Final Initial Study and Mitigated Negative Declaration

Coachillin' Anaerobic Digester Facility
On APN 666-360-015
DP 06-19

Prepared for:

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

Prepared by:

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CHAPTER ONE – INTRODUCTION

1.1 Purpose and Authority

1.1.1 Introduction

This Initial Study and Mitigated Negative Declaration have been prepared for Major Development Permit (MDP) DP-06-19, Coachillin' Anaerobic Digester (AD) on APN 666-360-015 (Proposed Project) in accordance with Section 17 of the Municipal Code.

The City of Desert Hot Springs allows for recycling facilities within Industrial Districts with approval of a development permit. The Proposed Project is located in a qualifying Light Industrial (I-L) District.

The Proposed Project consists of an AD facility that will take organic waste from local jurisdictions in the Coachella Valley and convert it to electricity. The facility would be located on an approximately 9.76-acre parcel (APN 666-360-015) on north of 19th Avenue and east of Calle De Los Ramos in the City of Desert Hot Springs, California. The Proposed Project would take approximately one year to build.

This document is a tiered IS/MND that has been prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et. seq. The City of Desert Hot Springs is the Lead Agency pursuant to CEQA.

1.1.2 Anaerobic Digestion Initiative

Under its Strategic Directive 6.1, CalRecycle seeks to reduce by 50 percent the amount of organic waste disposed in the state's landfills by 2020. In addition to conserving limited landfill capacity, this CalRecycle policy recognizes that organic wastes are a resource because they have an energy value that can be captured and utilized. Organic wastes are also a necessary component of compost, soil amendments, and other useful products. Directive 6.1 is also one of CalRecycle's actions to help California reduce the generation of greenhouse gases. Under the State's *Climate Change Scoping Plan*, CalRecycle has committed to take actions to reduce the emissions of methane, a greenhouse gas, from landfills. AD facilities assist in meeting this goal by capturing methane gas to create energy. Anaerobic digestion can also contribute to meeting the State's Renewable Portfolio Standard and Low Carbon Fuel Standard (CalRecycle 2011).

1.1.3 Assembly Bill 1826

In October 2014, Governor Brown signed Assembly Bill 1826, requiring local jurisdictions implement an organic waste recycling program to divert organic waste generated by businesses and multi-family residential dwellings that have five or more units. This law phases in mandatory recycling of commercial organic wastes over time. Anaerobic digestion is one means to manage organic waste recycling requirements.

1.1.4 Program Environmental Impact Report

In 2011, the California Department of Resources, Recycling, and Recovery (CalRecycle) certified a Program Environmental Impact Report (PEIR), assessing the potential environmental effects of development of AD facilities in California. The purpose of the PEIR is to provide a broad analysis of environmental impacts to expedite future site-specific environmental review by lead agencies with discretion to approve AD facilities (in this case, the City of Desert Hot Springs). It is the intent of the PEIR to serve as the basis for analyzing the environmental effects of individual AD facilities and to assist local lead agencies in identifying potential environmental effects of these types of facilities. Program-level mitigation measures are also provided. The purpose of the PEIR is to allow tiered environmental documents according to CEQA (Public Resources Code Sections 21093 and 21094) and the CEQA Guidelines (Sections 15152 and 15168). According to these regulations, "where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later Project pursuant to or consistent with the program, plan, policy or ordinance should limit the EIR or negative declaration on the later Project to effects which (1) were not examined as significant effects on the environment in the prior EIR; or (2) are susceptible to substantial reduction or avoidance by the choice of specific revisions in the Project, by the imposition of conditions or other means."

Therefore, the checklist format in this tiered document has been revised from the standard CEQA Guidelines Appendix G format identifying impacts as potentially significant, less than significant with mitigation, less than significant, or no impact to one that identifies if the impact will be consistent with or inconsistent with the PEIR. If inconsistent with the PEIR, the impact is identified as potentially significant, less than significant with mitigation, or less than significant. It should be noted that no potentially significant impacts that cannot be mitigated to a level that is less than significant have been identified either in the PEIR or in this site-specific analysis.

1.2 Determination

This Initial Study determined that development of the Proposed Project would not have a significant impact on the environment with the implementation of mitigation measures from the PEIR and the site-specific analysis (see Table 2-1 in Section 2.3, below). A Mitigated Negative Declaration is proposed.

1.3 California Environmental Quality Act (CEQA) Authority to Prepare a Mitigated Negative Declaration

This Draft Mitigated Negative Declaration (DMND) has been prepared by the City of Desert Hot Springs as lead agency and is in conformance with Section 15070, Subsection (a), of the State of California Guidelines for Implementation of CEQA. The purpose of the DMND and the Initial Study Checklist was to determine whether there were potentially significant impacts associated with development of the Proposed Project.

1.4 Public Review Process

In accordance with CEQA, a good faith effort has been made during the preparation of this DMND to contact affected agencies, organizations, and persons who may have an interest in this Proposed Project. The DMND has been sent to the Riverside County Clerk, responsible agencies, and advertised in *The Desert Star Weekly*.

CHAPTER TWO – PROJECT DESCRIPTION

2.1 Project Location

The Proposed Project is located on an approximately 9.76-acre parcel north of 19th Avenue and east of Calle De Los Ramos in the City of Desert Hot Springs, California.

Total Project Area: 9.76 acres

Assessor's Parcel Number: 666-360-015

Section, Township & Range Description or reference/attach a Legal Description:
The Project site, as depicted on the United States Geological Survey (USGS) 7.5-minute Desert Hot Springs topographic quadrangle, lies within Section 14 of Township 3 South, Range 4 East, San Bernardino Baseline & Meridian. The location of the Project site is shown below in Exhibits 2-1 and 2-2.

2.2 Project Description

2.2.1 Background on Anaerobic Digestion

Anaerobic digestion is the biological decomposition of organic matter with little or no oxygen, producing a biogas composed primarily of carbon dioxide (CO_2) and methane. Anaerobic decomposition (not digestion) yielding methane occurs naturally in marshes, wetlands, landfills, ruminants, and certain insects. There are a variety of controlled systems where AD technology is currently used in the United States, including wastewater treatment facilities and dairy manure digesters and co-digesters. In other countries (primarily in Europe), AD technology is used to process and treat the organic portion of municipal solid waste to recover energy and to reduce the overall volume of solid waste in landfills (CalRecycle 2011).

Benefits of ADs include a reduction in the mass of organic waste in landfills, reduced fugitive methane emissions from landfills, generation of soil amendments (fertilizers), reduction in odor, generation of renewable energy, and stabilization of organic material prior to disposal, which reduces environmental impacts to air and water quality (CalRecycle 2011).

Location: N:\2016\2016-219.001 Coachillin Anaerobic Digester\MAPS\location_vicinity\CAD_Location_20171121.mxd (AMyers)-amyers 11/21/2017

Map Date: 11/21/2017

Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

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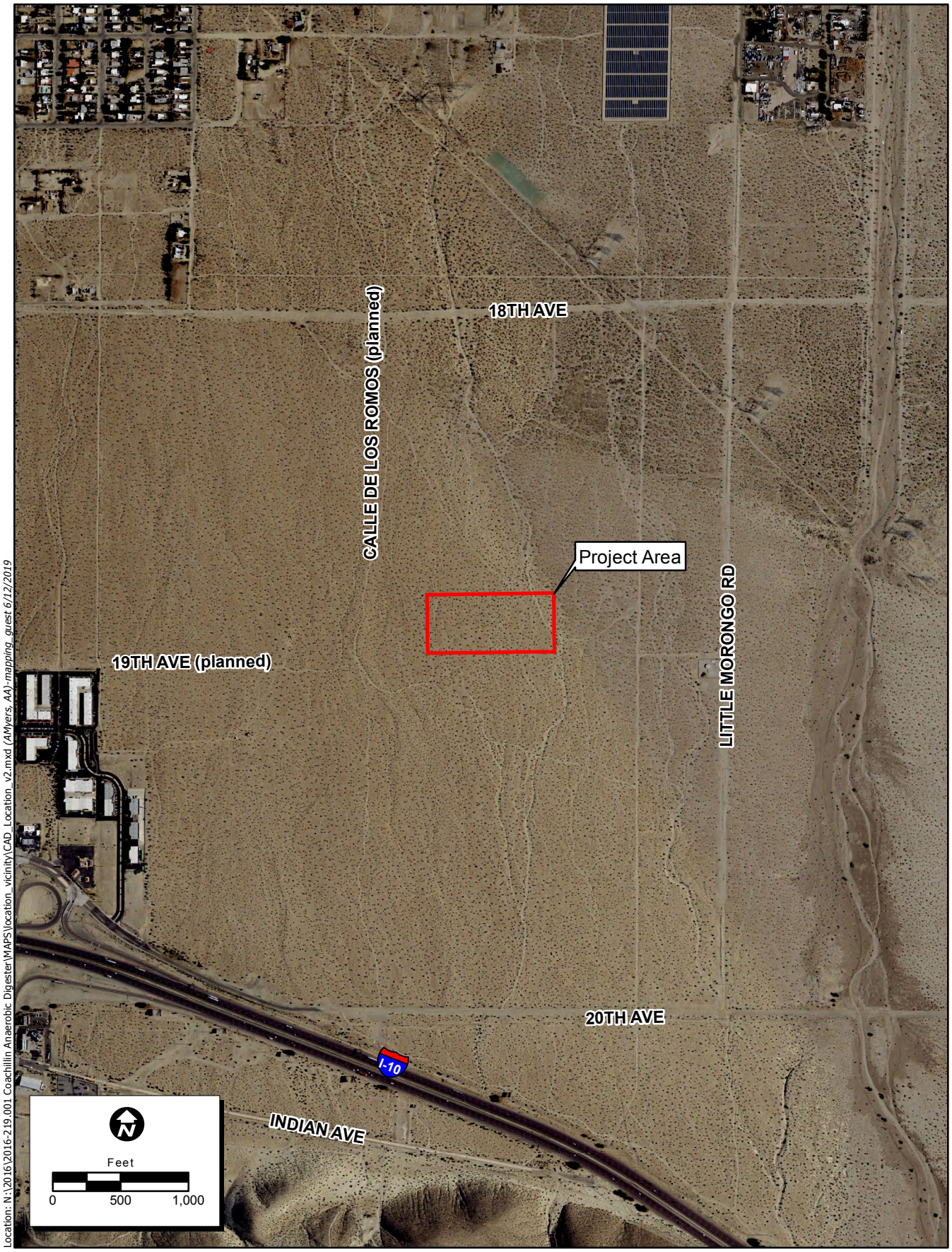
ENVIRONMENTAL CONSULTANTS

Figure 2-1. Project Vicinity

2016-219.001 Coachillin Anaerobic Digester



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Map Date: 6/12/2019
Base Source: 2016 NAIP

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Figure 2-2. Project Location

2016-219.001 Coachillin Anaerobic Digester

ANAEROBIC DIGESTER FACILITY

CITY OF DESERT HOT SPRINGS, CA

SCOPE OF WORK

NEW ANEROBIC DIGESTER FACILITY TO PROCESS ORGANIC WASTE AND TURN INTO BIOMETHANE GAS

PARKING CALCULATIONS

NAME & USE OF SPACE	OCC. GROUP	AREA (S.F.)	OCC. FACTOR	REQUIRED
OFFICE BUILDING	B	3000	500	6
ANAEROBIC DIGESTER BUILDING	F	22900	1,000	23
TOTAL REQUIRED				29
TOTAL PROVIDED				30

DEFERRED SUBMITTALS

FIRE SPRINKLER SYSTEM AND FIRE ALARM ARE A DEFERRED SUBMITTAL UNDER SEPARATE PERMIT.

SCOPE OF WORK

1. CONSTRUCTION OF AN ANAEROBIC DIGESTER (AD) BUILDING.
2. CONSTRUCTION OF AN OFFICE BUILDING.

APPLICABLE CODES

ALL WORK SHALL COMPLY WITH THE FOLLOWING CODES INCLUDING LOCAL AMENDMENTS.

2016 CALIFORNIA BUILDING CODE
2016 CALIFORNIA RESIDENTIAL CODE
2016 CALIFORNIA FIRE CODE
2016 CALIFORNIA PLUMBING CODE
2016 CALIFORNIA MECHANICAL CODE
2016 CALIFORNIA ELECTRICAL CODE
2016 CALIFORNIA GREEN BUILDING CODE
2016 CALIFORNIA BUILDING ENERGY EFFICIENCY STANDARDS

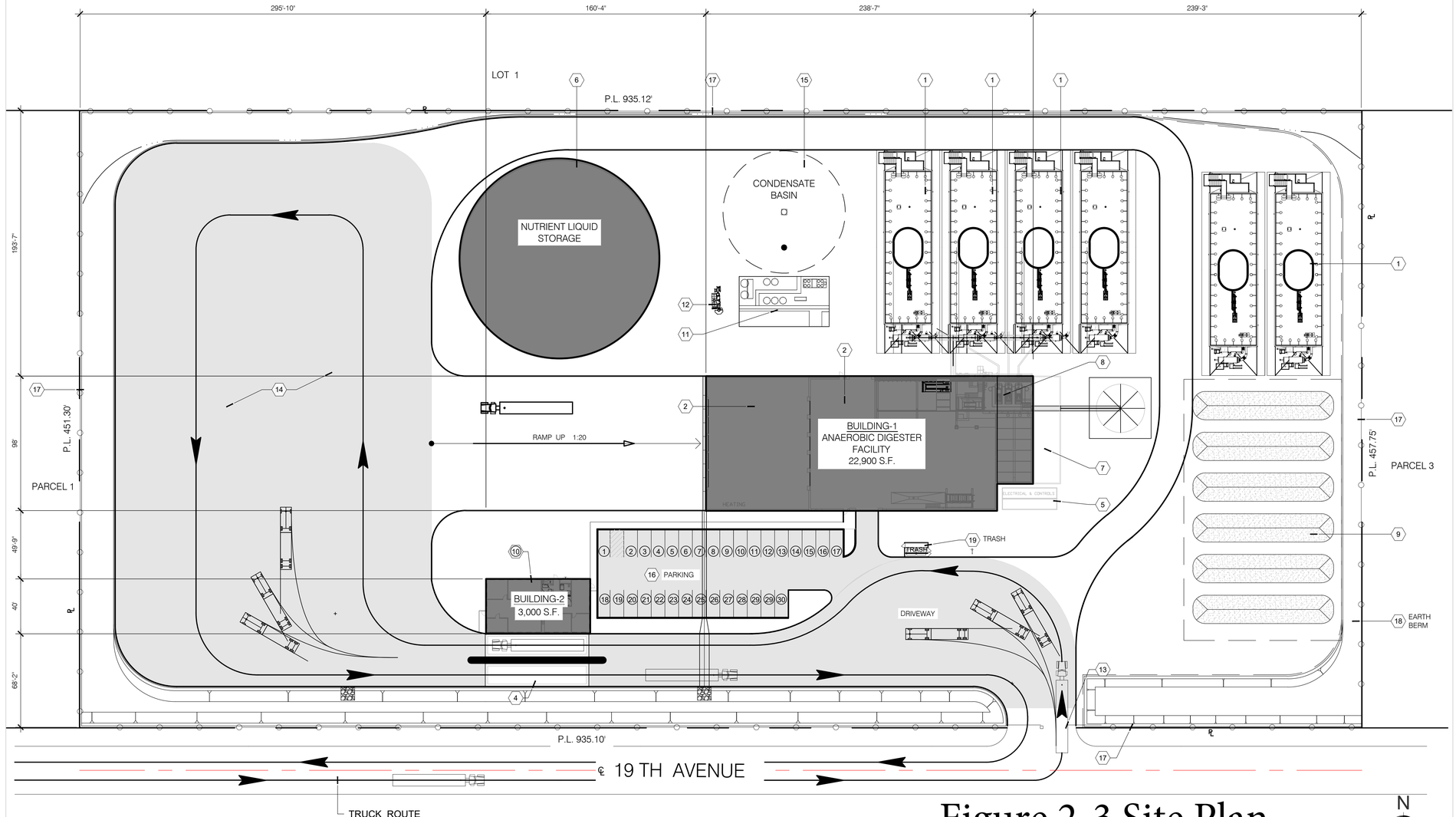


Figure 2-3 Site Plan

SITE PLAN

SCALE : 1" = 40'

SHEET INDEX

PROJECT INFORMATION

APN : 666-360-015

LOT SIZE : 420,750 SF

BUILDING - 1 : (ANAEROBIC DIGESTER) 22,900 S.F.

OCCUPANCY GROUP : FACTORY INDUSTRIAL, F-1
TYPE OF CONSTRUCTION : IIIB
FIRE SPRINKLERS : YES

BUILDING - 2 : (OFFICE) 3,000 S.F.

OCCUPANCY GROUP : OFFICE, B
TYPE OF CONSTRUCTION : IIIB
FIRE SPRINKLERS : YES

TOTAL BUILDING FOOTPRINT = 25,900 SF

LOT COVERAGE = 16%

OCCUPANCY CALCULATIONS

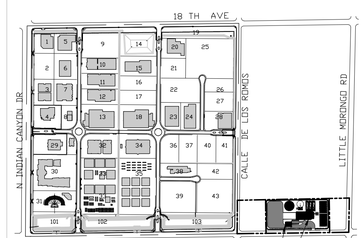
2016 CBC TABLE 1004.1.2

	SQ.FT.	OCC. FACTOR	OCC. LOAD
ANAEROBIC DIGESTER (INDUSTRIAL)	2,300	100	27
OFFICE (GROUP B) :	3,000	100	30

KEYNOTES

1. 550,000 GAL. HIGH SOLIDS TTV DIGESTER
2. FEEDSTOCK RECEIVING
3. FEEDSTOCK PROCESSING
4. TRUCK SCALE
5. HEATING, ELECTRICAL & CONTROLS
6. NUTRIENT LIQUID STORAGE
7. BIO FILTER
8. DEWATERING
9. DIGESTATE STAGING & BLENDING
10. OFFICE (3,000 S.F.)
11. BIOGAS UPGRADER
12. THERMAL OXIDIZER
13. GATED SITE ENTRANCE / EXIT
14. TRUCK TURNAROUND
15. SAFETY FLARE & CONDENSATE WELL
16. STAFF & VISITOR PARKING AREA
17. 6' PRECISION FACE BLOCK WALL
18. PERIMETER EARTH BERM
19. TRASH ENCLOSURE

KEY MAP



No.	Revision/Issue
	.
	.

valley design
230 W AVENIDA VALENCIA, SAN CLEMENTE CA. 92672
(909)576-5859

SHEET TITLE
TITLE PAGE / SITE PLAN

CLIENT
AD FACILITY
INDIAN AVENUE
DESERT HOT SPRINGS, CA

SCALE: AS NOTED

DATE: 01-02-20

DRAWN BY: TEAM

PROJECT NO: 1942

SHEET NO: **A1.0** OF X

2.2.2 Anaerobic Digester Process

Introduction. This section describes the AD process. Descriptions of the facilities proposed for the site are described in Section 2.2.3. The anaerobic digestion process converts organic materials to biogas that can be used for energy. Organic materials would be trucked to the facility from local jurisdictions. The organic materials would be pre-processed prior to loading into the digester. Within the digester, decomposition occurs in four phases: hydrolysis, acidogensesis, acetogenesis, and methanogenesis, resulting in methane (CH_4), carbon dioxide (CO_2), water, and digestate/residuals.

Post-processing of gas, liquid, and/or solids from the digester must also occur. AD facilities produce biogas consisting primarily of CH_4, CO_2, and small amounts of hydrogen sulfide (H_2S) and ammonia (NH_3). Typically, biogas is saturated with water vapor and may have trace amounts of hydrogen (H_2), nitrogen (N_2), oxygen (O_2), dust and siloxanes. Digestate is the remaining solids and/or liquids from the process (CalRecycle 2011).

Feedstocks. The organic waste feedstocks that would be handled by the AD include food waste, green waste and the organic fraction/fines from material recovery facilities that process municipal solid waste (OFMSW). Food waste includes food processing waste and fats, oils, and greases. Green material includes urban, agricultural, crop residues, and other green material. Unprocessed animal tissue (carcasses), biosolids, untreated septage, dairy manure, or hazardous waste are not included as part of the feedstock for the proposed AD.

For the proposed AD, feedstocks would be received in the Anaerobic Digester Facility Building located in the approximate center of the parcel. The feedstocks would be delivered by truck to one of two weigh bridges. Access to the Anaerobic Digester Facility Building would be from 19th Avenue. The facility would take in between 50 and 495 tons of feedstock; the intake would be phased over a 6-year period as described in the "Operational Phasing" section, below.

Operation. The proposed AD has three main operational stages: pre-processing, digestion, and post-processing. These stages are described below.

Pre-Processing. Pre-processing includes the activities necessary to prepare the feedstocks for delivery into the AD vessel. Pre-processing activities include feedstock receiving, storage of feedstock, all processing steps required to prepare the feedstock for the digester (such as sorting, screening, grinding, and dilution) and the process of feedstock delivery to the digester. For the Proposed Project, all pre-processing will occur in the Anaerobic Digester Facility Building.

There will be several streams of pre-treatment employed, depending on the specific feedstock received. The received food waste and green waste will be moved from the reception floor to a wide cut slow shredder, by a front-end loader, where the material will be cut to a 4- to 6-inch length. This material is then conveyed to a screen to remove the items larger than 2- to-4- inches in length. The material that passes through the screen ("unders") will then pass under an overband magnet to remove ferrous metals. The remaining unders are then conveyed to a storage bunker and ultimately fed to the digester. The larger items (e.g. plastic, glass, rubber, paper, cardboard or textiles) that pass over

the screen (“overs”) will be sent to a manual separation picking line, where they will be sorted for recycling, re-shredding or for disposal. The OFMSW material will not require any pre-processing and will be directly moved in the storage bunkers. All liquids, including food waste slurries and fats, oils & greases will be pumped directly into the liquid storage tank, via a camlock, outside of the receiving hall.

Digestion. Digestate staging and blending will occur in the southeast corner of the property. No water will be used for this process. All of the feedstocks, including pre-processed food waste/green waste, OFMSW & liquid feedstocks are mixed prior to entry into the digester to ensure the right consistency required for proper operation of the digesters. Once in the digesters, the mixed feedstocks are kept at thermophilic temperatures (130 degrees Fahrenheit) for the approximate 20 day retention time in the digester. Digestion will occur in six parallel digester vessels located behind (north and northeast of) the Anaerobic Digester Facility Building. Not all of the digester tanks may be used at once, depending on the amount of organic waste received at the facility at any one time. Production of biogas from organic matter involves a number of microbiological activities that convert solid or semi-solid materials into gaseous form in the absence of oxygen. The generated biogas is the metabolic product of bacteria. Biogas is an energy-rich mixture of CH_4 (50-70 percent) and CO_2 (30-50 percent) with traces of other gases.

The digestion is carried out by mixed naturally-occurring micro-organisms in a moist, heated environment. The proposed horizontal plug flow AD ensures that all material fed to the digesters experience the full 20 days of degradation allowing for optimal biogas production and more consistent methane yield.

The emerging biogas escapes into the freeboard room at the top of the AD tank ceiling. Produced biogas would be collected by a common gas pipeline. The biogas will pass through a scrubber installed on each tank to remove hydrogen sulfide and a condenser will be used to remove moisture. Following this, the biogas will pass through a gravel filter, which serves as a flame retardant. Finally, the biogas will be collected in a biogas storage balloon on each digester tank. An online sampling port is included on each tank for biogas analysis and monitoring. The biogas will be moved via pipeline to the gas conditioning and upgrading systems located on the concrete slab labeled Item 11 on site plan.

Post-Processing. Biogas generated through the anaerobic digestion process would be captured, cleaned and upgraded so that it meets natural gas pipeline requirements. Once the gas has been upgraded, it will be compressed and stored in tanker trailers for export to our offsite injection point. Trucks carrying the upgraded gas would enter and exit from 19th Avenue. More detail on the anticipated number of trucks is provided in Section 2.2.3.

Through the anaerobic digestion process, biomass in the waste stream is reduced through conversion to biogas and the nutrients are concentrated in the remaining output, consisting of liquids, remaining biomass, and inorganic solids. Liquid and solid digestate will be stored in tanks and an aeration and conditioning bunker. The liquid and solid digestate would be sold for a soil amendment for agricultural crops. Trucks carrying the soil amendment would enter and exit from 19th Avenue. More detail on the anticipated number of trucks is provided in Section 2.2.3.

2.2.3 Proposed Facilities and Operational Phasing

Proposed Facilities. Layout of the proposed facilities are shown in Figure 2-3. The proposed AD facility would include a 3,000-square-foot Office Building to act as a control and monitoring center for the facility as well as an administration facility to direct the operations receiving, material handling and processing through production, shipping and sales. The personnel in the Office Building will track the materials process and monitor both facility operations as well as site personnel. The Office Building includes a 30-space parking lot to accommodate visitors, employees and management personnel. Potable water connections for the restrooms and break room kitchen will be extended from an existing water line in 19th Avenue. According to the Department of Energy's Federal Water Use Indices, office water use ranges from 8 to 20 gallons per employee per day with the typical use 15 gallons per employee per day (Department of Energy 1996). Assuming 27 total employees at maximum buildout, water use would be approximately 0.45 acre-feet per year. Mission Springs Water District's 2015 Urban Water Management Plan states that 2015 water use for commercial uses was approximately 1.17 acre-feet per year per connection (MSWD 2016). These connections include heavy water users such as restaurants and car washes, which would not be representative of the office use proposed for the Proposed Project.

The 22,900-square-foot Anaerobic Digester Facility Building will accept delivery of the weighed organic material and grind the organic product for delivery to the multi-stage anaerobic digesters. The facility will use a misting system with odor control sprayers to reduce odor production and will accept between 250 and 495 tons of organic material per day at full capacity. The facility will incorporate up to six multi-stage 550,000-gallon digesters. The digesters will be developed in stages to accept the processed organic material. The CO_2 and CH_4 gas by product will be transported to low pressure gas balloons. Liquid and solid fertilizer produced during the AD process shall be separated and transported to 600-ton liquid fertilizer mixing and conditioning tanks and solid fertilizer aeration and conditioning bunkers for transport and/or sale. Excess liquid organic matter (if any) will be removed to a retention tank to be combined with additional organic material to be reprocessed by the ADs at a later date, by a sand filter pump. The retention tank will also act as a retention basin to accept excess drainage to be mixed and sent to the AD.

The low-pressure gas balloons will be developed in stages as required. The low-pressure gas balloons will transmit the CO_2 and CH_4 gas produced during the digestion process to the upgrader. From there the low-pressure gas will be piped to a 120 horsepower (hp) hermetically sealed compressor located on the gas cleansing and upgrading slab north of the Anaerobic Digester Facility (labeled item 11 on the site plan). The pressurized gas will ultimately be transmitted to high pressure gas tankers. The pressurized tankers will be hauled to an injection point for use in the regional natural gas system.

The site will be fenced for security and will be accessed by 19th Avenue, which will be paved from the site to Indian Canyon Drive as part of the Proposed Project. Calle de los Romos will also be paved to a half-width accommodate traffic from 18th Avenue via Indian Canyon Drive as part of the adjacent Coachillin Specific Plan. The AD facility will incorporate drought tolerant landscaping across the 19th Avenue frontage as required by the City.

Stormwater runoff will be completely contained on the site with two retention basins located on either side of the developed areas and adjacent to 19th Avenue. The western retention basin is approximately 80 feet by 40 feet and the eastern retention basin is approximately 140 feet by 50 feet and have been sized to completely contain all runoff from the site.

There is an existing 8-inch sewer line across the frontage of the facility that will transport waste from employee and visitor restrooms to a proposed septic system located east of the AD facilities. Ultimately, sewer waste will be transported to the Mission Springs Water District (MSWD) proposed facility east of the project site. Sewer laterals will be extended from the sewer main on 19th Avenue to the proposed Office Building to convey sewer waste. Wastewater from the AD process will not enter the public wastewater system or the interim septic system.

Potable water for the AD facility will be from a 12-inch water line in 19th Avenue along the southern parcel boundary which will be extended east from the intersection of Calle de los Romos and 19th Avenue. The AD facility will incorporate a looped fire suppression system throughout the proposed site. Individual water services will be installed to provide potable water to the Office Building.

Gas and electric service will be extended east within 19th Avenue from the intersection of Calle de los Romos and 19th Avenue. Electric, water and gas will be extended to the Anaerobic Digester Facility Building as well as the Office Building.

Operational Phasing. The Proposed Project's operations will be phased over approximately 6 years to allow for start-up and growth in organic waste recycling demand. The 5 phases proposed for the Proposed Project's operations are summarized below.

Phase (years)	Employees[1]	Material Receiving Trucks/Amount[2]	Fertilizer Shipping Trucks/Amount[2]
1 (June 2019-January 2021)	Shift 1: 10 Shift 2: 5 Shift 3: 4	5-7 trucks 50-100 tons	2-6 trucks 20-85 tons
2 (January 2021-June 2022)	Shift 1: 12 Shift 2: 6 Shift 3: 5	10-14 trucks 100-200 tons	5-7 trucks 50-100 tons
3 (June 2022-January 2024)	Shift 1: 14 Shift 2: 7 Shift 3: 6	15-21 trucks 150-295 tons	7-10 trucks 70- 140 tons
4 (January 2024-June 2025)	Shift 1: 14 Shift 2: 7 Shift 3: 6	20-28 trucks 200-395 tons	10-14 trucks 100-200 tons
5 (full capacity starting June 2025)	Shift 1: 14 Shift 2: 7 Shift 3: 6	25-35 trucks 250-495 tons	12-17 trucks 120-195 tons

Notes: [1]Shift 1 is 7:00 am to 3:30 pm, Shift 2 is 3:00 pm to 11:30 pm, Shift 3 is 11:00 pm to 7:30 am. Shifts are overlapping by ½ hour to allow for shift change reporting.
[2]All receiving and shipping will be during the first shift (7:00 am to 3:30 pm). Each truck has a 10-14-ton capacity. Numbers may be rounded to the nearest 5 tons.

2.3 Mitigation Monitoring Program

Mitigation measures are included within each section of the Initial Study Checklist that has an identified potentially significant impact and are provided below. The Mitigation Monitoring Program for the Proposed Project includes both tiered Mitigation Measures incorporated from the PEIR and Project-specific mitigation measures. The mitigation measures from the PEIR are labeled as such. Table 2-1: Mitigation Monitoring Program outlines the potential impacts and mitigation measures of the Proposed Project and assigns responsibility for the oversight of each mitigation measure. This table shall be included in all bid documents and included as a part of the Proposed Project's development.

