities which are consistent with the Regional Growth Management Plan/State Implementation Plan (GMP/SIP). A total of 2, 212 new housing units are proposed, including 420 dwelling units for senior housing. In addition, 878 new jobs will be created as a result of the project. Applying the jobs/housing (J/H) balance policy of the regional GMP, no additional jobs need be associated with these housing units to achieve J/H balance. The project will include sufficient employment opportunities to match the housing.

TECHNICAL NOTES

The GMP's trend projections for the Riverside Desert Subregion indicate an increase of 88,900 jobs and 142,400 dwelling units (DU) from 1984 to 2010. This is a ratio of 0.62 jobs per housing unit. The policy forecasts for the subregion, which include the J/H balance policy, increase the proportion of jobs to housing, resulting in a ratio of 0.77 jobs per housing unit. This is considered the J/H balance performance goal ratio for this subregion.

SIP CONFORMITY

A project is found to be in conformance with the State Implementation Plan (SIP) when it has satisfied the following three criteria:

1. It improves the subregion's jobs/housing balance performance ratio.
2. It reduces vehicle trips and vehicle miles traveled to the maximum extent feasible by implementing transportation demand management strategies.
3. Its environmental document includes an air quality analysis which demonstrates that the project will not have a significant negative impact on air quality in the long term.

Ms. Kimberly Davy
April 2, 1991
Page 3

Findings:

As described in the draft EIR, the Cornerstone Specific Plan does conform to the SIP at this time.

4
(Con't)

Recommendations:

An analysis should be conducted to determine that implementation of the project will not have a significant negative impact on air quality in the long term.

5

All mitigation measures associated with the project should be monitored in accordance with AB 3180 requirements and reported to SCAG through the Annual Reasonable Further Progress Report.

6

Southern California Association of Governments

4. Comment: As described in the draft EIR, the CornerStone Specific Plan does conform to the SIP at this time.

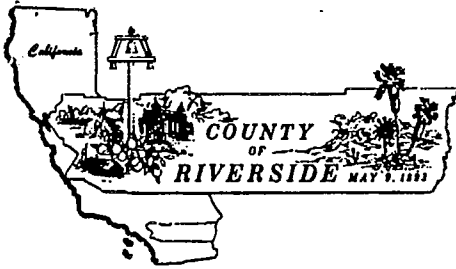
Response: Comments noted. Thank you for notifying us of the CornerStone project's compliance with the Regional Growth Management and State Implementation Plan.

5. Comment: An analysis should be conducted to determine that implementation of the project will not have a significant negative impact on air quality in the long term.

Response: Comment noted. Revisions and additions to the air quality analysis, as requested by the South Coast Air Quality Management District, are provided in Responses 23 through 28.

6. Comment: All mitigation measures associated with the project should be monitored in accordance with AB 3180 requirements and reported to SCAG through the Annual Reasonable Further Progress Report.

Response: The City of Desert Hot Springs will prepare a mitigation monitoring program for the CornerStone project. This program will refine the "mitigation monitoring" paragraphs, included within the Draft EIR, and develop a comprehensive program in compliance with Assembly Bill 3180. SCAG will be reported to through the Annual Reasonable Further Progress Report.



RIVERSIDE COUNTY FIRE DEPARTMENT

210 WEST SAN JACINTO AVENUE • PERRIS, CALIFORNIA 92370
(714) 657-3183

GLEN J. NEWMAN
FIRE CHIEF

April 2, 1991

TO: City of Desert Hot Springs

RE: Desert Hot Springs Resort - Draft EIR
Cornerstone Specific Plan #1-90

Fire Department personnel have completed a review of the above document and have the following comments:

The proposed project will have a cumulative adverse impact on the Department's ability to provide an acceptable level of service. These impacts are due to the increased number of emergency or public service calls generated by additional buildings and human population. 7

Annual costs for ongoing operations and maintenance of fire protection services equate to \$0.16 per square foot for retail/commercial and \$100 per residential dwelling unit. The annual costs necessary for the increased level of service required for this project may be partially off-set by the additional County Structure tax. An increase in the Fire Department's annual operating budget or other source of funding might be required.

Due to the number of dwelling units, a minimum of three access points should be provided. Entrance ways shown are conceptual. Final design must be approved by the Fire Department. 8

Water distribution facilities should be constructed in accordance with Mission Springs Water District and Riverside County Fire Department Standards. Phasing of the water plan must provide sufficient water storage to protect structures in all phases of the project. 9

All buildings shall be equipped with automatic fire sprinklers as required by Desert Hot Springs ordinance.

All buildings greater than two stories in height or having floors used for human occupancy located more than 30 feet above the lowest level of fire department vehicle access shall be equipped with a "Life Safety Support System" as required in Riverside County Fire Protection Ordinance 546. 10

PLANNING DIVISION

☒ INDIO OFFICE

79-733 Country Club Drive, Suite F, Indio, CA 92201
(619) 342-8886 • FAX (619) 775-2072

☐ RIVERSIDE OFFICE

3760 12th Street, Riverside, CA 92501
(714) 275-4777 • FAX (714) 369-7451

☐ TEMECULA OFFICE

41002 County Center Drive, Suite 225, Temecula, CA 92390
(714) 694-5070 • FAX (714) 694-5076

printed on recycled paper

To: City of Desert Hot Springs
Re: Desert Hot Springs Resort-Draft EIR
Cornerstone Specific Plan #1-90

4/2/91
Page 2.

All questions regarding the meaning of these comments should be referred to the Fire Department Planning & Engineering staff.

Sincerely,

RAY REGIS
Chief Fire Department Planner

By *Tom Hutchison*
Tom Hutchison
Fire Safety Specialist

te

cc: B-10

Riverside County Fire Department

7. **Comment:** Annual costs for ongoing operations and maintenance of fire protection services equate to \$0.16 per square foot for retail/commercial and \$100 per residential dwelling unit. The annual costs necessary for the increased level of service required for this project may be partially off-set by the additional County Structure tax. An increase in the Fire Department's annual operating budget or other source of funding might be required.

Response: Comments noted. Developer fees charged by the City of Desert of Hot Springs will be required, this will help off-set the costs of the development. Present building fees charged by the City for fire department impacts are \$.05 per square foot (under roof). The EIR can not address compensation for the fire department beyond the standard fire protection charges because, as stated on page III-112 of the Draft EIR, allocation of the budget of the City of Desert Hot Springs is beyond the scope of the EIR. However, it is highly recommended that project-related impacts to the fire department be incorporated into budget decisions.

8. **Comment:** Due to the number of dwelling units, a minimum of three access points should be provided. Entrance ways shown are conceptual. Final design must be approved by the Fire Department .

Response: Comment noted. Final design of access points will be sent to Riverside County Fire Department and/or Fire Marshall for approval, as appropriate.

9. **Comment:** Water distribution facilities should be constructed in accordance with Mission Springs Water District and Riverside County Fire Department Standards. Phasing of the water plan must provide sufficient water storage to protect structures in all phases of the project.

Response: Comment noted. Applicant engineers have conferred with Mission Springs Water District regarding the design of water distribution and storage facilities. Water distribution and storage engineering plans will be sent to the Fire Marshall for review and approval.

- 10 **Comment:** All buildings greater than two stories in height or having floors used for human occupancy located more that 30 feet above the lowest level of fire department vehicle access shall be equipped with a "Life Safety Support System" as required in Riverside County Fire Protection Ordinance 546.

Response:..Adherence to City of Desert Hot Springs Ordinances, (including the provision of automatic fire sprinklers in Ordinance #87-15), and all applicable Riverside County Fire Protection Ordinances (as appropriate) will be a condition of approval for the CornerStone project.



