	INITIAL STUDY

Project Title:	Palm Springs Assisted Living Project	
Case No.	5.1237 – PDD/GPA	
Assessor's Parcel No.	505-265-004, 505-265-005, 505-265-006, 505-265-013, 505-265-014, 505-265-015, 505-265-016	
Lead Agency Name and Address:	City of Palm Springs 3200 E. Tahquitz Way Palm Springs, California 92262	
Project Location:	1000 North Palm Canyon Drive Palm Springs, CA 92262	
Project Sponsor's Name and Address:	Tappan Enterprises L.L.C.	22792 Center Drive Lake Forest, CA 92630
General Plan Designation(s):	NCC (Neighborhood/Community Commercial)	
Zoning:	C-1 (Central Retail Business), R-3 (Multi-family & Hotel)	
Contact Person:	Ken Lyon, Associate Planner	
Phone Number:	(760) 323-8245	
Date Prepared	April, 2010	

Description of the Project

The Project proposes an assisted living facility on 1.43 acres, located between Tachevah and Tamarisk, and extending between North Palm Canyon Drive and North Indian Canyon Drive. The proposed project will include 108 beds in 94 units, and proposes a three story, or thirty-four feet high building, constructed over a partially below ground parking structure, which will extend the overall height to 40 feet at the lowest point on the site. The first floor will contain a large meeting room, dining room and commercial kitchen, a clubroom, lounge areas, bistro, exercise room, beauty shop, theater, billiard room, approximately 1,200 square feet of ancillary retail uses, and general supporting offices and functions. The first floor will also contain 14 memory care living units with 18 beds. The second floor will contain 40 living units with 46 beds. The third floor will contain 40 living units with 44 beds and a library and lounge with upper exterior deck and western views. At the center of the property will be a pool and courtyard areas. The north and south areas of the property will be landscape and garden areas.

The Project proposes:

1. A three-story 94-unit/108-bed assisted living facility, to include 29,951 s.f ground floor interior building area, a 34,605 s.f. below-grade parking garage, a 31,448 s.f. second floor interior building area, and a 31,785 s.f. third floor interior building area. Total building square footage will be 93,184 on 1.43 acres.
2. A total of 77 parking spaces, of which 75 will be located in an underground parking structure.
3. Ingress for underground parking occurring from North Palm Canyon Drive.
4. Ingress and egress for underground parking occurring from North Indian Canyon Drive.
5. A loading dock, dumpsters and truck parking on the east side of the project, adjacent to North Indian Canyon Drive.
6. A ground level entry/drop-off area, located adjacent to North Palm Canyon Drive and covered porte-cochere.

The Project is not consistent with the General Plan land use designation of NCC (Neighborhood/Community Commercial) for this site, which does not allow residential uses, and will therefore require a General Plan Amendment, changing the land use designation to High Density Residential (HDR).

The project is zoned both C-1 (retail business) and R-3 (multi-family and hotel), with a resort combining overlay, and will require the approval of a Planned Development District. The Planned Development District has been requested to request variations to the City's zoning standards, including the density of the site, building height, and setbacks, and to establish permitted uses for the site.

Environmental Setting and Surrounding Land Uses

The proposed project site occurs in the north-central section of urban Palm Springs, in a neighborhood known as Uptown. The project site is currently vacant, but was previously developed. 1000 North Palm Canyon Drive was designated a Class 2 historic site (the former Potter Clinic). The structure was demolished in 2007 (please also see Cultural Resources, below). The site is surrounded by existing development, including:

North: Multi-tenant commercial
South: Canyon Club Hotel
East: North Indian Canyon Drive, apartment complex beyond
West: North Palm Canyon Drive, multi-tenant commercial beyond

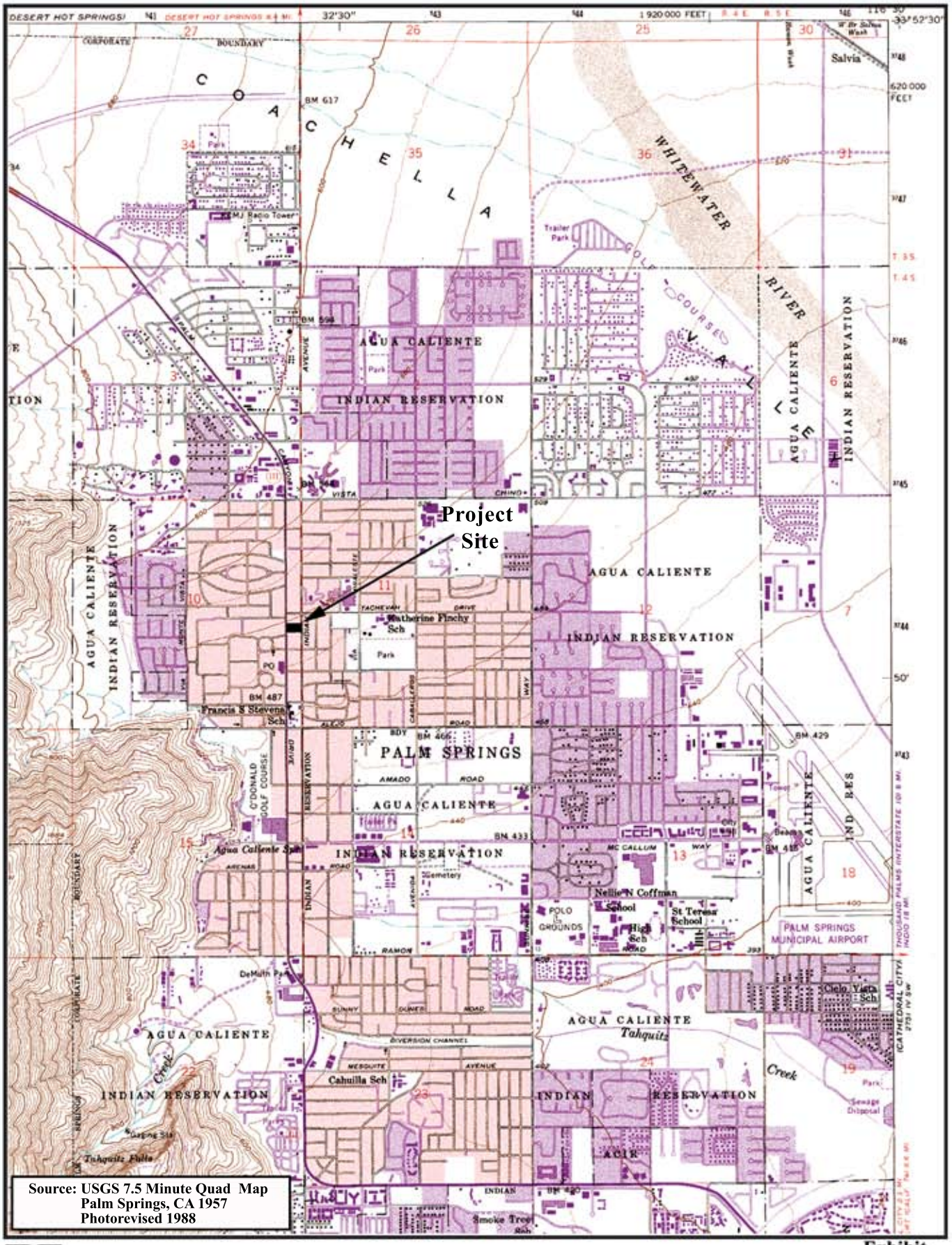
Other public agencies whose approval is required