Table 2-1
Mitigation Monitoring Program

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
1. Aesthetics	**PEIR Mitigation Measure 10.1b:** Landscaping and/or vegetated berms should be used to minimize views of facilities from sensitive views.	Developer	During Design and Construction	Less than significant
	PEIR Mitigation Measure 10.2b: Facilities using truck tippers or other un-enclosed unloading should consider using litter fences to manage blowing litter. Facilities should educate haulers delivering materials to the AD facility through literature, web links, or provide training on the acceptance of waste at the facilities to minimize litter. Facility operators should develop a protocol to identify feedstocks that are severely contaminated with potential litter and reject unacceptable loads.	AD Facility Operator Riverside County Department of Environmental Health	During Construction and Operation	Less than significant
	PEIR Mitigation Measure 10.2c: Clean-up crews can be used as necessary to control litter.	AD Facility Operator Riverside County Department of Environmental Health	During Operation	Less than Significant
	PEIR Mitigation Measure 10.2d: Feedstocks and digestate byproducts should be stored in enclosed facilities or processed in a timely manner to prevent visibly deteriorated site conditions.	AD Facility Operator Riverside County Department of Environmental Health	During Operation	Less than Significant
	PEIR Mitigation Measure 10.3b: Any lighting (portable or permanent) should be hooded and directed onto the Project site. This would reduce effects to nighttime skies from uplighting,	Developer	During Design and Construction	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	reduce glare, and prevent light from spilling onto adjoining properties and roads.			
	PEIR Mitigation Measure 10.3c: Flares may be enclosed to reduce the visibility of flames during operation.	Developer	During Design and Operation	Less than significant
3. Air Quality	**PEIR Mitigation Measure 5.1a:** Applicants shall prepare and submit an Air Quality Technical Report as part of the environmental assessments for the development of future AD facilities on a specific Project-by-Project basis. The technical report shall include an analysis of potential air quality impacts for all steps of the Project (including a screening level analysis to determine if construction and operation [for all on-site processes, including any end-use and disposal methods] related criteria air pollutant emissions would exceed applicable air district thresholds, as well as greenhouse gas (GHG) emissions and any health risk associated with toxic air contaminants (TACs) from all AD facility sources) and reduction measures. Preparation of the technical report should be coordinated with the appropriate air district and shall identify compliance with all applicable New Source Review and Best Available Control Technology (BACT) requirements. The technical report shall identify all Project emissions from permitted (stationary) and non-permitted (mobile and area) sources and mitigation measures (as appropriate) designed to reduce significant emissions to below the applicable air district thresholds of significance, and if these thresholds cannot be met with mitigation, then the individual AD facility Project could require additional CEQA review or additional mitigation measures.	Applicant	Prior to Construction	Less than significant
	PEIR Mitigation Measure 5.1b: Applicants shall require construction contractors and system operators to implement the	Developer Contractor	During Construction	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	following Best Management Practices (BMPs) as applicable during construction and operations: • Facilities shall be required to comply with the rules and regulations from the applicable Air Quality Management District (AQMD) or Air Pollution Control District (APCD). • Facilities shall require substrate unloading and pre-processing activities to occur indoors within enclosed, negative pressure buildings. Collected foul air (including volatile organic compounds (VOCs) off-gassed from undigested substrates) should be treated via biofilter or air scrubbing system. • Use equipment meeting, at a minimum, Tier II emission standards. • Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes (as required by the state airborne toxics control measure [Title 13, §2485 of the California Code of Regulations]). Provide clear signage that posts this requirement for workers at the entrances to the site. • Maintain all equipment in proper working condition according to manufacturer's specifications. • Use electric equipment when possible. • For Projects that are unable to use internal combustion engines due to air district regulations (i.e., NOx emission limits), other options for generating renewable energy from biogas should be considered. Other options that should be	AD Facility Operator	and Operation	

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	evaluated for using biogas or biomethane as an energy source include: use as a transportation fuel (compressed biomethane), use in fuel cells to generate clean electricity, use for on-site heating, or injection of biomethane into the utility gas pipeline system. If there are other lower NOx alternative technologies available at the time of AD facility development, these should be considered as well during the facility design process.			
	PEIR Mitigation Measure 5.2a: Applicants for the development of AD facilities shall comply with appropriate local land use plans, policies, and regulations, including applicable setbacks and buffer areas from sensitive land uses for potentially odoriferous processes.	Developer	During Construction and Operation	Less than significant
	PEIR Mitigation Measure 5.2b: If an AD facility handles compostable material and is classified as a compostable material handling facility, the facility must develop an Odor Impact Minimization Plan (OIMP) pursuant to 14 CCR 17863.4. Otherwise, applicants shall develop and implement an Odor Management Plan (OMP) that incorporates equivalent odor reduction controls for digester operations and is consistent with local air district odor management requirements. These plans shall identify and describe potential odor sources, as well as identify the potential, intensity, and frequency of odor from these likely sources. In addition, the plans will specify odor control technologies and management practices that if implemented, would mitigate odors associated with the majority of facilities to less than significant. However, less or more control measures may be required for individual Projects. Odor control strategies and management practices that can be incorporated into these plans include, but are not limited to, the following:	Developer AD Facility Operator Riverside County Department of Environmental Health	During Construction and Operation	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	• Require substrate haulage to the AD facility within covered, liquid leak-proof containers. • Establish time limit for on-site retention of undigested substrates (i.e., feedstocks should be processed and placed into the portion of the system where liquid discharge and air emissions can be controlled within 24 or 48 hours of receipt. • Provide enclosed, negative pressure buildings for indoor receiving and pre-processing. Treat collected foul air in a biofilter or air scrubbing system. • Establish contingency plans for operating downtime (e.g., equipment malfunction, power outage). • Manage delivery schedule to facilitate prompt handling of odorous substrates. • Handle fresh unstable digestate within enclosed building, or mix with greenwaste and incorporate into a composting operation within the same business day, and/or directly pump to covered, liquid leak-proof containers for transportation. • Protocol for monitoring and recording odor events. • Protocol for reporting and responding to odor events.			
4. Biological Resources	**Site Specific Mitigation Measure BIO-1**: The developer shall ensure that the applicable CVMSHCP Local Development Mitigation Fee is paid to the City of Desert Hot Springs. The time	Developer	Prior to building permits	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	of payment must comply with the City's Municipal Code (Chapter 3.40).			
	Site Specific Mitigation Measure BIO-2: A pre-construction survey shall be conducted for the CNPS List 1 and 2 plant species that have been identified to have a potential to occur and that are not covered by the CVMSHCP, including chaparral sand-verbena, Harwood's eriastrum, cliff spurge, California satintail, spiny-hair blazingstar, slender cottonheads, desert beardtongue, desert spike moss, narrow-leaf sandpaper plant, California ayenia, and Arizona spurge. The survey methods shall follow the guidelines listed in the CNPS Botanical Survey Guidelines (CNPS 2001). Surveys shall be conducted during the appropriate blooming season for each of the plant species, and more than one survey may be required to include the appropriate blooming periods. If a population of CNPS List 1 or 2 plants, not covered by the CVMSHCP, is found on the Project site then CDFW shall be consulted to discuss appropriate mitigation measures. Mitigation measures could include, but are not limited to, seed collection and/or transplanting.	Developer Planning Department Qualified Biologist	Prior to issuance of grading permit, as indicated	Less than significant
	Site Specific Mitigation Measure BIO-3: Pre-construction surveys for burrowing owl shall be conducted. The surveys shall follow the methods described in the CDFW's Staff Report on Burrowing Owl Mitigation (CDFW 2012). Two surveys shall be conducted, with the first survey being scheduled between 30 and 14 days before initial ground disturbance (grading, grubbing, and construction), and second survey being conducted no more than 24 hours prior to initial ground disturbance. If burrowing owls and/or suitable burrowing owl burrows are identified on the Project site during the survey, and impact to those features are unavoidable, the Applicant shall consult with CDFW and follow the methods listed in the CDFW's	Developer Planning Department Qualified Biologist	Prior to issuance of grading permit, as indicated	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	Staff Report on Burrowing Owl Mitigation (CDFW 2012) for avoidance and/or passive relocation.			
	Site Specific Mitigation Measure BIO-4: A pre-construction survey for special-status wildlife species is recommended no more than 14 days prior to the start of ground-breaking activities to identify whether any of these species are present on the Project site prior to construction. The focus of the survey will be on desert tortoise, Coachella Valley fringe-toed lizard, desert kit fox, and the special-status wildlife species not covered by the CVMSHCP with a moderate potential to occur on site (pallid bat, pallid San Diego pocket mouse, red-diamond rattlesnake, loggerhead shrike, coast horned lizard, and American badger). The survey should be conducted according to the 2010 USFWS survey protocol document *Preparing for Any Action that May Occur within the Range of the Mojave Desert Tortoise*. The survey methods in USFWS's *Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance* (USFWS 2011) should also be taken into consideration for desert kit fox because there are no specific guidelines for desert kit fox and CDFW usually recommends that surveys for desert kit fox follow these guidelines. If any of these special-status wildlife species are identified on the Project site during the pre-construction survey, and direct impacts to the species are unavoidable, the Project should consult with the County and the wildlife agencies before proceeding determine whether avoidance, exclusion, and/or passive relocation may be required. If possible this survey can be conducted in conjunction with the first pre-construction burrowing owl survey.	Developer Planning Department Qualified Biologist	Prior to issuance of grading permit, as indicated	Less than significant
	Site Specific Mitigation Measure BIO-5: If construction or other Project activities are scheduled to occur during the bird breeding season (February 1 through August 31 for the majority	Developer	Prior to issuance of grading	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	of migratory bird species), a pre-construction nesting bird survey should be conducted by a qualified biologist no more than three (3) days prior to initial ground disturbance. The nesting bird survey should include the Project site and adjacent areas where Project activities have the potential to cause nest failure. If an active nest is identified, a qualified biologist should establish an appropriate disturbance limit buffer around the nest using flagging or staking. Construction activities will need to be avoided within any disturbance limit buffer zones until the nest is deemed no longer active by the biologist. If possible this survey can be conducted in conjunction with the second pre-construction burrowing owl survey.	Planning Department Qualified Biologist	permit, as indicated	
	Site Specific Mitigation Measure BIO-6: To ensure impacts to waters and habitats jurisdictional to the California Department of Fish and Wildlife are avoided, an exclusion zone shall be staked along the streambed and a 10-foot buffer by a qualified biologist prior to the commencement of ground-disturbing activities. The streambed and all lands within the exclusion zone shall be avoided for the duration of construction, and in perpetuity. The purpose of the exclusion zone shall be included in the construction worker daily briefings (tailgate meetings).	Developer Planning Department Qualified Biologist	Prior to ground disturbing activities	Less than significant
	Site Specific Mitigation Measure BIO-7: Coordination with the USACE is recommended to confirm Water of the U.S. are absent from the site, through their internal Jurisdictional Determination process. If Waters of the U.S. are confirmed to be absent, then the Project may proceed without further coordination with the USACE. Otherwise a permit pursuant to Section 404 of the CWA shall be obtained prior to conducting any ground-disturbing activities within the streambed.	Developer Planning Department Qualified Biologist	Prior to ground disturbing activities	Less than significant
	Site Specific Mitigation Measure BIO-8: Coordination with the SWRCB will be required for the Project if the streambed is	Developer	Prior to ground	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	impacted. If USACE jurisdiction is confirmed, then a Section 401 Water Quality Certification will be required from the SWRCB prior to conducting any ground-disturbing activities within the streambed. If no USACE jurisdiction is confirmed to be absent, then a Report of Waste Discharge would be needed from the SWRCB, through the local RWQCB, prior to ground disturbance.	Planning Department Qualified Biologist	disturbing activities	
	Site Specific Mitigation Measure BIO-9: For impacts to areas jurisdictional to the CDFW, a 1602 Streambed Alteration Agreement will be required. A Section 1602 Notification of Lake or Streambed Alteration shall be submitted to the local CDFW office, and agreement or the equivalent obtained prior to onset of ground disturbance within the streambed.	Developer Planning Department Qualified Biologist	Prior to ground disturbing activities.	Less than significant
5. Cultural Resources	**Site Specific Mitigation Measure CR-1:** If during the course of grading or construction, artifacts or other cultural resources are discovered, all grading on the site shall be halted and the Applicant shall immediately notify the City Planner. A qualified archaeologist shall be called to the site by, and at the cost of, the Applicant to identify the resource and recommend mitigation if the resource is culturally significant.	Planning Department Qualified Archaeologist	During grading and other ground disturbing activities	Less than significant
7. Geology and Soils	**PEIR Mitigation Measure 5.4:** Implement Mitigation Measure 5.1a.	Applicant	Prior to Construction	Less than significant
	Site Specific Mitigation Measure GEO-1: Prior to the issuance of grading permits, the project applicant shall prepare a project site-specific geotechnical/geological engineering study, to be completed by a qualified geologist, and incorporate the recommendations of said geotechnical/geological engineering study into all Project plans. The Project's building plans shall demonstrate that they incorporate all applicable			

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	recommendations of the design-level geotechnical study and comply with all applicable requirements of the latest adopted version of the California Building Code. A licensed professional engineer shall prepare the plans, including those that pertain to soil engineering, structural foundations, pipeline excavation, and installation. All on-site soil engineering activities shall be conducted under the supervision of a licensed geotechnical engineer or certified engineering geologist.			
	Site Specific Mitigation Measure GEO-2: The Applicant shall ensure that any excavations deeper than 10 feet will be monitored by a qualified paleontological monitor. Should construction/development activities uncover paleontological resources, work will be halted in that area and moved to other parts of the Project site and the monitor shall determine the significance of these resources. The paleontologist shall have authority to divert grading away from exposed fossils temporarily in order to recover the fossil specimens. If the find is determined to be significant, avoidance or other appropriate measures shall be implemented as recommended by the monitor. All fossils and associated data recovered during the paleontological monitoring shall be reposted in an approved curation facility.	Planning Department Qualified Paleontologist	During construction for excavations greater than 10 feet in depth.	Less than significant
8. Greenhouse Gas Emissions	**PEIR Mitigation Measure 11.1:** Prior to final Project design and any earth disturbing activities, the applicant or agency(ies) responsible shall conduct a Phase I Environmental Site Assessment (ESA). The Phase I ESA shall be prepared by a Registered Environmental Assessor (REA) or other qualified professional to assess the potential for contaminated soil or groundwater conditions at the Project site; specifically in the area proposed for construction of AD facilities. The Phase I ESA shall include a review of appropriate federal, State and local	Planning Department Developer	Prior to final Project design and any earth disturbing activities	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	hazardous materials databases to identify hazardous waste sites at on-site and off-site locations with a one quarter mile radius of the Project location. This Phase I ESA shall also include a review of existing and past land uses through aerial photographs, historical records, interviews of owners and/or operators of the property, observations during a reconnaissance site visit, and review of other relevant information that could identify the potential existence of contaminated soil or groundwater. If no contaminated soil or groundwater is identified or if the Phase I ESA does not recommend any further investigation, then the Project applicant or agency(ies) responsible shall proceed with final Project design and construction. OR If existing soil or groundwater contamination is identified, and if the Phase I ESA recommends further review, the applicant or agency(ies) responsible shall retain a REA to conduct follow-up sampling to characterize the contamination and to identify any required remediation that shall be conducted consistent with applicable regulations prior to any earth disturbing activities. The environmental professional shall prepare a report the includes, but is not limited to, activites performed for the assessment, summary of anticipated contaminants and contaminant concentrations at the proposed construction site, and recommendations for appropriate handline of any contaminated materials during construction.			

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
9. Hazards and Hazardous Materials	**PEIR Mitigation Measure 11.4a:** Prior to Project approval, AD facility operators shall prepare and implement a Fire Safety Plan that outlines fire hazards, describes facility operations procedures to prevent ignition of fires, requires regular inspection of fire suppression systems, and provides for worker training in safety procedures as well as protocols for responding to fire incidents. The Fire Safety Plan shall be reviewed and approved by the local fire enforcement agency.	Planning Department Riverside County Fire Department	Prior to Project Approval	Less than Significant
	PEIR Mitigation Measure 6.2a: During pre-processing, all water that contacts digester feedstock, including stormwater from feedstock handling and storage facilities and water from equipment wash down and feedstock wetting, shall be contained until appropriately disposed or utilized. Best Management Practices (BMPs) may be used to reduce loading of sediment, nutrients, trash, organic matter, and other pollutants. These BMPs may include, but are not limited to, trash grates and filters, oil-water separators, mechanical filters such as sand filters, vegetated swales, engineered wastewater treatment wetlands, settling ponds, and other facilities to reduce the potential loading of pollutants into surface waters or groundwater. All discharges of stormwater are prohibited unless covered under the General Industrial Stormwater Permit, other National Pollutant Discharge Elimination System (NPDES) permit, or are exempted from NPDES permitting requirements. The NPDES permits will generally require implementation of management measures to achieve a performance standard of best available technology economically achievable (BAT) and best conventional pollutant control technology (BCT), as appropriate. The General Industrial Stormwater Permit also requires the development of a storm water pollution prevention plan (SWPPP) and a monitoring plan, in compliance with permit requirements.[3] Other liquid and solid	AD Facility Operator Colorado River Regional Water Quality Control Board	During Operation	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	wastes may only be discharged pursuant to an NPDES permit or waste discharge requirement (WDR) order.			
10. Hydrology and Water Quality	**PEIR Mitigation Measure 6.2b**: In order to minimize the amount of fugitive trash or feedstock released to surface waters, the following measures shall be implemented. When feasible, the Project proponent shall preferentially select feedstocks that contain minimal amounts of trash that could become entrained in surface water, either via direct contact with stormwater flows or via other accidental release, such as due to wind. Processing of such feedstocks may, however, be unavoidable, such as in support of an AD facility that processes MSW. Therefore, the Project applicant shall ensure that (1) drainage from all feedstock loading, unloading, and storage areas is contained onsite or treated to remove trash and stray feedstock, and sediment prior to release as permitted; (2) in all feedstock loading and unloading areas, and all areas where feedstock is moved by front loaders or other uncovered or uncontained transport machinery, the applicant shall ensure that mechanical sweeping and/or equivalent trash control operational procedures are performed at least daily, during operations; and (3) the facility operator shall train all employees involved in feedstock handling so as to discourage, avoid, and minimize the release of feedstock or trash during operations.	AD Facility Operator Colorado River Regional Water Quality Control Board	During Operation	Less than significant
	PEIR Mitigation Measure 6.2c: In order to minimize water quality degradation associated with accidental spills at AD facilities, the applicant for individual Projects that would be implemented under the Program EIR shall require Project proponents to complete and adhere to the requirements of a Spill Prevention, Control, and Countermeasure (SPCC) Plan, which is based on the federal SPCC rule. Notification of the SPCC Plan shall be provided to the local Certified Unified Program Agency (CUPA). The SPCC Plan shall contain	Riverside County Department of Environmental Health AD Facility Operator	Prior to and During Operation	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	measures to prevent, contain, and otherwise minimize potential spills of pollutants during facility operation, in accordance with U.S. EPA requirements. For individual Projects that would utilize wet digestion systems, in which processing and holding tanks would contain the (aqueous) digestion reaction and liquid digestate containing fats and oils, the SPCC Plan shall provide for installation and monitoring of secondary containment and/or leak detection systems to ensure that AD liquids are not accidentally discharged to navigable waters or adjoining shorelines. Monitoring of these systems shall be in accordance with SPCC Plan requirements. Additionally, the Project applicant shall adhere to the requirements and recommendations of WDRs, which would be provided for the Project by the applicable regional board. Requirements under WDRs include implementation of measures to minimize water quality degradation, including but not limited to restrictions on the concentration of water quality pollutants discharged from a proposed facility, and maximum acceptable flow volumes for a given facility			
	PEIR Mitigation Measure 6.2d: Any proposed discharge to a pond for an individual Project would require the Project applicant to acquire WDRs from the appropriate regional board. The Project applicant shall ensure that all ponds and discharges to such ponds adhere to all requirements under applicable WDRs. The need for pond liners in order to protect groundwater quality would be assessed during the regional board's review of the Project, and requirements for pond liners would be included in the WDRs, as warranted. If appropriate, California Code of Regulations requirements include, but are not limited to, groundwater monitoring, double liner systems with leachate collection, water balance, a preliminary closure plan for clean	AD Facility Operator	Prior to and During Operation	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	closure, seismic analysis, and financial assurances. Compliance with WDRs may require the installation of facilities such as tanks and digesters to store and process the digestate, the use of filter presses, and implementation of other water quality protection practices.			
	PEIR Mitigation Measure 6.3: Individual applicants seeking coverage under this Program EIR shall ensure that, for their proposed AD facilities including pre-processing areas, feedstock storage areas, and digestate handling facilities, are protected from FEMA-defined 100-year flood events. Design measures may include, but are not limited to: facility siting, access placement, grading, elevated foundations, and site protection such as installation of levees or other protective features.	Developer	Prior to Construction/ During Construction	Less than significant
	PEIR Mitigation Measure 6.4: In order to ensure that the AD facilities would not result in detrimental increases in stormwater flow or flooding on site or downstream, the Applicant for each AD facility Project shall prepare a comprehensive drainage plan (prior to construction) and implement the plan during construction. The comprehensive drainage plan shall include engineered stormwater retention facility designs, such as retention basins, flood control channels, storm drainage facilities, and other features as needed to ensure that, at a minimum, no net increase in stormwater discharge would occur during a 10-year, 24-hour storm event, as a result of Project implementation. Project related increases in stormwater flows shall be assessed based on proposed changes in impervious surface coverage on site, as well as proposed grading and related changes in site topography.	Developer Planning Department	Prior to Construction/ During Construction	Less than significant
	PEIR Mitigation Measure 7.1a: Construction activities shall be limited to the hours between 7 am and 7 pm Monday through Saturday or an alternative schedule established by the local	Developer	During Construction	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	jurisdiction or other limits to construction hours normally enforced by the local jurisdiction. This Project shall conform to the City of Desert Hot Springs' municipal code, which limits construction activities to the hours between 7 am and 5 pm Monday through Saturday. During daylight savings time, construction is permitted between 6:00 am and 6:00 pm Monday through Saturday. Construction is not permitted on Sundays.	Planning Department		
13. Noise	**PEIR Mitigation Measure 7.1b:** Construction equipment noise shall be minimized by muffling and shielding intakes and exhaust on construction equipment to a level no less effective than the manufacturer's specifications and by shrouding or shielding impact tools.	Developer Planning Department	During Construction	Less than significant
	PEIR Mitigation Measure 7.1d: Construction contractors shall comply with all local noise ordinances and regulations and other measures deemed necessary by the lead agency.	Developer Planning Department	During Construction	Less than significant
	PEIR Mitigation Measure 8.1: Implement Mitigation Measures 10.1b, 10.3c, and 11.4a.	Developer	Prior to Project Approval, During Construction, and Operation	Less than significant
15. Public Services	**PEIR Mitigation Measure 8.3a:** If the Project proposes to obtain water from a water supplier (municipal system or other public water entity) the developer would enter into an agreement for service with the supplier.	Developer	Prior to Operation	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	PEIR Mitigation Measure 8.3c: Alternate water sources, such as non-potable water and recycled water, shall be used during the pre-processing and AD process phases where needed and available.	AD Facility Operator	During Operation	Less than significant
	PEIR Mitigation Measure 9.3b: Prior to construction, the contractor(s) in cooperation with the agencies having jurisdiction over the affected roadways, will survey and describe the pre-construction roadway conditions on rural roadways and residential streets. Within 30 days after construction is completed, the affected agencies will survey these same roadways and residential streets in order to identify any damage that has occurred. Roads damaged by construction will be repaired to a structural condition equal to the condition that existed prior to construction activity.	City Public Works Department Developer	Prior to and Within 30 Days After Construction	Less than significant
17. Transportation	**PEIR Mitigation Measure 9.3c:** Prior to initiation of Project operations, the Project sponsor(s) will submit a Spill Prevention Plan to the appropriate local agency. The Spill Prevention Plan will include, among other provisions, a requirement that each truck driver know how to carry out the emergency measures described in the Spill Prevention Plan (therefore reducing roadway hazards if an accidental spill were to occur).	AD Facility Operator Planning Department	Prior to Operations	Less than significant
	PEIR Mitigation Measure 9.5a: Prior to construction, the Project sponsor will coordinate with the appropriate local government departments, Caltrans, and utility districts and agencies regarding the timing of construction Projects that would occur near AD Project sites. Specific measures to mitigate potential significant impacts will be determined as part of the interagency coordination, and could include measures such as employing flaggers during key construction periods,	City Public Works Department Developer	Prior to Construction	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	designating alternate haul routes, and providing more outreach and community noticing.			

	Site Specific Mitigation Measure TRA-1: The following off-site intersection improvements shall be constructed to address the Project traffic impact for the Existing Plus Project (2018) traffic conditions at the following study area intersections:
	• Indian Canyon Drive (NS) at Dillon Boulevard (EW) - #1
	  ○ Provide a second northbound through lane
	  ○ Provide a second southbound through lane
	• Indian Canyon Drive (NS) at 19th Avenue (EW) - # 4
	  ○ Install a westbound stop sign and a right-turn only lane
	  ○ Provide a southbound left turn lane
	  ○ Provide a westbound right turn lane
	  ○ Restrict eastbound and westbound left turn movements
		Developer	During Design and Operation	Less than significant

	Site Specific Mitigation MeasureTRA-2: The following off-site intersection improvements shall be constructed to mitigate the Existing Plus Ambient Plus Project (2025) traffic conditions: • Indian Canyon Drive (NS) at Dillon Boulevard (EW) - #2 ○ Install a new traffic signal	Developer	During Design and Operation	Less than significant
	Site Specific Mitigation Measure TRA-3: The following site intersection improvements shall be constructed to mitigate the Existing Plus Ambient Plus Cumulative Plus Project (2025) traffic conditions: • Indian Canyon Drive (NS) at 18th Avenue (EW) - #2 ○ Install a westbound stop sign and right-turn only sign (as part of the Coachillin' Industrial Park)	Developer	During Design and Operation	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	○ Provide a northbound right turn lane (as part of the Coachillin' Industrial Park) ○ Provide a southbound left turn lane (as part of the Coachillin' Industrial Park) ○ Provide a westbound right turn lane (as part of the Coachillin' Industrial Park) • Indian Canyon Drive (NS) at Coachillin' Access (EW) - #3 ○ Install a traffic signal (as part of the Coachillin' Industrial Park) ○ Provide a northbound U-turn lane (as part of the proposed Anaerobic Digester Project) ○ Provide a second northbound through lane (as part of the Coachillin' Industrial Park) ○ Provide a westbound left turn lane (as part of the Coachillin' Industrial Park) ○ Provide a westbound right turn lane (as part of the Coachillin' Industrial Park)			
	Site Specific Mitigation Measure TRA-4: The Project shall contribute towards the identified cumulative mitigation measure improvements on a fair share basis through payment of the adopted City of Desert Hot Springs Development Impact Fee program. The Project's fair share percentage at the intersection of Indian Canyon Road and Dillon Road is approximately 5.1 percent.	Developer	During Design and Operation	Less than significant
18. Tribal Cultural Resources	**Site Specific Mitigation Measure TCR-1:** The applicant/developer shall have an approved Tribal Monitor on site during any ground disturbing activities (including archeological surveys). The applicant/developer and consulting tribes (Morongo Band of Mission Indians, Agua Caliente Band of Cahuilla Indians and Twenty-Nine Palms Band of Mission Indians [monitoring on behalf of the Agua Caliente Band of	Developer	During Ground Disturbing Activities	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	Cahuilla Indians]) will agree on a monitoring schedule based on the necessary days of ground disturbance. Only one tribal monitor will be on-site at any given time. The tribal monitor shall have the authority to halt activities adversely affecting significant cultural resources or tribal cultural resources. Should buried cultural resource be encountered, the Monitor shall notify a Qualified Archeologist to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer and each of the consulting Tribal Preservation Offices (Morongo Band of Mission Indians, Agua Caliente Band of Cahuilla Indians, and the Twenty-Nine Palms Band of Mission Indians).			
	Site Specific Mitigation Measure TCR-2: In the event that human remains (or remains that may be human) are discovered at the project site during grading or earthmoving, the construction contractors, project archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The project proponent shall then inform the Riverside County Coroner and the City of Desert Hot Springs immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b). Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains shall be	Developer Riverside County Coroner Native American Heritage Commission	If Human Remains are Found During Ground Disturbing Activities	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	overseen by the MLD(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts. The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98. According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052) determined in consultation between the project proponent and the MLD. In the event that the project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply and the mediation and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).			
	Site Specific Mitigation Measure TCR-3: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries: a. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversite of the process; and b. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources,	Developer Project Archaeologist	After Discovery of Native American Cultural Resources	Less than significant

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Desert Hot Springs with evidence of same; c. Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed; d. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation; e. For purposes of conflict resolution, if more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Agua Caliente Cultural Museum.			

Section Number	Mitigation Measures	Responsible for Monitoring	Timing	Impact after Mitigation
	Site Specific Mitigation Measures TCR-4: At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted to the City of Desert Hot Springs documenting monitoring activities conducted by the project Archaeologist (if applicable) and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the consulting tribes (Morongo Band of Mission Indians, Agua Caliente Band of Cahuilla Indians, and the Twenty-Nine Palms Band of Mission Indians) and Eastern Information Center and interested tribes.	Developer Native American Tribal Monitor Project Archaeologist (if applicable)	At the completion of monitoring activities	Less than significant

CHAPTER THREE – ENVIRONMENTAL CHECKLIST

1. **Project Name:** Coachillin' Anaerobic Digester Facility on APN 666-360-015

2. **Lead Agency Name and Address:**
City of Desert Hot Springs
65950 Pierson Boulevard
Desert Hot Springs, California, 92240

3. **Contact Person and Phone Number:**
Rebecca Deming, Community Development Director
City of Desert Hot Springs
(760) 329-6411 ext. 240

4. **Project Location:**
The Project site is located east of Indian Canyon Drive, between 18th and 19th Avenues. The site is bordered to the north by vacant land and 18th Avenue beyond, to the west by vacant land and Indian Canyon Drive beyond, to the south by 19th Avenue, and to the east by vacant land and Little Morongo Road beyond as shown on the Regional Location Map (Figure 2-1).

5. **Project Applicants' Name and Address:**
Kenny Dickerson
Coachillin' Holdings, LLC
71713 Highway 111, Suite 100
Rancho Mirage, CA 92720

6. **General Plan Designation:** I-L Light Industrial

7. **Zoning Designation:** Light Industrial

8. **Description of Project:** The Proposed Project consists of an AD Facility that will take organic waste from local jurisdictions in the Coachella Valley and convert it to electricity. The facility would be located on an approximately 9.76-acre parcel north of 19th Avenue and east of Calle De Los Ramos in the City of Desert Hot Springs, California. The Proposed Project would take approximately one year to build.

9. **Surrounding Land Uses and Setting**: Light Industrial uses with vacant land immediately to the north, south, and east of the site, and a planned mixed-use Specific Plan to the west.

10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):** None

11. **Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code Section 21080.3? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, proc0edures regarding confidentiality, etc?** Three tribes requested consultation. Please see Section 18 of this Initial Study for a summary of consultation.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" or "Less Than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☒ Aesthetics	☐ Agriculture and Forestry Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology and Soils	☒ Greenhouse Gas Emissions	☒ Hazards/Hazardous Materials
☒ Hydrology/Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☒ Noise	☒ Paleontological Resources	☐ Population and Housing
☒ Public Services	☐ Recreation	☒ Transportation
☒ Tribal Cultural Resources	☐ Utilities and Service Systems	☐ Wildfire
☐ Mandatory Findings of Significance		

DETERMINATION On the basis of this initial evaluation:

☐ I find that the Project has been described and evaluated in the PEIR and determined not to have potential for any new impacts or more significant impacts than disclosed in the PEIR, and no additional CEQA compliance steps are required.

☒ I find that the Project may have site-specific environmental impacts not described in the PEIR, but the new impacts would be mitigated to a less-than-significant level and a tiered MITIGATED NEGATIVE DECLARATION is required.

☐ I find that the Project may have site-specific environmental effects, or more significant environmental effects, not described in the PEIR and at least one of these effects would remain significant even after mitigation and a tiered ENVIRONMENTAL IMPACT REPORT IS required.

_____ _____

Name Date

Title

	Consistent with PEIR, Less than Significant	Consistent with PEIR, Less than Significant with Mitigation	Inconsistent with PEIR, Potentially Significant	Inconsistent with PEIR, Less than Significant or Less than Significant with Mitigation	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the Project:					
a) Have a substantial adverse effect on a scenic vista?	☐	☒	☐	☐	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?	☐	☒	☐	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐	☐

	Consistent with PEIR, Less than Significant	Consistent with PEIR, Less than Significant with Mitigation	Inconsistent with PEIR, Potentially Significant	Inconsistent with PEIR, Less than Significant or Less than Significant with Mitigation	No Impact
II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to the information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resource Code section 122220(g)), timberland (as defined by Public Resource Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	☐	☐	☐	☐	☒

	Consistent with PEIR, Less than Significant	Consistent with PEIR, Less than Significant with Mitigation	Inconsistent with PEIR, Potentially Significant	Inconsistent with PEIR, Less than Significant or Less than Significant with Mitigation	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☐	☒
e) Involve other changes in the exiting environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☐	☒
III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the Project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☐	☒
b) 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?	☐	☒	☐	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☒	☐	☐	☐	☐

	Consistent with PEIR, Less than Significant	Consistent with PEIR, Less than Significant with Mitigation	Inconsistent with PEIR, Potentially Significant	Inconsistent with PEIR, Less than Significant or Less than Significant with Mitigation	No Impact
IV. BIOLOGICAL RESOURCES -- Would the Project:					
a) 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 California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐	☐
b) 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 California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐	☐
d) 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?	☒	☐	☐	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☐	☒

	Consistent with PEIR, Less than Significant	Consistent with PEIR, Less than Significant with Mitigation	Inconsistent with PEIR, Potentially Significant	Inconsistent with PEIR, Less than Significant or Less than Significant with Mitigation	No Impact
V. CULTURAL RESOURCES -- Would the Project:					
a) Cause a substantial adverse change in the significance of a historical resource pursuant §15064.5?	☐	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐	☐
VI. ENERGY – Would the Project:					
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation?	☐	☐	☐	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☐	☒
VII. GEOLOGY AND SOILS -- Would the Project:					
a) Directly or indirectly cause potential substantial 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?	☒	☐	☐	☐	☐

	Consistent with PEIR, Less than Significant	Consistent with PEIR, Less than Significant with Mitigation	Inconsistent with PEIR, Potentially Significant	Inconsistent with PEIR, Less than Significant or Less than Significant with Mitigation	No Impact
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 waste water disposal systems where sewers are not available for the disposal of waste water?	☒	☐	☐	☐	☐
f) Directly or indirectly destroy a unique paleontological resource or site or a unique geological feature?	☐	☒	☐	☐	☐
VIII. GREENHOUSE GAS EMISSIONS – Would the Project:					
a) Generate greenhouse gas emissions either directly or indirectly, that may have a significant impact on the environment?	☐	☒	☐	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☐	☒

	Consistent with PEIR, Less than Significant	Consistent with PEIR, Less than Significant with Mitigation	Inconsistent with PEIR, Potentially Significant	Inconsistent with PEIR, Less than Significant or Less than Significant with Mitigation	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the Project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐	☐
b) 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?	☐	☒	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☐	☒
d) Be located on a site which 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?	☐	☐	☐	☐	☒
e) For a Project 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 the Project result in a safety hazard or excessive noise for people residing or working in the Project area?	☐	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☒	☐	☐	☐

	Consistent with PEIR, Less than Significant	Consistent with PEIR, Less than Significant with Mitigation	Inconsistent with PEIR, Potentially Significant	Inconsistent with PEIR, Less than Significant or Less than Significant with Mitigation	No Impact
X. HYDROLOGY AND WATER QUALITY -- Would the Project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☒	☐	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☒	☐	☐	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:					
i) result in substantial erosion or siltation on- or off-site?	☐	☒	☐	☐	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☒	☐	☐	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☒	☐	☐	☐
iv) impede or redirect flood flows?	☐	☒	☐	☐	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	☒	☐	☐	☐	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☐	☒

	Consistent with PEIR, Less than Significant	Consistent with PEIR, Less than Significant with Mitigation	Inconsistent with PEIR, Potentially Significant	Inconsistent with PEIR, Less than Significant or Less than Significant with Mitigation	No Impact
XI. LAND USE AND PLANNING - Would the Project:					
a) Physically divide an established community?	☐	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☐	☒
XII. MINERAL RESOURCES -- Would the Project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☐	☒
XIII. NOISE – Would the Project result in:					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐	☐

	Consistent with PEIR, Less than Significant	Consistent with PEIR, Less than Significant with Mitigation	Inconsistent with PEIR, Potentially Significant	Inconsistent with PEIR, Less than Significant or Less than Significant with Mitigation	No Impact
d) For a Project located within the vicinity of a private airstrip or 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 the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☐	☒
XIV. POPULATION AND HOUSING -- Would the Project:					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☒	☐	☐	☐	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☐	☒
IV. PUBLIC SERVICES					
a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
i) Fire protection?	☐	☒	☐	☐	☐
ii) Police protection?	☒	☐	☐	☐	☐
iii) Schools?	☐	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☐	☒

	Consistent with PEIR, Less than Significant	Consistent with PEIR, Less than Significant with Mitigation	Inconsistent with PEIR, Potentially Significant	Inconsistent with PEIR, Less than Significant or Less than Significant with Mitigation	No Impact
v) Other public facilities?	☐	☐	☐	☐	☒
XVI. RECREATION					
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☐	☒
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☐	☒
XVII. TRANSPORTATION -- Would the Project:					
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☒	☐	☐	☐
b) Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?	☐	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☐	☒
d) Result in inadequate emergency access?	☒	☐	☐	☐	☐

	Consistent with PEIR, Less than Significant	Consistent with PEIR, Less than Significant with Mitigation	Inconsistent with PEIR, Potentially Significant	Inconsistent with PEIR, Less than Significant or Less than Significant with Mitigation	No Impact
XVIII TRIBAL CULTURAL RESOURCES – Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☐	☐	☒
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5020.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐	☐
XIX. UTILITIES AND SERVICE SYSTEMS – Would the Project:					
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction of which could cause significant environmental effects?	☐	☒	☐	☐	☐
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☒	☐	☐	☐

	Consistent with PEIR, Less than Significant	Consistent with PEIR, Less than Significant with Mitigation	Inconsistent with PEIR, Potentially Significant	Inconsistent with PEIR, Less than Significant or Less than Significant with Mitigation	No Impact
c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?	☐	☐	☐	☐	☒
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☐	☒
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☐	☒

	Consistent with PEIR, Less than Significant	Consistent with PEIR, Less than Significant with Mitigation	Inconsistent with PEIR, Potentially Significant	Inconsistent with PEIR, Less than Significant or Less than Significant with Mitigation	No Impact
XVIV. MANDATORY FINDINGS OF SIGNIFICANCE					
a) Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐	☐
b) Does the Project have impacts that are individually limited, but cumulatively considerable? (Cumulatively considerable means that the incremental effects of a 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)?	☐	☐	☒	☐	☐
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐	☐

CHAPTER FOUR – DISCUSSION OF ENVIRONMENTAL IMPACTS

This section provides explanation and justification of the Initial Study Checklist found in Chapter Three. The Proposed Project would have a less than significant impact on the environment with the implementation of mitigation measures as proposed as part of this review.