PALM SPRINGS UNIFIED SCHOOL DISTRICT

333 SOUTH FARRELL DRIVE
PALM SPRINGS, CALIFORNIA 92262 - 7994
(619) 327-1581

BOARD OF EDUCATION: MEREDY SHOENBERGER, *President* — LESLIE DeMERSSEMAN, *Clerk*
RICHARD CROMWELL III, *Member* — MICHAEL McCABE, *Member* — MINNA MARYANOV, *Member*

April 5, 1991

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

Attn: Kimberly Davy

Re: Draft EIR - Cornerstone Specific Plan (SP1-90)

Dear Ms. Davy:

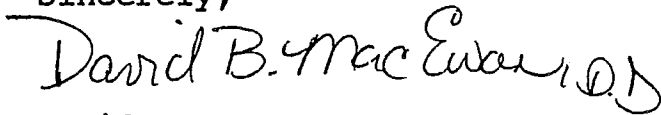
Palm Springs Unified School District has completed a review of the reference draft EIR and offers the following comments:

- Pg. III-112. Column 2 should be changed to read "Actual Fall 1990 Enrollment." Under this column, enrollment at Corsini should be changed from 797 to 769 and from 897 to 883 for Desert Springs. Column 3 should read "Projected Fall 1991 Enrollment." 11
- Pg. III-113. Para 2. last sentence. The District's long-range plan includes a high school as well as a second middle and three elementary schools in the Desert Hot Springs vicinity... 12
- Pg. III-113. Leroy F. Greene... Section. After "The State is currently unable to fund many of the requests throughout California" insert a new sentence to read "There is a backlog of \$5 billion in unfunded applications for State school construction funding." 13
- Pg. III-114. Lease-Purchase Arrangements. At the end of this paragraph, add the following sentences: "Lease-Purchase arrangements require a source of revenue to make lease payments. The District does not have a secure revenue source for entering into further lease-purchase arrangements." 14
- Pg. III-114. Mello-Roos Community Facilities Act. Delete last sentence or modify to reflect that fees may be paid up front or amortized over a longer period of time. 15
- Pg. III-114. Mitigation Monitoring and Reporting. Add sentence to reflect that mitigation of school facility impacts should be required as a condition of approval for the specific plan. 15

Letter to Kimberly Davy
Page 2
April 5, 1991

Thank you for the opportunity to respond to the draft EIR. I look forward to working with the City on the school facilities aspect of this project.

Sincerely,

A handwritten signature in cursive script that reads "David B. MacEwan". The signature is written in dark ink and includes a stylized flourish at the end.

David B. MacEwan
Director
Facilities Planning & Development

DBM:im

CC: Terra Nova

Palm Springs Unified School District

11. Comment: Page III-112. Column 2 should be changed to read "Actual Fall 1990 Enrollment". Under this column, enrollment at Corsini should be changed from 797 to 769 and from 897 to 883 for Desert Springs. Column 3 should read "Projected Fall 1991 Enrollment".

Response: Corrections noted and hereby incorporated into the Final EIR.

12. Comment: Page III-113. Paragraph 2, last sentence. The District's long-range plan includes a high school as well as a second middle and three elementary schools in the Desert Hot Springs vicinity...

Response: Additions noted and hereby incorporated into the Final EIR.

13. Comment: Page III-113. Leroy F. Greene...Section. After "The State is currently unable to fund many of the requests throughout California" insert a new sentence to read "There is a backlog of \$5 billion in unfunded applications for State school construction funding." Page III-114. Lease Purchase Arrangements. At the end of this paragraph, add the following sentences: "lease-Purchase arrangements require a source of revenue to make lease payments. The District does not have a secure revenue source for entering into further lease-purchase arrangements."

Response: Additional text noted and hereby incorporated into the Final EIR.

14. Comment: Mello-Roos Community Facilities Act. Delete last sentence or modify to reflect that fees may be paid up front or amortized over a longer period of time.

Response: Page III-114, the last sentence of the third paragraph shall hereby be changed to read: "A major benefit of Mello-Roos is that fees may be paid up front or amortized over a longer period of time."

15. Comment: Mitigation Monitoring and Reporting. Add sentence to reflect that mitigation of school facility impacts should be required as a condition of approval for the specific plan.

Response: The following condition of approval was developed to address project mitigation of school impacts.

The developer shall mitigate project-impacts to schools. The developer shall pay developer fees to off-set impacts to schools. In addition, the developer, if requested, should enter into discussions regarding a possible Mello Roos District on the project site which includes contributions to the Palm Springs School District. Palm Springs Unified School District shall be represented at development agreement meetings to ensure that they have input on mitigating project impacts to schools.

SunLine Transit

MEMBER AGENCIES

Cathedral City
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Desert Hot Springs
Indian Wells
Indio
La Quinta
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Palm Springs
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Riverside County

March 11, 1991

Mr. John Criste
Planning Consultant
City of Desert Hot Springs
65-950 Pierson Blvd
Desert Hot Springs, CA 92240

RE: Draft Environmental Impact Report for Desert Hot Springs
Resort SP 1-90

Dear Mr. Criste:

Thank you for allowing SunLine Transit Agency to review the Draft Environmental Impact Report for the Desert Hot Springs Resort. At the current time, SunLine Transit Agency operates a general public demand response system within the city limits of Desert Hot Springs. This service utilizes one eight passenger van which serves people primarily by appointment. Demand has almost reached capacity for this system and SunLine Transit Agency is considering the option of going to a fixed route system within Desert Hot Springs.

Projects such as the Desert Hot Springs Resort increase the pressure for additional transit services. Therefore, we ask your assistance in ensuring that transit amenities are included in the plans for the Resort. These amenities should include bus turnouts and passenger waiting shelters. Two sets are needed. A bus turnout and passenger waiting shelter is needed on the north side of Pierson to the west of the main entrance drive into the project. The other location for a bus stop, bus turnout and passenger waiting shelter, is on the south side of Pierson to the east of Miracle Hill. Both of these stops are necessary in order to adequately serve the demand that will be generated by this project.

16

SunLine Transit Agency has suggested standard for passenger waiting shelters and bus turnouts. If we can be of any assistance in planning these amenities, please feel free to give me a call at 343-3456.

16
(Con't)

Yours Very Truly,
SUNLINE TRANSIT AGENCY

A handwritten signature in dark ink, appearing to read "Debra Astin", followed by a horizontal line.

Debra Astin,
Director of Planning

DA/dc

SunLine Transit

16. Comment: Therefore, we ask your assistance in ensuring that transit amenities are included in the plans for the Resort. These amenities should include bus turnouts and passenger waiting shelters. Two sets are needed. A bus turnout and passenger waiting shelter is needed on the north side of Pierson to the west of the main entrance drive into the project. The other location for a bus stop, bus turnout and passenger waiting shelter, is on the south side of Pierson to the east of Miracle Hill. Both of these stops are necessary in order to adequately serve the demand that will be generated by this project.

Response: Comment noted. The provision of two sets of bus turnouts and passenger waiting shelters will be added as a condition of approval to the project. The project developer may wish to contact you regarding exact design and placement of these shelters.

S69-006.000

164 Hospitality Lane, #1 P.O. Box 8124
San Bernardino, California San Bernardino, California
92408-3328 92412-8124
Tel 714 888-1401 Fax 714 885-4638

April 3, 1991

CITY OF DESERT HOT SPRINGS
65950 Pierson Blvd.
Desert Hot Springs, CA 92240

Attention: John D. Criste

DRAFT ENVIRONMENTAL IMPACT REPORT FOR
DESERT HOT SPRINGS RESORT
CORNERSTONE SPECIFIC PLAN #1-90
(SCH: 90020556)

On behalf of the Mission Springs Water District, we would like to make the following comments on water and wastewater.

p. III-99 - Table III-20

Please modify:

- Residential Day Demand =
360 gallons per day per
dwelling unit to 500 gpd/DU
- Peak Factor = 1.3 to 1.5

p. III-100

- 4th paragraph, second sentence

Change 25 psi reservoir pressure to 20 psi residual pressure.