Desert Water Agency

Environmental Factors Potentially Affected:

The environmental factors checked below would be potentially affected by this project, as indicated by the checklist and corresponding discussion on the following pages.

☐ Aesthetics	☐ Agricultural Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology/Soils
☐ Hazards & Hazardous Materials	☐ Hydrology/Water Quality	☐ Land Use/Planning
☐ Mineral Resources	☒ Noise	☐ Population/Housing
☐ Public Services	☐ Recreation	☐ Transportation/ Traffic
☐ Utilities/Service Systems	☐ Mandatory Findings of Significance	



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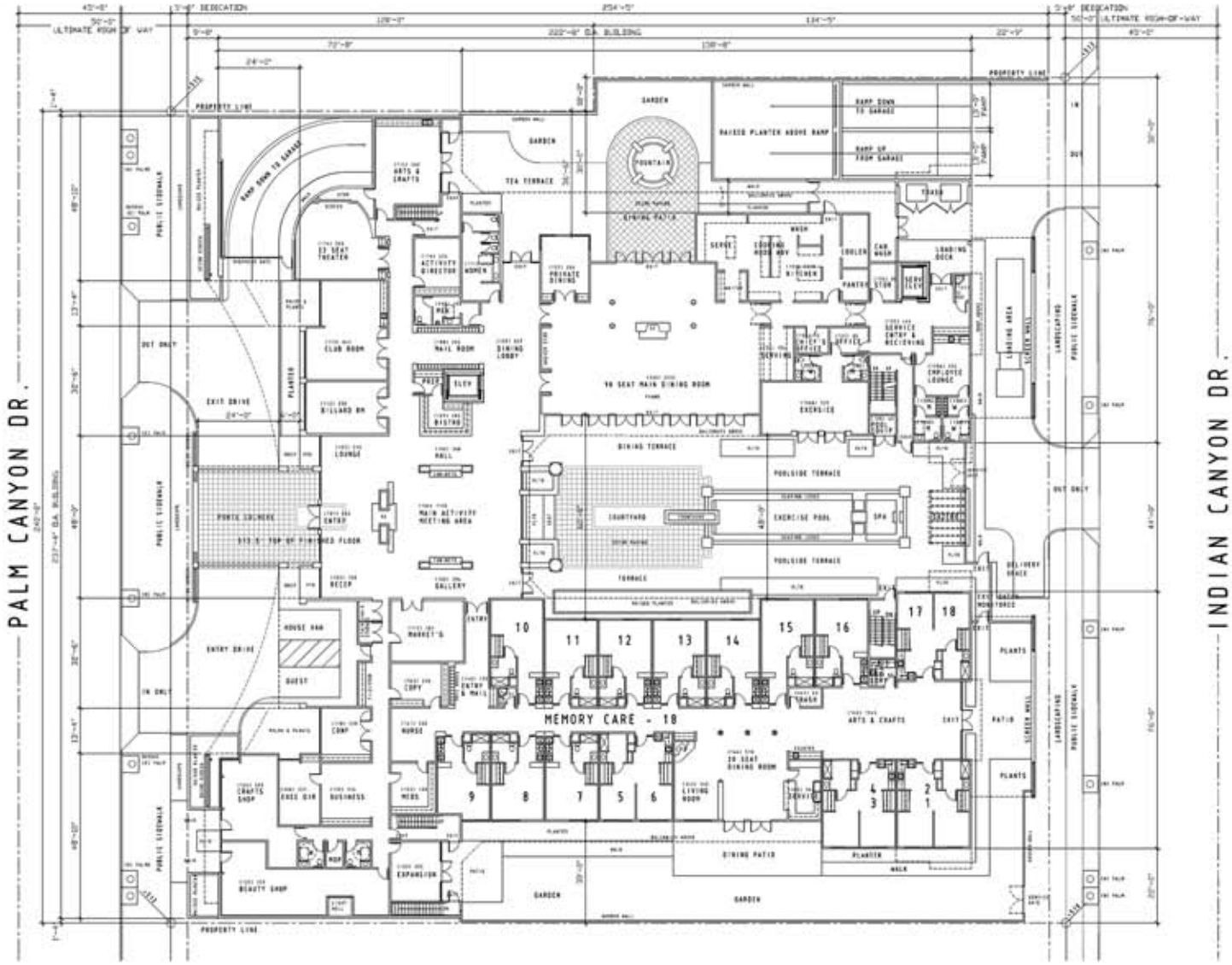
Legacy
Vicinity Map
Palm Springs, California

Exhibit
1



Source: Tappan Enterprises L.L.C.

TERRA NOVA®
Planning & Research, Inc.

Legacy
Site Plan
Palm Springs, California

Exhibit

2

DETERMINATION: The City of Palm Springs Planning Department

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Planner's Signature Date

Ken Lyon, Associate Planner

Edward Robertson, Principal Planner

PURPOSE OF THIS INITIAL STUDY

This Initial Study has been prepared consistent with CEQA Guidelines Section 15063, to determine if the proposed project, as proposed, may have a significant effect upon the environment. Based upon the findings contained within this report, the Initial Study will be used in support of the preparation of a Mitigated Negative Declaration.