As previously described, this Initial Study checklist tiers from the PEIR prepared by CalRecycle (CalRecycle 2011). Therefore, the checklist format in this tiered document has been revised from the standard CEQA Guidelines Appendix G format identifying impacts as potentially significant, less than significant with mitigation, less than significant, or no impact to one that identifies if the impact will be consistent with or inconsistent with the PEIR. If inconsistent with the PEIR, the impact is identified as potentially significant, less than significant with mitigation, or less than significant. It should be noted that no potentially significant impacts that cannot be mitigated to a level that is less than significant have been identified either in the PEIR or in this site-specific analysis.

Each section summarizes the analysis for the applicable resource from the PEIR, as well as any applicable PEIR mitigation measures. The PEIR mitigation measures are shown in *italicized* text, and the discussion of the applicability of these measures to the Proposed Project is shown in underlined text.

1. AESTHETICS

Summary of PEIR Evaluation

The PEIR determined that AD facilities located in urban/developed, urban transition, or areas within an existing permitted solid waste facility would not likely have significant effect to aesthetics. The PEIR requires a site-specific analysis to determine if the proposed AD facility is located in a scenic vista, would affect a state scenic highway, would substantially degrade the visual character of the site or its surroundings, or would create a new source of substantial light or glare.

Mitigation measures were proposed to reduce these impacts to a less-than-significant level. The following mitigation measures from the PEIR have been incorporated into the Project design or otherwise apply to the Project:

> ***Mitigation Measure 10.1a:*** *Avoid siting AD facilities near scenic vistas and corridors designated within an applicable land use plan and the State Scenic Highway Program.* The Proposed Project is not located in a designated scenic visa or corridor or within an area designated by the State Scenic Highway Program. This mitigation measure does not apply to the Proposed Project.
>
> ***Mitigation Measure 10.1b:*** *Landscaping and/or vegetated berms should be used to minimize views of facilities from sensitive views.* Although the Project site is not located in a sensitive viewshed, landscaping and fencing required by the City would shield views of the facility from public viewpoints.

Mitigation Measure 10.2a: *Implement Mitigation Measures 10.1a and 10.1b.* Mitigation measures 10.1a and 10.1b have been incorporated into the Project design as applicable, and as described above.

Mitigation Measure 10.2c: *Cleanup crews can be used as necessary to control litter.* The staffing plan includes 3 shifts so that staff are on the site 24-hours per day. Although all unloading will take place within an enclosed structure, and therefore excessive litter is not anticipated, part of the staff's duties will include making sure that litter is controlled on the site.

Mitigation Measure 10.2d: *Feedstocks and digestate byproducts should be stored in enclosed facilities or processed in a timely manner to prevent visibly deteriorated site conditions.* Feedstocks and digestate byproducts will be stored in enclosed facilities.

Mitigation Measure 10.2e: *Project operators should consider enclosure of pre-processing operations if it provides an aesthetic and/or noise attenuating benefit.* Although the Project site is not located in a designated scenic area or within a corridor designated by the State Scenic Highway Program, all pre-processing operations would be located in an enclosed building.

Mitigation Measure 10.3a: *Implement Mitigation Measure 10.1b.* Mitigation Measure 10.1b would be implemented by the Project.

Mitigation Measure 10.3b: *Any lighting (portable or permanent) should be hooded and directed onto the Project site. This would reduce effects to nighttime skies from uplighting, reduce glare, and prevent light from spilling onto adjoining properties and roads.* All Project lighting would be hooded and directed onto the Project site as part of the Project design.

Mitigation Measure 10.3c: *Flares may be enclosed to reduce the visibility of flames during operation.* The Project's flare would be shielded as part of the Project design.

Mitigation Measure 10.4: *Implement Mitigation Measures 10.1a, 10.1b, 10.2a, 10.2b, 10.2c, 10.2d, 10.2e, 10.3a, 10.3b, and 10.3c.* The Project would implement these mitigation measures.

a) Would the Project have a substantial adverse effect on a scenic vista?

Consistent with PEIR, Less Than Significant with Mitigation. The City of Desert Hot Springs, including the Project site, is located in the Coachella Valley, surrounded by the San Bernardino and San Jacinto Mountain Ranges in all directions. The San Bernardino and San Jacinto Mountain Ranges have a significant rise over the valley floor and are visible from most locations in the City. The Project site is located east of Calle De Los Ramos, north of Avenue 19. The Project site is located in a partially-developed area with a Light Industrial zoning and General Plan land use designation (City of Desert Hot Springs 2000a). Ultimate development of the site would result in the construction of industrial buildings and facilities (e.g., AD tanks). All Proposed Project activities would take place within enclosed facilities or within tanks that would be blocked from public views by the 6-foot block wall. Implementation of the Proposed

Project would change the site from vacant to developed industrial. The City's land use designations allow for the development of recycling facilities. The Proposed Project would be consistent with this designation. The Project area is located in an area separate from the City's main residential and commercial districts. No designated scenic vistas are in the vicinity of the site. The Proposed Project would be screened from public view by security fencing and native landscaping, which would be compatible with the other proposed and existing Light Industrial uses surrounding the site. The Proposed Project is not anticipated to adversely affect any significant vistas with the implementation of Mitigation Measures 10.1a and 10.1b from the PEIR (listed above). No Project- specific mitigation measures are required.

b) *Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

No Impact. The nearest Officially Designated State Scenic Highway is Interstate 10, which is approximately 0.25-mile south of the Project site (Caltrans 2018). The Project site does not contain any landmarks or scenic resources, such as trees, rock outcroppings, that would be damaged by the proposed development. No specific scenic resources such as rock outcroppings or unique features exist on the site and development of the Proposed Project would not obstruct any prominent scenic vista or other views open to the public traveling on I-10. No impacts to resources within the State Scenic Highway would occur.

c) *Would the Project, in non-urbanized areas, substantially degrade the existing visual character of quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?*

Consistent with PEIR, Less Than Significant with Mitigation. The PEIR identified litter from outdoor unloading of feedstocks and outdoor piling of feedstock and handling and storage of digester products as potentially-significant impacts related to changes in visual character. However, the Proposed Project would place all of these activities indoors. Additionally, flares could affect aesthetics if outdoors. With the Proposed Project, the flare would be used only in an emergency situation. The flare would be shielded and would not be visible to the general public from outside of the facility's block wall.

The PEIR also identified tanks and buildings associated with the AD facilities as having potentially significant effects if they are not compatible with surrounding land uses. The Project site is currently vacant and undeveloped. The Proposed Project is located in a relatively undeveloped area that is designated for Light Industrial. This area was annexed to the City of Desert Hot Springs with the Project site, as well as most of the nearby properties zoned for "Light Industrial." Consequently, there are a number of mixed activities and uses dating from earlier times, which were lightly regulated for design. The nearest uses include commercial business and industrial buildings in parks as well as mixed rural and outside storage uses. The Proposed Project would be of a scale compatible with surrounding existing and proposed uses and above ground structures would be designed to blend in with surroundings by using desert-compatible

native landscaping and natural colors. The heights and setbacks of the proposed facilities would be required to comply with the local standards for industrial development, therefore matching the existing visual character in relation to nearby existing and proposed industrial facilities. Therefore, impacts from changing the visual character of the site from vacant to developed industrial are considered to be less than significant with the implementation of Mitigation Measures 10.2a and 10.2b from the PEIR (listed above). No Project-specific mitigation measures are required.

d) *Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Consistent with PEIR, Less Than Significant with Mitigation. The Proposed Project would be located on vacant undeveloped land with no current sources of glare or light. The Project site is surrounded by vacant land, also designated as Light Industrial, in all directions with the closest residential development being a nonconforming single-family residence located approximately 0.6-mile northwest of the Project site.

To comply with the requirements found in Municipal Code 5.50, the Proposed Project would incorporate outdoor illumination for nighttime safety and facility security. The proposed lighting would be required to comply with the City of Desert Hot Springs Outdoor Lighting Standards, which requires new lighting to preserve low ambient lighting levels while maintaining security considerations (Municipal Code 17.40.170). The Desert Hot Springs outdoor lighting standards also meet the requirements of the PEIR Mitigation Measure 10.3b (listed above). Additionally, the flare associated with the biogas processing would be shielded and would not be visible. Although new sources of light and glare would be included with the Proposed Project, they would not be substantial and would not adversely affect day or nighttime views in the area. Impacts would be less than significant after implementation of PEIR Mitigation Measures 10.3a, 10.3b, and 10.3c. No Project-specific mitigation measures are required.

2. AGRICULTURE AND FORESTRY

Summary of PEIR Evaluation

The PEIR determined that AD facilities would have less than significant impacts to agriculture and forestry resources at the program level because It is assumed that AD facilities would be co-located with permitted solid waste facilities or located in areas zoned for industrial or solid waste handling activities. However, if proposed AD facilities would be constructed in undisturbed areas, then impacts to agriculture and forestry resources would be analyzed on a Project-by-Project basis. Site specific information would determine any impacts to agriculture and forestry resources on the Project site and would ensure that potential impacts to these resources would be mitigated appropriately, if necessary, using Project-specific mitigation measures.

No mitigation measures were proposed at the programmatic level because site specific impacts from individual facilities would need to be considered for agriculture and forestry resources.

a) *Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

No Impact. The California Farmland Mapping and Monitoring Program, Important Farmlands Map for Riverside County does not list the soils on the Project site as Prime Farmland or Farmland of Statewide Importance (CDC 2017). The soils on the Project site are listed as Other Land. Other Land is generally characterized as vacant and nonagricultural land surrounded by urban development greater than 40 acres. Therefore, the Proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to a non-agricultural use. No impact would occur.

b) *Would the Project conflict with existing zoning for agricultural use, or a Williamson Act Contract?*

No Impact. The Proposed Project is not located in an agricultural use zone nor is it subject to a Williamson Act Contract (CDC 2016). Therefore, the Proposed Project would not conflict with existing zoning for agricultural use or a Williamson Act Contract. No impact would occur.

c) *Would the Project involve other changes in the existing environment which, due to their location or nature could result in conversion of Farmland to non-agricultural use?*

No Impact. The Proposed Project is located on vacant undisturbed land zoned as light industrial in the City of Desert Hot Springs. The Project site is surrounded by vacant land in all directions with the closest light industrial development proposed to the west, adjacent to the Project site. Surrounding areas are not zoned as forest land, timberland, or timberland production. The Proposed Project would not conflict with the rezoning of forest land, timberland, or timberland production. No impact would occur.

d) *Result in the loss of forest land or conversion of forest land to non-forest use?*

No Impact. The Proposed Project is located in the City of Desert Hot Springs on vacant land in a light industrial zone. The Proposed Project would not cause the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

e) *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

No Impact. The Project site and the surrounding properties are not currently used for agriculture and are not within forest land. The Proposed Project would not result in the conversion of farmland or forest land to non-forest use. No impact would occur.

3. AIR QUALITY

Summary of PEIR Evaluation

The PEIR evaluates the effects of air quality pollutant emissions resulting from AD facility development in California and determined that on a programmatic level all the potential air quality-related impacts associated with AD facilities could be mitigated to a less than significant level with implementation of mitigation measures. The following mitigation measures from the PEIR have been incorporated into the Project design or otherwise apply to the Project:

> ***Mitigation Measure 5.1a:*** *Applicants shall prepare and submit an Air Quality Technical Report as part of the environmental assessments for the development of future AD facilities on a specific Project-by-Project basis. The technical report shall include an analysis of potential air quality impacts for all steps of the Project (including a screening level analysis to determine if construction and operation [for all on-site processes, including any end-use and disposal methods] related criteria air pollutant emissions would exceed applicable air district thresholds, as well as greenhouse gas (GHG) emissions and any health risk associated with toxic air contaminants (TACs) from all AD facility sources) and reduction measures. Preparation of the technical report should be coordinated with the appropriate air district and shall identify compliance with all applicable New Source Review and Best Available Control Technology (BACT) requirements. The technical report shall identify all Project emissions from permitted (stationary) and non-permitted (mobile and area) sources and mitigation measures (as appropriate) designed to reduce significant emissions to below the applicable air district thresholds of significance, and if these thresholds cannot be met with mitigation, then the individual AD facility Project could require additional CEQA review or additional mitigation measures.* Mitigation Measure 5.1a has been implemented by the Proposed Project in this Initial Study.
>
> ***Mitigation Measure 5.1b:*** *Applicants shall require construction contractors and system operators to implement the following Best Management Practices (BMPs) as applicable during construction and operations:*
>
> - *Facilities shall be required to comply with the rules and regulations from the applicable Air Quality Management District (AQMD) or Air Pollution Control District (APCD).*
> - *Facilities shall require substrate unloading and pre-processing activities to occur indoors within enclosed, negative pressure buildings. Collected foul air (including volatile organic compounds (VOCs) off-gassed from undigested substrates) should be treated via biofilter or air scrubbing system.*
> - *Use equipment meeting, at a minimum, Tier II emission standards.*
> - *Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes (as required by the state airborne toxics control measure [Title 13, §2485 of the California Code of Regulations]). Provide clear signage that posts this requirement for workers at the entrances to the site.*

- *Maintain all equipment in proper working condition according to manufacturer's specifications.*

- *Use electric equipment when possible.*

For Projects that are unable to use internal combustion engines due to air district regulations (i.e., NOx emission limits), other options for generating renewable energy from biogas should be considered. Other options that should be evaluated for using biogas or biomethane as an energy source include: use as a transportation fuel (compressed biomethane), use in fuel cells to generate clean electricity, use for on-site heating, or injection of biomethane into the utility gas pipeline system. If there are other lower NOx alternative technologies available at the time of AD facility development, these should be considered as well during the facility design process.

Mitigation Measure 5.1b will be incorporated into the Proposed Project.

Mitigation Measure 5.2a: *Applicants for the development of AD facilities shall comply with appropriate local land use plans, policies, and regulations, including applicable setbacks and buffer areas from sensitive land uses for potentially odoriferous processes.* Mitigation Measure 5.2a has been incorporated into the Proposed Project design.

Mitigation Measure 5.2b: *If an AD facility handles compostable material and is classified as a compostable material handling facility, the facility must develop an Odor Impact Minimization Plan (OIMP) pursuant to 14 CCR 17863.4. Otherwise, applicants shall develop and implement an Odor Management Plan (OMP) that incorporates equivalent odor reduction controls for digester operations and is consistent with local air district odor management requirements. These plans shall identify and describe potential odor sources, as well as identify the potential, intensity, and frequency of odor from these likely sources. In addition, the plans will specify odor control technologies and management practices that if implemented, would mitigate odors associated with the majority of facilities to less than significant. However, less or more control measures may be required for individual Projects. Odor control strategies and management practices that can be incorporated into these plans include, but are not limited to, the following:*

- *Require substrate haulage to the AD facility within covered, liquid leak-proof containers.*

- *Establish time limit for on-site retention of undigested substrates (i.e., feedstocks should be processed and placed into the portion of the system where liquid discharge and air emissions can be controlled within 24 or 48 hours of receipt.*

- *Provide enclosed, negative pressure buildings for indoor receiving and pre-processing. Treat collected foul air in a biofilter or air scrubbing system.*

- *Establish contingency plans for operating downtime (e.g., equipment malfunction, power outage).*

- *Manage delivery schedule to facilitate prompt handling of odorous substrates.*

- *Handle fresh unstable digestate within enclosed building or mix with greenwaste and incorporate into a composting operation within the same business day, and/or directly pump to covered, liquid leak-proof containers for transportation.*

- *Protocol for monitoring and recording odor events.*

- *Protocol for reporting and responding to odor events.*

Mitigation Measure 5.2b is applicable to the Proposed Project.

Mitigation Measure 5.3a: *Implement Mitigation Measures 5.1a and 5.1b.* Mitigation Measures 5.1a and 5.1b will be implemented by the Proposed Project.

Mitigation Measure 5.3b: *Based on the Air Quality Technical Report (specified in Measure 5.1a), if the health risk is determined to be significant on a Project-by-Project basis with diesel particulate matter (DPM) as a major contributor, then the applicants shall implement control measures such that the AD facility health risk would be below the applicable air district threshold, which may include implementation of one or more of the following requirements, where feasible and appropriate:*

- *Use either new diesel engines that are designed to minimize DPM emissions (usually through the use of catalyzed particulate filters in the exhaust) or retrofit older engines with catalyzed particulate filters (which will reduce DPM emissions by 85%);*

- *Use electric equipment to be powered from the grid, which would eliminate local combustion emissions;*

- *Use alternative fuels, such as compressed natural gas (CNG) or liquefied natural gas (LNG).*

The Project-specific air quality analysis did not determine a significant health risk, and this mitigation measure is not applicable (see analysis, below).

Mitigation Measure 5.4: *Implement Mitigation Measures 5.1a.*

Mitigation Measure 5.5: *Implement Mitigation Measures 5.1a and 5.1b*.

These mitigation measures would be implemented by the Proposed Project.

a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?

No Impact. As part of its enforcement responsibilities, the EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the California Clean Air Act requires an air quality attainment plan to be prepared for areas designated as nonattainment with regard to the federal and state ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The City of Desert Hot Springs is situated in the Coachella Valley, which is located in the northern region of the Salton Sea Air Basin (SSAB). The SSAB is designated as a nonattainment area for the federal ozone and coarse particulate matter (PM_{10}) standards and is also a nonattainment area for the state standards for ozone and PM_{10} (CARB 2017). In order to reduce emissions for which the Coachella Valley is in nonattainment, the South Coast Air Quality Management District (SCAQMD), the air pollution control officer for the region, has adopted the 2016 Air Quality Management Plan (AQMP) and Coachella Valley PM_{10} SIP. These air quality plans establish programs of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national ambient air quality standards. Pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including the Southern California Association of Governments' (SCAG) latest Regional Transportation Plan/Sustainable Communities Strategy, updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. According to the SCAQMD, in order to determine consistency with SCAQMD's air quality planning two main criteria must be addressed.

Criterion 1:
With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a Project include forecasts of Project emissions in relation to contributing to air quality violations and delay of attainment.

1. Would the Project result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new air quality violations?

As shown in Table 3-2, Table 3-4, Table 3-5, and Table 3-6 below the Proposed Project would result in emissions that would be below the SCAQMD regional and localized thresholds. Therefore, the Proposed Project would not result in an increase in the frequency or severity of existing air quality violations and would not have the potential to cause or affect a violation of the ambient air quality standards.

2. Would the Project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?

As shown in Table 3-2 and Table 3-5, below the Proposed Project would be below the SCAQMD regional thresholds for construction and operations. Because the Proposed Project would result in less than significant regional emission impacts, it would not delay the timely attainment of air quality standards or AQMP emissions reductions.

Criterion 2:
With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning within the Coachella Valley focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining Project consistency focuses on whether or not the Proposed Project exceeds the assumptions utilized in preparing the forecasts presented in its air quality planning documents. Determining whether or not a Project exceeds the assumptions reflected in the 2016 AQMP or Coachella Valley PM_{10} SIP involves the evaluation of the three criteria outlined below. The following discussion provides an analysis of each of these criteria.

1. Would the Project be consistent with the population, housing, and employment growth Projections utilized in the preparation of the AQMP and Coachella Valley PM_{10} SIP?

A Project is consistent with regional air quality planning efforts in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the SCAQMD air quality plans. Generally, three sources of data form the basis for the Projections of air pollutant emissions: The City of Desert Hot Springs General Plan, SCAG's Growth Management Chapter of the *Regional Comprehensive Plan and Guide* (RCPG), and SCAG's *2016 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS). The RTP/SCS also provides socioeconomic forecast Projections of regional population growth.

The Proposed Project is consistent with the land use designation and development density presented in the City General Plan. The Project site contains the General Plan designation of Light Industrial (I-L), which permits recycling facilities on all lands designated Industrial, with approval of a development permit. Furthermore, the Proposed Project does not involve any uses that would increase population beyond what is considered in the General Plan and, therefore, would not affect City-wide plans for population growth at the Project site.

Thus, the Proposed Project is consistent with the types, intensity, and patterns of land use envisioned for the site vicinity in the General Plan and RCPG. As a result, the Proposed Project would not conflict with the land use assumptions or exceed the population or job growth Projections used by SCAQMD to develop the 2016 AQMP and/or Coachella Valley PM_{10} SIP. The City's population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City. These are used by SCAG in all phases of

implementation and review. Additionally, as the SCAQMD has incorporated these same Projections into their air quality planning efforts, it can be concluded that the Proposed Project would be consistent with the Projections. (SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans.) Therefore, the Proposed Project would be considered consistent with the population, housing, and employment growth Projections utilized in the preparation of SCAQMD's air quality plans.

2. Would the Project implement all feasible air quality mitigation measures?

In order to further reduce emissions, the Proposed Project would be required to comply with emission reduction measures promulgated by the SCAQMD per General Plan Air Quality Element Policy 1, such as SCAQMD Rules 402, 403, 403.1 and 1113. SCAQMD Rule 402 prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. SCAQMD Rule 403 requires fugitive dust sources to implement Best Available Control Measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. SCAQMD Rule 403 is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. SCAQMD 1113 requires manufacturers, distributors, and end-users of architectural and industrial maintenance coatings to reduce reactive organic gas (ROG) emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories. As such, the Proposed Project meets this consistency criterion.

3. Would the Project be consistent with the land use planning strategies set forth by SCAQMD air quality planning efforts?

The AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. The Proposed Project is consistent with the land use designation and development density presented in the City's General Plan and therefore would not exceed the population or job growth Projections used by the SCAQMD to develop the AQMP and Coachella Valley PM_{10} SIP.

In conclusion, the determination of air quality plan consistency is primarily concerned with the long-term influence of a Project on air quality. The Proposed Project would not result in a long-term impact on the region's ability to meet State and Federal air quality standards. The Proposed Project's long-term influence would also be consistent with the goals and policies of SCAQMD's 2016 AQMP and Coachella Valley PM_{10} SIP.

Furthermore, the operation of the Project would create renewable energy over its planned lifetime and decrease the need for energy from fossil fuel–based power plants in the state, which is considered a beneficial impact to statewide air quality. Specifically, the Project would generate a maximum of 137.5 MW of electricity daily. Assuming an average electricity generation rate of half this, the Project could generate approximately 25,094 megawatt-hours (MWh) of electricity annually, and 752,820 MWh over a 30-year lifespan. The energy produced by the Project would displace the criteria pollutant emissions which would otherwise be produced by existing business-as-usual power generation resources (including natural gas and coal).

Table 3-1 shows the emissions that would be displaced by the proposed Project. Note that this estimate only includes that associated with the combustion of fossil fuels; it does not include the vehicle trips associated with the Project's operations, and it similarly does not include operational employee trips associated with natural gas or coal combustion nor the emissions associated with extracting and transporting those power sources. In addition, this estimate only includes the displacement of that portion of the California market that comes from fossil fuels and does not include the approximate 52 percent of the California electricity generated by non-combustion sources (wind, solar, nuclear, hydro-electric) (CEC 2018). Displacement of fossil fuel emissions has a direct beneficial effect on human health for those receptors downwind of the location of the fossil fuel power plants. As shown, the Project would potentially displace just under 80 tons of NO_x, 5 tons of CO, 8 tons of SO_2, just under 8 tons of PM_{10}, and 3 tons of $PM_{2.5}$ over the course of 30 years. The Project would be consistent with the emission-reduction goals of the 2016 AQMP and Coachella Valley PM_{10} SIP.

Table 3-1. Proposed Project Displaced Criteria Pollutant Emissions (Tons)						
	Emissions (Tons)					
	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Emissions Displaced Annually (tons)						
Displaced Natural Gas-Source Emissions	0.00	0.25	0.08	0.17	0.24	0.10
Displaced Coal-Source Emissions	0.00	2.41	0.10	0.11	0.02	0.01
Total	**0.00**	**2.66**	**0.18**	**0.28**	**0.26**	**0.11**
Emissions Displaced over 30 Years (tons)						
Displaced Natural Gas-Source Emissions	0.00	7.50	2.40	5.10	7.20	3.00
Displaced Coal-Source Emissions	0.00	72.30	3.00	3.30	0.60	0.30
Total	**0.00**	**79.80**	**5.40**	**8.40**	**7.80**	**3.30**

Source: Displaced emissions calculated by ECORP Consulting using U.S. EPA's AP-42 Fifth Edition Compilation of Air Emissions Factors 1995; 2015.

Notes: In order to provide a conservative analysis, the Proposed Project is assumed to generate electricity 50 percent of the time available (4,380 hours annually). An existing fossil fuel energy production heat rate of 9,313 British Thermal Units (Btu) per kilowatt hour is employed based on the average heat rate of natural gas-based energy generators serving California (CEC 2019). The Average coal-based energy plant heat rate is omitted since so little of California's energy is derived from coal, and to provide a conservative analysis.

137.5 megawatts generated daily equates to a 5.7-megawatt facility. 5.7 megawatts (25,093,751 annual kilowatt hours) x 9,313 average heat rate = 233,698,107,347 Btu displaced from fossil fuel production. Fossil fuel-based energy consumption in California is predominately derived from natural gas (33.67% total) (CEC 2018). 9.25% of the state's energy comes from unspecified nonrenewable sources and this percentage is added to the natural gas total for the purpose of this analysis. Coal constitutes 4.13% of all fossil fuel-based energy consumption in California (CEC 2018). Therefore, 100,303,227,673 units of the displaced Btu is displaced natural gas consumption and 9,651,731,833 units of the displaced Btu is displaced coal. The heat content of coal is assumed at 24 million BTU per ton of coal burned. At a rate of 24 million BTU per ton of coal burned, the project would displace 402 tons of burned coal annually.

b) 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?

Consistent with PEIR, Less Than Significant with Mitigation.

By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's individual emissions exceed its identified significance thresholds, the project would be cumulatively considerable. Projects that do not exceed significance thresholds would not be considered cumulative considerable.

Regional Construction Significance Analysis – Criteria Air Pollutants

Construction-generated emissions are temporary and short term but have the potential to represent a significant air quality impact. Three basic sources of short-term emissions will be generated through construction of the Proposed Project: operation of the construction vehicles (i.e., excavators, trenchers, dump trucks), the creation of fugitive dust during clearing and grading, and the use of asphalt or other oil-based substances during paving activities. Construction activities such as excavation and grading operations, construction vehicle traffic, and wind blowing over exposed soils would generate exhaust emissions and fugitive particulate matter emissions that affect local air quality at various times during construction. Effects would be variable depending on the weather, soil conditions, the amount of activity taking place, and the nature of dust control efforts. The dry climate of the area during the summer months creates a high potential for dust generation. As previously described, all development Projects in Desert Hot Springs, including the Proposed Project, are subject to SCAQMD rules and regulations in effect at the time of construction to reduce fugitive dust emissions and to mitigate potential air quality impacts per General Plan Air Quality Element Policy 1. Therefore, construction activities associated with the Proposed Project would be subject to SCAQMD Rule 403, which requires taking reasonable precautions to prevent the emissions of fugitive dust, such as using water or chemicals, where possible, for control of dust during the clearing of land and other construction activities.

The SCAQMD has established thresholds of significance for air quality for construction activities, as shown in Table 3-2 below. The previous analysis prepared in the PEIR found that construction activities associated with the AD Initiative would contribute to air pollutants to a level that is less than significant with the implementation of several mitigation measures that reduce construction impacts. These measures are binding and applicable to the Proposed Project. The specific PEIR mitigation measures applicable to the Proposed Project include PEIR Measures 5.1a and 5.1b. PEIR Measure 5.1a requires AD projects, such as that proposed by the Proposed Project, to prepare and submit an Air Quality Technical Report that includes an analysis of potential air quality impacts for all steps of the Proposed Project in order to determine whether the resultant criteria air pollutant emissions would exceed applicable air district thresholds. The Air Quality & Greenhouse Gas Assessment has been prepared in order

to fulfill the requirements of PEIR Mitigation Measures 5.1a. PEIR Mitigation Measure 5.1b requires AD projects to implement the following BMPs as applicable:

- Facilities shall be required to comply with the rules and regulations from the applicable Air Quality Management District (AQMD) or Air Pollution Control District (APCD).
- Use equipment meeting, at a minimum, Tier 2 emission standards (Tier 2 standards reduce NOx and PM emissions substantially compared with Tier 0 and Tier 1 engines).[1]
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes (as required by the state airborne toxics control measure [Title 13, §2485 of the California Code of Regulations]). Provide clear signage that posts this requirement for workers at the entrances to the site.
- Maintain all equipment in proper working condition according to manufacturer's specifications.
- Use electric equipment when possible.

Construction of the Proposed Project is anticipated to last one year. Construction-generated emissions associated with the Proposed Project were calculated using the California Air Resources Board (CARB)-approved CalEEMod computer program based on the specific type of construction equipment anticipated to be employed and the length of construction, per the Project applicant.

Predicted maximum daily construction-generated emissions for the Proposed Project are summarized in Table 3-2 accounting for the requirement of Tier 2 construction equipment of PEIR Mitigation Measure 5.1b (the remaining components of Mitigation Measure 5.1b cannot be quantified). Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

As shown in Table 3-2, emissions resulting from construction of the Proposed Project would not exceed the SCAQMD daily significance criterion for any pollutants. Furthermore, as demonstrated the Proposed Project complies with the requirements of the PEIR and would not result in an increase in the severity of construction-related air quality impacts. There is not a new or substantially more severe impact compared with the determination contained in the PEIR.

Localized Construction Significance Analysis

Localized Significance Thresholds (LSTs) were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD

[1] *The first federal standards (Tier 1) for new off-road diesel engines were adopted in 1994 for engines over 50 horsepower and were phased in from 1996 to 2000. The 1998 regulation introduced Tier 1 standards for equipment under 50 horsepower and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. Tier 4 engine standards began phasing-in in 2015.*

provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific level proposed Projects. The SCAQMD provides the LST lookup tables for one, two, and five-acre Projects emitting carbon monoxide (CO), nitrogen oxide (NO_X), coarse particulate matter ($PM_{2.5}$), or coarse particulate matter (PM_{10}). The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The Proposed Project is located within Sensitive Receptor Area (SRA) 30, Coachella Valley. As identified in Table 3-4 below, emissions on the peak day of construction would not exceed LSTs.

Table 3-2. Construction-Related Emissions (Regional Significance Analysis)

Construction Year	Pollutant (pounds per day)					
	Reactive Organic Gases	**Nitrogen Oxide**	**Carbon Monoxide**	**Sulfur Dioxide**	**Coarse Particulate Matter**	**Fine Particulate Matter**
2018	**2.49**	**54.74**	**42.01**	**0.07**	**117.75**	**12.91**
2019	2.40	43.98	34.70	**0.07**	117.74	12.90
SCAQMD Potentially Significant Impact Threshold	75	100	550	150	150	55
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod version 2016.3.2. Emission estimates account for each worker commute trip and each vendor trip traversing 0.7 mile of unpaved roadway.

Notes: The reduction/credits for construction emissions are based on measures included in CalEEMod and as required by the SCAQMD through Rule 403. This includes watering exposed surfaces three times daily; watering all haul roads twice daily; sweeping trackout from adjacent street; and limiting speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. Project construction emissions also account for the requirement of Tier 2 construction equipment of Program EIR Mitigation 5.1b. ***Bolded*** *values represent the maximum daily emissions.*

Construction LSTs

As previously described, the SCAQMD has produced look-up tables for Projects that disturb less than or equal to 5 acres daily. The SCAQMD has also issued guidance on applying the CalEEMod emissions software to LSTs for Projects greater than 5 acres. Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, the equipment list is used to determine the maximum daily disturbed-acreage for comparison to LSTs. Table 3-3 displays the maximum daily disturbed acreage for Project construction.

Table 3-3. Equipment-Specific Grading Rates					
Construction Phase	**Equipment Type[1]**	**Acres Graded/Disturbed per 8-Hour Day[2]**	**Equipment Quantity[1]**	**Operating Hours per Day[1]**	**Acres Graded per Day[2]**
Site Preparation	Crawler Tractor	0.5	1	8	0.5
	Excavator	0.0	2	8	0.0
	Grader	0.5	1	8	0.5
	Paver	0.0	1	8	0.0
	Roller	0.0	1	8	0.0
	All Terrain Forklift	0.5	2	8	1.0
	Tractor/Loader/Backhoe	0.5	2	8	1.0
	Trencher	0.5	1	8	0.5
	Site Preparation Total				**3.5**
Grading	Grader	0.5	1	8	0.5
	Off-Highway Truck	0.0	1	8	0.0
	Rubber Tired Loader	0.5	1	8	0.5
	Roller	0.0	1	8	0.0
	Scraper	1.0	2	8	2.0
	Tractor/Loader/Backhoe	0.5	1	8	0.5
	Grading Total				**3.5**
Maximum Total Acres Graded per Day					**3.5**

Source: [1] Project Applicant
[2]CalEEMod User's Guide-Appendix A.

As shown in Table 3-3, implementation of the Proposed Project could potentially disturb up to 3.5 acres daily during both the site preparation phase and grading phase. Thus, the LST threshold value for a 3.5-acre construction was sourced from the LST lookup tables.

The nearest sensitive receptor to the Project site is a residence located more than 3,000 feet (1,000 meters) to the northwest on Louise Street. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, for a conservative analysis, LSTs for receptors located at 500 meters were utilized in this analysis. Table 3-3 shows the construction-related emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ compared to the LSTs for SRA 30.

Table 3-4. Construction Localized Significance Thresholds				
Construction Phase	**Pollutant (pounds per day)**			
	NO_x	**CO**	**PM_{10}**	**$PM_{2.5}$**
Site Preparation	54.62	40.54	1.92	1.58
Grading	50.65	34.35	2.21	1.30
SCAQMD Localized Significance Threshold *(Adjusted for 3.5 acres of disturbance at 500 meters)*	*822.00*	*28,663.50*	*235.50*	*120.00*
Exceed SCAQMD LST Threshold?	**No**	**No**	**No**	**No**

Source: CalEEMod version 2016.3.2.