17

18

- 5th paragraph

Change all flows to million gallons per day (MGD)

18
(Con't)

p. III-101

- 2nd paragraph

Change 1250 pressure zone to 1240 pressure zone

The District also requires a site for a 1.0 MG reservoir to supply the 1400 pressure zone in the southeast corner of the project site (1.0 MG tank - 24 feet high with an 86 foot diameter)

19

p. III-102

- Water Distribution Facilities and Mitigation Monitoring/Reporting Program.

All work involving water facilities shall be reviewed by the MSWD District Engineer and staff to assure that it meets the District's standards.

20

p. III-104

- 3rd paragraph

"The implementation of a wastewater reclamation program by the District would also help to reduce the amount of water treated at the Horton Treatment Plant."

21

This sentence is incorrect.

S69-006.000
CITY OF DESERT HOT SPRINGS
April 3, 1991
Page 3

- Mitigation Measures and Mitigation Monitoring and Reporting

All work involving sewage collection facilities shall be reviewed by the MSWD District and staff to assure that it meets the District's standards.

22

If you have any questions or comments, please contact me.


RONALD WORTHINGTON
District Engineer

cc: Dick Dippner, MSWD
Jim Coates, MSWD

NBS Lowry for Mission Springs Water District

17. Comment: (Page) III-99, Table III-20. Please modify: • Residential Day Demand = 360 gallons per day per dwelling unit to 500 gpd/DU. • Peak Factor = 1.3 to 1.5.

Response: Comment noted. Based on additional conversations with Mission Springs Water District, Table III-20 has been modified by PACE, the project engineers. The modified table presented below is hereby incorporated into the Final EIR.

**Table III-20
Residential and Commercial
Water Demand Summary**

<u>Land Use</u>	<u>Acres</u>	<u>Dwelling Units</u>	<u>Average Day Demand (gal.)</u>	<u>Peak Day Demand (gal.)</u>
Residential				
SFA	76.5	687	343,500	515,250
Villa	58.5	875	437,500	656,250
Senior	21.0	420	210,000	315,000
Resort Village	11.5	230	115,000	172,500
Commercial				
Resort Village	10.0	--	36,000	54,000
Hotels/Spa	34.0	--	122,400	183,600
Clubhouse	4.0	--	14,400	21,600
Project Total	215.5	2,212	1,278,800	1,918,200

Notes: Residential Average Day Demand = 500 gallons per day per dwelling unit

Non-Residential Average Day Demand

• Commercial = 3,600 gallons per day per acre

• Hotels/Spa/Clubhouse = 3600 gallons per day per acre

Peak Factor = 1.5 (Residential and Non-Residential)

Source: Residential and Commercial demands and peak factors established by Mission Springs Water District.

18. Comment: Regarding p. III-100, 4th paragraph, second sentence: Change 25 psi reservoir pressure to 20 psi residual pressure. And in paragraph 5, change all flows to million gallons per day (MGD).

Response: Corrections noted and hereby incorporated into Final EIR. Page III-100, forth paragraph, second sentence, is changed to: "Adequate fire flows should provide 5,000 gallons per minute for 4 hours, with 20 psi residual pressure."

NBS Lowry for Mission Springs Water District (continued)

The fifth paragraph on page III-100 is changed to:

"Secondly, the phasing of the water plan may not provide sufficient water storage to protect structures constructed in Phases 1 and 2 of the project. Residential and commercial components of Phase 1 and 2 will generate a peak day demand of .94 million gallons per day (MGD). Fire flow demand, as stated in the Specific Plan, will be 1.2 MGD. This results in a need for storage of 2.14 MGD. As stated in the Specific Plan, water storage capacity in Phases 1 and 2 will be 1.42 MGD; clearly this is not sufficient and therefore is a potential impact."

19. Comment: Page III-101, 2nd paragraph: Change 1250 pressure zone to 1240 pressure zone. The District also requires a site for a 1.0 MG reservoir to supply the 1400 pressure zone in the southeast corner of the project site (1.0 MG tank - 24 feet high with an 86 foot diameter).

Response: Corrections noted and hereby incorporated into Final EIR. Future domestic water facilities of the project will be sent to Mission Springs Water District for approval to ensure that all necessary facilities and reservoirs are provided and sited appropriately. Page III-101, second paragraph, is changed to:

"The District has requested a site near the southwest corner of the project to construct a 1.0 million gallon storage tank to supply the 1240 pressure zone which serves an area outside of this project. The preliminary tank site has been located near hole number 15 of the golf course. The District also requires a site for a 1.0 MG reservoir to supply the 1400 pressure zone, in the southeast corner of the project site (1.0 MG tank is 24 feet high with an 86 foot diameter)."

20. Comment: Page III-102. Water Distribution Facilities and Mitigation Monitoring/Reporting Program/ All work involving water facilities shall be reviewed by the MSWD District Engineer and staff to assure that it meets the District's standards.

Response: Comments noted. The provision of MSWD review of domestic and irrigation water facility plans will be both a condition of approval and a mitigation monitoring measure.

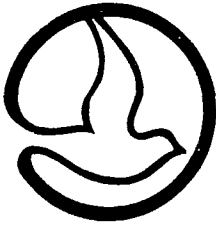
21. Comment: Page III-104, 3rd Paragraph. "The implementation of a wastewater reclamation program by the District would also help to reduce the amount of water treated at the Horton Treatment Plant." This sentence is incorrect.

Response: Correction noted and the statement is hereby deleted from the EIR.

NBS Lowry for Mission Springs Water District (continued)

22. Comment: Page III-104, 3rd paragraph. Mitigation Measures and Mitigation Monitoring and Reporting: All work involving sewage collection facilities shall be reviewed by the MSWD District and staff to assure that it meets the District's standards.

Response: Comments noted. The provision of MSWD review of sewage collection facility plans will be both a condition of approval and a mitigation monitoring measure.



**South Coast
AIR QUALITY MANAGEMENT DISTRICT**
9150 FLAIR DRIVE, EL MONTE, CA 91731 (818) 572-6200

April 19, 1991

City of Desert Hot Springs
C/O John Criste
Terra Nova Planning
275 N. El Cielo, Suite D-3
Palm Springs, CA 92262

Dear Mr. Criste:

**Re: Comments on the Draft Environmental Impact Report For The Desert Hot
Springs Resort/Cornerstone Specific Plan #1-90**

SCH #90020556

SCAQMD #RVC910228

The South Coast Air Quality Management District (SCAQMD) provides the following comments relative to the Draft Environmental Impact Report (EIR) for the Desert Hot Springs Resort/Cornerstone Specific Plan (DHSR/CSP) project. SCAQMD staff has reviewed the Draft EIR and concludes that the proposed project will result in significant adverse air quality impacts in the Coachella Valley area.

The SCAQMD is responsible for adopting, implementing, and enforcing air quality regulations for areas within its jurisdiction, which includes Riverside County. In addition, as a Responsible Agency, the SCAQMD reviews and analyzes environmental documents for projects within its jurisdiction that may generate significant adverse air quality impacts. In this capacity, SCAQMD advises the lead agency on air quality issues.

A detailed assessment of the air quality impacts of the DHSR/CSP is presented in Attachment 1 of this letter. SCAQMD staff recommends that the DHSR/CSP development plan include a plan to implement the mitigation measures outlined in the Draft EIR along with those listed in Table 1 of the Attachment.

SCAQMD appreciates the opportunity to comment on the Draft Environmental Impact Report for the Desert Hot Springs Resort/Cornerstone Specific Plan #1-90. If you have any questions regarding these comments, please contact Connie Day, Program Supervisor, at (818) 307-4507.