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on project-specific screening analysis).
2) All answers must take into account the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4) "Negative Declaration: Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a) Earlier Analysis Used. Identify and state where they are available for review.
    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8) The explanation of each issue should identify:
    a) The significance criteria or threshold, if any, used to evaluate each question; and
    b) The mitigation measure identified, if any, to reduce the impacts to less than significance.

I. AESTHETICS Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Setting

The City of Palm Springs is located in the valley floor in the southwest corner of the Coachella Valley. The city is framed by views of the San Jacinto Mountains to the south, west, and partially to the east; by open desert and the City of Cathedral City to the east; and the Little San Bernardino Mountains to the north. These mountain ranges provide a dramatic backdrop that is visible from virtually any point in the City. The project site is located approximately .75 miles east of the San Jacinto Mountains viewshed, as delineated by the Palm Springs General Plan Environmental Impact Report (EIR)[1].

State Route 111 from Interstate 10 is the primary entryway to the City from the west and is a significant area viewpoint for both exposure and to the number of potential viewers. Highway 111 becomes Palm Canyon Drive from Tram Way to the eastern City limits. Other scenic resources in the City include the Whitewater wash on the northern and eastern border of the city, Chino, Tahquitz., and Andreas Canyons.

The visual character in the vicinity of the proposed project is consistent with a suburban downtown, consisting of one and two story structures, many abutting each other, and others with limited separation from side to side. Desert Medical Center occurs to the north and east of the site, and consists of three and four stories, and a bell-tower. Views in the area are limited from the street, but western views of the San Jacinto Mountains are possible from second floor vantage points.

Discussion of Impacts

a) ***Less Than Significant Impact.*** As described above, the project site is located in an urban environment, and consists of an infill lot. Views from surrounding properties are limited, insofar as the project site is small, and provides only a small break in the structures which occur on Palm Canyon Drive and Indian Canyon Drive. The construction of the proposed

[1] Aesthetic Resources Figure 5.23, Draft Environmental Impact Report, General Plan Update, July 1992

project will reduce this window somewhat, but will not significantly impact the views from the street level on either North Palm Canyon or North Indian Canyon. From second story locations to the east of Indian Canyon, views will not be significantly impacted, because distance will still allow views of the westerly mountains over the project. From properties to the west of the project site, no significant views currently occur, and therefore no views will be impacted. No views from properties to the north or south are currently possible, due to the existing structures adjacent to the project site. Overall, therefore, impacts associated with viewsheds will be less than significant.

b) ***Less Than Significant Impact.*** There are no structures, trees or historic structures on the project site. Both North Palm Canyon Drive and North Indian Canyon Drive are designated scenic corridors in the City, however the project will not significantly impact the views in the corridor in the project site, due to the current urban character of the vicinity. As with other structures in the area, the project structures will abut adjacent buildings to the north and south. As a result, impacts are expected to be less than significant.

c) ***No Impact.*** The proposed project will add a three story structure to an area which currently is characterized by one and two story buildings in an urban environment. Because of the partially-underground parking structure, the building height will extend to 40 feet from the street grade. The project will be reviewed based on the City's Highrise Zoning standards, which allows structures of up to 60 feet in height. The Planned Development Permit has been submitted to seek relief from some of these standards. The proposed project will consist of modern or contemporary architecture, consistent with that currently occurring in the area. The proposed project will not significantly impact the visual character of Uptown.

d) ***Less Than Significant Impact.*** The development of the site will marginally increase lighting levels in the area, due primarily to outdoor architectural lighting on the building facades. Traffic generated by the facility will also increase lighting levels in the area marginally. The Uptown area is currently impacted by lighting from these two sources generated by projects surrounding the site. The addition of project lighting is therefore not expected to significantly impact lighting in the area. Further, the project will be required to comply with Zoning Ordinance Section 93.21.00, Outdoor Lighting Standards. These standards are designed to minimize off-site impacts of project lighting, and will assure that impacts associated with light and glare as a result of the development of the site will be less than significant.

II. AGRICULTURAL 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 Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland.

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Setting

The City of Palm Springs is located in a desert environment. Soils are characterized as sandy and rocky. The soil type that underlies the project site is Myoma fine sand (MaB), typical of the alluvial fans which occur in the City. There is no agricultural activity in the City, nor are properties in the City designated by the State as agriculturally significant.

a) ***No Impact.*** The Farmland Mapping and Monitoring Program of the California Resources Agency has not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance in the City. No impact to farmland would occur.

b) ***No Impact.*** The proposed project site is not located on lands zoned for agriculture and is not covered by a Williamson Act contract. Furthermore, no Williamson Act contracts are located in the immediate vicinity of the project site. The Zoning Ordinance does not include agricultural zones. The project site is located in the City's urban core. No impacts to agriculturally zoned property would occur.

c) ***No Impact.*** The proposed project is located in the City's urban core, far (20-35 miles) from agricultural activity. Implementation of the proposed project would therefore not result in conversion of farmland to non-agricultural uses. No Impacts to conversion of agricultural land will occur.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Result in significant construction-related air quality impacts?	☐	☐	☒	☐
e) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
f) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒
g) Generate greenhouse gas emissions either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
h) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Setting

The City of Palm Springs is located in the Coachella Valley, a low desert environment. Palm Spring's climate is characterized by low annual rainfall (2 to 6 inches per year) and low humidity, with temperatures ranging from 80° F to 108 ° F in July and 40° F to 57° F in January. The project City is located in the Salton Sea Air Basin which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

The SCAQMD maintains air quality monitoring stations at various locations throughout its jurisdiction, including two stations in the Coachella Valley. The stations monitor criteria pollutants

ozone, nitrogen dioxide, carbon monoxide, particulate matter under 10 microns (PM_{10}) and fine particulate matter 2.5 microns in size ($PM_{2.5}$). Criteria air pollutants are contaminants for which state and federal air quality standards have been established. They are shown in Table III-1. The Coachella Valley is currently in non-attainment for ozone and particulate matter.