Notes: The reduction/credits for construction emissions are based on measures included in CalEEMod and as required by the SCAQMD through Rule 403. This includes watering exposed surfaces three times daily; watering all haul roads twice daily; sweeping trackout from adjacent street; and limiting speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. Project construction emissions also account for the requirement of Tier 2 construction equipment of Program EIR Mitigation 5.1b.

The Localized Significance Threshold was determined using Appendix C of the SCAQMD Final Localized Significant Threshold Methodology guidance document for pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$. The Localized Significance Threshold was based on the daily disturbance during construction (3.5 acres), the distance to sensitive receptors (500 meters), and the source receptor area (SRA 30).

Table 3-4 shows that the emissions of these pollutants on the peak day of construction would not result in significant concentrations of pollutants at the nearest sensitive receptors. Therefore, significant impacts would not occur concerning LSTs during construction activities.

Regional Operational Significance Analysis – Criteria Air Pollutants

Implementation of the Proposed Project would result in long-term operational emissions of criteria air pollutants such as PM_{10}, $PM_{2.5}$, CO, and SO_2 as well as ozone precursors such as ROG and NO_X. Project-generated increases in emissions would be predominantly associated with motor vehicle use. Similar to construction air pollutant emissions, the previous analysis prepared in the Program EIR found that operational activities associated with the AD Initiative would contribute to air pollutants to a level that is less than significant with the imposition of several mitigation measures that reduce operational impacts. These measures are binding and applicable to the proposed Coachillin' AD Facility. The specific PEIR mitigation applicable to Proposed Project operations includes PEIR Mitigation Measures 5.1a and 5.1b. As previously described, PEIR Mitigation Measure 5.1a requires AD projects, such as the Proposed Project, to prepare and submit an Air Quality Technical Report that includes an analysis of potential air quality impacts for all steps of the Project in order to determine whether the resultant criteria air pollutant emissions would exceed applicable air district thresholds, and this Air Quality & Greenhouse Gas Assessment has been prepared to

fulfill this requirement. Program EIR Measure 5.1b requires AD Project proposals to implement the following air pollutant-reducing measures:

- Facilities shall require substrate unloading and pre-processing activities to occur indoors within enclosed, negative pressure buildings. Collected foul air (including volatile organic compounds (VOCs) off-gassed from undigested substrates) should be treated via biofilter or air scrubbing system.
- Facilities shall be required to comply with the rules and regulations from the applicable Air Quality Management District (AQMD) or Air Pollution Control District (APCD).

As previously described, organic waste (feedstock) would arrive at the proposed AD facility from local jurisdictions in the Coachella Valley via truck, and the organic materials would be pre-processed prior to being loaded into the digester. Feedstock trucks would be received in the Anaerobic Digester Facility Building to be located on the southern end of the parcel. All substrate unloading and pre-processing activities would occur inside of the enclosed Anaerobic Digester Facility Building. Per PEIR Mitigation Measure 5.1b, the Anaerobic Digester Facility Building is required to be equipped with a biofilter or air scrubbing system in order to collect emissions from undigested substrates.

Long-term operational emissions attributable to the Proposed Project are identified in Table 3-5 and compared to the regional operational significance thresholds promulgated by the SCAQMD, the applicable air quality management district.

Table 3-5. Operational-Related Emissions (Regional Significance Analysis)

Emission Source	Pollutant (pounds per day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer Emissions						
Area	2.06	0.00	0.01	0.00	0.00	0.00
Energy	0.03	0.31	0.26	0.00	0.02	0.02
Mobile	0.52	18.42	4.58	0.06	53.93	5.74
Gas Turbine Combustion[1]	2.43	67.09	7.12	2.72	0.00	0.00
Biogas Flare Emissions[2]	0.00	13.47	8.98	44.90	0.04	0.04
Project Total	**5.04**	**99.29**	**20.95**	**47.68**	**53.99**	**5.80**
Emissions Reduction from Fossil Fuel Displacement[3]	*0.00*	*-14.57*	*-0.96*	*-1.56*	*-1.38*	*-0.59*

Table 3-5. Operational-Related Emissions (Regional Significance Analysis)						
Emission Source	**Pollutant (pounds per day)**					
	ROG	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Winter Emissions						
Area	2.06	0.00	0.01	0.00	0.00	0.00
Energy	0.03	0.31	0.26	0.00	0.02	0.02
Mobile	0.52	18.63	4.52	0.05	1.95	0.58
Gas Turbine Combustion[1]	2.43	67.09	7.12	2.72	0.00	0.00
Biogas Flare Emissions[2]	0.00	13.47	8.98	44.90	0.04	0.04
Project Total	**5.04**	**99.50**	**20.89**	**47.67**	**54.00**	**5.79**
Emissions Reduction from Fossil Fuel Displacement[3]	*0.00*	*-14.57*	*-0.96*	*-1.56*	*-1.38*	*-0.59*
SCAQMD Regional Significance Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod version 2016.3.2. Emission estimates account for each Project trip traversing 0.7 mile of unpaved roadway..

[1] Emissions from combustion-fired gas turbine derived from ENVIRON International Corporation (2012), which identifies 96.0 pounds of NOx, 10.2 pounds of CO, 3.48 pounds of ROG, and 3.9 pounds of SO_2 per every million cubic feet of methane combusted. 698,940 cubic feet of methane are anticipated to be combusted daily, based on the maximum amount of feedstock proposed to be processed daily (495 tons). An estimated 1,412 cubic feet of biogas would be generated daily by each ton of material processed daily (North Carolina State University 2013) [1,412 x 495 tons daily = 698,940 cubic feet].

[2] Biogas flare emissions are based on the generation of 0.03 pounds of NOx, 0.02 pounds of CO, 0.0001 pounds of PM_{10} & $PM_{2.5}$, and 0.1 pounds of SO_2 for every 1.1 ton of organic waste processed (North Carolina State University 2013).

[3] Emissions reduction from fossil fuel displacement are from Table 3-1. Fossil fuel displacement reductions are only included for informational purposes and not utilized for determining significance.

Notes: Emissions projections account for a trip generation rate identified by Kunzman Associates 2018. The proposed Project consists of an anaerobic digester facility that would take organic waste from local jurisdictions in the Coachella Valley and convert it to electricity. The average trip length for delivery trucks is calculated at 22.62 miles, which represents the average automotive travel distance between the Project site and the eight communities of Palm Springs, Palm Desert, Rancho Mirage, Indio, La Quinta, Indian Wells, Cathedral City, and Coachella.

As shown in Table 3-5, the Proposed Project's emissions would not exceed SCAQMD thresholds for any criteria air pollutants. The Proposed Project complies with the requirements of the PEIR and would not result in an increase in the severity of operational-related air quality impacts. There is not a new or substantially more severe impact compared with the determination contained in the PEIR.

Localized Operational Significance Analysis

According to the SCAQMD localized significance threshold methodology, LSTs would apply to the operational phase of a proposed Project only if the Project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). The Proposed Project is Projected to attract an average of 70 heavy-duty delivery trucks daily during operations (Kunzman Associates, Inc. 2018), and thus would be a source of the air toxic, diesel particulate matter (DPM). Additionally, the Proposed Project would be a source of NO_x and CO, as well as trace amounts of the air toxics, hydrogen sulfide (H_2S) and ammonia (NH_3), released as fugitives from the AD or from the potential combustion or flaring of the biogas. Combustion of biogas containing H_2S generates the pollutant, sulfur dioxide (SO_2). Additional air toxics that could be generated by the combustion of biogas (either in an engine or flare) include benzene, formaldehyde, and other products of incomplete combustion.

LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4) and as a well for lead agencies to analyze localized air pollutant impacts. LSTs represent the maximum emissions that can be generated at a Project site without expecting to cause or substantially contribute to an exceedance of the most stringent national or state ambient air quality standards, which have been established to protect human health. The previous analysis prepared in the PEIR found that the AD Initiative would expose sensitive receptors to unhealthy amounts of air toxics at levels that are less than significant with the implementation of mitigation measures. These mitigation measures are binding and applicable to the Proposed Project. The specific PEIR mitigation measures applicable to the construction of the Proposed Project include PEIR Mitigation Measures 5.1a and 5.1b, previously described, as well as Mitigation Measures 5.3b and 5.3c. Mitigation Measure 5.3b states that based on the Project-specific Air Quality Technical Report, if DPM is determined to be a major contributor to health risk, then the Proposed Project applicants shall implement control measures such that the AD facility health risk would be below the applicable air district threshold. The PEIR identifies the use of either new heavy-duty truck diesel engines that are designed to minimize DPM emissions (usually through the use of catalyzed particulate filters in the exhaust) or retrofitting of older truck engines with catalyzed particulate filters (which will reduce DPM emissions by 85 percent) as a potential control measure. The PEIR also identifies the use of electric equipment to be powered from the grid, which would eliminate local combustion emission, and the use of alternative fuels, such as compressed natural gas (CNG) or liquefied natural gas (LNG). Additionally, PEIR Mitigation Measure 5.3c requires the H_2S contained in the biogas to be scrubbed via an iron sponge or other technology before emission to air is allowed to occur. A biological scrubber operates on the principle of a microbial fixation process. In this process (also known as biological desulfurization), biogas is streamed through a vessel containing media on which microorganisms are encouraged to grow. A small amount of air is injected into the vessel, and H_2S in the biogas is oxidized (via chemical and biological action). The by-products are sulfuric acid and elemental sulfur. Properly designed biological scrubbers are effective in reducing H_2S levels in biogas for systems with high or variable levels of H_2S.

The Proposed Project would require the need for material deliveries involving heavy-duty trucks, a source of DPM. According to the California Air Pollution Control Officers Association's (CAPCOA's) Health Risk Assessments for Proposed Land Use Projects (2009), operations that require more than 100 heavy-duty delivery trucks daily are considered a potential health risk from diesel particulate matter. As previously stated, the Project is estimated to attract an average of 70 heavy-duty delivery trucks daily during operations (Kunzman Associates, Inc. 2018). In addition, the EPA and the National Highway Transportation Safety Administration (NHTSA) announced fuel economy standards for medium- and heavy-duty trucks, which apply to vehicles in model years 2014–2018. The NHTSA has adopted standards for fuel consumption tailored to each of three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this program will reduce fuel consumption, and thus air toxic emissions, for affected vehicles by 6 percent to 23 percent. While this analysis does not rely on this program for purposes of mitigating impacts, this program should help further reduce the long-term operational impacts of the Proposed Project. Because the Proposed Project would not require more than an average of 100 heavy-duty truck visits daily, it would not be expected to be a substantial source of DPM emissions. Furthermore, the SCAQMD has produced look-up tables for Projects within 25, 50, 100, 200, and 500 meters of a sensitive receptor, and the Project site is located beyond 3,000 feet (1,000 meters) from the nearest sensitive receptor on Louise Street, well beyond 500 meters.

Nonetheless, for a conservative analysis LSTs for receptors located at 500 meters were utilized to analyze operational LSTs associated with Project-generated DPM emissions from heavy-duty delivery trucks, coupled with worker commute emissions. As described, the SCAQMD has produced look-up tables for Projects that disturb 1-acre, 2-acre, and 5-acre. While the Proposed Project site would span 6.86 acres of an 18-acre parcel, the LST threshold value for a 5-acre site was employed from the LST lookup tables. This is conservative since the analysis will only account for the dispersion of air pollutants over 5 acres before reaching sensitive receptors as opposed to accounting for the dispersion of air pollutants over a greater 9.76-acre area. For a worst-case scenario assessment, the emissions shown in Table 3-6 include all "on-site" Project-related stationary (area) sources and 10 percent of the Project-related mobile sources. Considering that the longest weighted trip length used in the Project CalEEMod model is approximately 17.1 miles, 10 percent of this total would represent an on-site travel distance for each car and truck of approximately 1.7 miles; thus, the 10 percent assumption is conservative and would tend to overstate the actual impact.

As seen in Table 3-6, the emissions of these pollutants on the peak day of operations would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, significant LST impacts associated with Project truck trips would not occur.

Table 3-6. Operational Localized Significance Thresholds				
Emission Source	**Pollutant (pounds per day)**			
	NO_x	**CO**	**PM_{10}**	**$PM_{2.5}$**
On-Site Emissions (Summer)	82.4	16.55	5.58	0.63
On-Site Emissions (Winter)	82.6	16.55	5.58	0.63
SCAQMD Localized Significance Threshold	*875.00*	*31,115.00*	*60.00*	*31.00*
Exceed SCAQMD LST Threshold?	**No**	**No**	**No**	**No**

Source: CalEEMod version 2016.3.2.
Notes: Emissions projections account for a trip generation rate identified by Kunzman Associates 2018, as well as emissions from the gas turbine and flaring (see Table 3-5).

As previously stated, the Proposed Project would be a source of trace amounts of the air toxics that would be released as fugitives from the AD or from the potential combustion or flaring of the biogas. According to the PEIR, health impacts from exposure to toxic emissions related to the AD facilities are dependent on the magnitude of concentrations that the public can be exposed to, as well as to the relative toxicities of the individual pollutants released from each type of facility. According to the PEIR, exposure levels are determined by carrying out dispersion modeling of estimated toxics emissions from typical proposed facility sources. However, the Project site is beyond 3,000 feet (1,000 meters) from the nearest sensitive receptor on Louise Street and SCAQMD. According to SCAQMD air quality dispersion modeling guidance contained in the *Risk Assessment Procedures for Rules 1401, 1401.1, and 212* (2017), for all dispersion modeling performed, a polar receptor grid with ten-degree azimuth increments at *downwind* distances of 25, 50, 75, 100, 200, 300, 500, and 1,000 meters should be utilized. While the Project site is located approximately 1,000 meters from the nearest sensitive receptor, this sensitive receptor, located on Louise Street, is northwest of the Project site and thus, *upwind*. Additionally, PEIR Mitigation Measure 5.3c requires the H_2S produced during anaerobic digestion activities be scrubbed via an iron sponge or other technology before emission to air is allowed to occur. As noted in the Project Description, the Proposed Project proposes to collect produced biogas with a common gas pipeline, where the biogas would pass through a scrubber installed on each tank to remove H_2S and a condenser would be used to remove moisture. As previously described, properly designed biological scrubbers are effective in reducing H_2S levels in biogas for systems with high or variable levels of H_2S.

Furthermore, the Proposed Project would also be regulated by SCAQMD Rule 1401, *New Source Review of Toxic Air Contaminants*, which provides for the review of toxic air contaminants (TAC) emissions in order to evaluate potential public exposure and health risk, to mitigate potentially significant health risks resulting from these exposures, and to provide net health risk benefits by improving the level of control when existing sources are modified or replaced. Pursuant to SCAQMD Rule 1401, stationary

sources having the potential to emit TACs, including ADs, are required to obtain permits from the SCAQMD. Permits may be granted to these operations provided they are operated in accordance with applicable SCAQMD rules and regulations. The SCAQMD's permitting procedures require substantial control of emissions, and permits are not issued unless TAC risk screening or TAC risk assessment, conducted by the SCAQMD, can show that risks are not significant. The SCAQMD may impose limits on annual biomass throughput to ensure risks are within acceptable limits. Under Rule 1401, the following requirements must be met before a permit is granted to the Proposed Project:

- The cumulative increase from all TACs emitted from a single piece of equipment in maximum individual cancer risk (MICR) shall not exceed:
  - one in one million (1×10^{-6}) if Best Available Control Technology for Toxics (T-BACT) is not used; or
  - ten in one million (10×10^{-6}) if T-BACT is used.
- The cumulative cancer burden from all TACs emitted from a single piece of equipment (increase in cancer cases in the population) shall not exceed 0.5.
- Neither the chronic hazard index (HIC), the 8-hour chronic hazard index (HIC8), nor the total acute hazard index (HIA) from all TACs emitted from a single piece of equipment shall exceed 1.0 for any target organ system, or an alternate hazard index level deemed to be safe.

The Proposed Project will be required to obtain a SCAQMD permit under Rule 1401. The Project would also be subject to SCAQMD Rule 1134, which applies to stationary gas turbines. Rule 1134 includes emissions limitations on stationary gas turbines, as determined by the SCAQMD. Under Rule 1134, the Project operator will have to install, operate, and maintain a continuous in-stack NOx and oxygen monitoring system with data gathering and retrieval capability to demonstrate compliance with the SCAQMD-specified emission limits. The Project monitoring systems must include equipment that measures and records among other information, the demonstrated percent efficiency (EFF) of the turbine.

For the reasons described, the Proposed Project would not exceed SCAQMD operational LST thresholds and would not result in an increase in the severity of air toxic-related impacts. The Proposed Project complies with the requirements of the PEIR. There is not a new or substantially more severe impact compared with the determination contained in the PEIR.

c) Would the Project expose sensitive receptors to substantial pollutant concentrations?

Consistent with PEIR, Less Than Significant with Mitigation. Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14,

athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis.

Construction

Construction-related activities would result in temporary, short-term Project-generated emissions of diesel particulate matter (DPM) from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g., clearing, grading), soil hauling truck traffic, paving, application of architectural coatings, and other miscellaneous activities. For construction activity, DPM is the primary TAC of concern. Particulate exhaust emissions from diesel-fueled engines (i.e., DPM) were identified as a TAC by the CARB in 1998. The potential cancer risk from the inhalation of DPM, as discussed below, outweighs the potential for all other health impacts (i.e., non-cancer chronic risk, short-term acute risk) and health impacts from other TACs. Accordingly, DPM is the focus of this discussion.

Based on the emission modeling conducted, the maximum construction-related daily emissions of $PM_{2.5}$ exhaust, considered a surrogate for DPM, would be 1.54 pounds per day during construction activity. ($PM_{2.5}$ exhaust is considered a surrogate for DPM because more than 90 percent of DPM is less than 1 microgram in diameter and therefore is a subset of particulate matter under 2.5 microns in diameter (i.e., $PM_{2.5}$), according to CARB. Most $PM_{2.5}$ exhaust derives from combustion, such as use of gasoline and diesel fuels by motor vehicles.) Furthermore, even during the most intense month of construction, emissions of DPM would be generated from different locations on the Project site, rather than a single location, because different types of construction activities (e.g., demolition, site preparation, building construction) would not occur at the same place at the same time.

The dose to which receptors are exposed is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for any exposed receptor. Thus, the risks estimated for an exposed individual are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to TAC emissions, should be based on a 70-, 30-, or 9-year exposure period. Consequently, an important consideration is the fact that construction of the proposed Project is anticipated to only last one year. Furthermore, the use of off-road heavy-duty diesel equipment would be limited to the periods of construction for which most diesel-powered off-road equipment use would occur, which are the site preparation and grading phases of construction, and these construction activities are anticipated to last just three months. Therefore, considering the relatively low mass of DPM emissions that would be generated during even the most intense season of construction, the relatively short duration of construction activities (one year) required to develop the site, including just three months of site preparation and grading activities, and the highly dispersive properties of DPM, construction-related TAC emissions would not expose sensitive receptors to substantial amounts of air toxics.

Furthermore, the Proposed Project has been evaluated against the SCAQMD's LSTs for construction. As previously stated, LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4) and can be used to assist lead agencies in analyzing localized impacts associated with project-specific level proposed projects. As shown in Table 3-3**,** the emissions of pollutants on the peak day of construction would not result in significant concentrations of pollutants at nearby sensitive receptors.

Operations

The previous analysis prepared in the PEIR found that the AD Initiative would expose sensitive receptors to unhealthy amounts of air toxics at levels that are less than significant with the imposition of mitigation measures that reduce such impacts. These measures are binding and applicable to the proposed Coachillin' AD Facility. The specific PEIR mitigation applicable to construction of the Proposed Project includes PEIR Mitigation Measures 5.1a, 5.1b, 5.3b and 5.3c, previously described.

As previously described, the Proposed Project would not instigate an average of 100 or more heavy-duty truck trips to the Project site, which is the number of daily heavy-duty trucks considered by CAPCOA (2009) to be a potential health risk from DPM. Additionally, as shown in Table 3-5, the emissions of heavy-duty truck-generated pollutants, biogas combustion and flaring on the peak day of operations would not result in significant concentrations of pollutants at nearby sensitive receptors, as determined through SCAQMD's LST methodology.

In terms of Project-related stationary-source TAC emissions, PEIR Mitigation Measure 5.3c requires the H_2S produced during anaerobic digestion activities be scrubbed via an iron sponge or other technology before emission to air is allowed to occur. As noted in the Project Description, the Proposed Project proposes to collect produced biogas with a common gas pipeline, where the biogas would pass through a scrubber installed on each tank to remove H_2S and a condenser would be used to remove moisture. Furthermore, the Proposed Project would also be regulated by SCAQMD Rule 1401, *New Source Review of Toxic Air Contaminants*, which provides for the review of TAC emissions in order to evaluate potential public exposure and health risk, to mitigate potentially significant health risks resulting from these exposures, and to provide net health risk benefits by improving the level of control when existing sources are modified or replaced.

For the reasons described, the Proposed Project would not result in an increase in the severity of air toxic-related impacts. The Proposed Project complies with the requirements of the PEIR. There is not a new or substantially more severe impact compared with the determination contained in the PEIR.

d) Create objectionable odors affecting a substantial number of people?

Consistent with PEIR, Less Than Significant. Typically, odors are regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to

physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).

With respect to odors, the human nose is the sole sensing device. The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals have the ability to smell minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; in fact, an odor that is offensive to one person (e.g., from a fast-food restaurant) may be perfectly acceptable to another. It is also important to note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity.

Quality and intensity are two properties present in any odor. The quality of an odor indicates the nature of the smell experience. For instance, if a person describes an odor as flowery or sweet, then the person is describing the quality of the odor. Intensity refers to the strength of the odor. For example, a person may use the word “strong” to describe the intensity of an odor. Odor intensity depends on the odorant concentration in the air. When an odorous sample is progressively diluted, the odorant concentration decreases. As this occurs, the odor intensity weakens and eventually becomes so low that the detection or recognition of the odor is quite difficult. At some point during dilution, the concentration of the odorant reaches a detection threshold. An odorant concentration below the detection threshold means that the concentration in the air is not detectable by the average human.

Anaerobic digestion is the biological decomposition of organic matter in the absence of molecular oxygen. As a result, odorous compounds, such as NH_3 and H_2S, are generated and could be released into the environment. The anaerobic digestion process occurs naturally in marshes, wetlands and is the principal decomposition process in landfills. However, in the operation of AD facilities, the digestion process occurs in a closed system. Volatile organic compounds are broken down through the anaerobic digestion process, and exhaust is generally processed in a more controlled environment. However, the collection transport, storage, and pre-processing activities of the potentially odiferous organic substrates for digestion and the resultant digestate could produce nuisance odors at AD facilities. In addition, the siting of these digester facilities could lead to objectionable odors at off-site receptors in the vicinity.

The previous analysis prepared in the PEIR found that odors associated with the AD Initiative would contribute less than significant impacts with the imposition of several mitigation measures. These measures are binding and applicable to the Proposed Project. The specific PEIR mitigation measures applicable to construction of the Proposed Project include PEIR Mitigation Measures 5.2a and 5.2b. Measure 5.2a requires applicants developing AD facilities to comply with all appropriate local land use plans, policies, and regulations, including applicable setbacks and buffer areas from sensitive land uses for potentially odoriferous processes. Measure 5.2b requires AD facilities that handle compostable material, such as the Proposed Project, to prepare an Odor Impact Minimization Plan (OIMP) pursuant to 14 CCR 17863.4. An

OIMP must identify and describe potential odor sources, as well as identify the potential, intensity, and frequency of odor from these likely sources. In addition, the OIMP must specify odor control technologies and management practices that mitigate odors associated with the majority of facilities to less than significant. Odor control strategies and management practices that can be incorporated into an OIMP include, but are not limited to, the following:

- The requirement that substrate haulage to the AD facility be contained within covered, liquid leak-proof sealed containers.
- Establishment of a time limit for on-site retention of undigested substrates (i.e., feedstocks should be processed and placed into the portion of the system where liquid discharge and air emissions can be controlled within 24 or 48 hours of receipt).
- The provision of enclosed, negative pressure buildings for indoor receiving and pre-processing, coupled with the required treatment of collected foul air in a biofilter or air scrubbing system.
- Establishment of contingency plans for operating downtime (e.g., equipment malfunction, power outage).
- Management of delivery schedule to facilitate prompt handling of odorous substrates.
- The requirement to handle fresh unstable digestate within enclosed building or mix with greenwaste and incorporate into a composting operation within the same business day, and/or directly pump to covered, liquid leak-proof-sealed containers for transportation.
- Establishment of a protocol for monitoring and recording odor events.
- Establishment of a protocol for reporting and responding to odor events.

In addition to Measure 5.2b, PEIR Mitigation Measure 5.1b requires AD projects to unload and pre-process substrate indoors within enclosed, negative pressure buildings. Collected foul air (including VOCs off-gassed from undigested substrates) must be treated via biofilter or air scrubbing system. PEIR Mitigation Measure 5.3c requires the H_2S produced during anaerobic digestion activities be scrubbed via an iron sponge or other technology before emission to air is allowed to occur. As previously described, properly designed biological scrubbers are effective in reducing H_2S levels in biogas for systems with high or variable levels of H_2S, and thus would reduce odors. Furthermore, the Project site is located approximately 3,000 feet (1,000 meters) from the nearest sensitive receptor, which is also located upwind of the Project site. For these reasons, the Proposed Project would not create objectionable odors affecting a substantial number of people.

4. BIOLOGICAL RESOURCES

Summary of PEIR Evaluation

The PEIR determined that AD facilities would have less than significant impacts to biological resources at the program level, because it is assumed that AD facilities would be co-located with permitted solid waste facilities or located in areas zoned for industrial or solid waste handling activities. However, if proposed AD facilities include construction in undisturbed areas, then impacts to biological resources would be analyzed on a project-by-project basis. Site specific information would determine any impacts to biological resources on the Project site and would ensure that potential impacts to these resources would be mitigated appropriately, if necessary, using Project-specific mitigation measures.

No mitigation measures were proposed at the programmatic level because site specific requirements of individual facilities would need to be considered for biological resources.

a) *Would the Project 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 California Department of Fish and Game or the U.S. Fish and Wildlife Service?*

Consistent with PEIR, Less Than Significant with Mitigation. The Project site is located in the City of Desert Hot Springs within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) area. The CVMSHCP is a long-term program designed to conserve federally protected species, state-protected species, and/or other species of concern. The CVMSHCP program aims to conserve over 240,000 acres of open space and protect 27 plant and animal species by providing comprehensive compliance with federal and state endangered species laws. The CVMSHCP includes most of the Coachella Valley floor portion of Riverside County (CVAG 2007). The Project site is not within a Conservation Area as shown in the CVMSHCP and does not abut a Conservation Area. Therefore, the Project site would not be subject to CVMSHCP requirements regarding lands within or adjoining Conservation Areas.

ECORP Consulting, Inc. conducted a literature review and biological resources survey for the Proposed Project (ECORP 2019). Below is a summary of the findings of the literature review and biological resources survey for the Proposed Project.

Vegetation. One vegetation community, disturbed creosote bush scrub, was present in the Project site and more apparent within the 250-foot buffer of the Project site. Creosote bush scrub is a native vegetation community that is common to the Colorado Desert. Vegetation removal had recently taken place at the Project site; however, remnants of creosote bush scrub remain. No special-status habitats or vegetation communities were observed on the Project site (ECORP 2019).

Plants. A total of 62 special-status plant species appeared in the literature review and database searches for the Project site. Of the 62 special-status plants identified, two species have a high potential, ten species have a moderate potential, and two species have a low potential to occur on the Project site. The remaining 48 species identified in the literature review were presumed absent from the Project site (ECORP 2019).

The Project site provides suitable habitat for 14 special-status plant species that have a potential to occur on the Project site based on the presence of suitable habitat and documented observations in the area. Of the 14 special-status plant species, two of the species with high potential to occur on the Project site, Coachella Valley milk-vetch (*Astragalus lentiginosus var. coachellae*) and Little San Bernardino Mountains linanthus (*Linanthus maculatus ssp. maculatus*) are covered under the CVMSHCP. The remaining species are not covered by the CVMSHCP but are designated by the California Native Plant Society (CNPS) in list designation 1A,1B, 2A, 2B, or 3 as described below. According to CNPS, plants on list 1B and 2 meet definitions for listing as threatened or endangered under Section 1901, Chapter 10 of the California Fish and Game Code, and impacts to these species may be significant under CEQA.

California Native Plant Society Status Designations	
List Designation	**Meaning**
1A	Plants Presumed Extirpated in California and Either Rare or Extinct Elsewhere
1B	Plants Rare, Threatened, or Endangered in California and Elsewhere
2A	Plants Presumed Extirpated in California, But Common Elsewhere
2B	Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere
3	Plants about which we need more information; a review list
4	Plants of limited distribution; a watch list
List 1B, 2, and 4 extension meanings:	
.1	Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
.2	Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)
.3	Not very threatened in California (less than 20% of occurrences threatened/low degree and immediacy of threat or no current threats known)

The species that have a moderate potential to occur on the site include (CNPS list designations in parentheses): chaparral sand-verbena (*Abronia villosa var. aurita*) (CNPS 1B.1), pointed dodder (*Cuscuta californica var. apiculata*) (CNPS list 3), Harwood's eriastrum (*Eriastrum harwoodii*) (CNPS 1B.2), cliff spurge (*Euphorbia misera*) (CNPS 2B.2), California satintail (*Imperata brevifolia*) (CNPS 2B.1), spiny-hair blazing star (*Mentzelia tricuspis*) (2B.1), slender cottonheads (*Nemacaulis denudate var. gracilis*) (2B.2), desert beardtongue (*Penstemon pseudospectabilis ssp. pseudospectabilis*) (2B.2), narrow-leaf sandpaper plant (*Petalonyx linearis*) (2B.3), and desert spike-moss (*Selaginella eremophila*) (2B.2).

The species that have a low potential to occur on the site include (CNPS list designations in parentheses): California ayenia (*Ayenia compacta*) (CNPS 2B.3) and Arizona spurge (*Euphorbia arizonica*) (CNPS 2B.3).

Ground disturbing activities associated with the construction of the Proposed Project could remove individual special-status plant species, if present, and would result in a permanent loss of habitat. This would result in a significant impact to all of the plants listed above, with the exception of pointed dodder, which is not a CNPS list 1 or 2 species. Impacts to the two special-status plant species covered under the CVMSHCP would be less than significant with the implementation of Mitigation Measure BIO-1. Impacts to CNPS list 1 and 2 plant species not covered by the CVMSHCP would be less than significant with the implementation of Mitigation Measure BIO-2.

Wildlife. A total of 41 special-status wildlife species appeared in the literature review and database searches for the Project site. Of the 41 special-status wildlife species identified, one species, burrowing owl (*Athene cunicularia*), was determined to have a high potential to occur, 12 species were found to have a moderate potential to occur, and six species were found to have a low potential to occur on the Project site. The remaining 22 species identified in the literature review were presumed absent from the Project site (ECORP 2019).

Of the 13 special-status wildlife species with high or moderate potential to occur on the Project site, six are covered under the CVMSHCP and would not require focused surveys or mitigation beyond payment of the CVMSHCP local development mitigation fees (Mitigation Measure BIO-1). However, the remaining seven special-status species with a high or moderate potential to occur that are not covered by the CVMSHCP could be affected from direct take through habitat loss or by mortality during construction activities. Indirect take may occur in the form of ground disturbance, noise, and increased human activity on the site. Implementation of Mitigation Measures BIO-3 through BIO-5 would reduce these impacts to less than significant. Burrowing owl, desert tortoise, Coachella Valley fringe-toed lizard, and desert kit fox are described in more detail below because they either have special designations in the State of California or are federally and/or state-listed.

Burrowing Owl. Burrowing owl was found to have a high potential to occur on the Project site. Several potentially suitable burrowing owl burrows were observed on the site; however, no sign of use by burrowing owl (whitewash, pellets, and/or feathers) was noted. The Project site does contain suitable habitat for this species and the literature review and database search identified multiple records in the vicinity of the Project site. Four burrowing owls were observed within 250 feet of the Project site during the survey, and several burrowing owls have been documented on nearby parcels during other surveys conducted by ECORP. Burrowing owls are a covered species under the CVMSHCP and covered species do not require additional focused surveys; however, the MSHCP requires pre-construction surveys for this species. Furthermore, because burrowing owls are protected by the MBTA and California Fish and Game Code, mitigation is required for direct take of burrowing owls and their burrows. Although burrowing owls were not identified on the Project site during the biological reconnaissance survey, four individuals were observed within 250 feet of the Project site. This species is mobile and if the conditions were to change on the Project site, burrowing owls could take up residence on the Project site. If burrowing owls were to occupy the site prior to construction, direct impacts could occur to burrowing owls in the form of habitat loss and mortality if owls were to be entombed in burrows during ground disturbance. Indirect impacts from construction noise and vibrations may occur.

Impacts to burrowing owl would be less than significant with the implementation of Mitigation Measure BIO-3.

Desert Tortoise. No desert tortoises or desert tortoise burrows were identified during the biological reconnaissance survey. Desert tortoises were found to have a moderate potential to occur on the Project site based on the presence of suitable habitat. Direct impacts to desert tortoise by mortality and habitat loss during ground disturbance activities and indirect impacts from construction noise and vibrations may occur. Take of this species is covered under the CVMSHCP and no focused surveys are required, but the CVMSHCP does require that individual tortoises be relocated if identified on a Project site prior to construction. Implementation of Mitigation Measure BIO-4 would reduce impacts to a level that is less than significant.

Coachella Valley Fringe-Toed Lizard. No Coachella Valley fringe-toed lizard or evidence of the species was identified during the biological reconnaissance survey. Coachella Valley fringe-toed lizard was found to have a moderate potential to occur on the Project site based on the presence of suitable habitat. Direct impacts to Coachella Valley fringe-toed lizard by mortality or habitat loss during ground disturbing activities and indirect impacts from construction noise and vibration may occur. Take of this species is covered under the CVMSHCP and no focused surveys are required. Implementation of Mitigation Measure BIO-4 would reduce impacts to a level that is less than significant.

