Section 15163 Study for the Supplement to the Revised Commercial WECS 20 Permit Project EIR

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APRIL 2019

Printed on 30% post-consumer recycled material.

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
APN	Assessor's Parcel Number
AQMP	air quality management plan
BMP	Best management practice
CalEEMod	California Emissions Estimator Model
CAP	Climate Action Plan
CCAs	Community Choice Aggregations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of Desert Hot Springs
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
CVCC	Coachella Valley Conservation Commission
CVMSHCP	Coachella Valley Multiple Species Habitat Conservation Plan
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control.
EIC	Eastern Information Center
EIR	environmental impact report
EO	Executive Order
EUI	Energy Unlimited Inc.
FAA	Federal Aviation Administration
GHG	greenhouse gas
I-	Interstate
kW	kilowatt
LST	localized significance threshold
MBTA	Migratory Bird Treaty Act
MM	mitigation measure
MSWD	Mission Springs Water District
MT	metric ton
MW	megawatt
MWh	megawatt hours
NAHC	Native American Heritage Commission
NO_x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NWP	Nationwide Permit
O&M	operations and maintenance
O_3	ozone
PM_{10}	coarse particulate matter

Acronym/Abbreviation	Definition
$PM_{2.5}$	fine particulate matter
PPV	peak particle velocity
RPS	Renewables Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SCADA	Supervisory Control and Data Acquisition
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SR-	State Route
SSAB	Salton Sea Air Basin
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminant
USFWS	U.S. Fish and Wildlife Service
VdB	vibration velocity decibel
VMT	vehicle miles traveled
VOC	volatile organic compound
WECS	Wind Energy Conversion System
WTG	wind turbine generator

1 INTRODUCTION

1.1 Section 15063 Checklist

The City of Desert Hot Springs (City) prepared the Desert Hot Springs Wind Energy Repowering Project's (Project's) Environmental Checklist per California Environmental Quality Act (CEQA) Guidelines Sections 15063(d)(3). Appendix G of the CEQA Guidelines includes a suggested checklist to indicate whether the conditions set forth in Section 15162, which would require a Subsequent or Supplemental Environmental Impact Report (SEIR), are met and whether there would be new significant impacts resulting from the Project not examined in the WECS 20 Permit Project Final Environmental Impact Report (WECS 20 FEIR). The checklist can be found in Section 3 of this document. Following the checklist, Sections 2.1 through 2.20 include an explanation and discussion of each significance determination made in the checklist.

For this Initial Study, the following four possible responses to each of the individual environmental issue areas are included in the checklist:

1. **Potential for New Significant Impact**. This response is used to indicate when the Project has changed to such an extent that revisions of the WECS 20 FEIR are required due to the presence of new potentially significant environmental effects.
2. **Potential for More Severe Impacts**. This response is used to indicate when the circumstances under which the Project is undertaken have changed to such an extent that revisions of the WECS 20 FEIR are required because the severity of previously identified significant effects would potentially substantially increase.
3. **New Ability to Substantially Reduce Significant Impact**. This response is used to show when new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the WECS 20 FEIR was certified indicates that there are new mitigation measures or alternatives available to substantially reduce significant environmental impacts of the Project, but that the project sponsor declines to adopt.
4. **No Substantial Change from Previous Analysis**. This response is used to indicate that the Project would not create a new impact or substantially increase the severity of the previously identified environmental impact disclosed in the WECS 20 FEIR.

The Environmental Checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the Project in the context of environmental impacts addressed in the previously certified WECS 20 FEIR.

1.1.1 Update to the CEQA Guidelines Environmental Checklist

In January 2018, the Governor's Office of Planning and Research transmitted its proposal for comprehensive updates to the CEQA Guidelines to the California Natural Resources Agency. Among other things, this package included proposed updates related to the Appendix G Environmental Checklist, which is the checklist used by the City. The changes have been approved by the Office of Administrative Law and were filed with the Secretary of State. The updated Guidelines became effective on December 28, 2018. The revisions to the Guidelines are prospective and new requirements will apply to steps in the CEQA process not yet undertaken by the effective date of the revisions (14 CCR 15007(b)). (The revised Guidelines will apply to a CEQA document only if the revised Guidelines are in effect when the document is sent out for public review (14 CCR 15007(c)).)

The California Natural Resources Agency revised the Appendix G Environmental Checklist in several ways. First, it reframed or deleted certain questions that should be addressed in the planning process to focus attention on those issues that must be addressed in the CEQA process. Second, it added questions that, although required by current law, tend to be overlooked in the environmental review process. Finally, it revised the questions related to transportation impacts and wildfire risk as required by Senate Bill 743 and Senate Bill 1241, respectively, and relocated questions related to paleontological resources as required by Assembly Bill 52.

As part of the reorganization of the Appendix G Environmental Checklist, the California Natural Resources Agency also updated some considerations or questions on the checklist. These updates to the Appendix G Environmental Checklist questions were undertaken by the California Natural Resources Agency in an effort to clarify, consolidate, and remove redundancy. Fundamentally, the same questions are being asked by the Appendix G Environmental Checklist, albeit in a different—and sometimes streamlined—manner. None of the updates to the Appendix G Environmental Checklist have changed the approach and methodology in which impact determinations are formed. For this reason, while the questions presented in the following section reflect the updated Appendix G Environmental Checklist, the responses to these questions still address the questions asked in the previous version(s) of the Environmental Checklist.

1.2 Environmental Factors Potential Affected

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potential for New Significant Impact" or "Potential More Severe Impact," as indicated by the checklist on the following pages. The environmental factors have been analyzed further in the supplemental EIR.

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

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2 EVALUATION OF ENVIRONMENTAL IMPACTS:

2.1 Aesthetics

		Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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 located 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?	☐	☒	☐	☐

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*) (as previously noted, as part of the reorganization of the Appendix G Environmental Checklist, the California Natural Resources Agency also updated some considerations or questions on the checklist. Fundamentally, the same questions are being asked by the Appendix G Environmental Checklist, albeit in a different—and sometimes streamlined—manner. While the updated questions may shift the order of impact analysis or adjust the focus of the inquiry, these updates do not significantly alter the significance conclusions listed below):

a) Would the project have a substantial adverse effect on a scenic vista? (*Less-Than-Significant Impact With Mitigation Incorporated*)

b) Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (*Less-Than-Significant Impact*)

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings? (*Less-Than-Significant Impact*)

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (*Less-Than-Significant Impact With Mitigation Incorporated*)

Project Significance Determination

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

Potential for More Severe Impacts. Implementation of the Project would allow for turbine heights up to 499-feet-tall, which is taller than the 340-feet-tall turbine heights analyzed in the WECS 20 FEIR. The Project would construct four fewer new turbines compared to the previous project analyzed in the WECS 20 FEIR. In addition, the Project would decommission and remove all of the 69 existing older on-site turbines, which is approximately 53 more than what was analyzed in the WECS 20 FEIR. However, due to the increase in new turbine heights, potential changes to visual resources-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

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

Potential for More Severe Impacts. Implementation of the Project would allow for turbine heights up to 499-feet-tall, which is taller than the 340-feet-tall turbine heights analyzed in the WECS 20 FEIR. The Project would construct four fewer new turbines compared to the previous project analyzed in the WECS 20 FEIR. In addition, the Project would decommission and remove all of the 69 existing older on-site turbines, which is approximately 53 more than what was analyzed in the WECS 20 FEIR. However, due to the increase in new turbine heights, potential changes to visual resources-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

c) Would the project, 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 a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Potential for More Severe Impacts. Implementation of the Project would allow for turbine heights up to 499-feet-tall, which is taller than the 340-feet-tall turbine heights analyzed in the WECS 20 FEIR. The Project would construct four fewer new turbines compared to the previous project analyzed in the WECS 20 FEIR. In addition, the Project would decommission and remove all of the 69 existing older on-site turbines, which is approximately 53 more than what was analyzed in the WECS 20 FEIR. However, due to the increase in new turbine heights, potential changes to visual resources-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR. (Note that the changes made to this impact question in the CEQA Guidelines Appendix G Environmental Checklist since the 2008 WECS 20 FEIR do not change the assessment of visual impacts. The project was and still is in a non-urbanized area and the environmental analysis of views was and still is focused on public views.)

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

Potential for More Severe Impacts. Implementation of the Project would allow for turbine heights up to 499-feet-tall, which is taller than the 340-feet-tall turbine heights analyzed in the WECS 20 FEIR. The Project would construct four fewer new turbines compared to the previous project analyzed in the WECS 20 FEIR. In addition, the Project would decommission and remove all of the 69 existing older on-site turbines, which is approximately 53 more than what was analyzed in the WECS 20 FEIR. However, due to the increase in new turbine heights, potential changes to visual resources-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

2.2 Agriculture and Forestry Resources

		Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
II.	**AGRICULTURE AND FORESTRY 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 information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and 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)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*):

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*)

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract? (*No Impact*)

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*)

Project Significance Determination

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 Substantial Change from Previous Analysis. According to the California Department of Conservation's California Important Farmland Finder, the Project site and surrounding area are identified as "Other Land" (DOC 2017). The Project site is not located on or adjacent to any parcels identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively referred to as "Important Farmland"). The nearest Prime Farmland is located approximately 25 miles southeast of the Project site in the City of Indio. Due to the considerable distance between the Project site and this Prime Farmland parcel(s), the Project would not impede, interfere with, convert, or otherwise affect this piece of agricultural land.

Therefore, no new or more severe impacts associated with Important Farmland would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the Draft SEIR.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Substantial Change from Previous Analysis. The Project site is currently used as a wind energy facility. The City's General Plan Map designates the Project site as I-E (Industrial Energy-Related) and does not identify any agricultural zones in the Project area. Additionally, per the California Department of Conservation's Riverside County Williamson Act 2015/2016 Parcels Map, no parcels under a Williamson Act contract are located in the Project area (DOC 2016). The nearest such parcels to the Project site are located several miles from the Project site near the City of Banning.

Therefore, no new or more severe impacts associated with agricultural zoning and Williamson Act contracts would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the Draft SEIR.

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 Substantial Change from Previous Analysis. As previously discussed, the Project would not impede, interfere with, convert, or otherwise affect this piece of agricultural land.

Therefore, no new or more severe impacts associated with the conversion of Important Farmland would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the Draft SEIR.

2.3 Air Quality

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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?	☐	☒	☐	☐

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*) (as previously noted, as part of the reorganization of the Appendix G Environmental Checklist, the California Natural Resources Agency also updated some considerations or questions on the checklist. Fundamentally, the same questions are being asked by the Appendix G Environmental Checklist, albeit in a different–and sometimes streamlined–manner. While the updated

questions may shift the order of impact analysis or adjust the focus of the inquiry, these updates do not significantly alter the significance conclusions listed below):

a) Would the project conflict with or obstruct implementation of the applicable air quality plan? (*Less-Than-Significant Impact With Mitigation Incorporated*)

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation? (*Less-Than-Significant Impact With Mitigation Incorporated*)

c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)? (*Less-Than-Significant Impact With Mitigation Incorporated*)

d) Would the project expose sensitive receptors to substantial pollutant concentrations? (*Less-Than-Significant Impact With Mitigation Incorporated*)

e) Would the project create objectionable odors affecting a substantial number of people? (*Less-Than-Significant Impact*)

Project Significance Determination

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

Potential for More Severe Impacts. Due to the changes proposed as a part of Project implementation, the Project will generate air emissions during the short-term construction phase (dust and vehicle emissions) and, to a lesser extent, during the long-term operational phase (vehicle emissions from O&M related trips). Both construction and operational emissions will be required to comply with South Coast Air Quality Management District (SCAQMD) regulations, as well as other applicable federal, state, and regional requirements, which have changed considerately since the clarification of the WECS 20 FEIR. As such, potential changes to air quality-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

b) Would the project 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?