Sincerely,

Mike A. Nazemi
Planning Manager

MAN:CD:CNI
Attachment
(cni/cnerston/41991)

ATTACHMENT 1

SCAQMD STAFF ASSESSMENT OF THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE DESERT HOT SPRINGS RESORT/CORNERSTONE SPECIFIC PLAN DESERT HOT SPRINGS, CA

April 19, 1991

INTRODUCTION

The Conerstone Development Company of Tustin is proposing to develop and operate the Desert Hot Springs Resort (DHSR), which would be located in the northeastern portion of the City, in the foothills of the Little San Bernardino Mountains. The proposed project site covers approximately 515 acres. The main components of the project include a mixed-use residential community, hotels, a health and fitness spa, a championship golf course, a commercial resort-related village, and open space. According to the Draft Environmental Impact Report (EIR), the development of the DHSR will occur in three phases, and over a period of ten years.

PROJECT DESCRIPTION

According to the Draft EIR, the 515-acre proposed DHSR comprises six-development components which are as follows: 1,982-single family attached dwelling units, villas and senior residences on 156 acres; two hotels with a total of 610 rooms on 24.5 acres, with an additional 100 rooms in the spa; a health and fitness spa on 9.5 acres; an 18-hole golf course and a club house on 164.5 acres; a commercial village consisting of 230 multi-family dwelling units integrated with commercial businesses on 21.5 acres; and 86.5 acres of open space and natural desert area. Circulation demand within the project area will occupy 52.5 acres. The development of the proposed project will occur in three phases. The golf course and the clubhouse including 809 dwelling units will be built in the first phase, as well as all major flood control facilities. Phase two comprises 108-single family attached dwelling units, 665 villas, and 18 acres of circulation improvements. Phase three includes the remainder of the project which comprise 210 villas, 420 senior residences, 24.5 acres of hotel areas, and 3.9 acres of circulation. The proposed project would amount to 2,212 dwelling units on 515 acres.

AIR QUALITY SETTING

Air quality data for PM10 and ozone concentrations exceeded both state and federal standards as monitored by the Palm Springs and Indio Air Quality Monitoring stations. Data from these stations were used to assess current ambient air quality conditions in the proposed project area. Consequently, the Draft EIR accurately reflects the most recent available air quality data for the project area which was compiled using the *SCAQMD 1989 Air Quality Data*.

AIR QUALITY IMPACTS

Construction (Short-Term) Impacts

Natural soil conditions and prevailing wind conditions in the project area results in very high PM10 emissions. The development of this project will further compound the problems associated with PM10 emissions. The construction-related activities, such as grading, cuts and fills, hauling and mobile equipment operations at the construction site would result in the generation of fugitive dust emissions and other construction-related air pollutants. Table III-14 of the Draft EIR illustrates the calculation of fugitive dust potential for the proposed project, which indicates that 47,850 pounds per day of fugitive dust will result from earth disturbance, grading, and development of the 515-acre site. The level of emissions projected in Table III-14 reflects fugitive dust emissions that will be generated by construction activities over the project's buildout.

Since the project will be developed in three phases, the emissions estimates for the proposed project should correspond with the phasing plan. Such presentation will be more reflective of project-related construction emission impacts. Also, while the Draft EIR states "Fugitive dust generation is expected to occur on a short-term, construction basis, and will be spread over the anticipated three phases of the project's development," the SCAQMD staff does not consider such a length of activity to be short-term. The intensity of construction-related activities may be reduced periodically, but air quality impacts upon the locality would persist due to exposed and untreated surfaces, and traffic congestions on local streets within proximity to the construction site.

23

Other than fugitive dust emissions, the Draft EIR should consider other construction-related emissions, such as emissions from truck hauling, heavy- to light-duty construction equipment, and personnel trips. To account for emissions from these sources, the total overall area to be graded and the amount of dirt to be moved should be estimated. This is essential in determining the types and the number of pieces of equipment that would be required, the amount of dirt to be moved to other on- or off-site locations, the number of personnel required, and the duration of these activities. Once these factors are determined, emissions from the various sources can then be estimated based on the average vehicle miles traveled (VMT) per day for light- to heavy-duty trucks and personnel associated with construction activities, and the number of hours of operation of each piece of construction equipment. The resultant emissions from these sources should be tabulated accordingly. Therefore, the Final EIR should include emissions calculations for mobile, stationary and fugitive dust emissions associated with the construction segment of the project.

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Project Operation (Long-Term) Impacts

Air quality impacts would result from the daily operations of the Resort, beginning with phase one completion through the buildout phase.

Stationary Source Emissions

The onsite facilities (residences, villas, hotels, restaurant, etc.) would operate on a daily basis, and the activities associated with these facilities would result in the generation of stationary source emissions, resulting from electricity and natural gas consumed by the facilities. Tables III-15 and III-16 illustrate stationary source emissions for the proposed project. The Draft EIR adequately assessed potential stationary source air

25

quality impacts. All stationary source emissions are below the SCAQMD California Environmental Quality Act (CEQA) threshold for project significance.

25
(Con't)

Mobile Source Emissions

Mobile source emissions will result primarily from the various activities that are proposed at the resort site in addition to the emissions resulting from spectators driving to the resort. The proposed project's related mobile emissions represent a significant addition of air pollutants into project area. Table III-17 illustrates "Moving Exhaust Emissions Rates (for Calendar year 2002)." Calendar years corresponding to each project phase should be used to accurately reflect project-related air quality impacts. Furthermore, according to Table III-17, the emissions estimate was based on a total average miles travelled of 82,092 per day. It was further assumed that the average trip-length is 3 miles. SCAQMD staff does not concur with this, because the average trip-length for this type of land use would be much greater. SCAQMD suggests the use of 10.7 miles, which is based on the average trip-length for home-to-work trips in the South Coast Air Basin (SCAG's Regional Mobility Plan, Technical Appendix, 1989).

26

To reflect more accurately mobile source emissions, the emissions levels illustrated in Table III-17 should be revised using the 10.7-mile average trip length, or using the appropriate average trip-length for the various proposed land uses. With such revision, relative project-related mobile source emissions will be significantly higher than the levels illustrated in Table III-17. In addition, EMFAC7E model should be used to estimate mobile emissions, if possible. However, owing to the problems associated with the non-main-frame use of this model, the EMFAC7D model is acceptable.

27

PROJECT SIGNIFICANCE

The combined stationary and mobile sources emissions would exceed the SCAQMD CEQA threshold for project significance. The Final EIR should demonstrate how such levels of air quality impacts can be reduced to insignificance. If it is not possible to accomplish this, the document should identify and develop plans to implement measures capable of reducing, to the maximum extent possible, project-related air quality impacts. The Final EIR should also make a finding that the proposed project will result in a significant adverse air quality impacts.

MITIGATION MEASURES

The Draft EIR identified some measures which would be implemented to reduce the proposed project's related air quality impacts. Additional mitigation measures should be identified to further reduce project-related air quality impacts in the Coachella Valley area. The development plan for the DHSR/CSP should include the implementation of PM10 control measures addressed in the Coachella Valley PM10 Plan. Therefore, SCAQMD staff recommends that the implementation of the Coachella Valley PM10 Plan Control Measures included in Table 1 and/or any other mitigation measures include those identified in the Draft EIR and those listed in Table 1. The discussion of all mitigation measures should be included in the Final EIR.

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Table 1
Potential Mitigation Measures

Minimize Construction Activity Emissions

- o Water site and equipment morning and evening.
- o Spread soil binders on site, unpaved roads, and parking areas.
- o Operate street-sweepers on paved roads adjacent to site.
- o Reestablish ground cover on construction site through seeding and watering.
- o Pave construction access roads.
- o Clean up the access roads and public roadways of soil, if necessary.
- o Implement rapid cleaning up of debris from streets after major storm events.

Reduce Construction Equipment Emissions

- o Wash off trucks leaving site.
- o Require trucks to maintain two-feet of freeboard, (i.e., the distance between the top of the load and the top of the truck bed sides).
- o Properly tune and maintain construction equipment.
- o Use low sulfur fuel for construction equipment.