Desert Kit Fox. No potential desert kit fox dens of the appropriate size and shape were identified during the biological reconnaissance survey. Desert kit fox was found to have a moderate potential to occur on the Project site based on the presence of suitable habitat. This species is not covered under the CVMSHCP and does not currently have a special-status designation from CDFW or USFWS, but is regulated as a fur-bearing mammal. As a fur-bearing mammal, the desert kit fox is protected under the California Code of Regulations Title 14, Chapter 5, Section 460, which prohibits “take” of the species at any time (CCR 2017). Direct impacts to desert kit fox could occur through mortality and habitat loss during ground disturbance activities and indirect impacts from construction noise and vibrations may occur. Impacts to desert kit fox would be less than significant with the implementation of Mitigation Measure BIO-4.

Nesting Birds. The Project site and surrounding areas provide suitable nesting habitat for raptors (i.e. burrowing owl) and marginally suitable habitat for songbirds (i.e. scarce occurrences of creosote bush scrub). The CVMSHCP does not address bird species covered under the MBTA, and all development within the CVMSHCP areas is required to comply with the MBTA and avoid impacts to nesting birds. The Project site and surrounding areas provide suitable habitat for burrowing owl and marginally suitable habitat for songbirds in the disturbed creosote bush scrub. If construction of the Proposed Project occurs during the bird breeding season (typically February 1 through August 31), ground-disturbing construction activities could directly affect birds protected by the MBTA and their nests through the removal of habitat on the Project site and indirectly through increased noise, vibrations, and increased human activity. Impacts to nesting birds would be less than significant with the implementation of Mitigation Measure BIO-5.

The special-status plant and wildlife species with potential to occur, but not covered under the CVMSHCP, do not include any federally or state-listed species. Therefore, it is not likely that the Proposed Project would need to acquire a mechanism for "take" of federally or state-listed plant or wildlife species. However, impacts to sensitive biological resources on the Project site that are not covered by the CVMSHCP, yet still regulated under CEQA would be less than significant with the implementation of Mitigation Measures BIO-1 through BIO-5.

BIO-1 The developer shall ensure that the applicable CVMSHCP Local Development Mitigation Fee is paid to the City of Desert Hot Springs. The time of payment must comply with the City's Municipal Code (Chapter 3.40).

BIO-2 A pre-construction survey shall be conducted for the CNPS List 1 and 2 plant species that have been identified to have a potential to occur and that are not covered by the CVMSHCP, including chaparral sand-verbena, Harwood's eriastrum, cliff spurge, California satintail, spiny-hair blazingstar, slender cottonheads, desert beardtongue, desert spike moss, narrow-leaf sandpaper plant, California ayenia, and Arizona spurge. The survey methods shall follow the guidelines listed in the CNPS Botanical Survey Guidelines (CNPS 2001). Surveys shall be conducted during the appropriate blooming season for each of the plant species, and more than one survey may be required to include the appropriate blooming periods. If a population of CNPS List 1 or 2 plants, not covered by the CVMSHCP, is found on the Project site then CDFW shall be consulted to discuss appropriate mitigation measures. Mitigation measures could include, but are not limited to, seed collection and/or transplanting.

BIO-3 Pre-construction surveys for burrowing owl shall be conducted. The surveys shall follow the methods described in the CDFW's Staff Report on Burrowing Owl Mitigation (CDFW 2012). Two surveys shall be conducted, with the first survey being scheduled between 30 and 14 days before initial ground disturbance (grading, grubbing, and construction), and second survey being conducted no more than 24 hours prior to initial ground disturbance. If burrowing owls and/or suitable burrowing owl burrows are identified on the Project site during the survey, and impact to those features are unavoidable, the Applicant shall consult with CDFW and follow the methods listed in the CDFW's Staff Report on Burrowing Owl Mitigation (CDFW 2012) for avoidance and/or passive relocation.

BIO-4 A pre-construction survey for special-status wildlife species is recommended no more than 14 days prior to the start of ground-breaking activities to identify whether any of these species are present on the Project site prior to construction. The focus of the survey will be on desert tortoise, Coachella Valley fringe-toed lizard, desert kit fox, and the special-status wildlife species not covered by the CVMSHCP with a moderate potential to occur on site (pallid bat, pallid San Diego pocket mouse, red-diamond rattlesnake, loggerhead shrike, coast horned lizard, and American badger). The survey should be conducted according to the 2010 USFWS survey protocol document *Preparing for Any Action that May Occur within the Range of the Mojave Desert Tortoise*. The survey methods in USFWS's *Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance*

(USFWS 2011) should also be taken into consideration for desert kit fox because there are no specific guidelines for desert kit fox and CDFW usually recommends that surveys for desert kit fox follow these guidelines. If any of these special-status wildlife species are identified on the Project site during the pre-construction survey, and direct impacts to the species are unavoidable, the Project should consult with the County and the wildlife agencies before proceeding determine whether avoidance, exclusion, and/or passive relocation may be required. If possible, this survey can be conducted in conjunction with the first pre-construction burrowing owl survey.

BIO-5 If construction or other Project activities are scheduled to occur during the bird breeding season (February 1 through August 31 for the majority of migratory bird species), a pre-construction nesting bird survey should be conducted by a qualified biologist no more than three (3) days prior to initial ground disturbance. The nesting bird survey should include the Project site and adjacent areas where Project activities have the potential to cause nest failure. If an active nest is identified, a qualified biologist should establish an appropriate disturbance limit buffer around the nest using flagging or staking. Construction activities will need to be avoided within any disturbance limit buffer zones until the nest is deemed no longer active by the biologist. If possible, this survey can be conducted in conjunction with the second pre-construction burrowing owl survey.

b) *Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service?*

No Impact. The Project site does not support riparian habitat, sensitive natural communities, wetlands, or trees that would need to be preserved and no Project related impacts are anticipated for these resources. No impact would occur.

c) *Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Consistent with PEIR, Less Than Significant with Mitigation. Wetlands and other waters that have connectivity with and are likely to have a significant nexus (affecting the chemical, physical, or biological integrity) with downstream traditional navigable waters (TNW) are considered jurisdictional features. The Project site contains an unvegetated streambed that is located within the northeast portion of the parcel. This feature terminates at a large berm along I-10, approximately 0.5 mile south of the Project site. Because this drainage is isolated by not being able to physically flow downstream to the Whitewater River or reach main drainages that enter the Salton Sea or other TNWs of the U.S. as defined by the Clean Water Act (CWA) it is not considered to be a potential Water of the U.S. under Section 404 of the Clean Water Act.

If through the USACE review and/or verification process the feature mapped within the Project site is determined to be under their jurisdiction (i.e., Waters of the U.S.), then the placement of dredged or fill material into this feature would require a permit

pursuant to Section 404 of the CWA and certification/waiver in compliance with Section 401 of the CWA.

A total of 0.07 acre of potential CDFW jurisdiction (the unvegetated streambed) has been mapped within the northeast corner of the Project site. The Project facilities would avoid this feature; however, site grading may disturb the streambed. Therefore, coordination with CDFW would be required to obtain a 1602 Streambed Alteration Agreement if the streambed cannot be avoided.

Coordination with the SWRCB would also be required to obtain Section 401 Water Quality Certification and/or other clearance from that agency.

Implementation of Mitigation Measure BIO-6 would ensure that jurisdictional features are avoided. If jurisdictional features cannot be avoided, then implementation of Mitigation Measures BIO-7, BIO-8, and BIO-9 would ensure that impacts to jurisdictional features would be less than significant. Please note that the permitting agencies may require additional mitigation measures beyond those discussed within this IS/MND.

BIO-6: To ensure impacts to waters and habitats jurisdictional to the California Department of Fish and Wildlife are avoided, an exclusion zone shall be staked along the streambed and a 10-foot buffer by a qualified biologist prior to the commencement of ground-disturbing activities. The streambed and all lands within the exclusion zone shall be avoided for the duration of construction, and in perpetuity. The purpose of the exclusion zone shall be included in the construction worker daily briefings (tailgate meetings).

BIO-7: Coordination with the USACE is recommended to confirm Water of the U.S. are absent from the site, through their internal Jurisdictional Determination process. If Waters of the U.S. are confirmed to be absent, then the Project may proceed without further coordination with the USACE. Otherwise a permit pursuant to Section 404 of the CWA shall be obtained prior to conducting any ground-disturbing activities within the streambed.

BIO-8: Coordination with the SWRCB will be required for the Project if the streambed is impacted. If USACE jurisdiction is confirmed, then a Section 401 Water Quality Certification will be required from the SWRCB prior to conducting any ground-disturbing activities within the streambed. If no USACE jurisdiction is confirmed to be absent, then a Report of Waste Discharge would be needed from the SWRCB, through the local RWQCB, prior to ground disturbance.

BIO-9: For impacts to areas jurisdictional to the CDFW, a 1602 Streambed Alteration Agreement will be required. A Section 1602 Notification of Lake or Streambed Alteration shall be submitted to the local CDFW office, and agreement or the equivalent obtained prior to onset of ground disturbance within the streambed.

d) Would the Project 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?

Consistent with PEIR, Less Than Significant. The Willow Hole Conservation Area is located approximately 0.1 mile east of the Project site and is conserved by the CVMSHCP. The Willow Hole Conservation Area, which connects to both Morongo Wash Special Provisions Area and the Upper Mission Creek/Big Morongo Canyon Conservation Areas, likely serves as a wildlife movement corridor for animals moving through or within the vicinity of the Project site. Although, the Project site provides wildlife movement opportunities because it is relatively open and unimpeded land, it would not be considered a wildlife movement corridor that would need to be preserved. Impacts would be less than significant.

e) *Would the Project conflict with any local policies or ordinance protecting biological resources, such as a tree preservation policy or ordinance?*

No Impact. The Proposed Project would not conflict with any local policies or ordinances protecting biological resources. The Proposed Project would comply with all requirements of the CVMSHCP. No impact would occur.

f) *Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

No Impact. The Proposed Project lies within the boundary of the CVMSHCP, which provides the framework and guidelines for conservation of habitats and natural communities within the area. On October 2, 2008, a habitat mitigation fee collected from new development projects was established to implement the CVMSHCP and support the procurement of conservation lands. The Proposed Project would comply with this requirement per Chapter 3.40 of the Desert Hot Springs (CVMSHCP/ Natural Community Conservation Plan Mitigation Fees). No impact would occur.

5. CULTURAL RESOURCES

Summary of PEIR Evaluation

The PEIR determined that AD facilities would have less than significant impacts to cultural resources at the program level, because it is assumed that AD facilities would be co-located with permitted solid waste facilities or located in areas zoned for industrial or solid waste handling activities. However, if proposed AD facilities would be constructed in undisturbed areas, then impacts to cultural resources would be analyzed on a project-by-project basis. Site specific information would determine any impacts to historical, archaeological, and paleontological resources on the Project site and would ensure that potential impacts to these cultural resources would be mitigated appropriately, if necessary, using Project-specific mitigation measures.

No mitigation measures were proposed at the programmatic level because site specific requirements of individual facilities would need to be considered for cultural resources.

a) *Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

Consistent with PEIR, Less Than Significant with Mitigation. A cultural resources study was conducted for the Proposed Project in December 2017 by ECORP Consulting, Inc. (ECORP 2017). This study consisted of a cultural resources records search, Native American Heritage Commission (NAHC) Sacred Lands File search, field survey of the Project site, and evaluation of identified resources using National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) eligibility criteria. The records search was conducted at the Eastern Information Center at the University of California Riverside for the Project site and a one-mile radius around the Project site. The records search results indicated that 24 previous cultural resource surveys have been conducted within a one-mile radius of the Project site and one study occurred within portions of the Project site. No previously recorded cultural resources have been documented within the Project site; however, 22 cultural resources have been documented within a one-mile radius of the Project site.

As a result of the field survey, three historic-period isolated finds (CA-001-I, CA-002-I, and CA-003-I) were identified and documented within the Project site. These resources have been evaluated using NRHP and CRHR eligibility criteria. Resources CA-001-I, CA-002-I, and CA-003-I are not eligible for the NRHP under any criteria and are not Historic Properties as defined by regulations implementing Section 106 of the NHPA (36 CFR Part 800). Resources CA-001-I, CA-002-I, and CA-003-I are not eligible for the CRHR under any criteria and are not Historical Resources as defined by CEQA regulations (CCR Title 14, § 15064.5(a)). Because there are no NRHP- or CRHR-eligible resources within the Project site, there would be no significant impacts to Historical Resources as defined by CEQA and there would be no significant impacts on Historic Properties for the purposes of Section 106 as a result of the Proposed Project.

There is no evidence of a historic-period residential area in the immediate vicinity and it is, therefore, unlikely that significant historic-period subsurface deposits are present. The sediments within the Project site consist of Holocene to Late Pleistocene younger Quaternary Alluvium. These sediments are concurrent in age with the period of known human occupation of the region. However, the area contains no bedrock outcrops and does not contain resources (e.g. rivers, lakes, mesquite stands) that would suggest that it was a likely location of resource procurement.

The archaeological sensitivity of the Project site is believed to be moderate. Although no prehistoric resources were noted during the pedestrian survey, prehistoric resources have been documented in the vicinity of the Project site, unknown buried resources may be present below the ground surface. If these resources are eligible for the California Register of Historical Resources (CRHR) and are disturbed by the development of the parcel, a significant impact would occur. This impact would be less than significant with the implementation of Mitigation Measure CR-1.

CR-1: If during the course of grading or construction, artifacts or other cultural resources are discovered, all grading on the site shall be halted and the Applicant shall immediately notify the City Planner. A qualified archaeologist shall be called to the site by, and at the cost of, the Applicant to identify the resource and recommend mitigation if the resource is culturally significant.

b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Consistent with PEIR, Less Than Significant with Mitigation. No archaeological resources were identified on the Project site (ECORP 2017). However, the potential remains for archaeological resources to be present on the site below the ground surface that could be disturbed during Project construction. Implementation of Mitigation Measure CR-1 would reduce this impact to a less than significant level.

c) Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Consistent with PEIR, Less Than Significant with Mitigation. No human remains were identified on the Project site during the survey. However, there is the potential for unknown remains to be present below the ground surface that could be disturbed during construction. Implementation of Mitigation Measure TCR-2 (see Section 18, Tribal Cultural Resources) would reduce this impact to a less than significant level.

6. ENERGY

Summary of PEIR Evaluation

According to the PEIR Section 12.5, Ads would use non-renewable fuel sources during construction and to some degree for the operation of the AD (e.g., fossil fuels for truck deliveries of substrate and electricity for the buildings). However, AD facilities would process organic waste into biogas, which is a flexible renewable energy source. Overall, AD facilities would have a net positive energy condition compared to the long haul of municipal solid waste to landfills. The landfills themselves can be expected to lose additional energy (compared to AD facilities) due to fugitive emissions of landfill gas. No program-level mitigation measures were adopted in the PEIR for energy.

a) Would the Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation?

No Impact. Although the Proposed Project would use energy during construction and operation. Energy would be used by heavy equipment during construction, trucks hauling substrate to the AD, trucks hauling soil amendment from the AD, and electricity for the buildings. However, the AD facility is would produce renewable energy (biogas) and would have a net positive energy condition. A beneficial impact would occur.

b) Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The Proposed Project would assist the state in meeting the California Renewable Portfolio Standard by providing a new source of renewable energy. A beneficial impact would occur.

7. GEOLOGY AND SOILS

Summary of PEIR Evaluation

The PEIR determined that AD facilities are not anticipated to adversely affect, or be affected by, geology, soils, and seismicity, because It is assumed that AD facilities would be co-located with permitted solid waste facilities or located in areas zoned for industrial or solid waste handling activities. However, if proposed AD facilities include construction in undisturbed areas, then geological, soils, and seismicity impacts would be analyzed on a project-by-project basis. Site specific information would determine any impacts to the Proposed Project from geology, soils, and seismicity and would ensure that potential impacts would be mitigated appropriately, if necessary, using Project-specific mitigation measures.

No mitigation measures were proposed at the programmatic level because site specific requirements of individual facilities would need to be considered for geology, soils, and seismicity.

a) Would the Project directly or indirectly cause substantial 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.

Consistent with PEIR, Less Than Significant. According to the City of Desert Hot Springs General Plan, the nearest faults to the Project site are the Banning and Mission Creek faults, which are segments of the San Andreas Fault. Based on analysis of the San Andreas Fault's earthquake potential, a major seismic event within the City of Desert Hot Springs planning area would lie within intensity zones IX through XI on the Modified Mercalli Intensity Scale (MMIS). The MMIS measures the damage potential of an earthquake based on people's reaction to a quake and observed damage to structures and other physical effects. The MMIS is measured within twelve levels of intensity, ranging from I (tremor not felt) to XII (damage is nearly total). During an earthquake, the City of Desert Hot Springs would be exposed to ground shaking and ground rupture.

There are no known active faults that traverse the Project site or its immediate vicinity. According to the California Division of Mines and Geology, Desert Hot Springs Quadrangle Special Studies Zone Map, the nearest fault to the Project site is the Banning Fault. This fault is located approximately 0.5-mile northeast of the Project site and lies within an Alquist-Priolo Earthquake Fault Zone (CDC 1980; City of Desert Hot Springs 2000a).

The Project site is not located within an Alquist-Priolo Earthquake Fault Zone. The potential for damage due to ground rupture is unlikely due to the location of the Project site from known fault lines within the Coachella Valley. The Proposed Project would have less than significant impacts due to ground rupture of a known earthquake fault and no mitigation measures are required.

ii. Strong seismic ground shaking?

Consistent with PEIR, Less Than Significant. According to the City of Desert Hot Springs General Plan, ground shaking is the primary seismic hazard that can be expected for the Project site, due to the location of the Banning and Mission Creek faults within the City limits. The intensity of this ground shaking can be affected by the distance from such fault.

Design and construction of the proposed facilities would comply with current building codes and standards which would reduce the risk of loss, injury, or death resulting from strong ground-shaking. A less than significant impact would occur, and no mitigation measures are required.

iii. Seismic-related ground failure, including liquefaction?

Consistent with PEIR, Less Than Significant. Liquefaction is a phenomenon where water-saturated granular soil loses shear strength during strong ground shaking produced by earthquakes. The loss of soil strength occurs as a consequence of cyclic pore water pressure increases below groundwater surface. Potential hazards due to liquefaction include loss of bearing strength beneath structures, possibly causing foundation failure and significant settlements and differential settlements. Liquefaction generally occurs in areas where the ground water table is less than 50 feet below the surface.

According to the City of Desert Hot Springs General Plan, liquefaction is considered low in the Desert Hot Springs area, principally because of the approximate depth of 150 to 200 feet to ground water (City of Desert Hot Springs 2000a). Less than significant impacts related to seismic ground failure as a result of liquefaction are expected for the Proposed Project and no mitigation measures are required.

iv. Landslides?

No Impact. Landslides can generally occur in areas that have steep slopes and can be caused by seismic activity and/or extended periods of rain resulting in high water saturation of soils. Topographically, the Project site is relatively flat with a high elevation of 967 feet above mean sea level (msl) in the northwest corner and 757 above msl in the southeast corner. The Project site is not located in an area susceptible to rock falls or landslides. No impacts related to landslides are anticipated for the Proposed Project and no mitigation measures are required.

b) Would the Project result in substantial soil erosion or the loss of topsoil?

Consistent with PEIR, Less Than Significant. Construction of the Proposed Project would require ground disturbing activities which could result in soil erosion. Construction of the Proposed Project would be required to comply with the Construction General Permit, through the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) and a Fugitive Dust Control Plan. The Project site is located in Federal Emergency Management Agency (FEMA) Flood Zone X, which is defined

as areas between limits of the 100-year flood and 500-year flood; or certain areas subject to 100-year flooding with average depths of less than 1 foot or where the contributing drainage area is less than one square mile; or areas protected by levees from the 100-year flood. These areas are generally located with most of the urban core of the community and outside the major drainages (City of Desert Hot Springs 2000a). Although the Project site could be subject to erosion as a result of sheet flow, the Proposed Project would be required to comply with the City of Desert Hot Springs grading ordinance. Compliance with the City of Desert Hot Springs Grading Ordinance requirements would minimize effects from sheet flow erosion. Therefore, by substantial soil erosion or the loss of topsoil would be minimized to a less-than-significant level. The Proposed Project would not result in significant impacts due to soil erosion or the loss of topsoil and no mitigation measures are required.

c) *Would the Project 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 offsite landslide, lateral spreading, subsidence, liquefaction or collapse?*

Consistent with PEIR, Less Than Significant with Mitigation. As discussed previously, impacts associated with liquefaction, lateral spread, and offsite landslides are expected to be less than significant.

Ground subsidence is defined as the gradual settling or sinking of the ground with little or no horizontal movement (City of Desert Hot Springs 2000a). Subsidence is usually associated with the extraction of oil, gas, or groundwater from below the ground surface, but it may also occur as a result of an earthquake. Devers Hill, located approximately two miles northwest of the Project site, is a prime example of uplift that has occurred in the Desert Hot Springs area. This uplift is seen in the four-meter-high cut on the west side of Devers Hill.

The City of Desert Hot Springs is mostly comprised of alluvial sediments which are prone to collapse. As part of the Proposed Project approvals, site specific grading plans and a geotechnical report would be required. Following the recommendations in the site-specific geotechnical report (Mitigation Measure GEO-1) would ensure that the potential for impacts related to unstable soils that could potentially result in, or offsite landslide, lateral spreading, subsidence, liquefaction or collapse would be less than significant.

GEO-1: Prior to the issuance of grading permits, the project applicant shall prepare a project site-specific geotechnical/geological engineering study, to be completed by a qualified geologist, and incorporate the recommendations of said geotechnical/geological engineering study into all Project plans. The Project's building plans shall demonstrate that they incorporate all applicable recommendations of the design-level geotechnical study and comply with all applicable requirements of the latest adopted version of the California Building Code. A licensed professional engineer shall prepare the plans, including those that pertain to soil engineering, structural foundations, pipeline excavation, and installation. All on-site soil engineering activities shall be conducted under the supervision of a licensed geotechnical engineer or certified engineering geologist.

d) *Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks of life or property?*

No Impact. The City of Desert Hot Springs planning area is underlain by alluvial and aeolian sediments. According to the City of Desert Hot Springs General Plan, these sediments are prone to collapse, and design and construction methods should be considered to prevent saturation of soils (City of Desert Hot Springs 2000a).

Expansive soils are defined as soils with a significant amount of clay particles with the ability to give up (shrink) or take on (swell) water. Within the City of Desert Hot Springs Planning area, expansive soils are not considered a significant hazard as there are minimal amounts of clay in the soils. Expansive soils are not known to occur on the Project site. The Proposed Project would not be located on expansive soils and therefore no impact would occur, and no mitigation measures are required.

e) *Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

No Impact. The Proposed Project includes restrooms for employees and visitors; waste would ultimately be transported to the Mission Springs Water District proposed wastewater facility located directly east of the Project site. On an interim basis, a septic system would be used. Soils on the site are adequate to support septic systems. No mitigation measures are required.

f) *Would the Project directly or indirectly destroy a unique paleontological resource or site or a unique geological feature?*

Consistent with PEIR, Less than Significant with Mitigation. No unique geologic features (river, lake, hills, faults, and folds etc.) are located on the Project site that could directly or indirectly be destroyed by the Proposed Project. The surface soils on the Project site consist of light brown, fine-to-coarse alluvial sands mixed with small rocks. Although, recent deposits are not conducive to the location of paleontological resources, older, deeper Pleistocene-age sediments and formations have a high potential for the presence of fossils (CRM Tech 2016). As such, deep excavations (greater than 10 feet) that extend into older Pleistocene-age sediments may encounter significant fossil remains that may be destroyed during site construction activities that extend to that depth. Impacts to buried fossils would be less than significant with the implementation of Mitigation Measure GEO-2.

GEO-2: The Applicant shall ensure that any excavations deeper than 10 feet will be monitored by a qualified paleontological monitor. Should construction/development activities uncover paleontological resources, work will be halted in that area and moved to other parts of the Project site and the monitor shall determine the significance of these resources. The paleontologist shall have authority to divert grading away from exposed fossils temporarily in order to recover the fossil specimens. If the find is determined to be significant,

avoidance or other appropriate measures shall be implemented as recommended by the monitor. All fossils and associated data recovered during the paleontological monitoring shall be reposed in an approved curation facility.

8. GREENHOUSE GAS EMISSIONS

Summary of PEIR Evaluation

The PEIR evaluates the effects of greenhouse gas (GHG) emissions resulting from AD facility development in California and determined that on a programmatic level all the potential GHG-related impacts associated with AD facilities could be mitigated to a less than significant level with implementation of mitigation measures. The following mitigation measures from the PEIR have been incorporated into the Project design or otherwise apply to the Project:

Mitigation measures were proposed to reduce these impacts to a less-than-significant level. The following mitigation measures from the PEIR have been incorporated into the Project design or otherwise apply to the Project:

Mitigation Measure 5.4: *Implement Mitigation Measure 5.1a.* The Proposed Project has implemented Mitigation Measure 5.4 during this Initial Study process.

a) Would the Project generate greenhouse gas emissions either directly or indirectly, that may have a significant impact on the environment?

Consistent with PEIR, Less Than Significant with Mitigation.

Construction

Construction-related activities that would generate GHGs include worker commute trips, haul trucks carrying supplies and materials to and from the Project site, and off-road construction equipment (e.g., dozers, loaders, excavators). Table 7-1 illustrates the specific construction-generated GHG emissions that would result from construction of the Project.

Table 7-1. Construction-Related Greenhouse Gas Emissions

Emissions Source	Carbon Dioxide Equivalents (Metric Tons/ Year)
Year One Construction	579
Total	**579**

Source: CalEEMod version 2016.3.2.

As shown in Table 7-1, construction of the Proposed Project would result in the generation of approximately 579 metric tons of carbon dioxide equivalents (CO_2e) over the course of construction. Once construction is complete, the generation of these GHG emissions would cease. Projected GHGs from construction have been quantified and

amortized over the life of the Project (30 years). The amortized construction emissions are added to the annual average operational emissions.

Operations

Operation of the Proposed Project would result in GHG emissions associated with the equipment needed for pre-processing, the increased traffic on the local and regional roadway network, and the post processing of the biogas (e.g., flaring of excess biogas, combusting for electricity, or cleaning up biogas for use as a transportation fuel or injection into natural gas utility transmission lines). According to the PEIR, biogas generated through the anaerobic digestion process is captured in the digester and can be combusted in a flare, used directly in internal combustion engines to produce electricity and heat, or can be upgraded to biomethane through the removal of H_2S, CO_2, and moisture. Biomethane can be used in place of natural gas for various processes, including use by utility companies if the biomethane is upgraded to utility standards and pumped into a natural gas supply pipeline, as well as for electrical generation, heating, and for natural gas-fueled vehicles.

The proposed AD would use a two-phase process. The biogas would be collected after the first two stages to optimize it for acidification and fermentation of organic materials, allowing for more consistent biogas production. Project-produced biogas would be collected by a common gas pipeline and used for power generation activities. The biogas will be moved via pipeline to the gas conditioning and upgrading systems located on the concrete slab north of the Anaerobic Digester Facility. It is anticipated that up to 137.5 megawatts (MW) of energy would be generated per day. Through the anaerobic digestion process, biomass in the waste stream would be reduced through conversion to biogas and the nutrients would be concentrated in the remaining output, consisting of liquids, remaining biomass, and inorganic solids. Liquid and solid digestate are proposed to be stored in tanks and in an Aeration and Conditioning Bunker. The liquid and solid digestate would be sold as a soil amendment for agricultural crops.

Project operations would divert organics out of landfills. By doing so, there would be less activity at the landfill, such as potentially fewer pieces of off-road equipment and a potential decrease in the VMT for haul trucks. Furthermore, as previously described it is anticipated that up to 137.5 MW of energy would be generated per day. Anaerobic digesters generate far less GHG life-cycle emissions (approximately 34 to 50 percent less) than fossil-fueled energy plants. Therefore, the proposed Project would contribute to the continued reduction of GHG emissions in the interconnected California and western United States electricity systems, as the energy produced by the Project would displace GHG emissions which would otherwise be produced by existing business-as-usual power generation resources (including natural gas, coal, arid renewable combustion resources).

Assuming an average electricity generation rate of half this, the Project could generate approximately 25,094 megawatt-hours (MWh) of electricity annually, and 752,820 MWh over a 30-year lifespan. Table 7-2 shows the emissions that would be displaced by the proposed Project. Note that this estimate only includes that associated with the combustion of fossil fuels; it does not include the vehicle trips associated with the

Project's operations, and it similarly does not include operational employee trips associated with natural gas combustion nor the emissions associated with extracting and transporting fossil fuel. In addition, this estimate only includes the displacement of that portion of the California market that comes from fossil fuels and does not include the approximate 52 percent of the California electricity generated by non-combustion sources (wind, solar, nuclear, hydro-electric) (CEC 2018).

As shown, the Project would potentially displace approximately 5,384 metric tons of CO_2e per year, and approximately 161,520 metric tons of CO_2e over the course of 30 years.

However, intermittently throughout Project operations, flaring of biogas would occur. Flares are used to combust excess biogas or to combust biogas during periods when the primary gas use device is undergoing maintenance or repair.

According to Anaerobic Digestion Process Model Documentation prepared by North Carolina State University (2013), a typical AD facility can be expected to employ flaring at a rate proportional to the amount of organic waste it processes. Generally, an AD would release 0.003 metric tons of CO_2 for every 1.1 ton of organic waste processed, and 4.9e-7 (0.00000049) metric tons of CH_4 for every 1.1 ton of organic waste processed. The facility would take in between 50 and 495 tons of feedstock daily (180,675 tons annually maximum).

GHG emissions would also be generated as a result of combusting biogas for electricity. According to *Anaerobic Digestion Process Model Documentation* prepared by North Carolina State University (2013), an anaerobic digester facility would generate 0.22 metric tons of CO_2 for every ton of feedstock processed into biogas and combusted for electricity. Additionally, trace amounts of CH_4 would escape combustion intact at a rate of 0.17 metric tons for every of feedstock processed into biogas and combusted. However, biogenic GHG emissions from decomposing organic material will occur regardless of the Project and regardless of whether the organic material is processed into biogas for combustion or decomposes in a landfill. Therefore, biogenic emissions are not attributable to the Project and the Project's projected increase in biogenic emissions is not considered a CEQA impact.

Long-term operational GHG emissions attributable to the Project, as well as Project emissions reductions from fossil fuel displacement, are identified in Table 7-3 and compared to SCAQMD's interim screening level numeric bright-line threshold of 3,000 metric tons of CO_2e annually.

Table 7-2. Proposed Project Displaced GHG Emissions (Metric Tons)				
	Emissions (Metric Tons)			
	CO_2	CH_4	N_2O	CO_2e
Emissions Displaced Annually				
Displaced Natural Gas-Source Emissions	4,413	0	0	4,413
Displaced Coal-Source Emissions	971	0	0	971
Total	**5,384**	**0**	**0**	**5,384**
Emissions Displaced over 30 Years				
Displaced Natural Gas-Source Emissions	132,390	0	0	132,390
Displaced Coal-Source Emissions	29,130	0	0	29,130
Total	**161,520**	**0**	**0**	**161,520**

Source: Displaced emissions calculated by ECORP Consulting using U.S. EPA's AP-42 Fifth Edition Compilation of Air Emissions Factors 1995; 2015.

Notes: In order to provide a conservative analysis, the Proposed Project is assumed to generate electricity 50 percent of the time available (4,380 hours annually). An existing fossil fuel energy production heat rate of 9,313 British Thermal Units (Btu) per kilowatt hour is employed based on the average heat rate of natural gas-based energy generators serving California (CEC 2019). The Average coal-based energy plant heat rate is omitted since so little of California's energy is derived from coal, and to provide a conservative analysis.

137.5 megawatts generated daily equates to a 5.7-megawatt facility. 5.7 megawatts (25,093,751 annual kilowatt hours) x 9,313 average heat rate = 233,698,107,347 Btu displaced from fossil fuel production. Fossil fuel-based energy consumption in California is predominately derived from natural gas (33.67% total) (CEC 2018). 9.25% of the state's energy comes from unspecified nonrenewable sources and this percentage is added to the natural gas total for the purpose of this analysis. Coal constitutes 4.13% of all fossil fuel-based energy consumption in California (CEC 2018). Therefore, 100,303,227,673 units of the displaced Btu is displaced natural gas consumption and 9,651,731,833 units of the displaced Btu is displaced coal. The heat content of coal is assumed at 24 million BTU per ton of coal burned. At a rate of 24 million BTU per ton of coal burned, the project would displace 402 tons of burned coal annually.

Table 7-3. Operational-Related Greenhouse Gas Emissions	
Emissions Source	**CO_2e (Metric Tons/ Year)**
Construction Emissions (Amortized over 30 years)	19
Energy Source Emissions	185
Mobile Source Emissions	1,055
Solid Waste Emissions	25
Water Emissions	1
Biogas Flare Emissions	494
Project Subtotal Emissions	**1,779**
Emissions Reduction from Fossil Fuel Displacement	-5,384
Total Emissions	**-3,605**
SCAQMD Screening Threshold	3,000
Exceed SCAQMD Threshold?	**No**

Source: CalEEMod version 2016.3.2. Biogas flare emissions per North Carolina State University 2013. Displaced emissions calculated by ECORP Consulting using U.S. EPA's AP-42 Fifth Edition Compilation of Air Emissions Factors 1995; 2015.

Notes: Emissions Projections account for a trip generation rate identified by Kunzman Associates 2018. The proposed Project consists of an AD facility that would take organic waste from local jurisdictions in the Coachella Valley and convert it to electricity. The average trip length for delivery trucks is calculated at 22.62 miles, which represents the average automotive travel distance between the Project site and the eight communities of Palm Springs, Palm Desert, Rancho Mirage, Indio, La Quinta, Indian Wells, Cathedral City, and Coachella.

Biogas flare emissions are based on the generation of 0.003 metric tons of CO_2 for every 1.1 ton of organic waste processed, and 4.9e-7 (0.00000049) metric tons of CH_4 for every 1.1 ton of organic waste processed (North Carolina State University 2013).

- *180,675 tons of organic waste process annually/1.1 tons = 164,250 1.1-ton increments. 164,250 1.1 tons increments maximum x 0.003 = 492 metric tons CO_2.*
- *180,675 tons of organic waste process annually/1.1 tons = 164,250 1.1-ton increments. 164,250 1.1 tons increments maximum x 4.9e-7 = 0.08 metric tons CH_4. 0.08 metric tons CH_4 x 25 = 2 metric tons CO_2e.*

As shown in Table 7-3, the Proposed Project would result in the generation of approximately 1,779 metric tons of CO_2e annually yet would potentially displace 5,384 metric tons of CO_2e annually as the energy produced by the Project would displace GHG emissions which would otherwise be produced by existing business-as-usual power generation resources (including natural gas, coal, arid renewable combustion resources). Therefore, the Proposed Project would not exceed the SCAQMD's interim screening level numeric bright-line threshold of 3,000 metric tons of CO_2e annually.