Potential for More Severe Impacts. Due to the changes proposed as a part of Project implementation, the Project will generate air emissions during the short-term construction phase (dust and vehicle emissions) and, to a lesser extent, during the long-term operational

phase (vehicle emissions from O&M related trips). Both construction and operational emissions will be required to comply with SCAQMD regulations, as well as other applicable federal, state, and regional requirements, which have changed considerately since the clarification of the WECS 20 FEIR. As such, potential changes to air quality-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

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

Potential for More Severe Impacts. Due to the changes proposed as a part of Project implementation, the Project will generate air emissions during the short-term construction phase (dust and vehicle emissions) and, to a lesser extent, during the long-term operational phase (vehicle emissions from O&M related trips). Both construction and operational emissions will be required to comply with SCAQMD regulations, as well as other applicable federal, state, and regional requirements, which have changed considerately since the clarification of the WECS 20 FEIR. As such, potential changes to air quality-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Potential for More Severe Impacts. Due to the changes proposed as a part of Project implementation, the Project will generate air emissions during the short-term construction phase (dust and vehicle emissions) and, to a lesser extent, during the long-term operational phase (vehicle emissions from O&M related trips). Both construction and operational emissions will be required to comply with SCAQMD regulations, as well as other applicable federal, state, and regional requirements, which have changed considerately since the clarification of the WECS 20 FEIR. As such, potential changes to air quality-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

2.4 Biological Resources

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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 Game or U.S. 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?	☐	☒	☐	☐

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*) (as previously noted, as part of the reorganization of the Appendix G Environmental Checklist, the California Natural Resources Agency also updated some considerations or questions on the checklist. Fundamentally, the same questions are being asked by the Appendix G Environmental Checklist, albeit in a different—and sometimes streamlined—manner. While the updated questions may shift the order of impact analysis or

adjust the focus of the inquiry, these updates do not significantly alter the significance conclusions listed below):

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 U.S. Fish and Wildlife Service? (*Less-Than-Significant Impact With Mitigation Incorporated*)

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, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (*Less-Than-Significant Impact With Mitigation Incorporated*)

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (*Less-Than-Significant Impact*)

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? (*Less-Than-Significant Impact*)

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (*Less-Than-Significant Impact*)

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? (*Less-Than-Significant Impact*)

Project Significance Determination

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 U.S. Fish and Wildlife Service?

Potential for More Severe Impacts. The change in the number of new turbines compared with the previous project analyzed in the WECS 20 FEIR, as well as the change in the number of existing turbines to be decommissioned, will result in a change in both temporary and permanent footprint that will be affected by Project construction and operations. This change in impacted footprint could result in an increase in the amount of

Project activities that need to occur within areas that are potentially sensitive for biological resources. In addition, since certification of the WECS 20 FEIR, the City has become a signatory to the Coachella Valley Multiple Species Habitat Conservation Plan. Therefore, potential changes to biological resources-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

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, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Potential for More Severe Impacts. The change in the number of new turbines compared with the previous project analyzed in the WECS 20 FEIR, as well as the change in the number of existing turbines to be decommissioned, will result in a change in both temporary and permanent footprint that will be affected by Project construction and operations. This change in impacted footprint could result in an increase in the amount of Project activities that need to occur within areas that are potentially sensitive for biological resources. In addition, since certification of the WECS 20 FEIR, the City has become a signatory to the Coachella Valley Multiple Species Habitat Conservation Plan. Therefore, potential changes to biological resources-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

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?

Potential for More Severe Impacts. The change in the number of new turbines compared with the previous project analyzed in the WECS 20 FEIR, as well as the change in the number of existing turbines to be decommissioned, will result in a change in both temporary and permanent footprint that will be affected by Project construction and operations. This change in impacted footprint could result in an increase in the amount of Project activities that need to occur within areas that are potentially sensitive for biological resources. In addition, since certification of the WECS 20 FEIR, the City has become a signatory to the Coachella Valley Multiple Species Habitat Conservation Plan. Therefore, potential changes to biological resources-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

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?

Potential for More Severe Impacts. The change in the number of new turbines compared with the previous project analyzed in the WECS 20 FEIR, as well as the change in the number of existing turbines to be decommissioned, will result in a change in both temporary and permanent footprint that will be affected by Project construction and operations. This change in impacted footprint could result in an increase in the amount of Project activities that need to occur within areas that are potentially sensitive for biological resources. In addition, since certification of the WECS 20 FEIR, the City has become a signatory to the Coachella Valley Multiple Species Habitat Conservation Plan. Therefore, potential changes to biological resources-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

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

Potential for More Severe Impacts. The change in the number of new turbines compared with the previous project analyzed in the WECS 20 FEIR, as well as the change in the number of existing turbines to be decommissioned, will result in a change in both temporary and permanent footprint that will be affected by Project construction and operations. This change in impacted footprint could result in an increase in the amount of Project activities that need to occur within areas that are potentially sensitive for biological resources. In addition, since certification of the WECS 20 FEIR, the City has become a signatory to the Coachella Valley Multiple Species Habitat Conservation Plan. Therefore, potential changes to biological resources-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

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?

Potential for More Severe Impacts. The change in the number of new turbines compared with the previous project analyzed in the WECS 20 FEIR, as well as the change in the number of existing turbines to be decommissioned, will result in a change in both temporary and permanent footprint that will be affected by Project construction and operations. This change in impacted footprint could result in an increase in the amount of Project activities that need to occur within areas that are potentially sensitive for

biological resources. In addition, since certification of the WECS 20 FEIR, the City has become a signatory to the Coachella Valley Multiple Species Habitat Conservation Plan. Therefore, potential changes to biological resources-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

2.5 Cultural Resources

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*) (as previously noted, as part of the reorganization of the Appendix G Environmental Checklist, the California Natural Resources Agency also updated some considerations or questions on the checklist. Fundamentally, the same questions are being asked by the Appendix G Environmental Checklist, albeit in a different—and sometimes streamlined—manner. While the updated questions may shift the order of impact analysis or adjust the focus of the inquiry, these updates do not significantly alter the significance conclusions listed below):

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? (*Less-Than-Significant Impact With Mitigation Incorporated*)

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? (*Less-Than-Significant Impact With Mitigation Incorporated*)

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (*Less-Than-Significant Impact With Mitigation Incorporated) (this topic is now addressed in the Geology and Soils section of the updated CEQA Guidelines Appendix G Environmental Checklist)*

d) Would the project disturb any human remains, including those interred outside of formal cemeteries? (*Less-Than-Significant Impact*)

Project Significance Determination

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Potential for More Severe Impacts. The change in the number of new turbines compared with the previous project analyzed in the WECS 20 FEIR, as well as the change in the number of existing turbines to be decommissioned, will result in a change in both temporary and permanent footprint that will be affected by Project construction and operations. This change in impacted footprint could result in an increase in the amount of Project activities that need to occur within areas that are potentially sensitive for cultural and tribal cultural resources. Therefore, potential changes to cultural and tribal cultural resources-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

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

Potential for More Severe Impacts. The change in the number of new turbines compared with the previous project analyzed in the WECS 20 FEIR, as well as the change in the number of existing turbines to be decommissioned, will result in a change in both temporary and permanent footprint that will be affected by Project construction and operations. This change in impacted footprint could result in an increase in the amount of Project activities that need to occur within areas that are potentially sensitive for cultural and tribal cultural resources. Therefore, potential changes to cultural and tribal cultural resources-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

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

Potential for More Severe Impacts. The change in the number of new turbines compared with the previous project analyzed in the WECS 20 FEIR, as well as the change in the number of existing turbines to be decommissioned, will result in a change in both temporary

and permanent footprint that will be affected by Project construction and operations. This change in impacted footprint could result in an increase in the amount of Project activities that need to occur within areas that are potentially sensitive for cultural and tribal cultural resources. Therefore, potential changes to cultural and tribal cultural resources-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

2.6 Energy

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
VI. ENERGY – Would the project:				
a) Result in potentially significant environmental impact 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?	☐	☐	☐	☒

Previous Significance Determination

The Energy section of the CEQA Guidelines Appendix G Environmental Checklist was not added until 2018, following certification of the WECS 20 FEIR by the City; thus, no significance determination was previously made.

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

Potential for More Severe Impacts. Project implementation will require the use of energy, including petroleum, during the short-term construction phase and, to a lesser extent, during the long-term operational phase. As such, energy-related impacts are addressed in the Draft SEIR.

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

Potential for More Severe Impacts. Project implementation will require the use of energy, including petroleum, during the short-term construction phase and, to a lesser

extent, during the long-term operational phase. As such, energy-related impacts are addressed in the Draft SEIR.

2.7 Geology and Soils

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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?	☐	☐	☐	☒
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 direct or indirect 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 unique geologic feature?	☒	☐	☐	☐

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*) (as previously noted, as part of the reorganization of the Appendix G Environmental Checklist, the California Natural Resources Agency also updated some considerations or questions on the checklist. Fundamentally, the same questions are being asked by the Appendix G Environmental Checklist, albeit in a different—and sometimes streamlined—manner. While the updated questions may shift the order of impact analysis or adjust the focus of the inquiry, these updates do not significantly alter the significance conclusions listed below):

a) Would the project expose people or structures to 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. (*Less-Than-Significant Impact*)

   ii. Strong seismic ground shaking? (*Less-Than-Significant Impact With Mitigation Incorporated*)

   iii. Seismic-related ground failure, including liquefaction? (*Less-Than-Significant-Impact*)

   iv. Landslides? (*Less-Than-Significant Impact With Mitigation Incorporated*)

b) Would the project result in substantial soil erosion or the loss of topsoil? (*Less-Than-Significant Impact*)

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 off-site landslide, lateral spreading, subsidence, liquefaction or collapse? (*Less-Than-Significant-Impact With Mitigation Incorporated*)

d) Would the project 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? (*Less-Than-Significant Impact*)

e) Would the project 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? (*No Impact*)

Project Significance Determination

a) Would the project 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.

No Substantial Change from Previous Analysis. According to the California Division of Mines and Geology's Seismic Hazard Zones–Desert Hot Springs Quadrangle Map, the new turbines would be located in close proximity to, but not within, an Alquist-Priolo Earthquake Fault Zone; thus, the potential for surface rupture on the Project site is low (Division of Mines and Geology 1980). Although the Project is likely to be subject to strong seismic ground shaking over the life of the Project (see Section 2.6(a)(ii)), ground rupture impacts are not anticipated on the Project site.

Therefore, no new or more severe impacts associated with earthquake fault rupture would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

ii) Strong seismic ground shaking?

No Substantial Change from Previous Analysis. Southern California is considered to be an area with high frequency of seismic events. U.S. Geological Survey seismic hazard maps show an increased risk in Southern California due to historic and pre-historic faulting and ongoing tectonism across the region. According to the U.S. Geological Survey's database on Quaternary faults of the United States, a section of the San Andreas Fault runs through the access road leading to/from the Project. The fault and an area surrounding it are classified as requiring a geologic investigation by the regulatory requirements set in place within the state by the Alquist-Priolo Earthquake Fault Zoning Act.

In seismically active Southern California, there is no way to avoid earthquake hazards. Appropriate measures to mitigate and minimize the effects of earthquakes are included in the Uniform Building Code. The design of structures

in accordance with the Uniform Building Code is expected to minimize the effects of ground shaking to the greatest degree feasible during a seismic event.

The Project would comply with Mitigation Measure (MM) GEO-62 through MM-GEO-64, which are required to ensure that seismic and geotechnical effects would be minimized to acceptable levels. In general, these mitigation measures ensure that Project design, engineering, and construction adhere to all applicable provisions set forth by the City's Municipal Code and Grading Code, any Project-specific geotechnical and soils studies, and good engineering practices. In the event of an earthquake, adherence with these requirements would help the Project maintain structural integrity and minimize the risk of loss, injury, or death.

Therefore, based on compliance with local and state codes and with incorporation of MM-GEO-62 through MM-GEO-64, no new or more severe impacts associated with strong seismic ground shaking would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

iii) Seismic-related ground failure, including liquefaction?

No Substantial Change from Previous Analysis. When loose, unconsolidated saturated, sandy soils are subjected to ground vibrations during a seismic event they may liquefy; this phenomenon is called liquefaction. This occurs in areas where the groundwater table is within 50 feet of the ground surface. However, the underlying groundwater level below the Project site is at depths greater than 50 feet below grade (Earth Systems 2000). Thus, the Project is not susceptible to substantial adverse effects related to liquefaction.

Therefore, no new or more severe impacts associated with seismically induced liquefaction would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

iv) Landslides?