TABLE III-1
FEDERAL AND STATE AMBIENT AIR QUALITY STANDARDS

Pollutant	AVERAGING TIME	Federal Primary Standard	State Standard
Ozone (O_3)	1-Hour 8-Hour	0.12 ppm 0.08 ppm	0.09 PPM --
Carbon Monoxide (CO)	8-Hour 1-Hour	9.0 ppm 35.0 ppm	9.0 ppm 20.0 ppm
Nitrogen Oxide (NO_x)	Annual 1-Hour	0.05 ppm --	-- 0.25 ppm
Sulfur Dioxide (SO_2)	Annual 24-Hour 1-Hour	0.03 ppm 0.14 ppm --	-- 0.04 ppm 0.25 ppm
PM_{10}	Annual 24-Hour	50 □g/m³ 150 □g/m³	30 □g/m³ 50 □g/m³
PM $_{2.5}$	Annual 24-Hour	15 □g/m³ 65 □g/m³	-- --
Lead	30-Day Avg. Month Avg.	-- 1.5 □g/m³	1.5 □g/m³ --

Source: California Air Resources Board, "Ambient Air Quality Standards," July 9, 2003.
ppm = parts per million
□g/m3 = Micrograms per Cubic Meter

Development within the City is governed by the 2007 Air Quality Management Plan (2007 AQMP) and the 2002 Coachella Valley PM_{10} State Implementation Plan (CVPM10 SIP). The AQMP sets forth a comprehensive program to bring Palm Springs and the other areas ion the region into compliance with federal and State air quality standards. CEQA requires that projects be consistent with the applicable AQMP.

The SCAQMD has also daily significance thresholds for operational and construction-related emissions a shown in Table III-2.

TABLE III-2
EMISSIONS SIGNIFICANCE THRESHOLD CRITERIA (POUNDS/DAY)

Pollutant	CO	ROG	NO_x	SO_x	PM_{10}
Operational Emissions					
Pounds/Day	550	150	100	75	150
Construction Emissions					
Pounds/Day	550	75	100	150	150

Source: SCQAMD, CEQA Air Quality Handbook, November 1993
Projects in the Coachella Valley with peak (highest daily) operation-related emissions that exceed any of these emissions thresholds should be considered significant.

Greenhouse Gases (GHGs)

The Global Warming Solutions Act (AB 32) requires the state to cut GHG emission to 1990 levels by the year 2020. Therefore, the project would have significant impacts to air quality if GHG's emitted by the project interfere with the ability of AB 32 to achieve the intended reductions by 2020. In addition, the Project will be considered to have a less than significant impact on global climate change on a cumulative basis if the Project is consistent with emission reduction strategies included in local, regional, or statewide planning documents and from reputable published sources such as the California Climate Action Team's (CAT) Report to the Governor, CARB Early Action Measures, and OPR's June 19, 2008 Technical Advisory Memorandum.

The Air Resources Board (ARB), Environmental Protection Agency (EPA), and other regulatory agencies have not adopted thresholds to analyze project level impacts on climate change. It should be noted that on October 24, 2008 CARB released the "Preliminary Draft Staff Proposal for Setting Interim Significance Thresholds." In the absence of adopted CEQA thresholds for emissions of greenhouse gases, impacts would be considered significant if it were determined that the project interferes with the goals of AB 32.

a) ***Less than Significant Impact.*** The proposed project is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Development at the project site will be governed by the 2007 Air Quality Management Plan (2007 AQMP) and the 2002 Coachella Valley PM_{10} State Implementation Plan ($CVPM_{10}$ SIP). SCAQMD based its plans on City General Plan designations and the emissions expected based on the type of land use planned for any given site. The proposed project will result in lower trips generation than the equivalent commercial development on the site. Therefore, the proposed project will not significantly impact air quality management planning.

b-d) ***Less than Significant Impact.*** The proposed project will result in emissions of air pollutants during the construction phase (short term), and during the project life (long term). Each of these potential impacts is addressed below.

Grading and Construction Emissions

The project site will require grading, in order to excavate for the parking garage, and will generate construction activities, both of which will generate air emissions.

The grading process will generate less than significant air emissions from fugitive dust, as shown in Table III-3. The SCAQMD threshold of significance for fugitive dust is 150 pounds per day. The project will emit 12.3 pounds per day, resulting in less than significant impacts.

Table III-3
Fugitive Dust Potential
(pounds per day)

Total Acres to be Disturbed at Buildout*	Factor (lbs./day/acre)	Total Potential Dust Generation (lbs./day)
1.4	8.81	12.3

Source: Table A9-9, "CEQA Air Quality Handbook," prepared by South Coast Air Quality Management District, April 1993.

Project grading will also require heavy equipment. Table III-4 summarizes the emissions which can be expected as a result of the use of this equipment, and the worker trips for those operating the equipment. As shown in the Table, grading activities will not exceed SCAQMD thresholds of significance.

Table III-4
Grading - Related Exhaust Emissions Summary
(pounds per day)

	CO	NOx	ROG	SOx	PM_{10}	$PM_{2.5}$	CO_2
Equipment Emissions	37.78	78.23	10.61	0.10	3.51	3.13	7,204.80
Workers' Vehicle Emissions	5.89	4.62	0.77	0.01	0.19	0.15	986.29
Total Construction Emissions	**43.68**	**82.84**	**11.38**	**0.11**	**3.70**	**3.28**	**8,191.09**
SCAQMD Thresholds of Significance	**550.00**	**100.00**	**75.00**	**150.00**	**150.00**	**55.00**	**N/A**

Construction activities will also result in air emissions. Table III-5 summarizes the potential emissions associated with construction activities. As shown in the Table, emissions will be less than the SCAQMD thresholds, and impacts as a result will be less than significant.