Thus, the Proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. As previously described the State of California promulgates several mandates and goals to reduce statewide GHG emissions, including the goal to reduce statewide GHG emissions to 1990 levels by the year 2020 (AB 32), the goal to reduce statewide GHG emissions to 40 percent below 1990 levels by the year 2030 (SB 32), and the requirement of all California utilities to generate 33 percent of their electricity from renewables by 2020 and 50 percent of their electricity from renewable by 2030 (Renewables Portfolio Standard). According to the PEIR, ADs would not pose any apparent conflict with the any of California's GHG-reducing strategies. In fact, the Project represents the furthering of compliance with AB 32, specifically the achievement of a 33 percent renewable energy mix by 2020 and the implementation of "high recycling/zero waste", resulting in a beneficial impact.

Although there will be emissions associated with the Proposed Project (see Table 7-3), its operation would divert organics out of landfills. By doing so, there would be less activity at the landfill, such as potentially fewer pieces of off-road equipment and a potential decrease in the VMT for haul trucks. Furthermore, as previously described it is anticipated that up to 137.5 MW of energy would be generated per day. ADs generate far less GHG life-cycle emissions (approximately 34 to 50 percent less) than fossil-fueled energy plants. Therefore, the Proposed Project would contribute to the continued reduction of GHG emissions in the interconnected California and western United States electricity systems, as the energy produced by the Project would displace GHG emissions which would otherwise be produced by existing business-as-usual power generation resources (including natural gas, coal, arid renewable combustion resources). As previously described, the Project would potentially displace approximately 5,384 metric tons of CO_2e per year, and approximately 161,520 metric tons of CO_2e over the course of 30 years. This would be a beneficial effect.

The contribution of renewable resource energy production would result in a net cumulative reduction of GHG emissions, a key environmental benefit. Therefore, the short-term minor generation of GHG emissions during construction, which is necessary to create this new, low-GHG-emitting power-generating facility, as well as the negligible amount generated during ongoing maintenance operations, would be more than offset by GHG emission reductions associated with the generated energy during operation.

Increasing sources of renewable energy is one of the measures identified under AB 32 to reduce statewide GHG emissions. The Proposed Project would reduce GHG emissions in a manner consistent with AB 32 and other California GHG-reducing legislation by creating a new source of renewable power to replace the current use of fossil fuel power and reduce GHG emissions power generation and use. This would be a beneficial impact.

In addition to state-wide efforts to reduce GHG emissions, the City of Desert Hot Springs adopted a Climate Action Plan (CAP) in 2013. The Proposed Project is

consistent with the GHG inventory and forecast prepared for the CAP (CVAG's Regional Greenhouse Gas Inventory is the source document for the City GHG inventory and forecast). Both the existing and the projected GHG inventories were derived based on the land use designations and associated densities defined in the City's General Plan, and the Proposed Project is consistent with the General Plan. Additionally, the Proposed Project would potentially displace approximately 5,384 metric tons of CO_2e per year, and approximately 161,520 metric tons of CO_2e over the course of 30 years, which is consistent with the CAP's GHG-reducing intent. The Proposed Project would also be expected to comply with all applicable emissions-reducing measures identified within the CAP, and the Proposed Project directly furthers CAP goals to increase the solid waste diversion rate by 10 percent by 2020.

The Proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. The Proposed Project would help meet state and local requirements for the reduction of GHG emissions by replacing fossil-fuel based energy sources with renewable energy and would result in a net reduction of GHG emissions. Therefore, the Proposed Project would help the state, region, and City of Desert Hot Springs in meeting GHG emissions goals.

9. HAZARDS AND HAZARDOUS MATERIALS

Summary of PEIR Evaluation

The PEIR determined that typical construction activities and operations anticipated for AD facilities would have reduced adverse effects when in compliance with laws, regulations, and mandatory regulatory permits applicable to such facilities. However, should site-specific potential impacts remain significant or potentially significant under CEQA, even after legal requirements, the PEIR proposes mitigation measures to reduce impacts to less than significant levels. The following mitigation measures from the PEIR have been incorporated into the Project design or otherwise apply to the Project:

Mitigation Measure 11.1: *Prior to final Project design and any earth disturbing activities, the applicant or agency(ies) responsible shall conduct a Phase I Environmental Site Assessment (ESA). The Phase I ESA shall be prepared by a Registered Environmental Assessor (REA) or qualified professional to assess the potential for contaminated soil or groundwater conditions at the Project site; specifically, in the area proposed for construction of AD facilities. The Phase I ESA shall include a review of appropriate federal, State, and local hazardous materials databases to identify hazardous waste sites at on-site and off-site locations within a one-quarter mile radius of the Project location. This Phase I ESA shall also include a review of existing and past land uses through aerial photographs, historical records, interview of owners, and/or operators of the property, observations during a reconnaissance site visit, and review of other relevant existing information that could identify the potential existence of contaminated soil or groundwater.*

If no contaminated soil or groundwater is identified or if the Phase I ESA does not recommend any further investigation then the Project applicant or agency(ies) responsible shall proceed with final Project design and construction.

OR

If existing soil or groundwater contamination is identified, and if the Phase I ESA recommends further review, the applicant or agency(ies) responsible shall retain a REA to conduct follow-up sampling to characterize contamination and to identify any required remediation that shall be conducted consistent with applicable regulations prior to any earth disturbing activities. The environmental professional shall prepare a report that includes, but is not limited to, activities performed for the assessment, summary of anticipated contaminants and contaminant concentrations at the proposed contamination site, and recommendations for appropriate handling of any contaminated materials during construction. The Proposed Project would implement Mitigation Measure 11.1. Additionally, according to the Department of Toxic Substances Control (DTSC's) Hazardous Waste Substance List (Cortese List) and EnviroStor database and the State Water Resources Control Board (SWRCB) Geotracker online database, the Proposed Project is not located on any known hazardous material sites (DTSC 2018; SWRCB 2018a).

Mitigation Measure 11.3: *Implement Mitigation Measures 5.1a and 6.2a-f.* The Proposed Project would implement these mitigation measures.

Mitigation Measure 11.4a: *Prior to Project approval, AD facility operators shall prepare and implement a Fire Safety Plan that outlines fire hazards, describes facility operations procedures to prevent ignition of fires, requires regular inspection of fire suppression systems, and provides for worker in training safety procedures as well as protocols for responding to fire incidents. The Fire Safety Plan shall be reviewed and approved by the local fire enforcement agency.* The Proposed Project would implement Mitigation Measure 11.4a.

Mitigation Measure 11.4b: *Implement Mitigation Measure 11.5.* There are no schools located within a one-quarter mile radius of the Project site. This mitigation measure does not apply.

Mitigation Measure 11.5: *AD facilities shall be sited at least one quarter mile from existing or proposed schools, daycare facilities, hospitals and other sensitive land uses.* The nearest sensitive receptor to the Project site is a residence located approximately 3,000 feet to the northwest on Louise Street.

Mitigation Measure 11.7: *For any AD facility proposed within 5 statute miles of an airport's air operations area, the operator will notify the Federal Aviation Administration (FAA) Regional Airports Division office and the airport operator of the proposed facility as early in the process as possible. Such AD facilities must receive an FAA Determination of No Hazard prior to Project approval.* The nearest airport to the Project site is Palm Springs International Airport, located approximately five miles south of the Project site.

Mitigation Measure 11.8: *Implement Mitigation Measures 11.1, 11.4, 11.5, and 11.7.* The Proposed Project would implement these mitigation measures, as applicable.

a) *Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Consistent with PEIR, Less Than Significant with Mitigation. According to the Code of Federal Regulations (CFR Title 40, Part 261) and the California Department of Toxic Substance Control (DTSC), hazardous materials are defined as having four of the following characteristics: ignitability, reactivity, corrosivity, and/or toxicity.

Construction of the Proposed Project would involve the temporary use of potentially hazardous substances, such as diesel fuel and hydraulic fluid associated with construction equipment. However, equipment maintenance and fueling activities would not occur on the site and use of equipment would be consistent with the manufacturer's instructions and industry standards. Additionally, construction activities would involve the implementation of a Storm Water Pollution Prevention Plan (SWPPP) with accompanying Best Management Practices (BMPs) for the delivery, storage, use, and spill prevention of hazardous materials.

The Proposed Project would adhere to laws and regulations implemented by state and federal agencies for the transport, use, storage, handling, and disposal of hazardous materials. Additionally, the Proposed Project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) Permit and the Construction General Permit, Order No. 99-08 to reduce the potential hazards associated with the release of hazardous materials during construction of the Proposed Project.

The organic waste feedstocks that would be handled by the AD include food waste and green waste. Food waste includes food processing waste and fats, oils, and greases. Green material includes urban, agricultural, crop residues, and other green material. Unprocessed animal tissue (carcasses), biosolids, untreated septage, dairy manure, or hazardous waste are not included as part of the feedstock for the proposed AD.

Operation and maintenance of the AD facility equipment would involve the use of hazardous materials such as fuels, lubricants, and hydraulic fluids for vehicles and onsite equipment. All steps of the AD process (pre-processing, digestion, and post-processing) would take place in enclosed facilities. Waste products (solids, digestate water, and biogas) would be recycled or, in the case of biogas, used to generate electricity. The air scrubber would need to be flushed to remove sulfide, which would produce a sulfide effluent which would be disposed of in accordance with all local, state, and federal regulations.

Handling of hazardous materials and hazardous wastes is covered by federal and state laws that minimize worker safety risks from both physical and chemical hazards in the workplace. Cal/OSHA is responsible for developing and enforcing workplace safety standards, including the handling and use of hazardous materials. Workers must be trained to understand the hazards and appropriate work procedures associated with confined spaces, flammable gases, etc. Businesses that use hazardous materials are required to submit a Hazardous Materials Business Plan to the local Certified Unified

Program Agency (CUPA), in this case, Riverside County, which performs inspections to ensure compliance with hazardous materials labeling, training, and storage regulations. Because numerous laws and regulations govern the transport, use, storage, handling, and disposal of hazardous materials, impacts related to the use of these materials on the site would be less-than-significant. Impacts would be further reduced with the implementation of Mitigation Measure 11.3. No Project-specific mitigation measures are required.

b) *Would the Project 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?*

Consistent with PEIR, Less Than Significant with Mitigation. The potential risk associated with accidental discharge during use and storage of equipment-related hazardous materials during construction is considered low because the handling of any such materials would be addressed through the implementation of BMPs. The Proposed Project consists of an AD Facility that would take organic waste from local jurisdictions in the Coachella Valley and convert it to electricity. Operation and maintenance of the Proposed Project would also involve the transport, use, storage, handling, and disposal of hazardous materials during pre-processing, digestion, and post-processing operations. With the implementation of Mitigation Measure 11.3 impacts associated with the release of hazardous materials during operation of the Proposed Project would be less than significant. No Project-specific mitigation measures are required.

c) *Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

No Impact. There are no schools located within a one-quarter mile radius of the Project site. Two Bunch Palms Elementary School is located approximately 2.7- miles northeast of the Project site. No impacts related to hazardous emissions or the handling of hazardous emissions or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school are expected.

d) *Would the Project be located on a site which 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?*

No Impact. Three record searches were completed for the Project site within multiple database platforms pursuant to Government Code Section 65962.5 and its subsections. The databases consulted included *Geotracker, EnviroStor,* and the EPA *Enforcement and Compliance History Online* (ECHO). Geotracker is maintained by the State of California Water Resources Control Board. EnviroStor is maintained by the State of California DTSC. The ECHO database focuses on inspection, violation, and enforcement data for the Clean Air Act (CAA), Clean Water Act (CWA) and Resource Conservation and Recovery Act (RCRA) and also includes Safe Drinking Water Act (SDWA) and Toxics Release Inventory (TRI) data.

The search results did not identify any records or sites in connection with the property. No Leaking Underground Storage Tank Cleanup Sites, Land Disposal Sites, Military Sites, DTSC Hazardous Waste Permits, DTSC Cleanup Sites, or Permitted Underground Storage Tanks are known to occur on or around the property (DTSC 2018; EPA 2018; SWRCB 2018a). The Proposed Project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

e) *For a Project 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 the Project result in a safety hazard or excessive noise for people residing or working in the Project area?*

No Impact. The Proposed Project is not located near an existing airport or airport land use plan. The nearest airport facility to the Project site is the Palm Springs International Airport, located approximately five miles south of the Project site. No impacts related to a safety hazard or excessive noise for people working in the Project site are expected because there are no airports within two miles of the Project site; no mitigation measures are required.

f) *Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

No Impact. The City of Desert Hot Springs General Plan has an Emergency Preparedness Element that identifies critical facilities necessary in the event of an emergency, to assess the availability of emergency response services, and to discuss the potential impacts of significant man-made and natural hazards within the community. This element was drafted with the goal of establishing policies and programs to assure effective response to environmental and man-made hazards that the community faces (City of Desert Hot Springs 2000a). The Emergency Preparedness Element identified critical facilities that are essential parts of an emergency response, including hospitals, fire and police stations, governmental operations and utility facilities, communications networks supporting emergency services, and emergency evacuation and access routes. The General Plan specifically identifies I-10 and the major roads that connect to the I-10 (such as Indian Canyon Drive and Palm Drive) as vital during an emergency. The Project site is located approximately 0.6 mile east of Indian Canyon Drive. There is no construction proposed in Indian Canyon Drive and the Project's estimated traffic is not anticipated to substantially affect flow on Indian Canyon Drive, after mitigation. The Proposed Project would pave a portion of 19th Avenue, which is currently a dirt road, as well as provide curb and gutter. This would increase emergency access to the Project area during flood conditions.

The Riverside County Fire Department, under contract with the City of Desert Hot Springs, provides 24-hour fire protection and emergency medical services to the Project area. The City of Desert Hot Springs has two fire stations, Battalion 10, Station 36 located at 11535 Karen Avenue is approximately four miles northwest from the Project site and Battalion 10, Station 37 located at 65958 Pierson Boulevard, approximately 3.75 miles northeast from the Project site. The Proposed Project is not

anticipated to hinder goals and or policies set forth in the Emergency Preparedness Element of the City of Desert Hot Springs General Plan.

The site design would be reviewed by the Riverside County Fire Department for compliance with Project-specific emergency access, water pressure and similar requirements as a routine aspect of the City's design review process. The Proposed Project would not interfere with an emergency response plan or emergency evacuation plan and no mitigation measures are required.

g) *Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

Consistent with PEIR, Less than Significant with Mitigation. Large areas of southern California are susceptible to wildfires year-round due to the region's weather, topography, and vegetation conditions. The Coachella Valley's hot dry summer and autumn weather is ideal to generate the dry vegetation that fuels most wildfires. The California Board of Forestry (CDF) ranks fire hazard of wildland areas of the State using four main criteria: fuels, weather, assets at risk, and level of service.

Vegetation removal had recently taken place at the Project site; however, remnants of creosote bush scrub remain, mostly apparent within the 250-foot buffer of the Project site. The Project site is undeveloped and mostly disturbed surrounded by creosote bush scrub vegetation, vacant land, and light industrial uses, these conditions have not been recognized to meet the criteria of high or very high fire hazard zones. The Western Coachella Valley Area Plan of the Riverside County General Plan designates the Project area as a Low Wildfire Zone (County of Riverside 2003). The Project area is also located in a Non-Very High Fire Hazard Severity Zone (VHFHSZ) on the Cal Fire Map Local Responsibility Area Map for Western Riverside County (CAL FIRE 2009). The Project site is not located near or adjacent to any wildfire areas. No impacts associated with wildland fire hazards are anticipated.

The PEIR determined that AD facilities could increase the risk of fire hazards due to the potential release of biogas generated during the AD processes. Compliance with existing safety regulations and widely-accepted industry standards would minimize the hazard to the public and the environment; however, in the unlikely event of a fire, there is a potential for exposure to nearby people or structures to fire risk. The Proposed Project would implement Mitigation Measure 11.4a of the PEIR, that would require the preparation and implementation of a Fire Safety Plan, which would reduce this impact to a level less than significant. No Project- specific mitigation measures are required.

10. HYDROLOGY AND WATER QUALITY

Summary of PEIR Evaluation

In determining the level of significance, the analysis in the PEIR assumed that the AD facilities would comply with relevant federal, state, and local ordinances and regulations in regard to hydrology and water quality. The PEIR determined that based on the scope of a Project and geographical location, AD facilities are not anticipated to result in impacts related to the following criteria: *Failure of a Levee or Dam, Exposure of People or Structures to Flooding, or Placement of Housing within a 100-Year Flood Zone*. However, site-specific conditions would still need to be addressed on a project-by-project basis. Should potential impacts remain significant or potentially significant under CEQA, even after regulatory and legal requirements, the PEIR proposes mitigation measures to reduce impacts to less than significant levels.

Mitigation measures were proposed to reduce these impacts to a less-than-significant level. The following mitigation measures from the PEIR have been incorporated into the Project design or otherwise apply to the Project:

> ***Mitigation Measure 6.2a:*** *During pre-processing, all water that contacts digester feedstock, including stormwater from feedstock handling and storage facilities and water from equipment wash down and feedstock wetting, shall be contained until appropriately disposed or utilized. Best Management Practices (BMPs) may be used to reduce loading of sediment, nutrients, trash, organic matter, and other pollutants. These BMPs may include, but are not limited to, trash grates and filters, oil-water separators, mechanical filters such as sand filters, vegetated swales, engineered wastewater treatment wetlands, settling ponds, and other facilities to reduce the potential loading of pollutants into surface waters or groundwater. All discharges of stormwater are prohibited unless covered under the General Industrial Stormwater Permit, other National Pollutant Discharge Elimination System (NPDES) permit or are exempted from NPDES permitting requirements. The NPDES permits will generally require implementation of management measures to achieve a performance standard of best available technology economically achievable (BAT) and best conventional pollutant control technology (BCT), as appropriate. The General Industrial Stormwater Permit also requires the development of a storm water pollution prevention plan (SWPPP) and a monitoring plan, in compliance with permit requirements.*[3] *Other liquid and solid wastes may only be discharged pursuant to an NPDES permit or waste discharge requirement (WDR) order.* The Proposed Project would implement Mitigation Measure 6.2a.
>
> ***Mitigation Measure 6.2b:*** *In order to minimize the amount of fugitive trash or feedstock released to surface waters, the following measures shall be implemented. When feasible, the Project proponent shall preferentially select feedstocks that contain minimal amounts of trash that could become entrained in surface water, either via direct contact with stormwater flows or via other accidental release, such as due to wind. Processing of such feedstocks may, however, be unavoidable, such as in support of an AD facility that processes MSW. Therefore, the Project applicant shall ensure that (1) drainage from all feedstock loading, unloading, and storage areas is contained onsite or treated to remove trash and stray feedstock, and sediment prior to release as*

permitted; (2) in all feedstock loading and unloading areas, and all areas where feedstock is moved by front loaders or other uncovered or uncontained transport machinery, the applicant shall ensure that mechanical sweeping and/or equivalent trash control operational procedures are performed at least daily, during operations; and (3) the facility operator shall train all employees involved in feedstock handling so as to discourage, avoid, and minimize the release of feedstock or trash during operations. The Proposed Project would implement Mitigation Measure 6.2b.

Mitigation Measure 6.2c: *In order to minimize water quality degradation associated with accidental spills at AD facilities, the applicant for individual projects that would be implemented under the Program EIR shall require Project proponents to complete and adhere to the requirements of a Spill Prevention, Control, and Countermeasure (SPCC) Plan, which is based on the federal SPCC rule. Notification of the SPCC Plan shall be provided to the local Certified Unified Program Agency (CUPA). The SPCC Plan shall contain measures to prevent, contain, and otherwise minimize potential spills of pollutants during facility operation, in accordance with U.S. EPA requirements. For individual Projects that would utilize wet digestion systems, in which processing and holding tanks would contain the (aqueous) digestion reaction and liquid digestate containing fats and oils, the SPCC Plan shall provide for installation and monitoring of secondary containment and/or leak detection systems to ensure that AD liquids are not accidentally discharged to navigable waters or adjoining shorelines. Monitoring of these systems shall be in accordance with SPCC Plan requirements.*

Additionally, the Project applicant shall adhere to the requirements and recommendations of WDRs, which would be provided for the Project by the applicable regional board. Requirements under WDRs include implementation of measures to minimize water quality degradation, including but not limited to restrictions on the concentration of water quality pollutants discharged from a proposed facility, and maximum acceptable flow volumes for a given facility. The Proposed Project would implement Mitigation Measure 6.2c.

Mitigation Measure 6.2d: *Any proposed discharge to a pond for an individual project would require the Project applicant to acquire WDRs from the appropriate regional board. The Project applicant shall ensure that all ponds and discharges to such ponds adhere to all requirements under applicable WDRs. The need for pond liners in order to protect groundwater quality would be assessed during the regional board's review of the Project, and requirements for pond liners would be included in the WDRs, as warranted. If appropriate, the WDRs would impose requirements for Class II surface impoundments as presented in Title 27 of the California Code of Regulations. Requirements include, but are not limited to, groundwater monitoring, double liner systems with leachate collection, water balance, a preliminary closure plan for clean closure, seismic analysis, and financial assurances. Compliance with WDRs may require the installation of facilities such as tanks and containers to store and process the digestate, the use of filter presses, and implementation of other water quality protection practices.* The Proposed Project would implement Mitigation Measure 6.2d.

Mitigation Measure 6.2e: *This measure would reduce potential for the movement of nutrients and other pollutants to groundwater and surface water for individual Projects that would employ land application for liquid digestate or residual solids. The operators*

of individual Projects implemented under this Program EIR shall ensure that land application of liquid digestate and/or residual solids adheres to all requirements of applicable WDRs. WDR requirements include but are not limited to, groundwater monitoring, completion of an anti-degradation analysis, and in some cases best practicable treatment and control to achieve salinity reduction in materials prior to discharge to land. WDRs would be issued by the appropriate regional board, and would consider site-specific conditions and waste characteristics, in order to determine applicable control measures and procedures that protect water quality. The Proposed Project does not propose land application of liquid digestate or residual solids. Mitigation Measure 6.2e does not apply to the Project.

Mitigation Measure 6.2f: *This measure would reduce the potential for water quality degradation from Projects that include discharge of liquid digestate to surface waters. The applicant for individual Projects implemented under this Program EIR shall ensure that the discharge of liquid digestate to surface waters adheres to all NPDES permitting recommendations and requirements, as established by the appropriate regional board. Specific measures may include, but are not limited to, limitations on discharge volumes, seasonal discharge restrictions, limitations on loading rates and/or concentrations of specific constituents, and other facility-specific water quality control measures designed to protect receiving water quality and preserve beneficial uses identified in Basin Plans.* The Proposed Project would not discharge liquid digestate to surface waters; Mitigation Measure 6.2f does not apply.

Mitigation Measure 6.3: *Individual applicants seeking coverage under this Program EIR shall ensure that, for their proposed AD facilities including pre-processing areas, feedstock storage areas, and digestate handling facilities, are protected from FEMA-defined 100-year flood events. Design measures may include, but are not limited to: facility siting, access placement, grading, elevated foundations, and site protection such as installation of levees or other protective features.* The Proposed Project would be located in an area designated as a Special Flood Hazard Area by the Western Coachella Valley Area Plan (Riverside County 2003). According to the Federal Emergency Management Agency Flood Insurance Rate Map # 06065C0895G Panel 895 of 3805, the Project site is located in Zone X, areas of 0.2% annual chance flood, areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square miles; and areas protected by levees from 1% annual chance flood. As such the Proposed Project would comply with Mitigation Measure 6.3.

Mitigation Measure 6.4: *In order to ensure that the AD facilities would not result in detrimental increases in stormwater flow or flooding on site or downstream, the Applicant for each AD facility Project shall prepare a comprehensive drainage plan (prior to construction) and implement the plan during construction. The comprehensive drainage plan shall include engineered stormwater retention facility designs, such as retention basins, flood control channels, storm drainage facilities, and other features as needed to ensure that, at a minimum, no net increase in stormwater discharge would occur during a 10-year, 24-hour storm event, as a result of Project implementation. Project related increases in stormwater flows shall be assessed based on proposed changes in impervious surface coverage on site, as well as proposed grading and*

related changes in site topography. The Proposed Project would implement Mitigation Measure 6.4.

Mitigation Measure 6.6: *To ensure that proposed AD facilities would not incur impacts associated with seiche, tsunami, or mudflow, the applicant for each individual Project shall ensure that all facilities are located outside of potential risk areas for seiche, tsunami, and mudflow. In the event that a proposed facility would be sited within a potential risk area for one of these hazards, the facility shall be raised above Projected maximum base inundation elevations, or shall be protected from inundation by the installation of berms, levees, or other protective facilities.* According to the Western Coachella Valley Area Plan, the Project site is not located in an area with steep or unstable slopes and therefore would not be subject to mudflows. Additionally, the Project site is located 69 miles east of the Pacific Ocean and not within a tsunami inundation zone (CDC 2018).

Mitigation Measure 6.7: *Implement Mitigation Measures 6.2 (a-f) and 6.3.* These mitigation measures would be implemented as applicable.

a) *Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Consistent with PEIR, Less Than Significant with Mitigation. The Project site is located within the Whitewater River Watershed in the Colorado River Region (Region 7) (SWRCB 2018b). There are nine California Regional Water Quality Control Boards (RWQCBs) that regulate water quality pursuant to the National Pollutant Discharge Elimination System (NPDES), an amendment to the federal Clean Water Act (CWA) of 1972, from non-point sources. The Proposed Project would disturb an area greater than one acre and therefore would be subject to compliance with the State's most current NPDES Construction General Permit (CGP) (Order No. 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ). As part of the CGP, to reduce potential adverse effects to surface water quality during construction, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared. The SWPPP would identify Best Management Practices (BMPs) to prevent stormwater runoff pollution. Preparation of a SWPPP and implementation of BMPs would ensure no adverse effects to water quality would occur during construction. Impacts would be less than significant.

Several operational processes could affect surface and groundwater quality. During pre-processing, wash down of equipment, feedstock wetting, and handling operations may result in a loss of a small amount of feedstock material. Pollutants associated with the feedstock (organic matter, sediment, nutrients, etc.) could be accidentally be released from the Project site or discharged during storm events. Implementation of PEIR Mitigation Measures 6.2a and 6.2b would reduce these impacts to a less than significant level.

Digestion occurs within enclosed tanks that are designed to prevent leakage. During post processing, digestate would be dewatered and separated into residual solids and liquids in an enclosed area, which would be sold for fertilizer or recycled back into the AD process. Therefore, potential effects on water quality would be limited to accidental

spills or releases of digestate. Implementation of PEIR Mitigation Measure 6.2c would reduce potential impacts to a less than significant level.

b) *Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable management of the basin?*

Consistent with PEIR, Less Than Significant. The City of Desert Hot Springs primarily relies on groundwater for its domestic water through extraction of groundwater from the Mission Creek subbasin, which forms a part of the larger Coachella Valley Groundwater Basin (SWRCB 2018b). Within the Project area, the Coachella Valley Water District (CVWD), Desert Water Agency (DWA), and the Mission Springs Water District (MSWD) manage the Mission Creek and Garnet Hill Subbasins Water Management Plan. This plan identifies long-term goals to direct operations of current and future water demands. The Project site is located within the jurisdiction of the MSWD.

No water is required for the AD process; the only water use would be for domestic and sanitary water for employees in the Office building. Over the life of the Project, water use is expected to be minimal. Potable water connections for the restrooms and break room kitchen will be extended from an existing water line in 19th Avenue. According to the Department of Energy's Federal Water Use Indices, office water use ranges from 8 to 20 gallons per employee per day with the typical use 15 gallons per employee per day (Department of Energy 1996). Assuming 27 total employees at maximum buildout, water use would be approximately 0.45 acre-feet per year. Mission Springs Water District's 2015 Urban Water Management Plan states that 2015 water use for commercial uses was approximately 1.17 acre-feet per year per connection (MSWD 2016). These connections include heavy water users such as restaurants and car washes, which would not be representative of the office use proposed for the Proposed Project. Even estimating 1.17 acre-feet per year of water use, impacts would be less than significant.

The Proposed Project is consistent with the City's General Plan and is not anticipated to interfere with groundwater supply. The Proposed Project would not require substantial additional water supplies after the fourth month of operation. A less than significant impact would occur.

c) *Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

i. result in substantial erosion or siltation on- or off-site?

Consistent with PEIR, Less Than Significant with Mitigation. The Proposed Project would require grading of the Project site which could affect the existing topographic and drainage features of the site. However, per PEIR Mitigation Measure 6.4, the Applicant has prepared a comprehensive site drainage plan prior to construction that would be designed by a registered civil engineer to safely retain, detain, and/or convey stormwater runoff and minimize potential erosion or siltation from the site. The drainage

plan provides two retention basins, that would capture all runoff from the Project on the site. Implementation of Mitigation Measure 6.4 would reduce impacts to less than significant. No Project-specific mitigation measures are required.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Consistent with PEIR, Less Than Significant with Mitigation. Please see the response to IX c) above. With the incorporation of Mitigation Measure 6.4, a less than significant impact would occur. No Project-specific mitigation measures are required.

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Consistent with PEIR, Less Than Significant with Mitigation. Per PEIR Mitigation Measure 6.4, the Applicant has prepared a site drainage plan prior to construction that has been designed by a registered civil engineer to safely retain, detain, and/or convey stormwater runoff and minimize potential erosion or siltation from the site. Two retention basins are proposed that would retain all runoff on the site. Implementation of Mitigation Measure 6.4 would reduce impacts to less than significant. No Project-specific mitigation measures are required.

During construction of the Proposed Project, site grading and other construction activities have the potential to expose large areas of bare soil to erosion during site preparation. water quality impacts associated with constriction of the Proposed Project are considered temporary and would be managed through the implementation of a SWPPP and associated BMPs. The PEIR determined that, for Projects that disturb more than one-acre, the proponent of the Project is required to comply with the National Pollutant Discharge Elimination System Construction General Permit. Adherence to this permit and associated BMPs would substantially reduce or prevent waterborne pollutants from entering natural waterways during construction. Runoff from the Proposed Project would be contained on site and would not be discharged into waters of the state. Any hazardous materials associated with construction would be regulated by the regional boards, Department of Toxic Substances Control, and local agencies. Impacts that would cause the degradation of water quality during construction would be less than significant.

During operation the Proposed Project does not propose to send digestate byproduct to a wastewater treatment plant. Liquid and solid digestate will be stored in tanks and an aeration and conditioning bunker. The liquid and solid digestate would be sold for a soil amendment for agricultural crops. With implementation of Mitigation Measures 6.2a through 6.2c the Proposed Project would not substantially degrade water quality.

iv. impede or direct flood flows?

Consistent with PEIR, Less Than Significant with Mitigation. The Proposed Project would be located in an area designated as a Special Flood Hazard Area by the Western Coachella Valley Area Plan (Riverside County 2003). According to the Federal

Emergency Management Agency Flood Insurance Rate Map # 06065C0895G Panel 895 of 3805, the Project site is located in Zone X, areas of 0.2% annual chance flood, areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square miles; and areas protected by levees from 1% annual chance flood. With the implementation of Mitigation Measure 6.3 impacts would be less than significant.

d) *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?*

Consistent with PEIR, Less Than Significant. As discussed above, The Proposed Project would be located in an area designated as a Special Flood Hazard Area by the Western Coachella Valley Area Plan (Riverside County 2003). According to the Federal Emergency Management Agency Flood Insurance Rate Map # 06065C0895G Panel 895 of 3805, the Project site is located in Zone X, areas of 0.2 percent annual chance flood, areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square miles; and areas protected by levees from 1 percent annual chance flood. However, the Project site is not located in a dam inundation zone (County of Riverside 2016). Therefore, people or structures would not be exposed to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam. A less than significant impact would occur.

The Project site is located 69 miles east of the Pacific Ocean. Due to the distance from the Pacific Ocean, the Project site would not be subject to inundation from seiche. According to the California Department of Conservation, the Project site is not located within a tsunami inundation zone (CDC 2018). No impact would occur from tsunami or seiche.

e) *Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Consistent with PEIR, Less Than Significant. As described above under question 10a, within the Project area, the CVWD, DWA, and the MSWD manage the Mission Creek and Garnet Hill Subbasins Water Management Plan. This plan identifies long-term goals to direct operations of current and future water demands. The Project site is located within the jurisdiction of the MSWD. Project groundwater use is expected to be minimal and would not conflict with the Water Management Plan.

11. LAND USE AND PLANNING

Summary of PEIR Evaluation

The PEIR determined that AD facilities would have a less than significant land use and land use planning impact at the program level, because it is assumed that AD facilities would be co-located with permitted solid waste facilities or located in areas zoned for industrial or solid waste handling activities. However, if proposed AD facilities would be constructed in undisturbed areas, then impacts to land use and land use planning would be analyzed on a project-by-project basis. Site specific information would determine any impacts to land use and

land use planning on the Project site and would ensure that potential impacts to these resources would be mitigated appropriately, if necessary, using Project-specific mitigation measures.

No mitigation measures were proposed at the programmatic level because site specific requirements of individual facilities would need to be considered for land use and land use planning.

a) Would the Project physically divide an established community?

No Impact. The Project site is currently vacant and is zoned as Light Industrial (I-L) district and designated as such by the City of Desert Hot Springs General Plan. The Project site is located within a light industrial land use which is defined by the City of Desert Hot Springs as including industrial and business park uses, and other uses conducted entirely within enclosed buildings and with limited and screenable outdoor storage (City of Desert Hot Springs 2000a). Surrounding land uses immediately adjacent to the Project site include undeveloped vacant land with conditions similar to those found on the Project site and light industrial facilities, including the Coachillin' Specific Plan. The Coachillin Specific Plan is an approximately 154-acre mixed-use development located immediately to the west of the site. To reduce and avoid land use incompatibility, the I-L District is predominantly separated from residential and commercial uses. There are no established communities that would be divided through implementation of the Proposed Project. No impact would occur.

b) Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The Proposed Project would result in the construction of an AD Facility that would take organic waste from local jurisdictions in the Coachella Valley and convert it to electricity. The facility would be located on an approximately 9.76-acre parcel north of 19th Avenue and east of Calle De Los Ramos in the City of Desert Hot Springs, California. The Project site is located within a light industrial (I-L) District and designated as a light industrial (I-L) land use by the City of Desert Hot Springs (City of Desert Hot Springs 2000a). The City of Desert Hot Springs General Plan states that energy-related industrial uses can include a wide range of development types, including wind turbine and solar energy arrays, but may also include gas turbine and biomass conversion technologies with low pollutant emission profiles. The City has classified this facility as a recycling facility, which is also allowed in the I-L land use designation with development permit review. The Proposed Project would develop an AD within an industrial use zone which would be consistent with the City of Desert Hot Springs General Plan. No impact would occur.

c) Would the Project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The Proposed Project lies within the boundary of the CVMSHCP, which provides the framework and guidelines for conservation of habitats and natural communities within the area. On October 2, 2008, a habitat mitigation fee collected

from new development projects was established to implement the CVMSHCP and support the procurement of conservation lands. The Proposed Project would comply with this requirement per Chapter 3.40 of the Desert Hot Springs (CVMSHCP/ Natural Community Conservation Plan Mitigation Fees). No impact would occur.