Reduce Construction-Related Traffic Congestion

- o Provide rideshare incentives for construction personnel.
- o Configure construction parking to minimize traffic interference.
- o Minimize obstruction of through-traffic lanes.
- o Provide a flagperson to ensure safety at construction sites.
- o Schedule operations affecting roadways for off-peak traffic hours.

Limit Emissions From Vehicle Trips, VMT and Roadway Construction

- o Establish a Transportation Management Plan per Regulation XV.
- o Provide commuter rideshare incentives.
- o Provide commuter transit incentives.
- o Provide merchant transit incentives.
- o Establish a program of alternative work schedules.
- o Schedule goods movements for off-peak traffic hours.
- o Contribute to local shuttle and regional transit systems.
- o Provide dedicated turn lanes as appropriate.
- o Provide incentives for alternative fuels.
- o Provide transit shelters.
- o Limit on-street parking.

Minimize Indirect-Source Emissions

- o Implement energy conservation measures beyond state and local requirements.
- o Install low-polluting and high-efficiency appliances.
- o Install solar water and pool heaters.
- o Install energy-efficient street lighting.
- o Include energy costs in capital expenditure analyses.
- o Landscape with native drought-resistant species to reduce water consumption and to provide passive solar benefits.
- o Provide incentives for purchase of low-polluting and high-efficiency appliances.

Minimize Building Energy Requirements

- o Improve the thermal integrity of buildings, and reduce the thermal load with automated time clocks or occupant sensors.
- o Introduce window glazing, wall insulation, and efficient ventilation methods.
- o Introduce efficient heating and other appliances, such as water heaters, cooking equipment, refrigerators, furnaces and boiler units.
- o Incorporate appropriate passive solar design, and solar heaters.
- o Use devices that minimize the combustion of fossil fuels.
- o Capture waste heat and reemploy this heat, in nonresidential buildings.

Minimize Potential Public Exposure to Air Toxic Emissions

- o Integrate additional mitigation measures into site design such as the creation of buffering areas between a potential sensitive receptor's boundary and potential pollution source.
- o Require design features, operating procedures, preventive maintenance, operator training, and emergency response planning to prevent the release of toxic pollutants.

Reduce PM10 Emissions

- o Chemically treat soil at construction sites where activity will cease for at least four consecutive days.
- o Pave construction access roads as they are developed, extend paving at least 120 feet from roadway into construction site and clean at the end of each work day.
- o Restore vegetative ground cover as soon as construction activities have been completed.
- o Trucks that haul dirt, sand or soil should be covered or should maintain at least 24 inches of free board.
- o Construction sites should be watered.
- o Parking lots that have a volume of 3,000 or more vehicles a should be paved. Public parking lots that are only used for special events may apply chemical treatments as opposed to paving.
- o Establish routine street cleaning.
- o Chemically treat unpaved public and private roads that carry 20 vehicle trips per day or more.
- o Chemically stabilize soil surfaces within 100 feet of roadways or establish snow fences within 50 feet of roadways.
- o Chemically stabilize unpaved shoulders within 200 feet of intersections and within 25 feet of driveways.
- o Plant tree windbreaks downwind of habitat preserves and other key areas.
- o Control dust from farm roads with vehicle trips in excess of 20 vehicles per day through chemical stabilization or water saturation.
- o Prohibit tilling, construction grading operations and earth moving operations during periods when winds are forecast to exceed 30 miles per hour.
- o Establish speed limits on unpaved roads at 15 miles per hour.

- o Plant tree windbreaks on the windward perimeter of construction projects.
- o Establish a sand removal program.

South Coast Air Quality Management District (SCAQMD)

23. Comment: Since the project will be developed in three phases, the emissions estimates for the proposed project should correspond with the phasing plan. Such presentation will be more reflective of project-related construction emission impacts. Also, while the Draft EIR state "Fugitive dust generation is expected to occur on a short-term, construction basis, and will be spread over the anticipated three phases of the project's development," the SCAQMD staff does not consider such a length of activity to be short-term. The intensity of construction-related activities may be reduced periodically, but air quality impacts upon the locality would persist due to exposed and untreated surfaces, and traffic congestions on local streets within proximity to the construction site.

Response: Comment noted. The Draft EIR presented fugitive dust emissions as totals to represent the worst case scenario. Fluctuations within the market may change the estimated ten year buildout plan. However, for discussion purposes, the table below presents emission estimates as they correspond with the phasing plan. Comments regarding the significance of construction emissions are well taken, although it should be noted that the Draft EIR did include measures to mitigate construction dust, including mandating developer compliance with the SCAQMD PM10 Plan.

Table III-14 (revised)
Calculations of Fugitive Dust Potential
For Each Development Phase

Phase	Disturbed Acreage	Potential Tons of Dust per Phase	Estimated Grading Months	Approximate Tons/Month per Phase
One	301.9	362.3	10	36.2
Two	79.2	95.0	3	31.7
Three	63.4	76.1	1.5	50.7
Total:	443.6	533.4	15.5	--

Dust generation factor: 1.2 tons/acre/month (per Draft EIR Table III-14).

Construction information provided by FMA, personal communication, May 13, 1991.

South Coast Air Quality Management District (continued)

24. Comment: Therefore, the Final EIR should include emissions calculations for mobile, stationary and fugitive dust emissions associated with the construction segment of the project.

Response: Comments noted. During construction, impacts to the air quality will occur. Construction vehicles such as trucks and earthmovers will generate vehicle emissions. Generators will also produce fossil fuel emissions. The air quality impacts from these sources cannot be accurately quantified. This is due to the many unforeseen variables associated with construction activities. We can, however, present some useful data and calculations for review. These calculations are presented on the table which follows this page.

25. Comment: Stationary Source Emissions: All stationary source emissions are below the SCAQMD California Environmental Quality Act (CEQA) threshold for project significance.

Response: Comment noted.

26. Comment: Mobile Source Emissions: The proposed project's related mobile emissions represent a significant addition of air pollutants into project area. Table III-17 illustrates "Moving Exhaust Emissions Rates (for Calendar year 2002)." Calendar years corresponding to each project phase should be used to accurately reflect project-related air quality impacts. Furthermore, according to Table III-17, the emissions estimate was based on a total average miles travelled of 72,092 per day. It was further assumed that the average trip length is 3 miles. SCAQMD staff does not concur with this, because the average trip-length for this type of land use would be much greater. SCAQMD suggests the use of 10.7 miles, which is based on the average trip-length for home-to-work trips in the South Coast Air Basin (SCAG's Regional Mobility Plan, Technical Appendix, 1989).

Response: Comments noted. Utilizing the trip generation calculations from Table III-8 of the Draft EIR, Table III-17 was revised. The table, now in three parts, reflects the three phases of project construction, the closest applicable buildout years for each phase, and the trip generation factor of 10.7 miles, as requested by the SCAQMD. None the less, it is felt that this average trip length, which is the average trip-length for home to work trips in the South Coast Air Basin, is quite conservative and probably overstates trip length for the subject project.

**CONSTRUCTION VEHICLE EMISSIONS
DIESEL-POWERED CONSTRUCTION EQUIPMENT
POLLUTANTS in lbs/8hr. day**

Type of Equipment	Carbon Monoxide	Exhaust Hydro- carbons	Nitrogen Oxides	Sulfur Oxides	Parti- culates
Tracktype Tractor	3.86	1.32	13.91	1.55	1.21
Whelled Tractor	39.51	2.07	14.02	.99	1.49
Whelled Dozer	--	--	--	3.85	1.82
Scraper	14.01	3.12	42.38	5.11	4.49
Motor Grader	1.67	0.44	0.59	.95	0.68
Wheeled Loader	6.32	2.77	20.89	2.01	1.89
Tracktype Loader	2.22	1.09	9.14	0.84	0.65
Off-Highway Truck	19.88	2.11	45.98	5.01	2.82
Roller	3.35	0.75	9.56	0.75	0.55
Miscellaneous	7.45	1.68	18.69	1.57	1.53

* The wheeled dozer HC/CO/NOX emissions are included in the off-highway truck category.