Table III-5
Aggregate Construction - Related Emissions Summary
(pounds per day)

	CO	NOx	ROG	SOx	PM10	PM2.5	CO2
Equipment Emissions	21.26	37.70	5.36	0.05	2.27	2.02	4,320.00
Workers' Vehicle Emissions	17.33	13.58	2.28	0.03	0.55	0.46	2,900.86
Asphalt Paving Emissions	-	-	0.26	-	-	-	-
Architectural Coatings Emissions	-	-	46.25	-	-	-	-
Total Construction Emissions	**38.59**	**51.28**	**54.15**	**0.08**	**2.83**	**2.48**	**7,220.86**
SCAQMD Thresholds of Significance	**550.00**	**100.00**	**75.00**	**150.00**	**150.00**	**55.00**	**N/A**

Finally, during the life of the project, air emissions will result from the production of electricity and natural gas, and the operation of vehicles to and from the site. Table III-6 illustrates the emissions that these activities will generate. As shown in the Table, the proposed project will not exceed thresholds of significance established by the SCAQMD, and impacts will be less than significant.

Table III-6
Anticipated Cumulative Daily Project-Related Emissions at Project Buildout

	Stationary Source Emissions		Moving Source Emissions	Total Anticipated Emissions (lbs./day)	SCAQMD Threshold Criteria* (lbs./day)
	Power Plants	Nat. Gas Consumption			
Carbon Monoxide	0.3	7.5	10.20	**18.03**	**550.0**
Nitrogen Oxides	1.7	30.2	1.36	**33.19**	**100.0**
Reactive Organic Gases	0.2	0.7	1.14	**1.98**	**75.0**
Sulfur Oxides	0.1	Negligible	0.02	**0.08**	**150.0**
Particulates	0.0	0.1	0.29	**0.38**	**55.0**
Carbon Dioxide	-	-	1,986.41	**1,986.41**	N/A

* Threshold criteria offered by the South Coast Air Quality Management District for assistance in determining the significance of air quality impacts. Source: "CEQA Air Quality Handbook," prepared by South Coast Air Quality Management District, April 1993, Revised October 2006.

Conclusion

As shown above, the proposed project will have less than significant impacts to air quality during grading, construction and operational phases. Overall impacts associated with air quality are therefore expected to be less than significant.

e-f) ***No Impact.*** The proposed project will provide interior living spaces, and protected outdoor areas for senior living. The project will not expose its residents to significant pollutant concentrations, particularly since the area's roadways operate at acceptable levels of service; nor will it result in objectionable odors.

g-h) ***Less Than Significant Impact.*** The proposed project will also generate GHGs during construction and operation. As described in the Tables above, the project will generate 8,191.09 pounds per day of carbon dioxide during grading. It is estimated that grading will occur for a period of approximately 30 days. As a result, the project will generate 245,732.7 pounds of carbon dioxide, or 122.85 metric tons. During the construction process, the project has the potential to generate 7,220.86 pounds per day of carbon dioxide. It is estimated that the construction process will take approximately 260 days (12 months). As a result, the project will generate 1,877,423.6 pounds of carbon dioxide, or 938.7 metric tons. During the life of the project, there will be 1,986.41 of carbon dioxide emitted per day, or 326.27 metric tons annually. The project represents an infill project in an urban area, providing residents with close proximity to services and retailers, thereby generating fewer vehicle trips, and vehicle miles traveled. The project has been designed to comply with all feasible and applicable measures as identified by the California Attorney General's Office and the California Action Team, and will be required to meet the City's green building requirements where they apply. The project is consistent with the goals and objectives of the emission reduction targets of AB32.

Therefore, the project will not result in significant emissions of greenhouse gases, and impacts associated with GHGs will be less than significant.

IV. BIOLOGICAL RESOURCES **Would the project:**	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c) 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Setting

The proposed project occurs in the north-central portion of the City's urban area and proposes the redevelopment of lands that are currently vacant but have been previously developed. There are no native plant communities occurring on the project site. The surrounding lands include primarily non-native ornamental plantings.

Discussion of Impacts

a) ***No Impact.*** The project area has been previously developed and its vicinity is fully developed. No sensitive species are expected to occur within the project boundary. The proposed project will result in temporary and permanent disturbance to land that has already been significantly impacted and does not serve as viable habitat for species. Therefore, development of the project will not impact sensitive species of plants, or animals, or natural communities and no mitigation measures will be required.

b) ***No Impact.*** There is no riparian habitat on the site.

c) ***No Impact.*** No wetlands occur on the property.

d) ***No Impact.*** The project site surrounded by roadways and commercial development, and does not have potential as a migratory corridor or provide habitat for migratory species.

e) ***No Impact.*** The proposed project will not interfere with any City policies regarding the preservation of plants or animals.

f) ***No Impact.*** The site is not identified as a conservation area in the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP); however, the County of Riverside and all participating cities, including the City of Palm Springs, are required to implement a Local Development Mitigation Fee (LDMF) within the CVMSHCP plan area. The project proponent will be required to contribute the required mitigation fee in order to comply with the Plan. The payment of the fee is intended to represent the project's fair share of the funds needed to preserve habitat for sensitive species at designated conservation areas.

V. CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Setting

The project site is located immediately north of the City's urban core. The site was previously developed, and is surrounded by existing commercial development and City roadways. The potential for archaeological resources is therefore low. The City includes a number of historic buildings, particularly those associated with mid-Century Modern architecture. There are no listed structures on or adjacent to the project site. However, the City designated the property a Class 2 historic site in 2007 (former Potter Clinic). Class 2 designation does not require the preservation or restoration of the structure, and it was demolished by the owner in 2007.

The City occurs well outside the boundary of ancient Lake Cahuilla, an area where paleontological resources have occurred. Further, soils in the City are generally post-Pleistocene age alluvium from the surrounding mountains, too new in the context of paleontology to yield fossilized remains.

Discussion of Impacts

a-b) ***No Impact.*** The project site was disturbed by previous development that included excavation, grading, and other construction activities, which significantly impacted the ground below these structures. The City designated the property a Class 2 historic site in 2007 (former Potter Clinic). Class 2 designation does not require the preservation or restoration of the structure, and it was demolished by the owner in 2007. It is currently vacant, with no structures remaining on any portion of the site. No archaeological resources have been identified previously within or adjacent to the project area, and there is no evidence indicating the existence of archaeological resources onsite. No impacts to historic or archaeological resources are expected to occur as a result of build out of the proposed project. The proposed project is outside the boundary of the Las Palmas Historic District, which occurs approximately 300 feet south of the project site. The proposed project will have no impact on the District.

c) ***No Impact.*** The City and the project site are well outside the boundary of ancient Lake Cahuilla, an area where paleontological resources have occurred. Soils in the City are

generally post-Pleistocene age alluvium from the surrounding mountains, making them too young in the context of paleontology to yield fossilized remains.

d) ***No Impact.*** It is not anticipated that any human remains will be encountered during construction of the proposed project because the site and surrounding area have been previously disturbed to accommodate development. However, should any previously unidentified or unanticipated human remains be discovered during project construction, state law requires that law enforcement be contacted, and the remains removed in a prescribed manner. The project will be subject to these requirements.