12. MINERAL RESOURCES

Summary of PEIR Evaluation

The PEIR determined that AD facilities would have a less than significant impact to mineral resources at the program level, because It is assumed that AD facilities would be co-located with permitted solid waste facilities or located in areas zoned for industrial or solid waste handling activities. However, if proposed AD facilities would be constructed in undisturbed areas, then impacts to mineral resources would be analyzed on a project-by-project basis. Site specific information would determine any impacts to mineral resources on the Project site and would ensure that potential impacts to these resources would be mitigated appropriately, if necessary, using Project-specific mitigation measures.

No mitigation measures were proposed at the programmatic level because site specific requirements of individual facilities would need to be considered for mineral resources.

a) Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Surface Mining and Reclamation Act of 1975 (SMARA) requires all cities and counties to incorporate the mapped mineral resource designations approved by the State Mining and Geology Board, in their General Plans. These designations categorize land into four Mineral Resource Zones.

According to the City of Desert Hot Springs General Plan, Energy and Mineral Resources Element and the County of Riverside General Plan EIR, the Project site is located within Mineral Resource Zone 3 (MRZ-3) (City of Desert Hot Springs 2000a; County of Riverside 2014). MRZ-3 is defined as areas containing mineral deposits, the significance of which cannot be evaluated with available data. The Project site is currently vacant and is not being used for mining.

The Proposed Project does not involve the extraction or loss of known mineral resources. Aggregate resources used as part of the construction of the Proposed Project would be obtained from existing local or regional facilities. The Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impact would occur.

b) Would the Project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. As described in the Desert Hot Springs General Plan, Energy and Mineral Resources Element, primary mineral resources that are known to exist in the Coachella Valley region consist of sand and gravel (aggregate) commonly found along and near local drainages (City of Desert Hot Springs 2000a). Aggregate is essential for local and

regional construction industries which rely heavily on a dependent source for building materials including asphalt, concrete, road base, stucco, and plaster.

According to the City of Desert Hot Springs General Plan, and the County of Riverside General Plan, the Project site is not a delineated mineral resource recovery site. In addition, the Proposed Project does not involve the mining operations and no mining operations exist in the vicinity of the Project site. No impact would occur.

13. NOISE

Summary of PEIR Evaluation

The PEIR determined that AD facilities would result in less than significant noise-related impacts, primarily through compliance with all local noise ordinances and regulations and other measures deemed necessary by the Lead Agency. The PEIR requires a site-specific noise analysis of AD facilities located within 2,000 feet of a sensitive receptor. (Sensitive noise receptors include such land uses as residences, schools, churches, and parks.) If operational sound levels would exceed local regulations, or 45 dBA at a sensitive receptor (if no regulations are available), additional sound-proofing such as enclosures, muffling, shielding, or other attenuation measures shall be installed to meet the required sound level. The closest sensitive receptor is a residence located more than 3,000 feet to the northwest on Louise Street. Therefore, a site-specific noise study is not required.

The following mitigation measures from the PEIR have been incorporated into the Project design or otherwise apply to the Project:

Measure 7.1a: *Construction activities shall be limited to the hours between 7 a.m. and 7 p.m., Monday through Saturday, or an alternative schedule established by the local jurisdiction, or other limits to construction hours normally enforced by the local jurisdiction (see Measure 7.1d below).* The Proposed Project will conform to the City of Desert Hot Springs' municipal code, which limits construction activities to the hours between 7 am and 5 pm Monday through Saturday. During daylight savings time, construction is permitted between 6:00 am and 6:00 pm Monday through Saturday. Construction is not permitted on Sundays.

Measure 7.1b: *Construction equipment noise shall be minimized by muffling and shielding intakes and exhaust on construction equipment to a level no less effective than the manufacture's specifications, and by shrouding or shielding impact tools.* The Proposed Project will comply with this mitigation measure.

Measure 7.1c: *Construction contractors within 750 feet of sensitive receptors shall locate fixed construction equipment, such as compressors and generators, and construction staging areas as far as possible from nearby sensitive receptors.* The proposed Project is located more than 3,000 feet from the nearest sensitive receptor. This mitigation measure does not apply.

Measure 7.1d*: Construction contractors shall comply with all local noise ordinances and regulations and other measures deemed necessary by the Lead Agency.* The Proposed Project will comply with this mitigation measure.

Measure 7.2: *AD facilities located within 2,000 feet of a sensitive receptor shall conduct a site-specific noise study. If operational sound levels would exceed local regulations, or 45 dBA at a sensitive receptor (if no regulations are available), additional sound-proofing such as enclosures, muffling, shielding, or other attenuation measures shall be installed to meet the required sound level.* A site-specific noise study is not required for this Project because the nearest sensitive receptor (a residence) is located more than 3,000 feet from the Project.

Measure 7.4: *Implement Mitigation Measures 7.1a through 7.1d and Measure 7.2.* These mitigation measures will be implemented, as applicable.

a) *Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Consistent with PEIR, Less Than Significant with Mitigation. Noise is generally defined as sound that is loud, disagreeable, or unexpected. The selection of a proper noise descriptor for a specific source is dependent on the spatial and temporal distribution, duration, and fluctuation of the noise. The noise descriptors most often encountered when dealing with traffic, community, and environmental noise include an overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear (in dBA).

Regarding increases in A-weighted noise levels (dBA), the following relationships should be noted in understanding this analysis:

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived by humans.
- Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference.
- A change in level of at least 5 dBA is required before any noticeable change in community response would be expected. An increase of 5 dBA is typically considered substantial.
- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

Noise can be generated by a number of sources, including mobile sources, such as automobiles, trucks, and airplanes, and stationary sources, such as construction sites, machinery, and industrial operations. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Mobile transportation sources, such as highways, and hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3.0 dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance from the source. Noise generated by stationary sources typically attenuates at a rate of approximately 6.0 to 7.5 dBA per doubling of distance from the

source (EPA 1971). Sound levels can be reduced by placing barriers between the noise source and the receiver.

Project Land Use Compatibility

The Project site is located on vacant land and predominately surrounded by vacant land in all directions. The nearest existing land uses in the vicinity of the Project area includes a solar energy generation facility approximately 460 feet to the east, a highway commercial area located more than 2,600 feet to the southwest, and a residence located more than 3,000 feet to the northwest on Louise Street. While not yet constructed, the approved Coachillin Specific Plan, an approximate 154-acre mixed-use commercial/industrial development, is located immediately to the west of the site.

The General Plan Noise Element includes a land use compatibility table that provides the City with a tool to gauge the compatibility of new land uses relative to existing noise levels. This table, represented as Table V-2 in the Noise Element, identifies normally acceptable, conditionally acceptable, and clearly unacceptable noise levels for various land uses, including industrial land uses such as those proposed by the Project. In the case that the noise levels identified at a proposed Project site fall within levels considered normally acceptable, the Project is considered compatible with the existing noise environment. As shown in Table V-2 in the Noise Element, an acceptable existing noise level for locating industrial processing land uses ranges from 50 to 75 dBA Community Noise Equivalent Level (CNEL)[2]. Conditionally acceptable noise levels range from 75 and 80 CNEL and the development of industrial uses in areas of the City experiencing noise levels beyond this are highly discouraged (City of Desert Hot Springs 2000a).

As previously described, the Project site is located on vacant land and predominately surrounded by vacant land in all directions; therefore, the Project site is not currently experiencing noise levels exceeding 75 dBA. The predominately source of noise in the Project vicinity is Interstate 10 (I-10), which traverses the area just under 3,000 feet south of the Project site at the nearest. According to Caltrans' *2015 Traffic Volumes* (2016), the segment of I-10 traversing the Project area accommodates an average of 86,000 vehicle trips daily. Using the Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (FHWA-RD-77-108), this amount of daily vehicle trips on I-10 results in a noise level of approximately 53.0 dBA CNEL (see Appendix A). As this noise level falls below 75 dBA, the Project site is considered an appropriate noise environment to locate proposed industrial land use per City standards.

Short-Term Construction-Generated Noise

Construction noise associated with the Proposed Project would be temporary and would vary depending on the nature of the activities being performed. Noise generated would primarily be associated with the operation of off-road equipment for on-site

[2] CNEL (Community Noise Equivalent Level) = A 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

construction activities as well as construction vehicle traffic on area roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., building construction, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). During construction, exterior noise levels could negatively affect sensitive receptors in the vicinity of the construction site.

Noise levels associated with individual construction equipment are summarized in Table 12-1.

Table 12-1
Typical Construction Equipment Noise Levels

Type of Equipment	Maximum Noise (L_{max}) at 50 Feet (dBA)	Maximum 8-Hour Noise (L_{eq}) at 50 Feet (dBA)
Crane	80.6	72.6
Dozer	81.7	77.7
Excavator	80.7	76.7
Generator	80.6	77.6
Grader	85.0	81.0
Other Equipment (greater than 5 horsepower)	85.0	82.0
Paver	77.2	74.2
Roller	80.0	73.0
Tractor	84.0	80.0
Dump Truck	76.5	72.5
Concrete Pump Truck	81.4	74.4
Welder	74.0	70.0

Source: FHWA 2006

As depicted in Table 12-1, noise levels generated by individual pieces of the most typical construction equipment range from approximately 70.0 dBA L_{eq} to 82.0 dBA L_{eq} at 50 feet.[3] Noise levels associated with construction projects can vary, depending on the activities performed. Short-term increases in vehicle traffic, including worker commute trips and haul truck trips, may also result in temporary increases in ambient

[3] L_{eq} (Equivalent Noise Level) = The average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

noise levels. The nearest sensitive receptor is a residence located more than 3,000 feet to the northwest on Louise Street. Based on the construction equipment noise levels listed in Table 12-1 and considering an average noise attenuation rate of 6 dB per doubling of distance from the source, predicted maximum 8-hour noise levels would range from approximately 35.5 dBA L_{eq} to 47.5 dBA L_{eq}.

The previous analysis prepared in the PEIR found that construction activities associated with the AD Initiative would be less than significant with the imposition of several mitigation measures (Measures 7.1a through 7.4) that reduce impacts. These measures are binding and applicable to the proposed Coachillin' AD Facility. For instance, Measure 7.1a limits to construction hours to those normally enforced by the local jurisdiction (i.e., City of Desert Hot Springs). The City regulates construction noise through Municipal Code Sections 8.12.100 and 9.04.030, which limit construction activities to the hours between 7:00 a.m. and 5:00 p.m., Monday through Saturday. During daylight savings time, construction is permitted between 6:00 a.m. and 6:00 p.m. Monday through Saturday. Construction is not permitted on Sundays. The Project would adhere to the City Municipal Code during construction. While Measure 7.1c would not be applicable to the Project because it only applies to projects within 750 feet of sensitive noise receptors, the Project would comply with Measure 7.1b, which reduces construction noise through the requirement of muffling and shielding intakes and exhaust on equipment. Construction noise associated with the Project would not exceed City standards.

Project construction would also instigate automobile traffic associated with construction worker commutes and vendor trips, and thus could result in off-site noise impacts to sensitive receptors along vicinity roadways. Per the CalEEMod computer program used to calculate Project air pollutant emissions associated with construction activities, as many as 183 traffic trips could be generated during construction of the Project, specifically during the facility construction and paving phases.

According to Traffic Impact Analysis prepared for the Project (Kunzman Associates, Inc. 2018), Project vicinity roadways potentially affected by the Project include Indian Canyon Drive, 19th Avenue, and Dillon Road. Under existing conditions, Indian Canyon Drive accommodates more than 14,000 traffic trips daily (Kunzman Associates, Inc. 2018). Similarly, 19th Avenue accommodates 14,200 traffic trips daily on average and Dillon Road experiences 5,200 traffic trips daily under current conditions (Kunzman Associates, Inc. 2018). According to the California Department of Transportation (Caltrans) *Technical Noise Supplement to the Traffic Noise Analysis Protocol* (2013), doubling of traffic on a roadway would result in an increase of 3 dB (a barely perceptible increase). Project construction activities would not result in a doubling of traffic, thus its contribution to existing traffic noise would not be perceptible. Construction-related traffic noise impacts associated with the Project would be less than significant.

Long-Term Operational Noise

PEIR Measure 7.2 states that all proposed AD facilities located within 2,000 feet of a sensitive receptor must conduct a site-specific noise study. As previously described, the nearest sensitive receptor to the Project is located more than 3,000 feet to the northwest. Nonetheless, Section 17.040.180 of the City's Municipal Code regulates

noise sources by prohibiting noise generated to exceed an exterior noise level of 65 dBA at any residential area.

On-site stationary sources of noise include preprocessing, vehicle circulation, and the operation of certain mechanical equipment such as stationary pumps, motors, compressors, fans, generators, and other equipment. Pre-processing activities include noise generating steps such as sorting and grinding.

Table 12-2 summarizes representative operational noise levels for on-site noise sources.

Table 12-2
Summary of On-site Stationary Source Noise Levels

Source	Distance (feet)	Noise Level (dBA L_{eq})
Stationary pumps & motors[1]	50 Feet	77.9
Compressors[1]	50 Feet	73.7
Fans[1]	50 Feet	78.9
Generators[1]	50 Feet	80.6
Sorting & Grinding Equipment[1]	50 Feet	76.2
Loading Dock / Delivery Truck Movements[2]	30 Feet	79.0

Source:
1 FHWA 2006.
2 Source noise levels for loading dock operations includes truck approach (68 dBA), backup alarm (79 dBA), idling (70 dBA), air brake discharge (72 dBA), engine ignition (71 dBA), and pull away (74 dBA) (City of San Jose 2014). These noise levels generally coincide with loading dock noise levels cited in other related documentation [i.e., 73 dBA at 50 feet (City of Industry 2016); 76 dBA at 50 feet (City of Ceres 2010)].

All feedstock trucks delivering organic material would be received in the Anaerobic Digester Facility Building to be located on the southern end of the parcel, and organic materials would be pre-processed there prior to being loaded into the digester. Preprocessing includes all processing steps required to prepare the feedstock for the digester, such as sorting, screening, grinding, wetting, and the process of feedstock delivery to the digester. Access to the Anaerobic Digester Facility Building would be from 19th Avenue.

The nearest sensitive receptor is a residence located more than 3,000 feet to the northwest on Louise Street. The Anaerobic Digester Facility Building would provide approximately 8 to 10 dBA of noise attenuation for the activities of sorting, grinding, and material delivery by enclosing these noise-generating activities (FHWA 2006). Enclosures can provide a substantial reduction in the nuisance effect of noise by controlling the noise pathway. Table 12-3 summarizes representative operational noise levels at the nearest sensitive receptor to the Project for on-site noise sources accounting for an average noise attenuation rate of 6 dB per doubling of distance from

the source. An additional attenuation of 8 dB is applied to the activities of sorting, grinding, and material delivery as these activities would occur within the Anaerobic Digester Building.

Table 12-3
Stationary Equipment Noise Levels at Nearest Sensitive Receptor

Source	Noise Level ($dBA L_{eq}$)
Stationary pumps & motors[1]	43.4
Compressors[1]	39.2
Fans[1]	44.4
Generators[1]	46.1
Sorting & Grinding Equipment[1]	33.7
Loading Dock / Delivery Truck Movements[2]	36.5

Source:
[1] FHWA 2006.
[2] Source noise levels for loading dock operations includes truck approach (68 dBA), backup alarm (79 dBA), idling (70 dBA), air brake discharge (72 dBA), engine ignition (71 dBA), and pull away (74 dBA) (City of San Jose 2014). These noise levels generally coincide with loading dock noise levels cited in other related documentation [i.e., 73 dBA at 50 feet (City of Industry 2016); 76 dBA at 50 feet (City of Ceres 2010)].

As shown in Table 12-3, Project stationary equipment would not result in noise levels beyond City standards at the nearest sensitive receptor. Noise levels would range from 33.7 to 46.1 at the nearest sensitive receptor and these noise levels are considered low.

The Project would be a source of automobile traffic, and thus could result in off-site noise impacts to sensitive receptors along vicinity roadways. Project-generated traffic noise levels in the Project vicinity were assessed based on the traffic volumes and traffic routes identified by Kunzman Associates (2018) coupled with the Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (FHWA-RD-77-108) to determine the noise-related effects to any sensitive receptors along Project vicinity roadways (see Appendix A). Table 12-4 shows the calculated off-site roadway noise levels under existing traffic levels compared to buildout of the Project. The calculated noise levels as a result of the Project at affected land uses are compared to City noise standards.

Table 12-4
Existing Plus Project Conditions Predicted Traffic Noise Levels

Roadway Segment	CNEL at 100 feet from Centerline of Roadway		Increase in Existing + Project Noise Level over Existing Noise Level	Threshold	Exceed Threshold?
	Existing Conditions	Existing + Project Conditions			
Indian Canyon Drive					
20th Avenue to 19th Avenue	60.8	60.9	0.1	65 dBA	No
19th Avenue to 18th Avenue	60.9	60.9	0.0	65 dBA	No
18th Avenue to Dillon Road	60.9	60.9	0.0	65 dBA	No
North of Dillon Road	58.8	59.9	1.1	65 dBA	No
Dillon Road					
East of Indian Canyon Drive	56.5	56.5	0.0	65 dBA	No
19th Avenue					
Indian Canyon Drive to Project Site[1]	48.4	49.2	0.8	65 dBA	No

Source: *Traffic noise levels were calculated by ECORP Consulting using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified by Kunzman and Associates (2018). Refer to Appendix A for traffic noise modeling assumptions and results.*

Notes: *19th Avenue from Indian Canyon Drive to the Project site is currently unimproved. In order to derive the traffic-generated noise experienced at the commercial land use at the southeast corner of Indian Canyon Road and 19th Avenue under existing conditions, traffic noise generated along Indian Canyon Road 680 feet from this commercial land use is represented. All other noise contours represent noise experienced 100 feet from the traffic source.*

As shown in Table 12-4, predicted increases in traffic noise levels associated with the Project would be less than thresholds. Furthermore, Project traffic would not result in a perceptible noise increase. This is because, regarding increases in A-weighted noise levels (dBA), a 3-dBA change compared with the existing condition is considered a just-perceivable difference to the human ear. As shown in Table 12-4, the largest increase in traffic noise over existing conditions would be 1.1 dBA, which is less than 3 dBA and thus imperceptible to the human ear. A less than significant impact would occur.

b) *Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?*

Consistent with PEIR, Less Than Significant. Once operational, the Project would not be a source of groundborne vibration. Increases in groundborne vibration levels attributable to the Proposed Project would be primarily associated with short-term

construction-related activities. Construction on the Project site would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. Construction-related ground vibration is normally associated with impact equipment such as pile drivers, jackhammers, and the operation of some heavy-duty construction equipment, such as dozers and trucks. Vibration decreases rapidly with distance. Since the City does not establish vibration thresholds, this impact discussion utilizes Caltrans's recommended standard of 0.2 inches per second (in/sec) peak particle velocity with respect to the prevention of structural damage for normal buildings (Caltrans 2013). This is also the level at which vibrations may begin to annoy people in buildings. Groundborne vibration levels associated with representative construction equipment are summarized in Table 12-5.

Table 12-5
Representative Vibration Source Levels for Construction Equipment

Equipment Type	Peak Particle Velocity at 25 Feet (inches per second)
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076
Rock Breaker	0.003
Jackhammer	0.035
Small Bulldozer/Tractor	0.089

Source: FTA 2006; Caltrans 2004

The nearest off-site structure to the Project site is approximately 2,600 feet from the construction site boundary. Based on the vibration levels presented in Table 12-5, ground vibration generated by heavy-duty equipment would not be anticipated to exceed approximately 0.089 in/sec PPV at 25 feet. Because vibration drops off rapidly with distance, vibration from construction activities experienced at the nearest sensitive receptor would be expected to be below the 0.2 inch-per-second PPV significance threshold. Impacts would be less than significant.

c) *For a Project located within the vicinity of a private airstrip or 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 the Project expose people residing or working in the Project area to excessive noise levels?*

No Impact. The Proposed Project is not located near an existing airport or airport land use plan. The nearest airport facility is the Palm Springs International Airport, located approximately five miles south of the Project site. The Proposed Project would not expose people residing or working in the Project area to excessive noise levels. No impact would occur.

14. POPULATION AND HOUSING

Summary of PEIR Evaluation

The PEIR determined that AD facilities would create a small number of jobs throughout California; however, this increase in employment would not be considered substantial. Additionally, AD Facilities do not involve the construction of roadways or residences which are causal features to population growth. The PEIR also determined that biogas generated by AD facilities would provide for an existing need for renewable energy and is not proposed for use for new off-site development and would not be growth-inducing. Therefore, it is assumed that AD facilities would have a less than significant impact to housing and population growth at the program level, because It is assumed that AD facilities would be co-located with permitted solid waste facilities or located in areas for industrial or solid waste handling activities and would not displace populations or housing.

No mitigation measures were proposed at the programmatic level.

a) Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes or businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Consistent with PEIR, Less Than Significant. The Proposed Project would result in the construction of an AD Facility that would take organic waste from local jurisdictions in the Coachella Valley and convert it to electricity. The Proposed Project would be consistent with operations and uses supported in the City of Desert Hot Springs Light Industrial (I-L) zoning and General Plan land use designation. The Proposed Project would be constructed over a period of approximately one year. The number of employees required for operation of the Proposed Project would be 27 at full capacity and would not induce population growth due to the nature and size of the proposed facilities.

The Proposed Project does not include construction of residential housing. Any improvements to roads and other infrastructure would be related to access to the facility and would not induce substantial population growth to the area. The Proposed Project would not induce substantial population growth in an area, either directly or indirectly. A less than significant impact would occur.

b) Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The existing Project site consists of vacant land zoned for Light Industrial (L-I) use. The Proposed Project would not displace any existing housing necessitating the construction of replacement housing elsewhere. The Project site is located on vacant land and predominately surrounded by vacant land in all directions. The nearest residence is located more than 3,000 feet to the northwest on Louise Street. The Proposed Project would not significantly displace housing, necessitating the construction of replacement housing elsewhere. No impact would occur.

15. PUBLIC SERVICES

Summary of PEIR Evaluation

The PEIR assumed that the AD facilities would comply with relevant federal, state, and local laws, regulations, ordinances and guidance with regards to public services. The PEIR determined that based on the scope of a Project and geographical location (co-located with permitted solid waste facilities or located in areas zoned for industrial or solid waste handling activities), AD facilities would have a less than significant or no impact on the following criteria: *Police Protection, Schools and Parks, Solid Waste Facilities, Solid Waste Regulations, and Energy Policies or Standards*. However, site-specific conditions may still need to be addressed on a project-by-project basis for impacts to water, wastewater treatment and stormwater treatment facilities, and utility requirements from a utility capacity perspective. Should potential impacts remain significant or potentially significant under CEQA, even after regulatory and legal requirements, the PEIR proposes mitigation measures to reduce impacts to less than significant levels.

Mitigation measures were proposed to reduce these impacts to a less-than-significant level. The following mitigation measures from the PEIR have been incorporated into the Project design or otherwise apply to the Project:

> ***Mitigation Measure 8.1:*** *Implement Mitigation Measures 10.1b, 10.3c, and 11.4a.* Mitigation Measures 10.1b (screening landscaping), 10.3c (enclosed flares), and 11.4a (Fire Safety Plan) would be implemented by the Proposed Project.
>
> ***Mitigation Measure 8.2a:*** *Implement Mitigation Measure 8.3b if the operator does not have an existing agreement, such as for co-located facilities.* The Proposed Project does not propose to send digestate byproduct to a wastewater treatment plant. Liquid and solid digestate will be stored in tanks and an aeration and conditioning bunker. The liquid and solid digestate would be sold for a soil amendment for agricultural crops. Mitigation Measure 8.2a would not apply.
>
> ***Mitigation Measure 8.2b:*** *In addition to an agreement for service, coordination with the wastewater treatment provider would be needed to determine if pre-treatment would be required to meet the RWQCB requirements for the existing wastewater treatment facility.* The Proposed Project does not propose to send digestate byproduct to a wastewater treatment plant. Liquid and solid digestate will be stored in tanks and an aeration and conditioning bunker. The liquid and solid digestate would be sold for a soil amendment for agricultural crops. Mitigation Measure 8.2b would not apply.
>
> ***Mitigation Measure 8.3a:*** *If the Project proposes to obtain water for a water supplier (municipal system or other public water entity), the developer would enter into an agreement for service with the supplier.* The Proposed Project would only require water for in the Office Building for restrooms and break room kitchen uses. A conservative estimate of 1.17 acre-feet per year of water would be used, typical of other office/commercial connections in the Mission Springs Water District.
>
> ***Mitigation Measure 8.3b:*** *If the Project proposes to obtain wastewater service from a wastewater treatment provider (municipal or other public entity), the developer would*

enter into an agreement for service with the provider. The Proposed Project does not propose to send digestate byproduct to a wastewater treatment plant. Liquid and solid digestate will be stored in tanks and an aeration and conditioning bunker. The liquid and solid digestate would be sold for a soil amendment for agricultural crops. Mitigation Measure 8.3b would not apply.

Mitigation Measure 8.3c: *Alternate water sources, such as non-potable water and recycled water, shall be used during pre-processing and AD process phases where needed and as available.* Mitigation Measures 8.3c has been incorporated into the Project design, which will recycle process water.

Mitigation Measure 8.6: *if the Project proposes to obtain wastewater service from a wastewater treatment provider (municipal or other public entity), implement Mitigation Measure 8.3b.* The Proposed Project does not propose to send digestate byproduct to a wastewater treatment plant. Liquid and solid digestate will be stored in tanks and an aeration and conditioning bunker. The liquid and solid digestate would be sold for a soil amendment for agricultural crops. Mitigation Measure 8.3b would not apply.

Mitigation Measure 8.7: *Projects requiring off-site energy infrastructure must complete CEQA review for the proposed energy improvements as a separate Project. Infrastructure improvements may qualify as a categorical exemption pursuant to CEQA.* The Proposed Project does not require off-site energy infrastructure.

a) *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:*

i. Fire protection?

Consistent with PEIR, Less Than Significant with Mitigation. According to the City of Desert Hot Springs General Plan, Fire and Police Protection Element, the City of Desert Hot Springs contracts with Riverside County Fire Department/Cal Fire (RCFD) to provide fire protection services (City of Desert Hot Springs 2000a). There are two RCFD fire stations located within the City of Desert Hot Springs: Battalion 10, Station 36 located at 11535 Karen Avenue, approximately four miles northwest of the Project site and Battalion 10, Station 37 located at 65958 Pierson Boulevard, approximately 3.75 miles northeast of the Project site. The City of Desert Hot Springs, in addition to relying on RCFD resources, also maintains cooperative mutual aid agreements with the cities of Palm Springs and Cathedral City to provide emergency responders when available across jurisdictions to service communities within the City limits (City of Desert Hot Springs 2000a).

The Proposed Project could increase demands for fire protection; however, due to the Project site's proximity to the existing fire stations (less than five miles away), the Proposed Project would not likely require new facilities for any significant increase to fire service demand. Additionally, as required by Mitigation Measure 11.4a, the Proposed Project would develop a Fire Safety Plan in coordination with RCFD. The

Proposed Project would be required to comply with all applicable and current California Fire Code Standards during construction and operation. The Proposed Project would be required to comply with the City's Development Impact Fees (DIF), a program designed to supplement the cost of funding public facilities and services, such as fire protection. The Proposed Project would not result in substantial adverse physical impacts associated with maintaining fire protection and would be designed per Mitigation Measure 10.1b and 10.3c to include berms and landscaping to minimize views of the facility and the enclosure of flares, which would reduce the likelihood of calls from the public related to flare. With the implementation of Mitigation Measure 10.1b, 10.3c, and 11.4a, Impacts would be less than significant. No Project- specific mitigation measures are required.

ii. Police protection?

Consistent with PEIR, Less Than Significant. According to the City of Desert Hot Springs General Plan, Fire and Police Protection Element, the Proposed Project would be served by the Desert Hot Springs Police Department which operates from a single location approximately 3.75 miles northeast of the Project site at 65950 Pierson Boulevard (City of Desert Hot Springs 2000a).

The PEIR determined that although AD facilities like the Proposed Project would require law enforcement services to a similar extent as other businesses, they would not increase the demand for police services that would interfere with the functionality of the City's current law enforcement service ratios. Furthermore, as described previously regarding fire protection services, the Proposed Project would be required to comply with the City's Development Impact Fees to offset the cost of funding public facilities and services. The Proposed Project would also include security fencing and controlled access at the gates. The Proposed Project would not result in substantial adverse physical impacts associated with maintaining police services. A less than significant impact would occur.

iii. Schools?

No Impact. The nature of the Proposed Project would not create a demand for school service. As described in Section 13: Population and Housing of this Initial Study, the Proposed Project is not anticipated to create a substantial increase in new residents to work at the facility. However, as required, the Project applicant would be subject to development fees to compensate for potential impacts to existing school facilities. No impact would occur.

iv. Parks?

No Impact. The nearest park to the Project site is Mission Springs Park located east of Palm Drive and south of Park Lane, approximately 3 miles from the Project site. The Proposed Project would not create a substantial increase in new residents that would increase park use to the extent that modifications to existing parks or construction of new park facilities are required. The Proposed Project would not impact existing park facilities and no mitigation measures are required.

v. Other public facilities?

No Impact. As described above, the Proposed Project would not create a substantial increase in new residents and therefore, no increase in the demand for government services and other public facilities is anticipated. The Proposed Project would not impact existing public facilities and no mitigation measures are required.

16. RECREATION

Summary of PEIR Evaluation

The PEIR determined that AD facilities would not induce population growth, restrict recreational opportunities, or increase the use or demand of such facilities. AD Facilities do not include recreational facilities. Therefore, it is assumed that AD facilities would have a less than significant impact to recreation at the program level, because It is assumed that AD facilities would not induce population growth necessitating the need for additional recreational facilities or increase the use of existing recreational facilities.

No mitigation measures were proposed at the programmatic level.

a) *Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

No Impact. The Proposed Project would not create a substantial increase in new residents that would increase park use to the extent that substantial physical deterioration of the facility would occur. The Proposed Project would not impact existing park facilities and no mitigation measures are required.

b) *Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

No Impact. The Project does not include recreational facilities or require the construction or expansion of recreational facilities. No impact would occur.

17. TRANSPORTATION

Summary of PEIR Evaluation

The PEIR determined that AD facilities would result in less than significant traffic-related impacts, primarily through compliance with all local ordinances and regulations and other measures deemed necessary by the Lead Agency, and compliance with any mitigation measures required by a Project-specific traffic study. The following mitigation measures from the PEIR have been incorporated into the Project design or otherwise apply to the Project:

Measure 9.1: *The contractor (s) will obtain any necessary road encroachment permits prior to installation of pipelines within the existing roadway right-of-way. As part of the road encroachment permit process, the contractor(s) will submit a traffic safety/traffic*

management plan (for work in the public right of way) to the agencies having jurisdiction over the affected roads. Elements of the plan will likely include, but are not necessarily limited to, the following:

- *Develop circulation and detour plans to minimize impacts to local street circulation. Use haul routes minimizing truck traffic on local roadways to the extent possible. Use flaggers and/or signage to guide vehicles through and/or around the construction zone.*
- *To the extent feasible, and as needed to avoid adverse impacts on traffic flow, schedule truck trips outside of peak morning and evening commute hours.*
- *Limit lane closures during peak traffic hours to the extent possible. Restore roads and streets to normal operation by covering trenches with steel plates outside of allowed working hours or when work is not in progress.*
- *Limit, where possible, the pipeline construction work zone to a width that, at a minimum, maintains alternate one-way traffic flow past the construction zone.*
- *Install traffic control devices as specified in Caltrans' Manual of Traffic Controls for Construction and Maintenance Work Zones where needed to maintain safe driving conditions. Use flaggers and/or signage to safely direct traffic through construction work zones.*
- *Coordinate with facility owners or administrators of sensitive land uses such as police and fire stations, hospitals, and schools. Provide advance notification to the facility owner or operator of the timing, location, and duration of construction activities.*
- *Coordinate with the local public transit providers so that bus routes or bus stops in work zones can be temporarily relocated as the service provider deems necessary.*

The Proposed Project does not include construction in local streets, and Mitigation Measure 9.1 is not applicable.

Measure 9.2: *Measures will be imposed by applicable local agencies, as needed, to address site-specific significant traffic impacts identified during subsequent facility-specific analysis, implementation of which would reduce those impacts to a less-than-significant level.* A Project-specific traffic analysis has been conducted, and mitigation measures have been proposed as necessary.

Measure 9.3a: *Implement Measure 9.1, which stipulates actions required of the contractor(s) to reduce potential traffic safety impacts to a less-than-significant level.* The Proposed Project does not include construction in local streets, and Mitigation Measure 9.3a (or 9.1) is not applicable.

Measure 9.3b: *Prior to construction, the contractor(s), in cooperation with the agencies having jurisdiction over the affected roadways, will survey and describe the pre-construction roadway conditions on rural roadways and residential streets. Within 30 days after construction is completed, the affected agencies will survey these same roadways and residential streets in order to identify any damage that has occurred. Roads damaged by construction will be repaired to a structural condition equal to the*

condition that existed prior to construction activity. This mitigation measure has been applied to the Proposed Project.

Measure 9.3c: *Prior to initiation of Project operations, the Project sponsor(s) will submit a Spill Prevention Plan to the appropriate local agency. The Spill Prevention Plan will include, among other provisions, a requirement that each truck driver know how to carry out the emergency measures described in the Spill Prevention Plan (therefore reducing roadway hazards if an accidental spill were to occur).* This mitigation measure has been applied to the Proposed Project.

Measure 9.4: *Implement Measure 9.1, which stipulates actions required of the contractor(s) to reduce potential access impacts to a less-than-significant level.* No construction is proposed in local streets. This mitigation measure does not apply to the Proposed Project.