**CONSTRUCTION VEHICLE EMISSIONS
GASOLINE-POWERED CONSTRUCTION EQUIPMENT
POLLUTANTS in lbs/8hr. day**

Type of Equipment	Carbon Mono xide	Exhaust Hydro carbons	Evapo rative Hydro carbons	Crank Case Hydro- carbons	Nitrogen Oxides	Sulfur Dioxides	Part icu lates
Whelled Tractor	105.16	3.94	0.76	0.80	4.75	0.17	0.26
Motor Grader	133.60	4.53	0.73	0.89	3.53	0.18	0.23
Wheeled Loader	171.8	5.86	0.72	1.17	5.72	0.26	0.33
Roller	148.00	23.9	0.69	1.35	3.98	0.2	0.29
Miscellaneous	187.84	6.18	0.62	1.23	4.55	0.26	0.29

Source: "Air Quality Handbook for EIRs",
Appendix. K. South Coast Air Quality Management District, Revised
April 1987.

South Coast Air Quality Management District (continued)

Table III-17 (Revised)
Moving Exhaust Emission Rates
Phase One
(Calendar Year 1992)
(pounds/day)

Miles Travelled in one day:		150,239*					
SPEED (MPH)		CO	TOG	ROG	NO	<u>PARTICULATES</u> TIRE WEAR EXHAUST	
5	8,647	745	665	599		72	26
10	6,029	523	467	533		72	26
15	4,537	390	351	486		72	26
20	3,541	308	275	453		72	26
25	2,819	248	222	434		72	26
30	2,283	205	182	424		72	26
35	1,883	172	152	424		72	26
40	1,588	149	132	434		72	26
45	1,380	132	119	450		72	26
50	1,241	113	99	520		72	26
55	1,155	113	99	520		72	26
Crankcase Blowby (Grams/mile)		0	0				
Diurnal Emissions (TOG or ROG)		626					
Hot Soak (TOG or ROG)		451					

* Assumptions include: 14,041 Average Daily Trips of 10.7 miles each

South Coast Air Quality Management District (continued)

Table III-17 (Revised)
Moving Exhaust Emission Rates
Phase Two
(Calendar Year 1996)
(pounds/day)

Miles Travelled in one day:		198,689*				
SPEED (MPH)	CO	TOG	ROG	NO	TIRE WEAR	PARTICULATES EXHAUST
5	8,630	744	439	718	95	27
10	6,315	543	481	635	95	27
15	4,849	416	368	578	95	27
20	3,812	328	289	538	95	27
25	3,042	263	236	512	95	27
30	2,460	219	193	499	95	27
35	2,018	184	162	499	95	27
40	1,689	158	140	503	95	27
45	1,449	140	127	525	95	27
50	1,282	127	114	556	95	27
55	1,169	118	105	604	95	27
Crankcase Blowby (Grams/mile)		0	0			
Diurnal Emissions (TOG or ROG)		396				
Hot Soak (TOG or ROG)		390				

* Assumptions include: 18,569 Average Daily Trips of 10.7 miles each (Phases 1 and 2)

South Coast Air Quality Management District (continued)

Table III-17 (Revised)
Moving Exhaust Emission Rates
Phase Three
(Calendar Year 2002
(pounds/day)

Miles Travelled in one day:		150,239*				
SPEED (MPH)	CO	TOG	ROG	NO	TIRE WEAR	PARTICULATES EXHAUST
5	10,009	909	806	566	140	33
10	7,617	677	600	877	140	33
15	5,933	522	458	793	140	33
20	4,689	413	368	735	140	33
25	3,753	335	297	703	140	33
30	3,031	277	245	684	140	33
35	2,477	232	206	677	140	33
40	2,057	200	181	690	140	33
45	1,735	174	155	709	140	33
50	1,496	161	142	755	140	33
55	1,341	148	129	819	140	33
Crankcase Blowby (Grams/mile)		0	0			
Diurnal Emissions (TOG or ROG)		346				
Hot Soak (TOG or ROG)		426				

* Assumptions include: 292,795 Average Daily Trips of 10.7 miles each (Phases 1,2 and 3)

South Coast Air Quality Management District (continued)

27. Comment:...EMFAC7E model should be used to estimate mobile emissions, if possible. However, owing to the problems associated with the non-main-frame use of this model, the EMFAC7D models is acceptable.

Response: In its response to the Notice of Preparation on the subject EIR, no referenced was made, nor materials provided, by the SCAQMD on the referenced alternative methodologies. Consultations with SCAQMD staff¹ indicate that the referenced methodologies (EMFAC7D and EMFAC7E) have been provided by the California Air Resources Board in a "raw" form, and are still being appropriately modified for use in the SAQMD handbook. District staff also indicated that the results of the EMFAC7C methodology (which was used in the Draft EIR), are generally more conservative than the forthcoming methodologies, and that the methodology and analysis included in the Draft EIR are acceptable.

28. Comment: The combined stationary and mobile sources emissions would exceed the SCAQMD CEQA threshold for project significance. The Final EIR should demonstrate how such levels of air quality impacts can be reduced to insignificance. If it is not possible to accomplish this, the document should identify and develop plans to implement measures capable of reducing, to the maximum extent possible, project-related air quality impacts. The Final EIR should also make a finding that the proposed project will result in... significant adverse air quality impacts.

Response: Comment noted. Combined stationary and mobile sources emissions would exceed the SCAQMD CEQA threshold for project significance. Mitigation measures are available to reduce these impacts to an "insignificant level". The Draft EIR, on page III-21, mandated adherence to the Coachella Valley PM10 plan. In addition, pages III-95 and III-96 provide mitigation measures for construction activities, mobile sources and stationary on-site, off-site sources. Condition of approval #66 has mandated use of passive solar energy to the greatest extent feasible, which will help to reduce fossil fuel consumption and thereby reduce increases in stationary source emissions from energy plants. A Mitigation Monitoring Program has been prepared for the project to ensure implementation of mitigation measures.

To further reduce impacts associated with the proposed project, the mitigation measures provided by SCAQMD on Table 1 are hereby adopted for incorporation into the EIR. Although many of these measures are already contained within the Draft EIR and/or the Conditions of Approval, the measures from Table 1 are repeated below in their entirety to ensure consistency and total coverage. Through the implementation of the mitigation measures listed below, those already contained in the Draft EIR, and

¹Fernando, Philip. Air Quality Specialist, South Coast Air Quality Management District, personal communication, April 9, 1991.

South Coast Air Quality Management District (continued)

conditions of approval, project-related air quality impacts can be reduced to a level of "insignificance". These measures are binding and have been incorporated into the Mitigation Monitoring Program for the project.

- To minimize construction activity emissions, the project contractors shall implement the following:
 - Water site and equipment morning and evening
 - Spread soil binders on site, unpaved roads, and parking areas
 - Operate street-sweepers on paved roads adjacent to site
 - Reestablish ground cover on construction site through seeding and watering
 - Pave construction access roads, as appropriate
 - Clean up the access roads and public roadways near the project site of soil
- To minimize construction equipment emissions, the project contractors shall implement the following:
 - Wash off trucks leaving the site
 - Require trucks to maintain two-feet of freeboard
 - Properly tune and maintain construction equipment
 - Use low sulfur fuel for construction equipment
- To reduce construction-related traffic congestion, the developer and contractors shall implement the following:
 - Provide rideshare incentives for construction personnel
 - Configure construction parking to minimize traffic interference
 - Minimize obstruction of through-traffic lanes
 - Provide a flagperson to ensure safety at construction sites, as necessary
 - Schedule operations affecting roadways for off-peak traffic hours
- To limit emissions from vehicle trips and roadway construction, the developer shall implement the following:
 - Establish a Transportation Management Plan per Regulation XV
 - Provide commuter rideshare incentives
 - Provide commuter transit incentives
 - Provide merchant transit incentives
 - Establish a program of alternative work schedules
 - Schedule goods movements for off-peak traffic hours
 - Contribute to local shuttle and regional transit systems
 - Provide dedicated turn lanes, as appropriate
 - Provide incentives for alternative fuels
 - Provide transit shelters
 - Limit on-street parking