No Substantial Change from Previous Analysis. According to the City's General Plan (City of Desert Hot Springs 2000), seismically induced landslides and rock falls can be expected to occur within the City. However, as

addressed in the WECS 20 FEIR (City of Desert Hot Springs 2008), these slides would be very local in nature, and that actual run out of the boulders down the slope faces would be on the order of less than 5 feet. Isolated rock fall events would always be possible along the access road leading to the turbines (similar to most other access roads in the foothill area of the City). However, since the areas immediately surrounding the new turbines are generally flat, the Project site would not be subject to an increase risk of loss, injury, or death as a result landslides or rockslides.

Therefore, no new or more severe impacts associated with seismically induced landslides would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

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

No Substantial Change from Previous Analysis. Construction of the Project would be subject to local and state codes and requirements for erosion control and grading. Because construction activities would disturb one or more acres, the Project must adhere to the provisions of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. Construction activities subject to this permit include clearing, grading, and disturbances to the ground such as stockpiling and excavating. The NPDES Construction General Permit requires implementation of a Stormwater Pollution Prevention Plan (SWPPP), which would include Project construction features (i.e., best management practices (BMPs)) designed to prevent erosion and protect the quality of stormwater runoff. Sediment-control BMPs may include stabilized construction entrances, straw wattles on earthen embankments, sediment filters on existing inlets, or the equivalent.

Additionally, grading activities would be required to conform with the incumbent version of the California Building Code, the City's Municipal Code, the approved grading plans, and good engineering practices. The Project must also comply with SCAQMD Rule 402 (Nuisance) and Rule 403 (Fugitive Dust), which would reduce construction erosion impacts. Rule 403 requires control measures to reduce fugitive dust from active operations, storage piles, or disturbed surfaces so as to not be visible beyond the property line or exceed 20% opacity. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off site.

Compliance with these federal, regional, and local requirements would reduce the potential for both on-site and off-site erosion effects to accepted levels.

Therefore, through compliance with existing local and state codes, no new or more severe impacts associated with soil erosion or topsoil loss would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

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 off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

No Substantial Change from Previous Analysis. As previously discussed, the Project site is susceptible to localized rock falls and strong seismic ground shaking. The Project would still comply with MM-GEO-62 through MM-GEO-64, which are required to ensure that seismic and geotechnical effects would be minimized to acceptable levels. In the event of an earthquake or other geotechnical event, adherence with these requirements would help the Project maintain structural integrity and minimize the risk of loss, injury, or death.

Therefore, based on compliance with local and state codes and MM GEO-62 through MM-GEO-64, no new or more severe impacts associated with an unstable geologic unit or soils would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

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 to life or property?

No Substantial Change from Previous Analysis. Expansive soil is a fine-grained clay that occurs naturally and is generally found within historic floodplains and lakebeds. Expansive soil is subject to swelling and shrinkage of the soil, varying in proportion to the amount of moisture present in the soil. As water is initially introduced into the soil (by rainfall or watering), an expansion takes place. If dried out, the soil will contract, often leaving small fissures or cracks. Excessive drying and wetting of the soil will progressively deteriorate structures over the years. This excessive wetting and drying causes damage due to differential settlement within buildings and other improvements.

According to the City's General Plan, expansive soils are generally not considered a hazard because of the relatively minor amount of clay present in the soils. Where expansive soils may occur is in the soils generally occurring north of the Mission Creek Fault and in the vicinity of the Whitewater Hill (City of Desert Hot Springs 2000). The Project site is located in the vicinity of Whitewater Hill; however, the potential for expansive soils to impact the Project is considered to be low across the majority of the Project site (Earth Systems 2000). Thus, the Project is not susceptible to substantial adverse effects related to expansive soils.

Therefore, no new or more severe impacts associated with expansive soils would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is evaluated in the SEIR.

e) Would the project 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?

No Substantial Change from Previous Analysis. Similar to the existing conditions, the Project would not require septic tanks or other alternative wastewater disposal systems.

Therefore, no new or more severe impacts associated with adequate soils and alternative wastewater disposal systems would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is evaluated in the SEIR.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potential for More Severe Impacts. The change in the number of new turbines compared with the previous project analyzed in the WECS 20 FEIR, as well as the change in the number of existing turbines to be decommissioned, will result in a change in both temporary and permanent footprint that will be affected by Project construction and operations. This change in impacted footprint could result in an increase in the amount of Project activities that need to occur within areas that are potentially sensitive for cultural and tribal cultural resources. Therefore, potential changes to cultural- and tribal cultural resources–related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

Existing Mitigation Measures Applicable to Project

The Project would be required to comply with the following applicable geology and soils mitigation measures adopted by the City of Desert Hot Springs as part of the WECS 20 FEIR:

MM-GEO-62 As recommended in the Update to Geotechnical Engineering Report (2000) by Earth Systems Southwest, additional geologic and geotechnical studies will be performed prior to commencement of construction, which are to include additional soil borings to a depth of 40 feet or refusal along the alignment of the turbines. At least three soil borings will be performed to evaluate the soil conditions to support the wind turbines. The additional studies will also include an analysis of Project wind turbine foundation compliance with the current Uniform Building Code.

MM-GEO-63 The minimum seismic design of the Project will comply with the current edition of the Uniform Building Code for non-building structures.

MM-GEO-64 Site development shall be in conformance with all recommendations as specified in the Update to Geotechnical Engineering Report (2000) by Earth Systems Southwest.

2.8 Greenhouse Gas Emissions

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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?	☐	☒	☐	☐

Previous Significance Determination

The Greenhouse Gas (GHG) Emissions section of the CEQA Guidelines Appendix G Environmental Checklist was not added until 2010, following certification of the WECS 20 FEIR by the City; thus, no significance determination was previously made.

Project Significance Determination

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

Potential for More Severe Impacts. Due to the changes proposed, Project implementation will generate GHG emissions during the short-term construction phase (dust and vehicle emissions) and, to a lesser extent, during the long-term operational phase (vehicle emissions from operations and maintenance-related trips). Both construction and operational emissions will be required to comply with South Coast Air Quality Management District regulations, as well as other applicable federal, state, and regional requirements. As such, GHG emissions-related impacts are addressed in the Draft SEIR.

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

Potential for More Severe Impacts. Due to the changes proposed, Project implementation will generate GHG emissions during the short-term construction phase (dust and vehicle emissions) and, to a lesser extent, during the long-term operational phase (vehicle emissions from operations and maintenance-related trips). Both construction and operational emissions will be required to comply with South Coast Air Quality Management District regulations, as well as other applicable federal, state, and regional requirements. As such, GHG emissions-related impacts are addressed in the Draft SEIR.

2.9 Hazards and Hazardous Materials

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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?	☐	☐	☐	☒

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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 that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*) (as previously noted, as part of the reorganization of the Appendix G Environmental Checklist, the California Natural Resources Agency also updated some considerations or questions on the checklist. Fundamentally, the same questions are being asked by the Appendix G Environmental Checklist, albeit in a different—and sometimes streamlined—manner. While the updated questions may shift the order of impact analysis or adjust the focus of the inquiry, these updates do not significantly alter the significance conclusions listed below):

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (*Less-Than-Significant Impact With Mitigation Incorporated*)

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? (*Less-Than-Significant Impact With Mitigation Incorporated*)

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? (*Less-Than-Significant Impact*)

d) Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (*Less-Than-Significant Impact*)

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 for people residing or working in the project area? (*Less-Than-Significant Impact With Mitigation Incorporated*)

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? (*Less-Than-Significant Impact*)

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (*Less-Than-Significant Impact*)

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? (*Less-Than-Significant Impact With Mitigation Incorporated*)

Project Significance Determination

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

Short-Term Construction Impacts

No Substantial Change from Previous Analysis. During construction of the Project, hazardous and potentially hazardous materials typically associated with construction activities would be routinely transported to/from and used on the Project site. These hazardous materials could include gasoline, diesel fuel, lubricants, and other products used to operate and maintain construction equipment. During construction of the new turbines, standard operating procedures would be followed to ensure that lubricants do not escape the surrounding area. The transport, use, and handling of these materials would be a temporary activity coinciding with short-term Project construction activities. Although

such materials may be stored on the Project site, any transport, use, and handling of these materials would be conducted by a permitted and licensed service provider.

Any handling, transport, use, or disposal would comply with all applicable federal, state, and local agencies and regulations, including the U.S. Environmental Protection Agency, the Department of Toxic Substances Control (DTSC), the California Department of Transportation, the California Occupational Safety and Health Administration, the Resource Conservation and Recovery Act, and the Riverside County Department of Environmental Health (the Certified Unified Program Agency for Riverside County). Additionally, as mandated by the Occupational Safety and Health Administration, all hazardous materials stored on site would be accompanied by a Material Safety Data Sheet, which would inform on-site personnel about the necessary remediation procedures in the case of accidental release.

In addition, as further detailed in Section 2.9(d), the Project site is not listed as a hazardous materials site pursuant to California Government Code Section 65962.5 ("Cortese List"), and no other property in the surrounding area is considered a recognized environmental concern. As such, subsurface construction activities would not expose construction workers or nearby bystanders to contaminated soils.

Further, the Project would be required to adhere to MM-HAZ-65 through MM-HAZ-68, implementation of which would further minimize hazardous materials impacts. Therefore, compliance with federal, state, and local regulations and with incorporation of mitigation, no new or more severe short-term construction impacts associated with the transport, use, and disposal of hazardous materials would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

Long-Term Operational Impacts

No Substantial Change from Previous Analysis. Hazardous and potentially hazardous materials would also likely also be transported and used on the Project site during operation of the Project. According to the WECS 20 FEIR, used lubricants are currently generated by the existing on-site turbines. The lubricant (gearbox oil) that is replaced during maintenance is stored on site in metal containers within a designated area until a used oil recycler removes the oil for processing off site.

The County of Riverside Department of Environmental Health, which serves as the Certified Unified Program Agency within Riverside County and issued a Hazardous Materials Permit for the existing on-site turbines, regulates the use and management of lubricants. Additionally, a permanent California Environmental Protection Agency ID number has been assigned to existing on-site turbines by the California DTSC. The Project would be required to operate in compliance with permits issued by the County of Riverside Department of Environmental Health and DTSC. These permits would be amended, if necessary, to apply to the Project.

In addition, as mandated by the Occupational Safety and Health Administration, all hazardous materials stored on site would be accompanied by a Material Safety Data Sheet, which would inform on-site personnel about the necessary remediation procedures in the case of accidental release.

Further, the Project would be required to adhere to MM-HAZ-65 through MM-HAZ-68, implementation of which would further minimize hazardous materials impacts. Therefore, based on compliance with federal, state, and local regulations and with incorporation of mitigation, no new or more severe long-term operational impacts associated with the transport, use, and disposal of hazardous materials would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

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?

No Substantial Change from Previous Analysis. As previously discussed in the response provided in Section 2.9(a), neither construction nor operation of the Project would 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.

Further, the Project would be required to adhere to MM-HAZ-65 through MM-HAZ-68, implementation of which would further minimize hazardous materials impacts. Therefore, based on compliance with federal, state, and local regulations and with incorporation of mitigation, no new or more severe impacts associated with the release of hazardous materials into the environment would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

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 Substantial Change from Previous Analysis. The Project site is not located within 0.25-mile radius of an existing or proposed school. The nearest school to the Project is Desert Hot Springs High School (65850 Pierson Boulevard), which is located more than five miles from the Project site. In addition, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste.

Therefore, no new or more severe impacts associated with hazardous emissions or handling of hazardous materials near a school would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

d) Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Substantial Change from Previous Analysis. EnviroStor is the California DTSC's data management system for tracking cleanup, permitting, enforcement, and investigation efforts at hazardous waste facilities and sites with known contamination or sites where there may be reasons to investigate further. Additionally, GeoTracker is the State Water Resources Control Board's data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater. GeoTracker contains records for sites that require cleanup, such as leaking underground storage tank sites, Department of Defense sites, and cleanup program sites. GeoTracker also contains records for permitted facilities such as irrigated lands, oil and gas production, operating permitted underground storage tanks, and land disposal sites. According to both the California DTSC's EnviroStor and the State Water Resources Control Board's GeoTracker online databases (DTSC 2018; SWRCB 2018), the Project site is not listed as a hazardous materials site pursuant to California Government Code Section 65962.5 ("Cortese List").