Measure 9.5a: *Prior to construction, the Project sponsor will coordinate with the appropriate local government departments, Caltrans, and utility districts and agencies regarding the timing of construction Projects that would occur near AD Project sites. Specific measures to mitigate potential significant impacts will be determined as part of the interagency coordination and could include measures such as employing flaggers during key construction periods, designating alternate haul routes, and providing more outreach and community noticing.* The Project-specific traffic study considered cumulative effects of the Project, and mitigation has been proposed, where necessary.

Measure 9.5b: *Implement Mitigation Measure 9.2.* The Proposed Project will implement Mitigation Measure 9.2.

Measure 9.5c: *Implement Mitigation Measures 9.1, 9.3b, and 9.3c.* The Proposed Project will implement these mitigation measures.

a) *Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

Consistent with PEIR, Less than Significant with Mitigation. A Project specific traffic impact analysis was prepared for the Proposed Project to provide an assessment of the traffic impacts resulting from the development of the proposed Coachillin' AD (Kunzman Associated 2018). Assumptions in this traffic impact analysis were derived from a previously approved report prepared for the adjacent Coachillin' Industrial Park Project. The results of this analysis are summarized below.

Study Area. Based on the approved scoping agreement, the study area consisted of the following eight intersections:

- Indian Canyon Drive (NS) at:
  - Dillon Boulevard (EW) - #1
  - 18th Avenue (EW) - #2
  - Coachillin' Access (EW) - #3
  - 19th Avenue (EW) - #4
  - 20TH Avenue (EW) - #5
  - Garnet Avenue (EW) - #6
- I-10 Freeway Eastbound Ramps (NS) at:
  - Garnet Avenue (EW) - #7
- I-10 Freeway Eastbound Ramps (NS) at:
  - 20TH Avenue (EW) - #8

Analysis Scenarios. The following four (4) scenarios were analyzed

- Existing (2018) Conditions
- Existing Plus Project (2018) Conditions
- Existing Plus Ambient Plus Project (2025) Conditions
- Existing Plus Ambient Plus Cumulative Plus Project (2025) Conditions.

Current Traffic Conditions. Regional access to the site is provided by the I-10 freeway located approximately one-half mile south of the Project site and State Route 62, located approximately four miles west of the Project site. Local north-south circulation is provided by Indian Canyon Drive. Local east-west circulation is provided by Dillon Road, 20th Avenue, and Garnet Avenue. Existing 2018 average daily traffic volumes were obtained from the Coachella Valley Association of Government's Traffic Census Report (2017). Existing morning and evening peak hour traffic volumes are based on morning and evening peak period intersection turning movement counts conducted in November 2016 during typical weekday conditions with an annual growth rate of 2% to account for one year of growth from 2016 to 2018. The study area intersections currently operate within acceptable Levels of Service (LOS) of D or better during the peak hours for Existing traffic conditions, except for the Indian Canyon Drive (NS) at Dillon Boulevard (EW) - #1 intersection that currently operates at unacceptable LOS during the peak hours.

Performance Standards/Thresholds of Significance. The City's General Plan Circulation Element has established LOS D as the minimum acceptable LOS for the City's transportation system. Based on this standard, a Project traffic impact is considered significant if the proposed Project causes or worsens LOS to E or F at a study intersection.

Trip Generation. The Proposed Project is forecast to generate approximately 180 daily trips in passenger car equivalents, 85 of which will occur during the morning peak hour and 6 will occur during the evening peak hour.

Ambient Growth Projection. To account for ambient growth on roadways, existing traffic volumes were increased by two percent per year in accordance with the City of Desert Hot Springs approved scoping agreement. The overall ambient growth factor is 15 percent over 7 years between 2018 and 2025.

Cumulative Development. A list of other cumulative developments in the Project vicinity was provided by City staff. Average daily traffic volumes as well as morning and evening peak hour intersection volumes were calculated from this list.

Existing Plus Project (2018) Traffic Conditions. The study area intersections are Projected to operate within acceptable LOS (D or better) during the peak hours for Existing Plus Project (2018) traffic conditions, except for the following study area intersections that are projected to operate at unacceptable LOS during the peak hours:

- Indian Canyon Drive (NS) at Dillon Boulevard (EW) #1
- Indian Canyon Drive (NS) at 19th Avenue (EW) #4

Impacts as a result of Existing Plus Project (2018) traffic conditions would be less than significant with the implementation of Mitigation Measure TRA-1.

Existing Plus Ambient Plus Project (2025) Traffic Conditions. All study area intersections are projected to operate within LOS D or better during the peak hours for the Existing Plus Ambient Plus Project (2025) traffic conditions, except for the following study area intersections that are projected to operate at unacceptable LOS during the peak hours:

- Indian Canyon Drive (NS) at Dillon Boulevard (EW) - #1
- Indian Canyon Drive (NS) at 19th Avenue (EW) - #4

Impacts as a result of Existing Plus Ambient Plus Project (2025) traffic conditions would be less than significant with the implementation of Mitigation Measure TRA-2.

Existing Plus Ambient Plus Cumulative Plus Project (2025) Traffic Conditions. The study area intersections are projected to operate within acceptable LOS (D or better) during the peak hours for the Existing Plus Ambient Plus Cumulative Plus Project (2025) traffic conditions, except for the following study area intersections that are projected to operate at unacceptable LOS during the peak hours:

- Indian Canyon Drive (NS) at Dillon Boulevard (EW) - #1
- Indian Canyon Drive (NS) at 18th Avenue (EW) - #3
- Indian Canyon Drive (NS) at 19th Avenue (EW) - #4

Impacts as a result of Existing Plus Ambient Plus Cumulative Project (2025) traffic conditions would be less than significant with the implementation of Mitigation Measure TRA-3.

The Proposed Project would contribute towards the identified cumulative mitigation measure improvements on a fair share basis through payment of the adopted City of

Desert Hot Springs Development Impact Fee program. Implementation of Mitigation Measure TR-4 would satisfy this requirement.

Consistency with the Riverside County Congestion Management Program. The Congestion Management Program (CMP,) prepared by the Riverside County Transportation Commission (RCTC,) is intended to link land use, transportation and air quality with reasonable growth management methods, strategies and programs that effectively utilize new transportation funds to alleviate traffic congestion and related impacts. As the designated Congestion Management Agency (CMA), the RCTC prepares the CMP that designates a system of highways and roadways to include all State Highway facilities within Riverside County and a system of "principal arterials" to be included as the Congestion Management System (CMS.) Program updates include consultation with local agencies, the County of Riverside, transit agencies and sub-regional agencies like the Coachella Valley Association of Governments (CVAG).

It is the responsibility of local agencies, when reviewing and approving development proposals to consider the traffic impacts to the CMS. All development proposals and circulation projects to be included within the City of Desert Hot Springs are required to comply with the current policies and procedures set forth by the RCTC's CMP. The CMA provides a uniform database of traffic impacts for use in a countywide transportation computer model. The RCTC has recognized use of the Coachella Valley Area Transportation System (CVATS) sub-regional transportation model and the Riverside Transportation Analysis Model (RIVTAM) to analyze traffic impacts associated with development proposals or land use plans. The methodology for measuring LOS must be that contained in the most recent version of the Highway Capacity Manual. Traffic standards must be set no lower than LOS E for any segment or intersection on the CMP system unless the current LOS is lower (i.e., LOS F). The Proposed Project is located approximately 0.50 miles northeast of the westbound on-ramp to the Interstate 10 Freeway (I-10). Interstate 10 is identified as a CMP corridor. Traffic resulting from the operations at the proposed cultivation facility is not anticipated to individually or cumulatively contribute to an exceedance of a level of service standard established in the CMP.

As described above, the Proposed Project would not contribute to an exceedance of LOS standards identified in the CMP individually or cumulatively, with the incorporation of Mitigation Measures TRA-1 thru TRA-5.

Transit, Bicycle and Pedestrian Facilities. The City of Desert Hot Springs Bicycle and Pedestrian Master Plan show planned buffered bike lanes along Pierson Boulevard northeast of the Project site. However, there are no pedestrian or bicycle pathways, or public transit facilities located within the Project footprint. The nearest transit line to the Project site is located approximately three miles to the east at Two Bunch Palms Trail and West Drive (Kunzman Associates, Inc. 2018). Although, employees of the Proposed Project may use public transportation and the planned bicycle lane, implementation of the Proposed Project is not anticipated to substantially increase demand for public transit or hinder existing service. A less than significant impact would occur.

Mitigation Measures:

TRA-1: The following off-site intersection improvements shall be constructed to address the Project traffic impact for the Existing Plus Project (2018) traffic conditions at the following study area intersections:

- Indian Canyon Drive (NS) at Dillon Boulevard (EW) - #1
  - Provide a second northbound through lane
  - Provide a second southbound through lane
- Indian Canyon Drive (NS) at 19th Avenue (EW) - # 4
  - Install a westbound stop sign and a right-turn only lane
  - Provide a southbound left turn lane
  - Provide a westbound right turn lane
  - Restrict eastbound and westbound left turn movements

TRA-2: The following off-site intersection improvements shall be constructed to mitigate the Existing Plus Ambient Plus Project (2025) traffic conditions:

- Indian Canyon Drive (NS) at Dillon Boulevard (EW) - #2
  - Install a new traffic signal

TRA-3: The following site intersection improvements shall be constructed to mitigate the Existing Plus Ambient Plus Cumulative Plus Project (2025) traffic conditions:

- Indian Canyon Drive (NS) at 18th Avenue (EW) - #2
  - Install a westbound stop sign and right-turn only sign (as part of the Coachillin' Industrial Park)
  - Provide a northbound right turn lane (as part of the Coachillin' Industrial Park)
  - Provide a southbound left turn lane (as part of the Coachillin' Industrial Park)
  - Provide a westbound right turn lane (as part of the Coachillin' Industrial Park)
- Indian Canyon Drive (NS) at Coachillin' Access (EW) - #3
  - Install a traffic signal (as part of the Coachillin' Industrial Park)
  - Provide a northbound U-turn lane (as part of the proposed Anaerobic Digester Project)
  - Provide a second northbound through lane (as part of the Coachillin' Industrial Park)
  - Provide a westbound left turn lane (as part of the Coachillin' Industrial Park)
  - Provide a westbound right turn lane (as part of the Coachillin' Industrial Park)

TRA-4: The Project shall contribute towards the identified cumulative mitigation measure improvements on a fair share basis through payment of the adopted City of Desert Hot Springs Development Impact Fee program. The Project's fair share percentage at the intersection of Indian Canyon Road and Dillon Road is approximately 5.1 percent.

b) Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?

No Impact. CEQA Guidelines section 15064.3, subdivision (b) details the use of vehicle miles traveled (VMT) to assess the significance of transportation impacts. As detailed in CEQA Guidelines section 15064.3, subdivision (c), a lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide. As of the preparation of this document (June 2019), VMT analysis has not been adopted by the City of Desert Hot Springs and this question does not apply to the Proposed Project.

As discussed in Section 17a, the Proposed Project would generate 180 trips daily in Passenger Car Equivalents. Eighty-five of these trips would be in the morning peak hour and six would be in the evening peak hour. The Proposed Project is generally consistent with the Riverside County CMP. The City of Desert Hot Springs Bicycle and Pedestrian Master Plan show planned buffered bike lanes along Pierson Boulevard northeast of the Project site. However, there are no pedestrian or bicycle pathways, or public transit facilities located within the Project footprint. The nearest transit line to the Project site is located approximately three miles to the east at Two Bunch Palms Trail and West Drive (Kunzman Associates, Inc. 2018). Although, employees of the Proposed Project may use public transportation and the planned bicycle lane, the traffic analysis did not assume that public transportation would be used.

c) Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Consistent with PEIR, Less Than Significant: The Proposed Project consists of an AD Facility within an existing Light Industrial district. The Project site is undeveloped and surrounded by the unpaved alignment of 19th Avenue to the south.

To provide proper access to the Project site, off-site design and the proposed off-site improvements have been developed as described in question a. These improvements and the site design have been designed in accordance with City code and will undergo City and Fire Department review before Project approval to ensure that the local development standards for roadway in interior and exterior circulation designs are met without resulting in traffic safety impacts.

The Proposed Project does not include sharp curves or dangerous intersections. No incompatible uses or hazardous design features will result from the proposed Project

as a standard condition. All Project plans shall be reviewed and approved by the City Engineering Department.

The Proposed Project would not substantially increase hazards due to a design feature (e.g., sharp curves of dangerous intersections) or incompatible uses (e.g., farm equipment) and no mitigation measures are required.

d) Would the Project result in inadequate emergency access?

Consistent with PEIR, Less Than Significant. Construction of the Proposed Project would result in temporary construction truck traffic. Emergency access throughout the Project site will be developed in accordance with City ordinances, standard conditions of approval, and permits related to emergency access. The Proposed Project is not anticipated to result in inadequate emergency access and no mitigation measures are required.

18. TRIBAL CULTURAL RESOURCES

Summary of PEIR Evaluation

The PEIR did not analyze tribal cultural resources separately. However, the PEIR recommended analysis of cultural resources on a Project-specific level. As part of the literature review for the cultural resources survey (ECORP 2017), the Native American Heritage Commission was contacted to determine if there were any Sacred Lands File records in the Project area or vicinity. No records were found. The results of the AB 52 process for this Project are provided below.

Would the Project cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).

No Impact. No resources that are listed or eligible for listing on the CRHR or a local register as defined in Public Resources Code Section 5020.1(k) are present on the Project site (ECORP 2017). No impact would occur.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Consistent with PEIR, Less Than Significant. A letter dated June 5, 2019 from the Native American Heritage Commission (NAHC) identified the culturally affiliated tribes and provided the negative results of NAHC Sacred Lands File search. On June 7, 2019,

the City of Desert Hot Springs submitted AB 52 notification letters to 18 Native American tribal governments or designated tribal representatives. Of the 18 tribes or tribal representatives (in some cases multiple letters were sent to representatives of the same tribe), the City received responses from three tribes. Responses and consultation requests were received from the following tribes within 30-days:

- Agua Caliente Band of Cahuilla Indians (June 7, 2019): The tribe responded within the 30-day timeframe under AB 52 and requested copies of the Cultural Resources study. This information was provided on June 12, 2019. On July 19, 2019 the tribe requested continuing consultation and deferred monitoring to the Twenty-Nine Palms Band of Mission Indians. On August 7, 2019 the City of Desert Hot Springs sent proposed language for tribal cultural resources mitigation measures to the tribe, which were accepted on August 22, 2019.
- Los Coyotes Band of Cahuilla and Cupeno Indians (June 19, 2019): The tribe responded within the 30-day timeframe under AB 52 and stated that the project was currently under review. No additional correspondence was received.
- Morongo Band of Mission Indians (June 18, 2019): The tribe responded within the 30-day timeframe under AB 52 and requested the contact information for this project at the City of Desert Hot Springs. On July 30, 2019 the Morongo Band of Mission Indians requested to be a part of tribal monitoring. The City of Desert Hot Springs sent proposed language for tribal cultural resources mitigation measures to the tribe, which were accepted on August 27, 2019.

Pursuant to PRC 21080.3.1(d), each tribal government or representative was given 30 days upon receipt of the AB 52 notification letter to provide a request for consultation on the Proposed Project. The 30-day request period for consultation expired on March 27, 2019. Three of the 18 tribal representatives responded to the initial notification letter, with two requesting consultation. Tribal consultation between the City of Desert Hot Springs, the Morongo Band of Mission Indians, the Agua Caliente Band of Cahuilla Indians, and the Twenty-Nine Palms Band of Mission Indians (monitoring on behalf of Agua Caliente) will be considered ongoing until the monitoring is complete and both parties agree to conclude consultation. The City of Desert Hot Springs, as lead agency, has fulfilled its obligations under AB 52 to engage in tribal consultation with all other tribal governments.

The consulting tribes did not identify any specific tribal cultural resources within the project area and the NAHC Sacred Lands File search did not identify any resources. Therefore, the Proposed Project would not affect any known tribal cultural resources. However, as a result of AB 52 consultation, the project area was identified as having the potential to contain unknown tribal cultural resources. Significant impacts may occur from the disturbance of unknown tribal cultural resources during ground-disturbing construction activities associated with the Proposed Project. Impacts to unknown tribal cultural resources would be less than significant with the implementation of Mitigation Measures TCR-1 through TCR-4.

TCR-1: The applicant/developer shall have an approved Tribal Monitor on site during any ground disturbing activities (including archeological surveys). The applicant/developer and consulting tribes (Morongo Band of Mission Indians, Agua Caliente Band of Cahuilla Indians and Twenty-Nine Palms Band of Mission Indians [monitoring on behalf of the Agua Caliente Band of Cahuilla Indians]) will agree on a monitoring schedule based on the necessary days of ground disturbance. Only one tribal monitor will be on-site at any given time. The tribal monitor shall have the authority to halt activities adversely affecting significant cultural resources or tribal cultural resources. Should buried cultural resource be encountered, the Monitor shall notify a Qualified Archeologist to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer and each of the consulting Tribal Preservation Offices (Morongo Band of Mission Indians, Agua Caliente Band of Cahuilla Indians, and the Twenty-Nine Palms Band of Mission Indians).

TCR-2: In the event that human remains (or remains that may be human) are discovered at the project site during grading or earthmoving, the construction contractors, project archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The project proponent shall then inform the Riverside County Coroner and the City of Desert Hot Springs immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b). Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains shall be overseen by the MLD(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts. The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98. According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052) determined in consultation between the project proponent and the MLD. In the event that the project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply and the mediation and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

TCR-3: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course

of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:

a. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversite of the process; and
b. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Desert Hot Springs with evidence of same;
c. Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;
d. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;
e. For purposes of conflict resolution, if more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Agua Caliente Cultural Museum.

TCR-4: At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted to the City of Desert Hot Springs documenting monitoring activities conducted by the project Archaeologist (if applicable) and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the consulting tribes (Morongo Band of Mission Indians, Agua Caliente Band of Cahuilla Indians, and the Twenty-Nine Palms Band of Mission Indians) and Eastern Information Center and interested tribes.

19. UTILITIES AND SERVICE SYSTEMS

Summary of PEIR Evaluation

The PEIR assumed that the AD facilities would comply with relevant federal, state, and local laws, regulations, ordinances and guidance regarding utilities. The PEIR determined that based on the scope of a project and geographical location (co-located with permitted solid waste facilities or located in areas zoned for industrial or solid waste handling activities), AD facilities would have a less than significant or no impact on the following resources: *Solid Waste Facilities, Solid Waste Regulations, and Energy Policies or Standards*. However, geographical consideration may still need to be addressed on a project-by-project basis for impacts to water, wastewater treatment and stormwater treatment facilities, and utility requirements from a utility capacity perspective. Should potential impacts remain significant or potentially significant under CEQA, even after regulatory and legal requirements, the PEIR proposes mitigation measures to reduce impacts to less than significant levels.

Mitigation measures were proposed to reduce these impacts to a less-than-significant level. The following mitigation measures from the PEIR have been incorporated into the Project design or otherwise apply to the Project:

> ***Mitigation Measure 8.1:*** *Implement Mitigation Measures 10.1b, 10.3c, and 11.4a.* Mitigation Measures 10.1b, 10.3c, and 11.4a would be implemented by the Proposed Project.
>
> ***Mitigation Measure 8.2a:*** *Implement Mitigation Measure 8.3b if the operator does not have an existing agreement, such as for co-located facilities.* The Proposed Project does not propose to send digestate byproduct to a wastewater treatment plant. Liquid and solid digestate will be stored in tanks and an aeration and conditioning bunker. The liquid and solid digestate would be sold for a soil amendment for agricultural crops. Mitigation Measure 8.2a would not apply.
>
> ***Mitigation Measure 8.2b:*** *In addition to an agreement for service, coordination with the wastewater treatment provider would be needed to determine if pre-treatment would be required to meet the RWQCB requirements for the existing wastewater treatment facility.* The Proposed Project does not propose to send digestate byproduct to a wastewater treatment plant. Liquid and solid digestate will be stored in tanks and an aeration and conditioning bunker. The liquid and solid digestate would be sold for a soil amendment for agricultural crops. Mitigation Measure 8.2b would not apply.
>
> ***Mitigation Measure 8.3a:*** *If the Project proposes to obtain water for a water supplier (municipal system or other public water entity), the developer would enter into an agreement for service with the supplier.* The Proposed Project would only require water for restroom and break room kitchen uses in the Office Building. A conservative estimate of 1.17 acre-feet of water per year would be used, which is typical of office/commercial uses in the Mission Springs Water District.
>
> ***Mitigation Measure 8.3b:*** *If the Project proposes to obtain wastewater service from a wastewater treatment provider (municipal or other public entity), the developer would*

enter into an agreement for service with the provider. The Proposed Project does not propose to send digestate byproduct to a wastewater treatment plant. Liquid and solid digestate will be stored in tanks and an aeration and conditioning bunker. The liquid and solid digestate would be sold for a soil amendment for agricultural crops. Mitigation Measure 8.3b would not apply.

Mitigation Measure 8.3c: *Alternate water sources, such as non-potable water and recycled water, shall be used during pre-processing and AD process phases where needed and as available.* Mitigation measures 8.3c has been incorporated into the Project design as applicable, and as described above. After start up, process water would be recycled.

Mitigation Measure 8.6: *if the Project proposes to obtain wastewater service from a wastewater treatment provider (municipal or other public entity), implement Mitigation Measure 8.3b.* The Proposed Project does not propose to send digestate byproduct to a wastewater treatment plant. Liquid and solid digestate will be stored in tanks and an aeration and conditioning bunker. The liquid and solid digestate would be sold for a soil amendment for agricultural crops. Mitigation Measure 8.3b would not apply.

Mitigation Measure 8.7: *Projects requiring off-site energy infrastructure must complete CEQA review for the proposed energy improvements as a separate Project. Infrastructure improvements may qualify as a categorical exemption pursuant to CEQA.* Off-site energy infrastructure improvements are not required.

a) *Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which would cause significant environmental effects?*

Consistent with PEIR, Less Than Significant. As described in question 19b, below, The Proposed Project would use minimal water and would not require the construction of new or expanded water facilities.

The Proposed Project does not propose to send digestate byproduct to a wastewater treatment plant. Liquid and solid digestate would be stored in tanks and an aeration and conditioning bunker. The liquid and solid digestate would be sold for a soil amendment for agricultural crops. New or expanded wastewater facilities would not be required. A less than significant impact would occur.

The Proposed Project would introduce impervious surfaces including buildings, paving, and other hardscape. The Proposed Project would implement BMPs as part of a SWPPP to comply with the NPDES Permit construction requirement. The Project includes retention basins that would retain all runoff on the site. The Proposed Project would not require new or expanded stormwater facilities. A less than significant impact would occur.

The Proposed Project would require electric power and telecommunications infrastructure. The Proposed Project would not require new or expanded electric or telecommunications infrastructure beyond the connections to the Project site.

b) *Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

Consistent with PEIR, Less Than Significant. The Proposed Project would not require process water. The only water required would be for the restrooms and break room kitchen in the Office Building. A conservative estimate of 1.17 acre-feet per year would be used, which is typical of office/commercial uses in the Mission Springs Water District. A less than significant impact would occur.

c) *Would the Project result in determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?*

No Impact. The Proposed Project does not propose to send digestate byproduct to a wastewater treatment plant. Liquid and solid digestate would be stored in tanks and an aeration and conditioning bunker. The liquid and solid digestate would be sold for a soil amendment for agricultural crops. No impact would occur.

d) *Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

No Impact. The Proposed Project would result in a net decrease in the amount of waste which would normally be sent to landfills or other solid waste facilities, representing a beneficial impact to local landfills. Additionally, the Proposed Project does not propose to send digestate byproduct to a wastewater treatment plant or landfill. Instead, Liquid and solid digestate would be stored in tanks and an aeration and conditioning bunker. The liquid and solid digestate would be sold for a soil amendment for agricultural crops resulting in reduced demands on existing solid waste facilities. The Proposed Project would assist CalRecycle in meeting Strategic Directive 6.1, which seeks to reduce by 50 percent the amount of organic waste disposed in the state's landfills by 2020. The Proposed Project would also assist the City of Desert Hot Springs in meeting its obligation to implement an organic waste recycling program under AB 1826. A beneficial impact would occur.

e) *Would the Project comply with federal, state, and local statues and regulations related to solid waste?*

No Impact. As determined by the PEIR, AD facilities including the Proposed Project, would be regulated under CalRecycle's existing compostable material handling and transfer/processing regulations. No conflicts with existing regulations are anticipated. The Proposed Project would assist the State and the City with meeting the requirements of CalRecycle Strategic Directive 6.1 and AB 1826. A beneficial impact would occur.

20. WILDFIRE

Summary of PEIR Evaluation

Wildfire was not analyzed separately in the PEIR. Instead, it was analyzed as part of the Hazards and Hazardous Materials section of the PEIR. The PEIR determined that AD facilities could increase the risk of fire hazards due to the potential release of biogas during the AD process. Compliance with existing safety regulations and widely-accepted industry standards would minimize the hazard to the public and the environment; however, in the unlikely event of a fire, there is potential for exposure to nearby people or structures to fire risk. PEIR Mitigation Measure 11.4a (preparation and implementation of a fire safety plan) would reduce this impact to a level that is less than significant. Mitigation Measure 11.4a is stated in Section 9, Hazards and Hazardous Materials, of this Initial Study and is repeated below for convenience. The following mitigation measure from the PEIR has been incorporated into the Project design or otherwise apply to the Project:

> ***Mitigation Measure 11.4a:*** *Prior to Project approval, AD facility operators shall prepare and implement a Fire Safety Plan that outlines fire hazards, describes facility operations procedures to prevent ignition of fires, requires regular inspection of fire suppression systems, and provides for worker in training safety procedures as well as protocols for responding to fire incidents. The Fire Safety Plan shall be reviewed and approved by the local fire enforcement agency.* The Proposed Project would implement Mitigation Measure 11.4a.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

a) *Substantially impair an adopted emergency response plan or emergency evacuation plan?*

No Impact. The Project site is undeveloped and mostly disturbed surrounded by creosote bush scrub vegetation, vacant land, and light industrial uses. The Western Coachella Valley Area Plan of the Riverside County General Plan designates the Project area as a Low Wildfire Zone (County of Riverside 2003). The Project area is also located in a Non-VHFHSZ on the Cal Fire Map Local Responsibility Area Map for Western Riverside County (CAL FIRE 2009). The nearest VHFHSZ is located over five miles north of the Project site in the Little San Bernardino Mountains (CAL FIRE 2009). The Project site is not located near or adjacent to any wildfire areas and would not impair an adopted emergency response plan or emergency evacuation plan for these areas.

b) *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

No Impact. The Project site is not located in, near or adjacent to any VHFHSZs and would not exacerbate wildfire risks in these areas. The discussion of potential wildfire impacts to the Project site and surrounding area is located in Question 9g of this Initial Study.

c) *Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

No Impact. The Project site is not located in, near or adjacent to any VHFHSZs and would not exacerbate wildfire risks or cause environmental impacts in these areas. The discussion of potential wildfire impacts to the Project site and surrounding area is located in Question 9g of this Initial Study.

d) *Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

No Impact. The Project site is not located in, near or adjacent to any VHFHSZs and would not exacerbate post-fire flooding or landslide risks in these areas. The discussion of potential wildfire impacts to the Project site and surrounding area is located in Question 9g of this Initial Study.

20. MANDATORY FINDINGS OF SIGNIFICANCE

a) *Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

Consistent with PEIR, Less Than Significant With Mitigation. The PEIR required site-specific studies to determine Project-level impacts associated with air quality, biological resources, cultural resources, greenhouse gas emissions, and transportation. These site-specific studies were conducted for the Proposed Project, and it was determined that impacts to these resources would be less-than-significant with mitigation.

b) *Does the Project have impacts that are individually limited, but cumulatively considerable? (Cumulatively considerable means that the incremental effects of a 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)?*

Consistent with PEIR, Less Than Significant With Mitigation. A cumulative impact is a compilation of a project's impact when considered in concert with other approved projects, projects under consideration for entitlement, or recently completed projects, that when combined with the Proposed Project being evaluated in this Initial Study could produce related or cumulative impacts (CEQA Guidelines Section 15130). The Project is in an area of Desert Hot Springs that has been designated in the General Plan and Zoning Ordinance as Light Industrial. It is also within an area allowed for cannabis cultivation with a Conditional Use Permit. Sixty-seven Conditional Use Permits have been approved in the City as of April 30, 2019 (City of Desert Hot Springs

2019). In general, this area of the City is transitioning from undeveloped to light industrial uses as foreseen in the City's General Plan. The nearest development is the Coachillin' Specific Plan located just west of the Project site. As each facility is developed, individual CEQA documents are prepared. In general, environmental impacts from cannabis cultivation tend to be less than other light industrial/warehouse uses due to the high level of regulation from both the State of California and the City. The traffic, air quality/greenhouse gas, and noise modeling for this Project included growth assumptions that took into account the cumulative effects of nearby development.

The PEIR determined that, with implementation of program-level and Project-level mitigation measures, cumulative impacts from AD projects would not be considerable, as long as the projects were consistent with the types of projects evaluated in the PEIR. The Proposed Project is consistent with the PEIR, and all impacts would be less than significant, or less than significant with implementation of PEIR or Project-level mitigation measures. Impacts from the Proposed Project would not be cumulatively considerable.

c) *Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Consistent with PEIR, Less Than Significant With Mitigation. There are no impacts from the Proposed Project that remain significant after mitigation. Therefore, the Proposed Project would not have substantial adverse effects, either directly or indirectly, on human beings.

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APPENDIX A – NOISE

TRAFFIC NOISE LEVELS AND NOISE CONTOURS

Project Number: 2016-219.001
Project Name: Coachillin'Anaerobic Digester - **Interstate 10 Existing Conditions**

Background Information

Model Description: FHWA Highway Noise Prediction Model (FHWA-RD-77-108) with California Vehicle Noise (CALVENO) Emission Levels.
Source of Traffic Volumes: Caltrans Traffic Countys I-10 (2016)
Community Noise Descriptor: L_{dn}: _____ CNEL: x

Assumed 24-Hour Traffic Distribution:	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

Analysis Condition: 2050 Project

Roadway, Segment	Lanes	Median Width	ADT Volume	Design Speed (mph)	Alpha Factor	Vehicle Mix: Medium Trucks	Vehicle Mix: Heavy Trucks	**CNEL at 3000 Feet**	Distance from Centerline of Roadway: Distance to Contour: 70 CNEL	65 CNEL	60 CNEL	55 CNEL	**Calc Dist**
Interstate 10 - Existing Conditions													
North Indian Canyon Interchange to Palm Dr Interchange	8	40	86,000	70	0.5	1.8%	0.1%	**53.0**	222	479	1,032	2,223	**3,000**

Coachillin Anaerobic Digester - Existing Traffic Noise

TRAFFIC NOISE LEVELS AND NOISE CONTOURS

Project Number: 2016-219.001
Project Name: Coachillin Anaerobic Digester

Background Information

Model Description: FHWA Highway Noise Prediction Model (FHWA-RD-77-108) with California Vehicle Noise (CALVENO) Emission Levels.
Source of Traffic Volumes: Kunzman & Associates (2018)
Community Noise Descriptor: L_{dn}: _____ CNEL: x

Assumed 24-Hour Traffic Distribution:	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

Analysis Condition: Existing				Design		Vehicle Mix		Distance from Centerline of Roadway					
		Median	ADT	Speed	Alpha	Medium	Heavy	CNEL at	Distance to Contour				Calc
Roadway, Segment	Lanes	Width	Volume	(mph)	Factor	Trucks	Trucks	100 Feet	70 CNEL	65 CNEL	60 CNEL	55 CNEL	Dist
Indian Canyon Drive													
20th Avenue to 19th Avenue	2	0	14,100	40	0.5	1.8%	0.1%	60.8	-	53	114	245	100
19th Avenue to 18th Avenue	2	0	14,200	40	0.5	1.8%	0.1%	60.9	-	53	114	246	100
18th Avenue to Dillon Road	2	0	14,200	40	0.5	1.8%	0.1%	60.9	-	53	114	246	100
North of Dillon Road	2	0	8,900	40	0.5	1.8%	0.1%	58.8	-	39	84	180	100
Dillon Road													
East of Indian Canyon Drive	2	0	5,200	40	0.5	1.8%	0.1%	56.5	-	-	59	126	100
19th Avenue													
Indian Canyon Drive to Project [traffic on Indian Canyon]	2	0	14,200	40	0.5	1.8%	0.1%	48.4	-	53	114	246	680

TRAFFIC NOISE LEVELS AND NOISE CONTOURS

Project Number: 2016-219.001
Project Name: Coachillin Anaerobic Digester

Background Information

Model Description: FHWA Highway Noise Prediction Model (FHWA-RD-77-108) with California Vehicle Noise (CALVENO) Emission Levels.
Source of Traffic Volumes: Kunzman & Associates (2018)
Community Noise Descriptor: L_{dn}: _____ CNEL: x

Assumed 24-Hour Traffic Distribution:	Day	Evening	Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

Analysis Condition: Existing + Project				Design		Vehicle Mix		Distance from Centerline of Roadway					
		Median	ADT	Speed	Alpha	Medium	Heavy	CNEL at	Distance to Contour				Calc
Roadway, Segment	Lanes	Width	Volume	(mph)	Factor	Trucks	Trucks	100 Feet	70 CNEL	65 CNEL	60 CNEL	55 CNEL	Dist
Indian Canyon Drive													
20th Avenue to 19th Avenue	2	0	14,228	40	0.5	1.8%	0.1%	60.9	-	53	115	247	100
19th Avenue to 18th Avenue	2	0	14,246	40	0.5	1.8%	0.1%	60.9	-	53	115	247	100
18th Avenue to Dillon Road	2	0	14,246	40	0.5	1.8%	0.1%	60.9	-	53	115	247	100
North of Dillon Road	2	0	8,927	40	0.5	1.8%	0.1%	58.9	-	39	84	181	100
Dillon Road													
East of Indian Canyon Drive	2	0	5,218	40	0.5	1.8%	0.1%	56.5	-	-	59	126	100
19th Avenue													
Indian Canyon Drive to Project [traffic on Indian Canyon]	2	0	14,200	40	0.5	1.8%	0.1%	48.4	-	53	114	246	680
Indian Canyon Drive to Project Site [traffic on 19th]	2	0	167	40	0.5	1.8%	0.1%	41.6	-	-	-	-	100
Combined Noise Level **								49.2					

**The decibel (dB) scale is logarithmic, not linear, and therefore sound levels cannot be added or subtracted through ordinary arithmetic.