South Coast Air Quality Management District (continued)

- To Minimize Indirect-Source Emissions, the developer shall implement the following:
 - Implement energy conservation measures beyond state and local requirements
 - Install low-polluting and high-efficiency appliances
 - Install solar pool heaters
 - Install solar water heaters, to the greatest extent feasible
 - Install energy-efficient street lighting
 - Include energy costs in capital expenditure analyses
 - Landscape with native drought-resistant species to reduce water consumption and to provide passive solar benefits
 - Provide incentives for purchase of low-polluting and high-efficiency appliances, as feasible
- To minimize building energy requirements, the developer shall implement the following:
 - Improve the thermal integrity of buildings, and reduce the thermal load with automated time clocks or occupant sensors
 - Introduce window glazing, wall insulation, and efficient ventilation methods
 - Introduce efficient heating and other appliances, such as water heaters, cooking equipment, refrigerators, furnaces and boiler units
 - Incorporate appropriate passive solar design, and solar heaters
 - Use devices that minimize the combustion of fossil fuels
 - Capture waste heat and reemploy this heat, in nonresidential buildings, to the greatest extent feasible
- To minimize potential public exposure to air toxic emissions, the City Planning Department and Building Department shall implement the following measures, as project details become available.
 - Integrate additional mitigation measures into site design such as the creation of buffering areas between a potential sensitive receptor's boundary and a potential pollution source.
 - Require design feature, operating procedures, preventive maintenance, operator training, and emergency response planning to prevent the release of toxic pollutants
- To Reduce PM10 Emissions, the project contractor shall implement the following measures*:
 - Chemically treat soil at construction sites where activity will cease for at least four consecutive days
 - Pave construction access roads as they are developed, extend paving at least 120 feet from roadway into construction site and clean at the end of each work day

South Coast Air Quality Management District (continued)

- Restore vegetative ground cover as soon as construction activities have been completed
- Trucks that haul dirt, sand or soil shall be covered or shall maintain at least 24 inches of free board
- Construction sites shall be watered
- Chemically treat unpaved roads that carry 20 vehicle trips per day or more
- Chemically stabilize soil surfaces within 100 feet of roadways or establish snow fences within 50 feet of roadways
- Plant tree windbreaks, utilizing non-invasive species, on the windward perimeter of construction projects, where feasible
- All construction grading operations and earth moving operations shall cease when winds are exceed 30 miles per hour

* Some measures from Table 1, which appeared under this heading have been delated because they apply to City-wide policies and activities which are beyond the scope of the EIR for the CornerStone development.

RIVERSIDE COUNTY FLOOD CONTROL AND
WATER CONSERVATION DISTRICT

RIVERSIDE, CALIFORNIA 92502

May 9, 1991

City of Desert Hot Springs
65950 Pierson Boulevard
Desert Hot Springs, CA 92240

Attention: Kimberly Davy

Ladies and Gentlemen:

Re: Specific Plan 1-90
Cornerstone

This is a proposal to develop 515 acres in the northern part of the City of Desert Hot Springs. The District is reviewing this project as it relates to our master planned facilities.

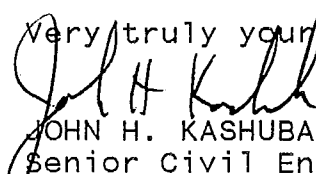
The plan proposes three dams which would work as detention and debris basins. The use of these basins would allow for the downsizing of the proposed master plan facilities downstream of this site. Preliminary studies were used to roughly size the basins for the specific plan and EIR. Separate, more detailed hydrology, routing and debris studies should be done to properly size each of the basins and the downstream facilities. We prefer that the dams be designed so that they do not fall within State jurisdiction. 29 30

This project may have problems outletting storm flows since master drainage plan facilities downstream will not be constructed to this project for several years. With no storm drain outlet, the development will have to pull back and discharge the flows onsite so that they return to their existing pre-development conditions even though the peak flow rates will have been decreased by the basins. Unfortunately, this is the area where the Phase I resort village is proposed. The project configuration or phasing might have to be changed. 31

The District is willing to maintain the basins, inlet and outlet structures, and large storm drains which are logical extensions of the MDP. Appropriate agreements will have to be made regarding design review, construction, inspection, right of way transfers and other items. 32

The District will review this project only as it relates to the master drainage plan in this area. We do not intend to comment on its need to provide flood protection to its various elements or how it will affect the drainage on neighboring properties. 33

Very truly yours,


JOHN H. KASHUBA
Senior Civil Engineer

JHK:slw

Riverside County Flood Control and Water Conservation District

29. **Comment:** Separate, more detailed hydrology, routing and debris studies should be done to properly size each of the basins and the downstream facilities.

Response: Comment noted. Concerns regarding the need for additional, detailed hydrology, routing, and debris studies for the project's Master Drainage Plan are well taken. This need was addressed both through the mitigation measures specified on page III-32 of the Draft EIR, and through the conditions of approval #32 through #35. In addition, condition of approval #32 also requires that all future drainage plans and refinements be submitted to Riverside County Flood Control and Water Conservation District for review.

30. **Comment:** We prefer that the dams be designed so that they do not fall within State jurisdiction.

Response: Comment noted. As presently designed, the project's detention basins fall under the jurisdiction of the State Department of Safety of Dams. The City does not know if the detention basins can be downsized to a degree which allows them to not fall under State jurisdiction; however, your request has been passed on to the project engineer. As Riverside County Flood Control and Water Conservation District will be involved with the review of all future refinements of the Master Drainage Plan, ample time remains for the District to work with the project engineer on developing a drainage plan which is beneficial for both the project and the overall drainage plans of the District.

31. **Comment:** This project may have problems outletting storm flows since master drainage plan facilities downstream will not be constructed to this project for several years. With no storm drain outlet, the development will have to pull back and discharge the flows on site so that they return to their existing pre-development conditions even though the peak flow rates will have been decreased by the basins. Unfortunately, this is the area where the Phase I resort village is proposed. The project configuration or phasing might have to be changed.

Response: Comment noted. This issue has been incorporated into condition of approval #32, which requires subsequent hydrology plans to demonstrate that off-site flood flows and velocities will not be increased. Again, involvement of the District through subsequent hydrology plan review, will ensure that this issue is adequately addressed. The developer, City and District should work closely to construct downstream drainage facilities concerned with project buildout.

Riverside County Flood Control and Water Conservation District (continued)

32. Comment: The District is willing to maintain the basins, inlet and outlet structures, and large storm drains which are logical extensions of the MDP. Appropriate agreements will have to be made regarding design review, construction, inspection, right-of-way transfers and other items.

Response: As maintenance of the drainage facilities was an unresolved issue of the Draft EIR, we appreciate being notified of the District's willingness to assume this responsibility in time to include it within the Final EIR. Conditions of approval #32 through #35 address some of the items which still need to be resolved between the District and the developer.

33. Comment: The District will review this project only as it relates to the master drainage plan in this area. We do not intend to comment on its need to provide flood protection to its various elements or how it will affect the drainage on neighboring properties.

Response: Limited scope of review noted.



April 26, 1991

DHS 91-04

Mr. John Criste
City Planner
City of Desert Hot Springs
65950 Pierson Blvd.
Desert Hot Springs, Ca. 92240

Re: Comments on Draft Environmental Impact Report
for Desert Hot Springs Resort
Cornerstone Specific Plan #1-90

Dear John:

The DEIR appears to have covered the issues associated with drainage and flood control quite well. I therefore have no recommended changes or additions. I do however have several thoughts as to how certain items maybe expanded upon.