Therefore, no new or more severe impacts associated with hazardous materials sites would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

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 Substantial Change from Previous Analysis. Palm Springs International Airport is located approximately 8.5 miles southeast of the Project site and is closest public airport to the Project site (AirNav.com 2018). Although there is considerable distance between the Project site and this airport, the Project must comply with Federal Aviation Administration (FAA) standards.

The FAA uses level and sloping imaginary surfaces to determine if a proposed structure is an obstruction to air navigation. Structures that are identified as obstructions are then subject to a full aeronautical study and increased scrutiny. However, exceeding a Part 77 imaginary surface does not automatically result in the issuance of a determination of hazard. Proposed structures must have airspace impacts that constitute a substantial adverse effect in order to warrant the issuance of determinations of hazard (14 CFR Part 77.17(a)(2) and 77.19/21/23). Public-use airport imaginary surfaces do not overlie the Project site, and as a result, the new turbines would not exceed these surfaces (Capitol Airspace Group 2018).

Installation of the wind turbines and meteorological towers would be required to comply with all applicable requirements set forth in FAA Advisory Circular 70/7460-1L Change 1, Obstruction Lighting/Marking. These requirements include marking and lighting standards for wind turbines and meteorological towers intended to provide day and night conspicuity and to assist pilots in identifying and avoiding these obstacles (FAA 2018). Pursuant to these standards, it is likely one red light would be mounted on the northern-most wind turbine, one red light would be mounted on the southern-most wind turbine, and one red light would be mounted on each of the permanent and temporary meteorological towers. These red lights would be used only at night and would be simultaneously flashing. Because the wind turbines would be greyish in color and the meteorological towers would be painted with alternate bands of aviation orange and greyish paint, daytime lighting is not required. Further, according to the City of Palm Springs International Airport Master Plan Update (City of Palm Springs 2015), the Project site is not located in a noise exposure zone.

In addition, the Project would comply with MM-HAZ-76, which is required to ensure that airport hazard effects would be minimized to acceptable levels. Therefore, based on compliance with FAA regulations and with incorporation of mitigation, no new or more

severe impacts associated with public airport hazards would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

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

No Substantial Change from Previous Analysis. According to the City's General Plan, the City has coordinated with other jurisdictions throughout Riverside County to prepare the Multi-Hazard Functional Plan, which addresses pre-emergency planning, normal and heightened readiness levels, emergency operation, and post-emergency recovery.

As addressed in Section 2.17, the Project would not add a substantial number of vehicle trips onto local and regional roadways. Thus, the Project would not interfere with emergency responders traveling along roadways during an emergency, nor would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. In addition, with respect to construction traffic, the Project would comply with MM-TRA-86 and MM-TRA-87, which is required to ensure that a traffic plan to minimize traffic flow interference from construction activities is established to avoid impact to local circulation during construction, minimizing the probability of any short-term interference with emergency response.

Therefore, with incorporation of mitigation, no new or more severe impacts associated with emergency response plans or emergency evacuation plans would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

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

No Substantial Change from Previous Analysis. According to the WECS 20 FEIR, the implementation of wind turbines may expose people or structures to a significant risk involving wildland fires. However, a previous records search conducted as part of the WECS 20 FEIR yielded results of no fire hazard or vegetation growth violations for the Project site. Further, per the California Department of Forestry and Fire Protection's Very High Fire Hazard Severity Zones in LRA" map, the Project site is not located in an area susceptible to high fire hazard dangers (CAL FIRE 2009).

In addition, the Project would be required to adhere to MM-HAZ-69 through HAZ-MM-75, implementation of which would further minimize hazards impacts, specifically impacts related to wildland fire. These measures would require that the new turbine nacelle covers have fire retardant applied, the roads between the turbines and nearby residences be maintained, and compliance with the City's Fire Department requirements be strictly adhered to.

Therefore, no new or more severe impacts associated with wildland fires would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

Existing Mitigation Measures Applicable to Project

The Project would be required to comply with the following applicable hazards and hazardous materials mitigation measures adopted by the City of Desert Hot Springs as part of the WECS 20 FEIR. Where required, minor refinements to the WECS 20 FEIR's mitigation measures have been made to better tailor the mitigation measures to the current Project; text changes are shown in underline (additional text) and ~~strikethrough~~ (removed text):

MM-HAZ-65 The Project ~~WECS 20 Wind Park~~ will continue to operate in compliance with permits issued by the County of Riverside Department of Environmental Health and by the California Department of Toxic Substances Control.

Reason for Text Amendment to the Mitigation Measure: The Project is no longer named the WECS 20 Wind Park.

MM-HAZ-66 Monitoring of all turbines for oil leakage would be performed on a monthly basis, and monthly reports would be submitted to the City Planning Department.

MM-HAZ-67 Any oil leakage or spills would be reported immediately to the City Planning Department.

MM-HAZ-68 All new turbines would be equipped with oil pans or other oil containment devices in order to catch any oil in the event of a leak.

MM-HAZ-69 All new turbine nacelle covers will have fire retardant applied for containment.

MM-HAZ-70 Turbine rotor blades would be equipped with lightning protection, which will bring to the ground, and then dissipate, the current.

MM-HAZ-71 The two roads in between the turbines and nearby residences shall be maintained by the Project Applicant ~~EUI~~ free of vegetation in order to serve as fire breaks.

Reason for Text Amendment to the Mitigation Measure: EUI is not the current Project Applicant.

MM-HAZ-72 The Project will comply with all Fire Department requirements and conditions.

MM-HAZ-73 The following areas would be cleared of vegetation and maintained by the Project Applicant ~~EUI~~ as a fire/fuel break for as long as the turbines are in operation:

- Thirty (30) feet around the periphery of the Project. Access roads that completely surround the Project may satisfy this requirement, if approved by the fire department.
- Ten (10) foot-radius around all transformers and wind turbine towers.
- Thirty (30) feet around all buildings.
- All buildings or equipment enclosures of substantial size containing control panels, switching equipment, or transmission equipment, and no regular human occupancy, shall be equipped with an automatic fire extinguishing system. Plans for such systems must be submitted to the Fire Department for review or approval.

Reason for Text Amendment to the Mitigation Measure: EUI is not the current Project Applicant.

MM-HAZ-74 No permit shall be issued for the construction or placing of any structure on-site for the purpose of habitation or human occupancy without first establishing fire protection requirements as a condition of such permit. This requirement includes the establishment of a minimum fire flow per Division VIII of Riverside County Ordinance 546.

MM-HAZ-75 Service vehicles assigned to regular maintenance or construction at the Project site shall be equipped with a portable fire extinguisher of a 4A40 BC rating. All motor driven equipment shall be equipped with an approved spark arrestor.

MM-HAZ-76 The Project will comply with current FAA obstruction lighting standards for structures, and any required FAA permits or approvals shall be obtained prior to

construction. ~~The most recent standards are published in the November 2005 report, Obstruction Lighting Standards for Wind Turbine Farms (DOT/FAA/AR-TN05/50). Pursuant to these standards, the Project will have one red light mounted on top of the northernmost wind turbine in the Project, and one red light mounted on top of the southernmost wind turbine in the Project. These two red lights would be used only at night, and would be simultaneously flashing. The Project will use fixtures that will minimize impacts to neighboring residents, such as red light emitting diode or rapid discharge style L-864 fixtures. Since the wind turbines would be painted white, daytime lighting is not recommended.~~

Reason for Text Amendment to the Mitigation Measure: FAA standards are updated on occasion and the original MM reference is outdated.

2.10 Hydrology and Water Quality

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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 offsite;	☐	☐	☐	☒
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; or	☐	☐	☐	☒

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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?	☐	☐	☐	☒

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*) (as previously noted, as part of the reorganization of the Appendix G Environmental Checklist, the California Natural Resources Agency also updated some considerations or questions on the checklist. Fundamentally, the same questions are being asked by the Appendix G Environmental Checklist, albeit in a different—and sometimes streamlined—manner. While the updated questions may shift the order of impact analysis or adjust the focus of the inquiry, these updates do not significantly alter the significance conclusions listed below):

a) Would the project violate any water quality standards or waste discharge requirements? (*Less-Than-Significant Impact With Mitigation Incorporated*)

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? (*Less-Than-Significant Impact*)

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, in a manner which would result in substantial erosion or siltation on- or off-site? (*Less-Than-Significant Impact With Mitigation Incorporated*)

d) 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? (*Less-Than-Significant Impact*)

e) Would the project 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? (*Less-Than-Significant Impact With Mitigation Incorporated*)

f) Would the project otherwise substantially degrade water quality? (*Less-Than-Significant Impact With Mitigation Incorporated*)

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? (*Less-Than-Significant Impact*)

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows? (*Less-Than-Significant Impact*)

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? (*No Impact*)

j) Would the project be susceptible to inundation by seiche, tsunami, or mudflow? (*No Impact*)

Project Significance Determination

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

Short-Term Construction Impacts

No Substantial Change from Previous Analysis. Construction of the Project would be subject to local and state requirements for erosion control and grading. While construction activities would generally be limited to areas located within the existing turbine footprints, and thus, short-term impacts to the existing drainage pattern would be minimal, because construction activities would disturb one or more acres, the Project would still be required to adhere to the provisions of the NPDES Construction General Permit. Construction activities subject to this permit include clearing, grading, and disturbances to the ground such as stockpiling and excavating. The NPDES Construction General Permit requires implementation of a SWPPP, which would include Project construction features (i.e., BMPs) designed to prevent erosion and protect the quality of stormwater runoff. Sediment control BMPs may include stabilized construction entrances, straw wattles on earthen embankments, sediment filters on existing inlets, or the equivalent. Collectively, these construction BMPs will help retain stormwater, and any constituents, pollutants, and sediment contained therein, on the Project site, which, in turn, will help prevent water quality impacts to downstream receiving waters and groundwater basins.

Therefore, through compliance with existing local and state codes and with incorporation of MM-HYD-77 through MM-HYD-79, no new or more severe short-term construction impacts associated with water quality standards would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

Long-Term Operational Impacts

No Substantial Change from Previous Analysis. The construction of new buildings and other aboveground structures can alter existing topography and impede existing drainage flows. The Project would involve construction of new wind turbines, permanent access roads, collection lines, and other improvements, any of which could potentially impede drainage flows through the Project area compared with existing conditions. However, the Project would ultimately remove approximately 69 existing turbines from the Project site, replacing them with a maximum of four new turbines. Although the new turbines would have a larger footprint, the reduction in the number of old turbines would have a positive effect on surface drainage, given that there would be fewer aboveground structures to possibly impede stormwater flows.

In addition, while new or altered access roads would be required, these roads would be comprised of only pervious materials (e.g., compacted soil, gravel), so the amount of impervious surfaces found on the Project site would not be expected to increase. Further, some segments of the existing access roads would no longer be required following decommissioning of the existing turbines, and as such, these areas would be restored back to a more natural drainage condition. Overall, the use of the Project site is not changing compared with existing conditions, and the amount of on-site impervious surfaces would not be substantially altered and the Project would not introduce new uses to the site that could adversely affect water quality.

Lastly, consistent with HYD-MM-77, preparation of a hydrology study, drainage plan, and erosion control plan are required. As such, a Hydrology Study, Drainage Plan, and Erosion Control Plan will be prepared for the Project and submitted to the City for review and approval.

Therefore, through compliance with existing local and state codes and with incorporation of MM-HYD-77 through MM-HYD-79, no new or more severe long-term operational impacts associated with water quality standards would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures

are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR. (Note that the change in language between the 2008 CEQA Guidelines Appendix G Environmental Checklist and the 2018 Appendix G Environmental Checklist does not affect substance of analysis.)

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

Groundwater Supplies

No Substantial Change from Previous Analysis. Mission Springs Water District (MSWD) provides domestic water services to the City of Desert Hot Springs, including the Project site, primarily utilizing groundwater from the Mission Creek sub-basin (MSWD 2018). The Mission Creek sub-basin is naturally recharged by surface and subsurface flows from natural sources (i.e., precipitation and runoff) from the San Bernardino and Little San Bernardino Mountains. Estimates of natural sources of recharge have ranged from 6,000 to 9,000 acre-feet per year. Based on state and federal analysis the Mission Creek sub-basin has a storage capacity of approximately 2.6 million acre-feet (City of Desert Hot Springs 2000).