VI. GEOLOGY AND SOILS **Would the project:**	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

Setting

The project site is located in a seismically active area. The San Andreas Fault zone is the major fault in the Coachella Valley. The project and its vicinity are not within or adjacent to any Alquist Priolo Fault Zones. The nearest fault zone is located north of Interstate 10, approximately 11 miles north of the project site.

The City's soils are generally composed of alluvial sediments ranging from sand and silty sand to large boulders. The area of the project site, and its surroundings, consist of developed sites with compacted fill.

Discussion of Impacts

a)

i) ***No Impact.*** This site is not within an Alquist-Priolo Fault Zone. Therefore, active fault rupture is unlikely to occur at the project site.

ii) ***Less than Significant Impact.*** High levels of ground shaking may occur during large magnitude earthquakes, particularly on the San Andreas Fault. All structures on the property will be subjected to this shaking, and could be seriously damaged if not properly designed. This potential impact will be reduced to a less than significant level through the structural design of all buildings consistent with the California Building Code. As a performance standard, the City shall require that the project be designed and constructed to conform to the California Building Code (CBC) requirements for Seismic Zone 4. This standard practice will assure that impacts associated with seismic ground shaking will be less than significant.

iii) ***No Impact.*** Liquefaction is the loss of soil strength from sudden shock (usually earthquake shaking), causing the soil to become a fluid mass. In general, for the effects of liquefaction to be manifested at the surface, groundwater levels must be within 50 feet of the ground surface and the soils within the saturated zone must also be susceptible to liquefaction. Although soils within the project site consist of fine-grained granular sediments, susceptibility to liquefaction at the project site is considered low, as groundwater depths are greater than 50 feet. The geotechnical investigation conducted for the proposed project identified groundwater levels at a depth of more than 200 feet[2]. As a result, no impacts associated with liquefaction are expected.

iv) ***No Impact.*** The City of Palm Springs General Plan indicates that potential landslide hazard is primarily located in hillsides or mountainous areas of the City. The project site occurs on the Valley floor, has been previously graded, and is generally flat. The site is surrounded on all sides by existing development and City streets. The foothills of the San Jacinto Mountains occur to the southwest and west of the project area, over .5 of a mile away. The potential for landslides does not occur on or adjacent to the site. No impact is expected.

b) ***Less than Significant Impact.*** During grading operations, the project has the potential to cause airborne and waterborne erosion. Standard City protocols would be enforced during review of engineering design plans and during construction. Projects larger than 1 acre in size require compliance with National Pollution Discharge Elimination System (NPDES) criteria, preparation of a Storm Water Pollution Prevention Plan (SWPPP), and the inclusion of appropriate best management practices (BMPs) to control soil erosion as well as offsite discharge to surface waters. The project will also be required to prepare a Fugitive Dust (PM_{10}) Mitigation Plan in compliance with adopted procedures of the SCAQMD and the City. Compliance with these procedures will be required prior to

[2] "Geotechnical Investigation Proposed Assisted Living Development…," prepared by NorCal Engineering, January 2010.

issuance of grading permits and implemented throughout the project's construction period. These procedures will ensure that potential erosion is controlled during the construction process.

c) ***Less than Significant Impact.*** The project area has been previously developed. The proposed project will result in the construction of new structures that include an underground parking structure and a building of 34 feet in height. The City will require geotechnical analysis and structural engineering specific to the proposed project, including analysis of soil excavation or compaction. These standard requirements will assure that impacts associated with soil stability are less than significant.

d) ***No Impact.*** The soils at the project site are not expansive. No impact is expected.

e) ***No Impact.*** No septic tanks or alternative wastewater disposal systems would be constructed as part of the proposed project. Therefore, no impact would occur.

VII. HAZARDS AND HAZARDOUS MATERIALS **Would the project:**	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
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?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) 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?	☐	☐	☐	☒

Setting

The project site is currently vacant, and has been previously developed. No chemical or hazardous waste disposal has been documented on the site. There are no known underground tanks or buried materials on the project site.

Discussion of Impacts

a-b) ***Less than Significant Impact.*** The proposed project will include the development of an assisted living facility on approximately 1.43 acres of land.

Construction of the proposed project would involve the use of heavy equipment, which uses small amounts of oils and fuels and other potentially flammable substances. During construction, equipment would require minor maintenance on location, which could lead to fuel and oil spills. The Contractor will be required to identify a staging area for storing materials and equipment, and will be required to implement best management practices to assure that any such minor spills are properly remediated.

The residential units are expected to store small quantities of household cleaners and chemicals, typical of any household. The City contracts with Palm Springs Disposal Services for the disposal of household hazardous waste. These programs include an ABOP (Acid, Batteries, Oil, Paint) facility, located on Vella Road, approximately 3.5 miles southeast of the project site. In addition, regional household hazardous waste programs are held throughout the year in the Coachella Valley. These existing programs will ensure that household hazardous waste is disposed of properly, and that potential impacts associated with these materials are less than significant.