1. On page III-32, the third mitigation measure should probably include the Federal Emergency Management Administration by name. The requirement for obtaining a Conditional Letter of Map Revision would be in keeping with current City policy. 34
2. On page III-32, the last mitigation measure should specifically address turning over the flood control facilities to Riverside County Flood Control and Water Conservation District. As we have recently determined, ownership of the detention basins must be by the responsible public agency to satisfy FEMA requirements. 35

Very truly yours,

SANBORN / WEBB, INC.

Michael T. Schulz

Michael T. Schulz

MTS:lm

Sanborn/Webb Incorporated, Acting City Engineer

34. Comment: On page III-32, the third mitigation measure should probably include the Federal Emergency Management Administration by name. The requirement for obtaining a Conditional Letter of Map Revision would be in keeping with current City policy.

Response: Comment noted. Condition of Approval #33 and the errata sheet for hydrology reflect this recommendation.

35. Comment: On page III-32, the last mitigation measure should specifically address turning over the flood control facilities to Riverside County Flood Control and Water Conservation District. As we have recently determined, ownership of the detention basins must be by the responsible public agency to satisfy FEMA requirements.

Response: Comment noted. Conditions of Approval #35 and #36 specifically address turning over the flood control facilities to Riverside County Flood Control and Water Conservation District. Implementation of the Conditions of Approval were incorporated into the Mitigation Monitoring Program for this project.



5885 Brockton Avenue • Riverside, California 92506 • 714-788-0670

March 28, 1991

Mr. John Criste, AICP
Terra Nova Planning & Research Inc.
275 North El Cielo, #D-3
Palm Springs, California 92262

Dear John *[Signature]*

In reviewing the Draft Environmental Impact Report Summary/Matrix, I noticed under Biological Resources that several sensitive plant and animal species were listed. The statistical summary diagram indicates the following Open Space designations:

Planning Area #1	67.0 Ac
" " #13	9.5 Ac
" " #21	<u>10.0 Ac</u>
	86.5

We at RLC would like to begin a dialogue dealing with the long-term monitoring and management of these open space values.

RLC currently manages a raptorial habitat in western Riverside County, has participated in several Stephens Kangaroo Rat acquisition/protection projects and is currently working with several other developers to address open space value/endangered species issues within their project boundaries.

We would welcome the opportunity to be able to discuss these issues, as identified in Cornerstone Specific Plan #1-90, at your convenience.

Sincerely,

[Signature]
Henry J. Hohenstein, AICP
Executive Director

HJH/vm

Riverside Land Conservancy

36. Your interest in managing the open space areas is noted. The City and the project applicant have not discussed the long-term monitoring and management of the open space areas on the project site. The management of these resources may be given to the project's home owners association or a conservancy group. Your interest in these lands has been passed on to the project developer.

II. ERRATA SHEETS

Based on additional review and information received following publication of the Draft EIR, the following corrections were submitted by technical consultants for inclusion within the Final EIR. None of the following corrections change the basic findings of the Draft EIR, and no significant new information is presented.

Hydrology

Page III-22, footnote #9, the date of the hydrology study should be changed to "December 17 (revised)".

Page III-31, paragraph three: it should be noted that implementation of the CornerStone Master Drainage Plan will not change the historic flows which will come off of the site. Therefore, the development would not be responsible for downstream channels, nor would these channels necessarily need to be constructed in conjunction with the CornerStone Master Drainage Plan improvements. This renders the fourth mitigation measure on page III-32 unnecessary.

Page III-32, second mitigation measure: the "complete debris study" called for in this mitigation measure may not be necessary to insure that the Master Drainage Plan adequately accounts for debris runoff. Additional debris and routing flows will be required in subsequent hydrology plans, but this does not necessary involve a "complete debris study". In addition, the condition that Riverside County Flood Control and Water Conservation District reviews all CornerStone drainage plans and that all drainage facilities are constructed to RCFC&WCD standards will be included as both a mitigation measure and a condition of approval for this project. This will insure that the debris are adequately accounted for in the Master Drainage Plan and that the necessary coordination between the District and project engineers is maintained.

Page III-32, the third mitigation measure should include the following:

"In addition, a 'Conditional Letter of Map Revision' must be obtained from the Federal Emergency Management Agency."

Page III-33, second paragraph under "Mitigation Monitoring and Reporting". Second sentence shall be changed to read: "Prior to issuance of construction plan approval or grading permits, the City Planning Department must have received a letter from the California Division of Safety of Dams..."

Biology

Page III-47, third paragraph and page III-56, first mitigation measure: *Mammilaria microcarpa* should be changed to *Mammilaria tetrancistra*.

Traffic

Page III-70, third paragraph, last sentence shall be replaced with the following: "With the project, improvements will be provided along Pierson Boulevard, parallel with Hacienda, which may attract some traffic off of Hacienda. The project is not forecast to increase traffic on Hacienda."

Noise

Page M-8, second to the last sentence under Project Impacts should be changed to read "...noise levels of approximately 70 dB at unshielded residences nearest to the street."

Page III-81, sixth paragraph, the last sentence should be changed to read "The measured background...were slightly higher due to the smaller setback of the measurement microphone from the street."

Page III-83, for clarification of the fourth and fifth paragraphs under "Off-Site Traffic Noise", Table 3 from the technical acoustical study, contained in Appendix G, should have been included in Section III-H of the Draft EIR; Table 3 is hereby included within the Final EIR.

Page III-86, second mitigation measure on page under Construction Noise should be changed to read "In accordance with the requirements of the City's Noise Ordinance, construction activity shall be prohibited between the hours of 5:00 p.m. of each day and 7:00 a.m. of the next day, except when daylight savings time is in effect. While daylight savings time is in effect, no construction activities shall be permitted between the hours of 6:00 p.m. and 6:00 a.m. of the next day."

Page III-87, replace the first mitigation measure on the page with the following sentence: "Site specific analyses will be required throughout the development to determine the required acoustic shielding to meet the exterior noise criteria and the necessary barrier configurations for individual projects within the development."

Page III-87, third mitigation measure on the page and item five on the Pre-Construction Mitigation Monitoring should define exterior and interior noise levels as 55 dB and 45 db, not CNEL .

Acoustical Analysis Report
 CornerStone Development
 February 4, 1991

Road Segment	Present ADT	Project ADT	Future ADT without Project	Future ADT with Project	dB inc Future without Project vs Present	dB inc Future with Project vs Present	dB inc Future with Project vs Future without Project
Mission Lakes							
w/o Palm	2440	1400	10440	11840	6.3	6.9	0.5
e/o Indian	2440	1400	8140	9540	5.2	5.9	0.7
Pierson							
e/o Palm	4640	20500	5570	26070	0.8	7.5	6.7
w/o Palm	7720	9600	10420	20020	1.3	4.1	2.8
e/o Indian	7720	9600	9820	19420	1.0	4.0	3.0
Hacienda							
e/o Palm	9640	0	11570	11570	0.8	0.8	0.0
Long Canyon							
n/o Dillon	1000	2700	1100	3800	0.4	5.8	5.4
Mountain View							
n/o Dillon	3910	4100	4690	8790	0.8	3.5	2.7
Miracle Hill							
n/o Hacienda	4640	6800	5570	12370	0.8	4.3	3.5
Palm							
s/o Mission L	5630	4100	8030	12130	1.5	3.3	1.8
n/o Pierson	11090	4100	13490	17590	0.9	2.0	1.2
n/o Hacienda	16110	6800	18510	25310	0.6	2.0	1.4
s/o Hacienda	20010	6800	22410	29210	0.5	1.6	1.2
n/o Dillon	18220	6800	20620	27420	0.5	1.8	1.2
Indian							
n/o Pierson	6700	0	9400	9400	1.5	1.5	0.0
n/o Dillon	7300	5500	9700	15200	1.2	3.2	2.0

Table 3
 Incremental Changes in Traffic Noise
 Due to Cumulative and Project Related Traffic