MSWD has groundwater elevation monitoring wells and has been the exclusive monitoring and reporting agency to the California Statewide Groundwater Elevation Monitoring for groundwater conditions in the Mission Creek sub-basin. MSWD, along with the Coachella Valley Water District and Desert Water Agency, manage the sub-basin due to continuing overdraft conditions through the Mission Creek Settlement Agreement. This agreement specifies the available State Water Project water that would be allocated in proportion to the amount of water produced or diverted from the sub-basin in the preceding year (MSWD 2016).

O&M activities would not involve regular or continuous water or wastewater discharges. With respect to construction and decommissioning, non-stormwater discharges would include periodic application of water for dust control purposes. Because dust control is necessary during windy and dry periods to prevent wind erosion and dust plumes, water would be applied in sufficient quantities to wet the soil, but not so excessively as to produce runoff from the construction site. Water applied for dust control would either quickly evaporate or locally infiltrate into shallow surface soils. These stipulations are routine in SWPPPs and other construction contract documents, which normally state that

water would only be applied in a manner that does not generate runoff. As such, water applied for dust control would not result in appreciable effects on groundwater.

Therefore, no new or more severe impacts associated with groundwater supplies would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

Groundwater Recharge

No Substantial Change from Previous Analysis. The Project would ultimately remove approximately 69 existing turbines from the Project site, replacing them with a maximum of four new turbines. Although the new turbines would have a larger footprint, the reduction in the number of old turbines would have a positive effect on the amount of impervious surfaces on the Project site. In addition, while new or altered access roads would be required, these roads would be comprised of only pervious materials (e.g., compacted soil, gravel), so the amount of impervious surfaces found on the Project site would not be expected to increase. Given that the Project would not result in an increase in impervious surfaces, the Project would not affect the infiltration potential of the Project site.

Therefore, no new or more severe impacts associated with groundwater recharge would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR. (Note that the change in language between the 2008 CEQA Guidelines Appendix G Environmental Checklist and the 2018 Appendix G Environmental Checklist does not affect substance of analysis.)

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;

No Substantial Change from Previous Analysis. The construction of new buildings and other aboveground structures can alter existing topography and impede existing drainage flows. The Project would involve construction of new wind turbines, permanent access roads, collection lines, and other improvements, any of which could potentially impede drainage flows through the Project area compared with existing conditions. However, the Project would ultimately remove approximately 69 existing turbines from the Project site,

replacing them with a maximum of four new turbines. Although the new turbines would have a larger footprint, the reduction in the number of old turbines would have a positive effect on surface drainage, given that there would be fewer aboveground structures to possibly impede stormwater flows.

In addition, while new or altered access roads would be required, these roads would be comprised of only pervious materials (e.g., compacted soil, gravel), so the amount of impervious surfaces found on the Project site would not be expected to increase. Further, some segments of the existing access roads would no longer be required following decommissioning of the existing turbines, and as such, these areas would be restored back to a more natural drainage condition. Overall, the use of the Project site is not changing compared with existing conditions, and the amount of on-site impervious surfaces would not be substantially altered.

Lastly, consistent with MM-HYD-77, preparation of a hydrology study, drainage plan, and erosion control plan are required. As such, a hydrology study, drainage plan, and erosion control plan will be prepared for the Project and submitted to the City for review and approval and would incorporate measures to reduce opportunities for erosion and siltation.

Therefore, through compliance with existing local and state codes and with incorporation of MM-HYD-77 through MM-HYD-79, no new or more severe impacts associated with the altering of the existing drainage pattern would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the Draft SEIR.

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

No Substantial Change from Previous Analysis. As previously discussed in the response provided in Section 2.10(c)(i), neither construction nor operation of the Project would substantially alter the existing drainage pattern in a manner which would result in flooding on or off site.

Consistent with MM-HYD-77, preparation of a hydrology study, drainage plan, and erosion control plan are required. As such, a hydrology study, drainage plan, and erosion control plan will be prepared for the Project and submitted to the City for review and approval and would incorporate measures to reduce opportunities for flooding on and off site.

Therefore, through compliance with existing local and state codes and with incorporation of MM-HYD-77 through MM-HYD-79, no new or more severe impacts associated with the altering of the existing drainage pattern would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the Draft SEIR.

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; or

No Substantial Change from Previous Analysis. While new or altered access roads would be required, these roads would be comprised of only pervious materials (e.g., compacted soil, gravel), so the amount of impervious surfaces found on the Project site would not be expected to increase. Further, some segments of the existing access roads would no longer be required following decommissioning of the existing turbines, and as such, these areas would be restored back to a more natural drainage condition. Overall, the use of the Project site is not changing compared with existing conditions, and the amount of on-site impervious surfaces would not be substantially altered.

In addition, consistent with MM-HYD-77, preparation of a hydrology study, drainage plan, and erosion control plan are required. As such, a hydrology study, drainage plan, and erosion control plan will be prepared for the Project and submitted to the City for review and approval.

Therefore, through compliance with existing local and state codes and with incorporation of MM-HYD-77 through MM-HYD-79, no new or more severe impacts associated with the creation of stormwater runoff would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the Draft SEIR.

iv) impede or redirect flood flows?

No Substantial Change from Previous Analysis. As previously discussed in the response provided in Section 2.10(c)(i), neither construction nor operation of the Project would substantially alter the existing drainage pattern.

Consistent with MM-HYD-77, preparation of a hydrology study, drainage plan, and erosion control plan are required. As such, a hydrology study, drainage plan, and erosion control plan will be prepared for the Project and submitted to the City for review and approval.

Therefore, through compliance with existing local and state codes and with incorporation of MM-HYD-77 through MM-HYD-79, no new or more severe impacts associated with the altering of the existing drainage pattern would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the Draft SEIR.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

No Substantial Change from Previous Analysis. The Project site is located over 100 miles inland from the Pacific Ocean. No lakes or reservoirs are located in the Project area, and the Project site consists of flat topography. As such, the Project would not be susceptible to inundation by tsunami, seiche, or mudflow. Additionally, according to the Federal Emergency Management Agency, the Project site is located outside of the 100-year floodplain and susceptible to only minimal flood hazard (FEMA 2018). Nonetheless, in the unlikely event of Project inundation, the Project would not risk release of pollutants. As discussed in Section 2.9, Hazards and Hazardous Materials, the Project would be required to adhere to MM-HAZ-65 through MM-HAZ-68, implementation of which would minimize opportunities for pollutants, such as hazardous materials, to be released into the environment.

Therefore, no new or more severe impacts associated with flooding would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the Draft SEIR.

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

Short-Term Construction Impacts

No Substantial Change from Previous Analysis. Construction of the Project would be subject to local and state requirements for erosion control and grading. While construction activities would generally be limited to areas located within the existing turbine footprints, and thus, short-term impacts to the existing drainage pattern would be minimal, because construction activities would disturb one or more acres, the Project would still be required to adhere to the provisions of the

NPDES Construction General Permit. Construction activities subject to this permit include clearing, grading, and disturbances to the ground such as stockpiling and excavating. The NPDES Construction General Permit requires implementation of a SWPPP, which would include Project construction features (i.e., BMPs) designed to prevent erosion and protect the quality of stormwater runoff. Sediment control BMPs may include stabilized construction entrances, straw wattles on earthen embankments, sediment filters on existing inlets, or the equivalent. Collectively, these construction BMPs will help retain stormwater, and any constituents, pollutants, and sediment contained therein, on the Project site, which, in turn, will help prevent water quality impacts to downstream receiving waters.

Additionally, as discussed in Section 2.10(c)(i) above, with respect to construction and decommissioning, non-stormwater discharges would include periodic application of water for dust control purposes. Because dust control is necessary during windy and dry periods to prevent wind erosion and dust plumes, water would be applied in sufficient quantities to wet the soil, but not so excessively as to produce runoff from the construction site. Water applied for dust control would either quickly evaporate or locally infiltrate into shallow surface soils. These stipulations are routine in SWPPPs and other construction contract documents, which normally state that water would only be applied in a manner that does not generate runoff. As such, water applied for dust control would not result in appreciable effects on groundwater nor would it result in a substantial amount of water that could conflict with MSWD's management of the Mission Creek sub-basin.

Therefore, through compliance with existing local and state codes and with incorporation of MM-HYD-77 through MM-HYD-79, no new or more severe short-term construction impacts associated with water quality standards, waste discharge requirements, erosion or siltation, and degradation of water quality would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the Draft SEIR.

Long-Term Operational Impacts

No Substantial Change from Previous Analysis. The construction of new buildings and other aboveground structures can alter existing topography and impede existing drainage flows. The Project would involve construction of new wind turbines, permanent access roads, collection lines, and other improvements, any of which could potentially impede drainage flows through the Project area compared with existing conditions. However, the Project would ultimately remove approximately 69 existing turbines from the Project site, replacing them with a maximum of four new turbines. Although the new turbines would have a larger footprint, the reduction in the number of old turbines would have a positive effect on surface drainage, given that there would be fewer aboveground structures to possibly impede stormwater flows.

In addition, while new or altered access roads would be required, these roads would be comprised of only pervious materials (e.g., compacted soil, gravel), so the amount of impervious surfaces found on the Project site would not be expected to increase. Further, some segments of the existing access roads would no longer be required following decommissioning of the existing turbines, and as such, these areas would be restored back to a more natural drainage condition. Overall, the use of the Project site is not changing compared with existing conditions, and the amount of on-site impervious surfaces would not be substantially altered.

Lastly, consistent with MM-HYD-77, preparation of a hydrology study, drainage plan, and erosion control plan are required. As such, a hydrology study, drainage plan, and erosion control plan will be prepared for the Project and submitted to the City for review and approval.

Therefore, through compliance with existing local and state codes and with incorporation of MM-HYD-77 through MM-HYD-79, no new or more severe long-term operational impacts associated with water quality standards, waste discharge requirements, erosion or siltation, and degradation of water quality would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the Draft SEIR. (Note that the language changes between the 2008 CEQA Guidelines Appendix G Environmental Checklist and the 2018 Appendix G Environmental Checklist did not substantively change the scope or focus of the analysis of hydrological impacts. The main difference is the order in which the topics are presented for analysis.)

Existing Mitigation Measures Applicable to Project

The Project would be required to comply with the following applicable hydrology and water quality mitigation measures adopted by the City of Desert Hot Springs as part of the WECS 20 FEIR:

MM-HYD-77 A hydrology study, drainage plan, and erosion control plan would be prepared and submitted to the City Engineer for review and approval. The Project will adhere to all recommendations based on the findings of said study and plans, which would be completed prior to issuance of a grading permit

MM-HYD-78 For sites greater than 5 acres in size, the Project applicant will obtain coverage under the State Water Resources Control Board's General National Pollutant Discharge Elimination System (NPDES) permit for construction storm water discharges through the Regional Water Quality Control Board (RWQCB), Colorado River Basin Region prior to commencement of construction. A Notice of Intent, a Storm Water Pollution Prevention Plan (SWPPP), and a Monitoring

Plan would be prepared as requirements of the NPDES permit. The SWPPP will include Best Management Practices (BMPs) in compliance with the NPDES program requirements.

MM-HYD-79 The Project applicant will obtain all necessary permits, agreements, and approvals from appropriate agencies (such as the RWQCB and Mission Springs Water District) related to water quality and nuisance water issues.

2.11 Land Use and Planning

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*) (as previously noted, as part of the reorganization of the Appendix G Environmental Checklist, the California Natural Resources Agency also updated some considerations or questions on the checklist. Fundamentally, the same questions are being asked by the Appendix G Environmental Checklist, albeit in a different—and sometimes streamlined—manner. While the updated questions may shift the order of impact analysis or adjust the focus of the inquiry, these updates do not significantly alter the significance conclusions listed below):

a) Would the project physically divide an established community? (*No Impact*)

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? (*No Impact*)

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan? (*No Impact*)

Project Significance Determination

a) Would the project physically divide an established community?

No Substantial Change from Previous Analysis. Under the existing conditions, the Project site currently contains a wind energy facility. Because the surrounding land uses consist largely of either other wind energy facilities or undeveloped land, there are no existing established communities immediately adjacent to the Project site, and the site does not provide connectivity between any established communities.