The proposed senior living facility will also store and utilize commercial cleansers and chemicals used in housekeeping and cleaning activities. The facility will be required to store these materials in a manner consistent with City and County requirements. In addition, the Fire Department will inspect the facility for compliance with its standards. These requirements will assure that impacts associated with the storage of commercial grade cleansers and chemicals on the site are reduced to less than significant levels.

c) ***No Impact.*** The proposed project land uses will not generate hazardous emissions, nor will these products be used in the project area. Further, there are no schools located or planned within one-quarter mile of the project site. There will be no impact to schools.

d) ***No Impact.*** The proposed project site is not listed on state or federal databases of contaminated sites. No impacts associated with hazardous materials contamination are expected on the project site.

e-f) ***No Impact.*** The Palm Springs International Airport is located approximately 1.8 miles east of the project site. The project site is not located within the boundaries of the airport's land use plan. There are no private airstrips in Palm Springs.

g) ***No Impact.*** The proposed project will be constructed on the City's existing street grid, including North Indian Canyon Drive and North Palm Canyon Drive, which are General Plan roadways. The project does not propose alteration of this existing street system, and will therefore not have any impact on established evacuation routes or emergency responses. Circulation within the site will be reviewed by the Fire Department to ensure

that the internal driveways are adequate for emergency vehicles. There will be no impact associated with emergency response resulting from project build out.

h) ***No Impact.*** The project area is located in the northern portion of the City's urban core, and is surrounded by urban development. Although the site is located approximately .5 of a mile east of the foothills of the San Jacinto Mountains, it is not located in a wildland fire area, and the proposed project will not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, no impact would occur.

VIII. HYDROLOGY AND WATER QUALITY **Would the project:**	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) 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)?	☐	☐	☒	☐
c) 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?	☐	☐	☒	☐
d) 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?	☐	☐	☒	☐
e) 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?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) 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? (Source:	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) 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	☐	☐	☐	☒

VIII. HYDROLOGY AND WATER QUALITY	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project: levee or dam?				
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Setting

The project site will be served by Desert Water Agency (DWA), which supplies domestic water to this area of the City. The DWA pumps water from a number of wells throughout the area for domestic use. Groundwater has historically been the principal source of domestic water in the City. DWA also recharges groundwater through recharge basins located in the northwestern portion of the City. Sanitary sewer services to the site will be provided at the City's treatment plant.

The project site is outside the 100 year flood boundary, and therefore not subject to flooding. The site, and surrounding area are generally flat. The proposed project is required to not increase the flow of storm water downstream of the proposed project, and to retain stormwater generated on the project site as a result of development. A preliminary hydrology analysis was prepared for the proposed project, and its findings are summarized below[3].

Discussion of Impacts

a) ***Less than Significant Impact.*** Construction at the site would be subject to National Pollutant Discharge Elimination System (NPDES) stormwater regulations for construction activities. The project proponent shall be required to comply with all rules, regulations and procedures of the NPDES permit as promulgated by the Regional Water Quality Control Board (Colorado River Basin-Region VII). A Storm Water Pollution Prevention Plan must be prepared to determine and describe the Best Management Practices (BMPs) which will be implemented on the project site. The project would be required to meet all applicable water quality standards or waste discharge requirements thereby avoiding violation of such standards or requirements. Therefore, compliance with all standards would ensure that impacts will be less than significant.

In terms of wastewater, the proposed project will connect to the City's sanitary sewer system, which would convey project wastewater to the Palm Springs Wastewater Treatment Plant (WWTP). Operation, and any future expansion of the WWTP are overseen by the Regional Water Quality Control Board. Compliance with existing regulations and discharge requirements of the RWQCB will ensure that impacts will be less than significant.

b) ***Less than Significant Impact.*** The proposed project will connect to DWA domestic water lines existing in the project vicinity, and will generate a need for domestic water for residential uses and for project landscaping and pool facilities. The DWA secures water from wells located throughout the City, and recharges the groundwater basin at recharge ponds located in the northwestern end of the City.

[3] "Preliminary Drainage Study Tappan Assisted Living," prepared by JHA Engineers, January 2010.

In 2005, DWA had 60,450 acre feet per year in water supply, including all sources of water, and non-consumptive return[4]. In that same year, DWA had a demand for groundwater of 45,400 acre feet per year. It is estimated that DWA's water demand will be 55,800 acre feet per year in 2009, and 74,300 acre feet per year in 2030. The proposed project will generate demand for approximately 17.77 acre feet per year of domestic water for both indoor use and landscaping. This represents 0.03% of its 2009 demand, and will therefore be a less than significant impact on groundwater supplies.

c-e) ***Less than Significant Impact.*** The hydrology study prepared for the proposed project identified that stormwater generated on the site currently drains to the southeast corner, and discharges into North Indian Canyon Drive. Off-site stormwater currently flows in the existing Palm Canyon and Indian Canyon rights-of-way, and will impact the project site only at the northwesterly driveway of the proposed project. The hydrology analysis proposes to direct off-site flows to the south end of the property, where they will be discharged into a catch basin or drywell, and percolated into the soil.

The study further estimated that the development of the site will result in 90% of the area being covered in impervious surfaces, and will generate 3.14 cubic feet per second (cfs) in the 10 year storm, and 5.08 cfs in the 100 year storm, and increase of 1.32 cfs and 1.48 cfs, respectively. The hydrologist proposes to collect stormwater in catch basins and drywells along the south side of the property. Stormwater and nuisance water in the parking structure will be directed to a catch basin/drywell and sump pump, which will pump water to the drywells on the southern boundary. The City will review the project plans to assure that Low Impact Development concepts are utilized to the extent possible. The plan for the control and conveyance of stormwater will be reviewed by the City Engineer throughout the pre-development process, and final hydrology designs meeting City standards must be approved prior to the issuance of grading permits, ensuring that the impacts associated with drainage patterns and storm flows are less than significant.

f) ***Less than Significant Impact.*** Construction at the project site could produce pollutants that would have the potential to temporarily degrade the quality of surface waters. In addition, operation of the facility has the potential to generate pollutants. With the implementation of Best Management Practices (BMPs), no significant long-term impact to water quality would result. Therefore, impacts associated with water quality will be less than significant.

g-h) ***No Impact.*** As stated above, the proposed project is not located in a flood zone.

i) ***No Impact.*** The proposed project is not located in proximity to a dam or levy, and is outside of the boundary of the Tachevah Creek Detention Reservoir Dam Failure Inundation Pathway. No impact is expected.

j) ***No Impact.*** The proposed project is not located near a large body of water, and will therefore not be impacted by seiche, tsunami or mudflow.

[4] "Desert Water Agency 2005 Urban Water Management Plan," prepared by Krieger & Stewart, December 2005.