Typically, division of an established community involves removal of physical connection between two communities (e.g., removal of an existing bridge) or construction of a large physical barrier between two communities (e.g., construction of a highway, railroad tracks, or flood control channel). The Project does not include any such components.

Therefore, no new or more severe impacts associated with physically dividing an established community would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

No Substantial Change from Previous Analysis. The Project involves the decommissioning of approximately 69 existing wind turbines, the construction and operation of up to four new wind turbines generally located within and adjacent to existing footprints of the current wind turbines, and the future decommissioning of the new wind turbines at the end of their useful life. As such, the Project conforms to the City's General Plan Land Use Designation as I-E, Industrial Energy-Related, and the City's Zoning I-E, Industrial-Scale Energy Production zone.

City of Desert Hot Springs General Plan

Table 1 demonstrates how the Project promotes consistency with the goals and policies related to the use of alternative, renewable, and wind energy sources.

Table 1
Project Consistency with General Plan

General Plan Goal or Policy[1]	Is the Project Consistent?
Land Use Element	
Goal 1: A balanced mix of functionally integrated land uses meeting general social and economic needs of the community through simplified, compatible and consistent land use and zoning designations.	**Consistent.** The Project involves the repowering of an existing commercial wind energy facility and, thus, represents an identical use as the existing on-site use. Therefore, from a land use compatibility perspective, the Project would be consistent with the surrounding land use pattern and character of the surrounding area. The Project would generate approximately twice the energy with the same electric capacity compared to the existing turbines operating on the Project site, allowing for the better use of the site for energy production without expanding the existing boundaries of the current facility.
Policy 6: All land use development proposals shall be consistent with all applicable land use policies and standards contained in the General Plan.	
Community Design Element	
Policy 1: Private and public sector development projects shall equally apply City community design standards, thereby protecting the community's scenic viewsheds, providing community cohesion and enhancing the image of Desert Hot Springs as a resort residential community.	**Consistent.** The Project would be consistent with the City's scenic setback requirements related to SR-62, I-10, and other local roadways. Further, by repurposing an existing wind energy facility (instead of an undisturbed/undeveloped site), the Project is helping the City to protect the community's scenic viewsheds. In addition, replacing the existing wind turbines with the new turbines would reduce the overall development intensity on the Project site, reduce the visual "clutter" that currently affects the site from certain public vantage points, and improve the overall aesthetic condition.
Policy 14: Water wells, utility substations, switching and control facilities associated with it shall be screened to preserve scenic viewsheds and limit visual clutter.	
Energy and Mineral Resources Element	
Policy 1: Promote energy conservation in all areas of community development, including transportation, development planning, public and private sector office construction and operation, as well as in the full range of residential, commercial, and industrial projects.	**Consistent.** The Project would produce up to 17 MW of wind energy. As proposed by the Project Applicant, the repowering component of the Project would consist of up to four new wind turbines in the range of approximately 2.0 MW to 4.2 MW in nameplate capacity per turbine. This would be achieved by using larger wind turbines employing modern technology. The Project would generate approximately twice the energy with the same electric capacity compared to the existing turbines operating on the Project site. The models and heights of the wind turbines would be selected to allow for the Project to take advantage of local meteorological conditions and for a much more efficient wind energy facility.
Policy 5: Support public and private efforts to develop and operate alternative systems of thermal and electrical production, which take advantage of local renewable resources.	

Source: City of Desert Hot Springs 2000.
Notes: I- = Interstate; MW = megawatt; SR- = State Route

Desert Hot Springs Municipal Code

The Project site is located within the I-E (Industrial-Scale Energy Production) zone. According to Section 17.16.140 of the City's Zoning Code, WECS subject to the standards and development criteria contained in Section 17.16.140(E) are conditionally permitted in the commercial and industrial zoning districts. According to the provisions of Section 17.16.140(A) of the City's Zoning Code, "a Conditional Use Permit process for a commercial WECS is intended to regulate and provide for the installation of commercial WECS which are made feasible by the strong prevailing winds within certain areas of the City designated by the General Plan. The conditions of the permit are meant to ensure that a safe and beneficial environment, for both the WECS development and the adjacent properties, is provided" (City of Desert Hot Springs 2017a).

The surrounding Project area is currently developed with several other commercial wind energy facilities, as is the Project site. Specifically, other commercial wind energy facilities can be found near the Project site on unincorporated County of Riverside land to the south and southwest. The Project involves the repowering of an existing commercial wind energy facility, and the Project site has been an operational commercial wind energy facility for approximately 30 years. The Project would not substantially alter the scale, mass, coverage, density, and intensity of the on-site use, and given that the City has already found the existing wind energy facility to be consistent with the adjacent land uses during prior Conditional Use Permit approval processes, it follows that the Project would continue to be consistent with the neighboring uses.

Consistent with Chapter 17.140, Variances, of the Desert Hot Spring Zoning Ordinance, the Project Applicant has submitted an application for variances related to development criteria specifically related to height limits and minimum setback requirements for WECS projects set forth in Section 17.16.140(E) of the Zoning Ordinance. If granted by the City's Planning Commission, these variances would allow the Project to be consistent with the intent of the zoning ordinance and would allow for the following:

- The new turbines and the new permanent and temporary meteorological towers would be able to exceed the 200-foot height restriction for WECS (Zoning Ordinance Sections 17.16.140(E)(1)(a) and 17.16.140(E)(1)(b))
- The new southernmost turbine would be constructed closer than 1.25 times the total WECS height from the southern Project boundary (Zoning Ordinance Section 17.16.140(E)(3)(c))

- The new turbines would be constructed in locations where the center of the turbine tower is within a distance of five rotor diameters from a lot line that is perpendicular to and downwind of, or within 45° of perpendicular to and downwind of, the dominant wind direction (Zoning Ordinance Sections 17.16.140(E)(4)(a))

Pursuant to Section 17.140.010, Purpose, of the Zoning Ordinance, the City may grant a variance to depart from zoning ordinances when, because of special circumstances unique to a specific property, strict application of the ordinance deprives such property of privileges enjoyed by other properties in the vicinity and under identical zoning. Section 17.140.050, Findings, of the Zoning Ordinance, states that the Planning Commission may grant a variance from the requirements of the Zoning Ordinance where practical difficulties, unnecessary hardships, or results contrary to the intent of the Municipal Code would occur from the strict and literal interpretation and enforcement of the Municipal Code. A variance may be granted with conditions that will ensure the protection of the public safety, health, and welfare.

The siting of new wind turbines on the Project site is already constrained due to the need to maintain other setbacks, easements, and right-of-way and because of the hydrologic and geotechnical characteristics of the site. The requested zoning variances would allow the Project to optimize spacing between turbines to fully use the wind resources and would provide the Project Applicant with the layout flexibility to optimize the number and type of turbines to ensure that the Project is capable of producing the maximum amount of energy feasible. The requested height variance would allow for the Project to take advantage of local meteorological conditions and would allow for a much more efficient and successful wind energy facility by reducing the overall ground disturbance from the disturbance that would be required with more turbines to meet Project objectives at lower heights. In addition, replacing the existing wind turbines with the new turbines would reduce the overall development intensity on the Project site and reduce the visual "clutter" that currently affects the site from older, smaller turbines, improving the overall aesthetic condition. Overall, the taller turbines allow for a more efficient project to make better use of wind resources, reducing the overall number of turbines from what would be necessary if the 200-foot height limit was required.

For the lot line setbacks, none of the adjacent properties contain any dwellings, hotels, schools, libraries, or hospitals, and none of these properties are not expected to facilitate human activity. No future development is believed to be currently proposed on these adjacent parcels (especially within 625 feet of the northernmost and southernmost wind turbine), and largely due to the variable topography on these abutting parcels, it is not

anticipated that any dwelling, hotel, school, library, hospital, or any other land use that would facilitate human activity would be constructed at these neighboring locations.

In addition, for the wind access setbacks, the parcels adjacent to the Project site to the north and east are unlikely to be developed with a wind energy facility, especially within 2,135 feet of the Project site (i.e., five rotor diameters), given the zoning and that the large, linear Metropolitan Water District facility bisects these sites. Similarly, the parcel that abuts the Project site to the south is zoned by the County of Riverside as W-2 (Controlled Development Areas); according to the County's Zoning Ordinance, commercial wind energy facilities are neither a permitted nor a conditionally permitted use in the W-2 zone. Thus, it is improbable that these neighboring parcels could be developed with wind energy facilities.

These zoning variances requested are typical of variances that have been granted for other commercial wind energy facilities that have been previously proposed in the Project area, including in land under the jurisdiction of Riverside County and the adjacent City of Palm Springs. With the exception to these zoning variances, the Project would meet all applicable development standards required for commercial wind energy facilities developed with the I-E zone.

Should the Planning Commission be able to make the necessary findings, the requested zoning variance would be a permissible action outlined in the Zoning Ordinance that can resolve a potential site engineering and design issue, which is the overall intent and purpose of the variance process. In addition, it should also be noted the project analyzed in the WECS 20 FEIR requested and was subsequently granted similar variances by the City.

Therefore, no new or more severe impacts associated with consistency with the City's General Plan and/or the City's Municipal Code would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

Existing Mitigation Measures Applicable to Project

The WECS 20 FEIR did not include any mitigation measures related to land use and planning.

2.12 Mineral Resources

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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?	☐	☐	☐	☒

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*):

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*)

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*)

Project Significance Determination

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 Substantial Change from Previous Analysis. According to the Western Coachella Valley Area Plan Land Use Plan map, the Project site is not located on a known mineral resource area, which is designated as a mineral extraction and processing facilities site, or an area held in reserve for future mineral extraction and processing (County of Riverside 2017).

The WECS 20 FEIR identified the Project site as within Mineral Resource Zone 3 (MRZ-3), which is defined as areas containing mineral deposits, the significance of which cannot be evaluated from available data. Despite this classification, the WECS

20 FEIR concluded that development on the Project site would have no impact on mineral resources, because the future mineral extraction in the Project area, if any, would not be restricted or prevented by implementation of the Project. The construction of a wind energy facility does not preclude the ability of future mining on site, and WECS are generally considered a compatible land use adjacent to a surface mine.

Therefore, no new or more severe impacts associated with mineral resources would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

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 Substantial Change from Previous Analysis. As previously discussed in the response provided in Section 2.12(a), neither construction nor operation of the Project would result in the loss of availability of a locally-important mineral resource recovery site.

Therefore, no new or more severe impacts associated with mineral resource recovery sites would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

Existing Mitigation Measures Applicable to Project

The WECS 20 FEIR did not include any mitigation measures related to mineral resources.

2.13 Noise

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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?	☐	☒	☐	☐

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
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?	☐	☐	☐	☒

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*) (as previously noted, as part of the reorganization of the Appendix G Environmental Checklist, the California Natural Resources Agency also updated some considerations or questions on the checklist. Fundamentally, the same questions are being asked by the Appendix G Environmental Checklist, albeit in a different—and sometimes streamlined—manner. While the updated questions may shift the order of impact analysis or adjust the focus of the inquiry, these updates do not significantly alter the significance conclusions listed below):

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (*Less-Than-Significant Impact*)

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? (*Less-Than-Significant Impact With Mitigation Incorporated*)

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? (*Less-Than-Significant Impact With Mitigation Incorporated*)

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? (*Less-Than-Significant Impact With Mitigation Incorporated*)

e) Would the project be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? (*Less-Than-Significant Impact*)

f) Would the project be within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? (*No Impact*)

Project Significance Determination

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?

Potential for More Severe Impacts. Implementation of the Project would allow for taller turbine heights than those turbine heights analyzed in the WECS 20 FEIR. In addition, the Project would construct fewer new turbines compared to the previous project analyzed in the WECS 20 FEIR and would decommission and remove all of the 69 existing older on-site turbines, which is more than what was analyzed in the WECS 20 FEIR. Each of these proposed changes will need to be further analyzed in order to ensure that no new or more severe noise effects would occur as a result of the Project. As such, potential changes to noise-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

b) Would the project result ingeneration of excessive groundborne vibration or groundborne noise levels?

Potential for More Severe Impacts. Implementation of the Project would allow for taller turbine heights than those turbine heights analyzed in the WECS 20 FEIR. In addition, the Project would construct fewer new turbines compared to the previous project analyzed in the WECS 20 FEIR and would decommission and remove all of the 69 existing older on-site turbines, which is more than what was analyzed in the WECS 20 FEIR. Each of these proposed changes will need to be further analyzed in order to ensure that no new or more severe noise effects would occur as a result of the Project. As such, potential changes to noise-related impacts as disclosed in the WECS 20 FEIR are addressed in the Draft SEIR.

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 Substantial Change from Previous Analysis. Palm Springs International Airport is located approximately 8.5 miles southeast of the Project site and is closest public airport to the Project site (AirNav.com 2018). Given that there is considerable distance between the Project site and this airport, air traffic-related noise levels would be nominal.

Therefore, no new or more severe impacts associated with public airport noise would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR. (Note that the language changes between the 2008 CEQA Guidelines Appendix G Environmental Checklist and the 2018 Appendix G Environmental Checklist do not substantially alter the required noise analysis.)

2.14 Population and Housing

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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?	☐	☐	☐	☒

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*) (as previously noted, as part of the reorganization of the Appendix G Environmental Checklist, the California Natural Resources Agency also updated some considerations or questions on the checklist. Fundamentally, the same questions are being asked by the Appendix G Environmental Checklist, albeit in a different—and sometimes

streamlined—manner. While the updated questions may shift the order of impact analysis or adjust the focus of the inquiry, these updates do not significantly alter the significance conclusions listed below):

a) Would the project induce substantial 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)? (*Less-Than-Significant Impact*)

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? (*No Impact*)

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? (*No Impact*)

Project Significance Determination

a) Would the project 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)?

No Substantial Change from Previous Analysis. The Project would not include any permanent residential uses that would directly increase the housing supply and population. To operate the existing wind energy facilities, the Project Applicant and its affiliates employ approximately 10 people in the broader Project area. Once repowered, a similarly sized operations team would continue to work on the Project and Project site. No additional employees would be required.

Section 15126.2(d) of the CEQA Guidelines requires that a CEQA document discuss the ways in which a project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects that would remove obstacles to population growth or may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

The purpose of the Project is to transfer power generated by the new turbines to the regional electrical grid in support of the state's need for renewable energy to meet its RPS. The power generated would be added to the state's electricity grid with the intent that it would displace electricity and associated environmental impacts that would otherwise be produced by fossil-fuel power plants. The Project would supply energy to support existing demand and projected growth, which would otherwise be served from other sources, but would not foster new growth. As such, construction of the

infrastructure associated with the Project and the Project's operation would not indirectly encourage new development or induce population growth in the Project area.

Therefore, no new or more severe impacts associated with population growth would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

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

No Substantial Change from Previous Analysis. The Project site is currently developed with a wind energy facility. The Project site does not contain any residential uses. As such, no residences would be displaced as a result of the Project.

Therefore, no new or more severe impacts associated with the displacement of substantial numbers of existing housing would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

Existing Mitigation Measures Applicable to Project

The WECS 20 FEIR did not include any mitigation measures related to population and housing that would pertain to the Project.

2.15 Public Services

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
XV. 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:				
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*):

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? (*Less-Than-Significant Impact With Mitigation Incorporated*)

   ii. Police protection? (*Less-Than-Significant Impact With Mitigation Incorporated*)

   iii. Schools? (*Less-Than-Significant Impact With Mitigation Incorporated*)

   iv. Parks? (*Less-Than-Significant Impact*)

   v. Other public facilities? (*Less-Than-Significant Impact With Mitigation Incorporated*)

Project Significance Determination

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?

No Substantial Change from Previous Analysis. Fire protection is provided to the City by the Riverside County Fire Department. Riverside County Fire Department Fire Station No. 56 (Sky Valley Fire Station, 72985 Dillon Road) is the closest fire station to the Project site, located approximately 2.5 miles to the northeast. The Project site is already located within the service area of the Riverside County Fire Department.

The Project would neither directly nor indirectly induce population growth in the Project area. In addition, the Project site is already served by the Riverside County Fire Department, and the proposed land use would be identical to the existing land use. For these reasons, calls for service originating from the Project site are not expected to increase following implementation of the Project.

Notwithstanding, consistent with MM-PUB-85, the applicant would be required to submit any and all required impact fees to the City as part of building permit fees, which would help to offset any incremental impacts to fire services as result of the Project, as well as other development projects within the City.

Therefore, with incorporation of mitigation, no new or more severe impacts associated with fire protection facilities would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

ii) Police protection?

No Substantial Change from Previous Analysis. The City of Desert Hot Springs Police Department operates out of City's Civic Center (65950 Pierson Boulevard), which is located approximately 5.5 miles southwest of the Project site. The Project site is already located within the service area of the City of Desert Hot Springs Police Department.

The Project would neither directly nor indirectly induce population growth in the Project area. In addition, the Project site is already served by the Desert Hot Springs Police Department, and the proposed land use would be identical to the existing land use. For these reasons, calls for service originating from the Project site are not expected to increase following implementation of the Project.

Notwithstanding, consistent with MM-PUB-85, the applicant would be required to submit any and all required impact fees to the City as part of building permit fees, which would help to offset any incremental impacts to police services as result of the Project, as well as other development projects within the City.

Therefore, with incorporation of mitigation, no new or more severe impacts associated with police protection facilities would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

iii) Schools?

No Substantial Change from Previous Analysis. The Project would neither directly nor indirectly induce population growth in the Project area. As such, the Project

would not result in an increased the need for new or expanded schools facilities because the Project would not induce an increase in school-aged residents.

Nevertheless, consistent with MM-PUB-85, the applicant would be required to submit any and all required impact fees to the City as part of building permit fees, which would help to offset any incremental impacts to public facilities as result of both the Project and other development projects within the City.

Therefore, based on compliance with state law and MM-PUB-85, no new or more severe impacts associated with school facilities would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

iv) Parks?

No Substantial Change from Previous Analysis. The Project would neither directly nor indirectly induce population growth in the Project area. As such, the Project would not result in an increased use of park and recreational facilities.

Therefore, no new or more severe impacts associated with the use or expansion of existing, as well as the construction of new, park and recreational facilities would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

v) Other public facilities, including library services?

No Substantial Change from Previous Analysis. The Project would neither directly nor indirectly induce population growth in the Project area. As such, the Project would not result in an increased patronage of other public facilities, including library branches.

Nevertheless, consistent with MM-PUB-85, consistent with MM-PUB-85, the applicant would be required to submit any and all required impact fees to the City as part of building permit fees, which would help to offset any incremental impacts to public facilities as result of both the Project and other development projects within the City.

Therefore, based on compliance with state law and MM-PUB-85, no new or more severe impacts associated with libraries would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

Existing Mitigation Measures Applicable to Project

The Project would be required to comply with the following applicable public services mitigation measures adopted by the City of Desert Hot Springs as part of the WECS 20 FEIR:

MM-PUB-85 The Project applicant will submit any and all required impact fees to the City, which may include but are not limited to the fire facilities impact fee, the police facilities impact fee, the general facilities impact fee, and the storm drain impact fee, as part of building permit fees.

2.16 Recreation

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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?	☐	☐	☐	☒

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*):

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? (*Less-Than-Significant Impact*)

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? (*Less-Than-Significant Impact*)

Project Significance Determination

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 Substantial Change from Previous Analysis. The Project would neither directly nor indirectly induce population growth in the Project area. Given that the Project would not increase the number of residents in the City, it follows that the Project would not result in an increased use, and subsequently an increase deterioration, of existing park and recreational facilities.

Therefore, no new or more severe impacts associated with the use of park and recreational facilities would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

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 Substantial Change from Previous Analysis. The Project does not include recreational facilities or require the construction or expansion of recreational facilities. Additionally, given that the Project would not induce population growth in the Project area, it follows that neither the construction of new or the expansion of existing recreational facilities are required as a result of the Project.

Therefore, no new or more severe impacts associated with the expansion of existing, as well as the construction of new, park and recreational facilities would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

Existing Mitigation Measures Applicable to Project

The WECS 20 FEIR did not include any mitigation measures related to recreation.

2.17 Transportation

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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) Conflict or be inconsistent with CEQA Guidelines Sections 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?	☐	☐	☐	☒

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*) (as previously noted, as part of the reorganization of the Appendix G Environmental Checklist, the California Natural Resources Agency also updated some considerations or questions on the checklist. Fundamentally, the same questions are being asked by the Appendix G Environmental Checklist, albeit in a different—and sometimes streamlined—manner. While the updated questions may shift the order of impact analysis or adjust the focus of the inquiry, these updates do not significantly alter the significance conclusions listed below):

a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? (*Less-Than-Significant Impact With Mitigation Incorporated*)

b) Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? (*Less-Than-Significant Impact With Mitigation Incorporated*)

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? (*Less-Than-Significant Impact)*

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (*Less-Than-Significant Impact*)

e) Would the project result in inadequate emergency access? (*No Impact*)

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? (*Less-Than-Significant Impact*)

Project Significance Determination

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

No Substantial Change from Previous Analysis. The proposed access route to the Project site is currently used by O&M personnel for the existing on-site wind energy operations. The Project site would be accessed from SR-62 at Dillon Road, continuing westerly to Seeley Street, traveling north on Seeley Street to 16th Avenue, continuing west on 16th Avenue to Windhaven Road, then traveling north on Windhaven Road to the Project's private access road, which leads northeast to the site.

An increase in traffic to and from the site during the construction phase of the Project would occur. According to the WECS 20 FEIR, the current average daily trips along the access route has not been established; however, by observation, it appeared low, and any short-term increase in average daily trips along the access route due to construction traffic would have little impact on the ability of the access road system to handle the traffic load, as the volume-to-capacity ratio on these roads would remain very small.

Parking capacity would not be affected by Project traffic, since vehicles used in the construction, operation, and maintenance of the Project would park on private property. Some parking along access roads may occur to allow for the adjustment of delivery loads; however, this would not be the norm, and each occurrence should have little impact on local traffic.

The Project area is not located in close proximity to other office uses, employment centers, and existing and future residential sites. Thus, the opportunities for alternative transportation, including transit, bicycle, and pedestrian facilities, in the area are limited. Moreover, the Project would not include any off-site improvements that would impede or interfere with any existing or future alternative transit facilities located or planned in the Project area and beyond.

Consistent with MM-TRA-86 and MM-TRA-87, prior to issuance of grading permits, a traffic plan to minimize traffic flow interference from construction activities would be submitted by the Project Applicant for review and approval to the City Engineer. This construction traffic plan would include measures designed to reduce the impact of temporary construction traffic and any necessary lane or street closures. Such measures may include but are not limited to providing early notification of closures to the fire and police services, residents, and nearby businesses; the use of signage before and during

construction activities that clearly delineates detour routes around the lane and street closures; and flaggers to direct traffic in the vicinity of the closure.

Therefore, with incorporation of mitigation, no new or more severe impacts associated with transportation and traffic would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

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

No Substantial Change from Previous Analysis. CEQA Guidelines Section 15064.3(b) focuses on newly adopted criteria (vehicle miles traveled (VMT)) for determining the significance of transportation impacts. The County of Riverside and City of Desert Hot Springs have not yet adopted local VMT criteria. This threshold is not required until new significance criteria have been adopted or July 1, 2020, whichever is sooner. Therefore, a VMT analysis for the Project is not applicable and has not been prepared at this time.

As previously discussed in the response provided in Section 2.17(a), neither construction nor operation of the Project would conflict with any intersection or roadway segment identified in the County's congestion management program.

Consistent with MM-TRA-86 and MM-TRA-87, prior to issuance of grading permits, a traffic plan to minimize traffic flow interference from construction activities would be submitted by the Project Applicant for review and approval to the City Engineer. This construction traffic plan would include measures designed to reduce the impact of temporary construction traffic and any necessary lane or street closures. Such measures may include but are not limited to providing early notification of closures to the fire and police services, residents, and nearby businesses; the use of signage before and during construction activities that clearly delineates detour routes around the lane and street closures; and flaggers to direct traffic in the vicinity of the closure.

Therefore, with incorporation of mitigation, no new or more severe impacts associated with roadway facilities identified in the congestion management program would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

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)?

No Substantial Change from Previous Analysis. Where feasible, the existing network of permanent access roads would be retained and reused for the Project. In addition to the existing roads, new segments of permanent maintenance roads would be constructed to provide access and circulation within the Project. Access roads would incorporate applicable federal and local standards regarding internal road design and circulation. As such, the construction of the access and maintenance roads would not increase hazards due to design features.

Further, implementation of MM-TRA-86 and MM-TRA-87 would address the introduction of potentially incompatible uses (i.e., oversized construction truck traffic). The construction traffic plan would include measures designed to reduce the impact of temporary construction traffic, including oversized loads, and any necessary lane or street closure.

Therefore, with incorporation of mitigation, no new or more severe impacts associated with hazardous Project design features would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

d) Would the project result in inadequate emergency access?

No Substantial Change from Previous Analysis. The Project would not alter emergency access onto the Project site. Where feasible, the existing network of permanent access roads would be retained and reused for the Project. In addition to the existing roads, new segments of permanent maintenance roads would be constructed to provide access and circulation within the Project. Access roads would consist of approximately 16-foot wide permanent roads to provide access to each wind turbine and ancillary equipment. These same permanent access roads would be used during construction, although the width of these roads may be temporarily increased to up to approximately 36 feet wide to accommodate cranes and larger construction equipment. New permanent access road layout would incorporate applicable federal and local standards regarding internal road design and circulation, particularly those provisions related to emergency vehicle access.

Therefore, no new or more severe impacts associated with emergency access would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR.

No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

Existing Mitigation Measures Applicable to Project

The Project would be required to comply with the following applicable transportation and traffic mitigation measures adopted by the City of Desert Hot Springs as part of the WECS 20 FEIR:

MM-TRA-86 Prior to issuance of grading permits, a traffic plan to minimize traffic flow interference from construction activities shall be submitted for review and approval to the City Engineer.

MM-TRA-87 Project construction, operation, and maintenance activities will adhere to the recommendations described in the Energy Unlimited, Incorporated WECS 20 Wind Park Revised Permit Application Offsite Road and Traffic Impact Plan, prepared by Krieger & Stewart.

2.18 Tribal Cultural Resources

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☒	☐	☐	☐

Previous Significance Determination

The Tribal Cultural Resources section of the CEQA Guidelines Appendix G Environmental Checklist was not added until 2017, following certification of the WECS 20 FEIR by the City; thus, no significance determination was made.

Project Significance Determination

a) 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:

i) 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)?

Potential for More Severe Impacts. The change in the number of new turbines compared with the previous project analyzed in the WECS 20 FEIR, as well as the change in the number of existing turbines to be decommissioned, will result in a change in both temporary and permanent footprint that will be affected by Project construction and operations. This change in impacted footprint could result in an increase in the amount of Project activities that need to occur within areas that are potentially sensitive tribal cultural resources. Therefore, tribal cultural resources–related impacts are addressed in the Draft SEIR.

ii) 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potential for More Severe Impacts. The change in the number of new turbines compared with the previous project analyzed in the WECS 20 FEIR, as well as the change in the number of existing turbines to be decommissioned, will result in a change in both temporary and permanent footprint that will be affected by Project construction and operations. This change in impacted footprint could result in an increase in the amount of Project activities that need to occur within

areas that are potentially sensitive tribal cultural resources. Therefore, tribal cultural resources–related impacts are addressed in the Draft SEIR.

2.19 Utilities and Service Systems

	Potential for New Significant Impact	Potential for More Severe Impacts	New Ability to Substantially Reduce Significant Impact	No Substantial Change from Previous Analysis
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 storm water drainage, electric power, natural gas, or telecommunications 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?	☐	☐	☐	☒
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??	☐	☐	☐	☒
g) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Previous Significance Determination

The WECS 20 FEIR determined that development would result in the following impacts (impact significance determination listed in *italics*) (as previously noted, as part of the reorganization of the Appendix G Environmental Checklist, the California Natural Resources Agency also updated some considerations or questions on the checklist. Fundamentally, the same questions are being asked by the Appendix G Environmental Checklist, albeit in a different—and sometimes streamlined—manner. While the updated questions may shift the order of impact analysis or adjust the focus of the inquiry, these updates do not significantly alter the significance conclusions listed below):

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? (*Less-Than-Significant Impact*)

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (*Less-Than-Significant Impact*)

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (*Less-Than-Significant Impact*)

d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? (*Less-Than-Significant Impact*)

e) Would the project 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? (*Less-Than-Significant Impact*)

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? (*Less-Than-Significant Impact With Mitigation Incorporated*)

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste? (*Less-Than-Significant Impact With Mitigation Incorporated*)

Project Significance Determination

a) Would the project require or result in the relocation or construction of new or expanded water, or wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects?

Wastewater Treatment Facilities and Capacities

No Substantial Change from Previous Analysis. The Project would not generate wastewater that would be treated by public wastewater treatment facilities. Portable restroom facilities would be used during construction and operation of the Project in accordance with County regulations. The Project would not necessitate connection to the municipal sewer system, and no off-site wastewater treatment would be required.

Therefore, no new or more severe impacts associated with the wastewater treatment facilities, would occur, and the level of impact would not change from the level identified in the WECS

20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

Water Treatment Facilities and Supplies

No Substantial Change from Previous Analysis. MSWD provides domestic water services to the City of Desert Hot Springs, including the Project site, primarily utilizing groundwater from the Mission Creek Sub basin (MSWD 2018). The Mission Creek sub-basin is naturally recharged by surface and subsurface flows from natural sources (i.e., precipitation and runoff) from the San Bernardino and Little San Bernardino Mountains. Estimates of natural sources of recharge have ranged from 6,000 to 9,000 acre-feet per year. Based on state and federal analysis the Mission Creel Sub basin has a storage capacity of approximately 2.6 million acre-feet (City of Desert Hot Springs 2000).

O&M activities would not involve regular or continuous use. With respect to construction and decommissioning, water usage would include periodic application of water for dust control purposes, consistent with SCAQMD regulations. Because dust control is necessary during windy and dry periods to prevent wind erosion and dust plumes, water would be applied in sufficient quantities to wet the soil, but not so excessively.

The Project would not require the extension of water lines and would not result in new construction or expansion of existing water treatment facilities. Water used on the Project site would be brought in by truck, and thus, would not require the construction of a new water facility.

Therefore, no new or more severe impacts associated with the water treatment requirements or facilities, capacities, or supplies would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

Stormwater Drainage Facilities

No Substantial Change from Previous Analysis. As discussed in Section 2.10, Hydrology and Water Quality, the Project would not result in conditions that would substantially increase the amount of stormwater conveyed off site such that new stormwater drainage facilities would be required. In addition, consistent with MM-HYD-77, preparation of a hydrology study, drainage plan, and erosion control plan are required. As such, a hydrology study, drainage plan, and erosion control plan will be prepared for the project and submitted to the City for review and approval. Project construction may involve the use of stormwater BMPs, such as straw wattles, mulch, and

gravel bags, to minimize stormwater runoff. However, these BMPS would be temporary and would not cause adverse environmental effects.

Therefore, no new or more severe impacts associated with stormwater drainage facilities would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the Draft SEIR.

Electric Power, Natural Gas, and Telecommunications Facilities

No Impact. The Project would not involve the use of electric power or natural gas, and as such, would not result in the construction or expansion of electric power and natural gas facilities. The Project would involve the installation of fiber-optic cables for wind turbine generator management and control, but these cables would be installed within trenches located within existing Project access roads in compliance with the Project-specific erosion control plan that will be prepared for the Project and submitted to the City for review and approval. As such, the installation of telecommunication facilities would not result in significant environmental effects.

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?

No Substantial Change from Previous Analysis. O&M activities would not involve regular or continuous use. With respect to construction and decommissioning, water usage would include periodic application of water for dust control purposes, consistent with SCAQMD regulations. Because dust control is necessary during windy and dry periods to prevent wind erosion and dust plumes, water would be applied in sufficient quantities to wet the soil, but not so excessively.

The Project would not require the extension of water lines and would not result in new construction or expansion of existing water treatment facilities. Water used on the Project site would be brought in by truck, and thus, would not require the construction of a new water facility.

Therefore, no new or more severe impacts associated with the water supplies would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

c) Would the project 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?

No Substantial Change from Previous Analysis. The Project would not generate wastewater that would be treated by public wastewater treatment facilities. Portable restroom facilities would be used during construction and operation of the Project in accordance with County regulations. The Project would not necessitate connection to the municipal sewer system, and no off-site wastewater treatment would be required.

Therefore, no new or more severe impacts associated with the wastewater treatment capacities would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

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 Substantial Change from Previous Analysis. Before starting Project construction, the existing wind turbines would be decommissioned, and some solid waste, such as wood, metal, concrete, etc. would be generated by Project construction. As required by Section 8.08.040, Diversion Requirements, of the Desert Hot Springs Municipal Code, at least 50% of all construction waste must be recovered and salvaged as designated recyclable and reusable materials (City of Desert Hot Springs 2017b). As such, a majority of demolition debris generated during demolition activities would be diverted from the landfill.

Solid waste that cannot be diverted in Coachella Valley communities are taken to the landfills operated by Riverside County. Based on proximity to the Project site, the solid waste generated by the Project would likely be disposed of at the Lamb Canyon Landfill or the Badlands Landfill, located approximately 22 miles and 29 miles east of the Project site, respectively. The Lamb Canyon Landfill has a maximum permitted throughput of 5,500 tons/day and is anticipated to operate until 2029 (CalRecycle 2018a). The Badlands Landfill has a maximum permitted throughput of 4,800 tons/day and is anticipated to operate until 2022 (CalRecycle 2018b). Additionally, any hazardous materials found within the existing building would be removed, transported, and disposed of according to all applicable laws and regulations.

Therefore, no new or more severe impacts associated with the solid waste generation would occur, and the level of impact would not change from the level identified in the

WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Substantial Change from Previous Analysis. The Project would comply with all applicable federal, state, and local agency regulations related to solid waste. In conjunction with the building permit application fees, the Project Applicant would complete a construction and demolition waste plan pursuant to Section 8.08.070 of the City's Municipal Code (City of Desert Hot Springs 2017b). Thus, the City would evaluate the Project for compliance with all applicable provisions, ensuring that any potentially significant impacts or inconsistencies are satisfactorily mitigated and resolved. Once operational, the Project would not result in any substantial solid waste disposal needs.

Overall, the Project would be required to comply with all solid waste statutes regulating solid waste, consistent with MM-UTL-88. Therefore, no new or more severe impacts associated with the solid waste regulations would occur, and the level of impact would not change from the level identified in the WECS 20 FEIR. No new mitigation measures are required, no revisions to the WECS 20 FEIR are necessary, and this issue is not evaluated in the SEIR.

Existing Mitigation Measures Applicable to Project

The Project would be required to comply with the following applicable utilities and service systems mitigation measures adopted by the City of Desert Hot Springs as part of the WECS 20 FEIR:

MM-UTL-88 All solid waste generated during Project construction would be disposed of in compliance with all State, Federal, and local statutes regulating solid waste (as set forth in City Ordinance No. 2005-14).

2.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Previous Significance Determination

The Wildfire section of the CEQA Guidelines Appendix G Environmental Checklist was not added until 2018, following certification of the WECS 20 FEIR by the City; thus, no significance determination was previously made.

Project Significance Determination

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The California Department of Forestry and Fire Protection's Very High Fire Hazard Severity Zones in LRA map does not identify the Project site as being located in an area susceptible to high fire hazard dangers (CAL FIRE 2009). Therefore, impacts associated with impairing an adopted emergency response and evacuation plans would not occur.

b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, 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 California Department of Forestry and Fire Protection's Very High Fire Hazard Severity Zones in LRA map does not identify the Project site as being located in an area susceptible to high fire hazard dangers (CAL FIRE 2009). Therefore, no impact related to wildfire would occur.

c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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 California Department of Forestry and Fire Protection's Very High Fire Hazard Severity Zones in LRA map does not identify the Project site as being located in an area susceptible to high fire hazard dangers (CAL FIRE 2009). Therefore, impacts associated with installation or maintenance of associated infrastructure resulting in fire risk would not occur.

d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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 California Department of Forestry and Fire Protection's Very High Fire Hazard Severity Zones in LRA map does not identify the Project site as being located in an area susceptible to high fire hazard dangers (CAL FIRE 2009). Therefore, impacts associated with exposing people or structures to fire risks would not occur.

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