IX. LAND USE AND PLANNING Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Setting

The City of Palm Springs encompasses approximately 102,100 acres between the San Jacinto Mountains and Santa Rosa Mountains to the southwest and the Little San Bernardino Mountains to the east. The City's General Plan includes a mixture of residential, commercial, open space and civic uses. The General Plan Land Use Element includes discussion and policy direction for the Uptown neighborhood, in which the proposed project is located.

Discussion of Impacts

a) ***No Impact.*** The proposed project will be constructed on currently vacant land, in an area which includes a mix of commercial, resort and residential land uses. The proposed project will not divide an established community.

b) ***Less than Significant Impact.*** The project site is currently designated Neighborhood/Community Commercial on the General Plan Land Use Map. The project proponent has requested a designation of High Density Residential. The site is 1.4 acres in size, and is located in the Uptown neighborhood, in which the General Plan envisions the development of commercial uses which would be convenient to adjacent residential uses. Under current standards, the project site could accommodate approximately 22,000 square feet of commercial space, which is considerably less than would be needed for a typical neighborhood shopping center. The project proposes an assisted living facility within less than 0.5 miles of existing medical offices and the Desert Regional Medical Center, which will provide proximate services for the residents. The proposed project also includes a request for approval of a Planned Development District, which requests modifications to zoning standards including setbacks, height and land use limitations. The project is generally consistent in intensity and scale with the existing development on North Palm Canyon, which includes commercial development on the ground floor, and residential development above. The proposed General Plan Amendment will remove 1.4 acres of Neighborhood/Community Commercial from the City's land inventory, representing a loss of less than 1% of the total land available in this land use designation. The proposed request for a General Plan Amendment to High Density Residential, therefore, will not significantly impact the land use pattern in this

portion of the City, and will result in less than significant impacts to land use and planning.

c) ***No Impact.*** The proposed project is not located in a conservation area, as delineated by the Coachella Valley Multiple Species Habitat Conservation Plan. No impact to the Plan will result from build out of the proposed project.

X. MINERAL RESOURCES Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Setting

The California Division of Mines and Geology identifies portions of Palm Springs as a resource zone for aggregate/industrial minerals. The majority of the City, including the project site, is located in Mineral Resource Zone 3 MRZ-3 (an area containing mineral deposits the significance of which cannot be evaluated from available data). MRZ-2 areas are located in the northern portion of the City. MRZ-2 represents an area where adequate information has been established to indicate that significant mineral deposits are present, or where it has been judged that a high likelihood for such deposits exists. Minerals in the Palm Springs area are limited to sand and gravel for aggregate and/or decorative stone purposes and limestone.

Discussion of Impacts

a-b) ***No Impact.*** The project site is located in the City's urban core, and although undeveloped, inappropriate for mineral resource extraction. The area is not designated for mineral resource extraction, nor has it ever been. No impact to mineral resources will occur as a result of the proposed project.

XI. NOISE Would the project result in:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Setting

The Uptown area is relatively noisy currently, due to existing development and traffic. The General Plan identifies the 65 dBA CNEL noise contour at 132 feet from centerline on Palm Canyon Drive, in the vicinity of the proposed project. The City of Palm Springs requires that the community noise equivalent level (CNEL) does not exceed 65 dB at the exterior living areas (rear yards, patios or balconies exceeding 6 feet in depth) or 45 dB at the habitable interior living area.

A noise impact analysis was prepared for the proposed project[5]. Its findings are summarized below.

Discussion of Impacts

a) ***Potentially Significant unless Mitigation Incorporated.*** In order to complete the noise impact analysis, noise monitoring was conducted. The noise monitoring found that

[5] "Legacy Palm Springs Final Noise Study," prepared by Urban Crossroads, January, 2010.

current noise levels range 62.5 to 63.1 dBA CNEL adjacent to the proposed project (both on Palm Canyon and Indian Canyon Drives. The noise analysis further estimates that the noise levels at the building façade, on project build out, will range from 63.9 to 67.7 dBA CNEL at the loading area along Indian Canyon, and 62.5 to 63.1 dBA CNEL at habitable areas, including areas where balconies will occur. This noise level is less than the City's standard of 65 dBA CNEL, and as a result noise levels will be less than significant. The noise levels on the project perimeter does not require mitigation. However, the higher exterior noise levels on both streets require the analysis of interior noise levels, after construction of the proposed project. The noise impact analysis found that the construction materials will reduce noise from 28.4 to 30.5 dBA. The interior noise levels could exceed City standards for interior spaces (45 dBA CNEL), and therefore could result in a potentially significant impact, which requires mitigation, as follows:

MM-XI-1 The building shall be constructed with standard windows with a Sound Transmission Class (STC) rating of 26 or higher. Doors accessing balconies shall be have the same STC.

MM-XI-2 The building shall be constructed to include a windows closed conditions – i.e. air conditioning and heating – for all units.

MM-XI-3 All exterior window and door assemblies used throughout the project shall be free of cut outs and openings and shall be well fitted and well eather-stripped.

MM-XI-4 Exterior walls shall have a minimum STC rating of 46.

MM-XI-5 The Roof/ceiling systems shall be built using a minimum ½ inch plywood sheathing, well sealed to form a continuous barrier with a minimum R-19 bat insulation in the joist cavities.

MM-XI-6 Attic vents should be oriented away from Indian Canyon and Palm Canyon Drives.

With implementation of these mitigation measures, the residents of the project will not be exposed to excessive noise levels, and impacts will be less than significant.

b) ***No Impact.*** Potential ground borne vibration may occur during construction of the project, caused by idling heavy equipment. However, this would be short term in nature and would occur during the less sensitive daytime hours. No impact is expected.

c) ***Less than Significant Impact.*** The proposed project will result in an assisted living facility. As described in the Traffic Section, below, the project will generate 256 daily trips, and will not significantly increase noise levels associated with traffic noise. As described in the noise impact analysis, noise levels in the project vicinity will be in the range of 63.9 to 67.7 dBA CNEL. There are no exposed sensitive receptors in the project area, as development adjacent to the roadways consists primarily of commercial retail and limited residential land uses. Impacts associated with noise levels in the project area in the long term are expected to be less than significant.

d) ***Less than Significant Impact.*** There would be some short-term increases in noise levels during construction of the proposed project. However, the City's Municipal Code limits the time period that construction activities may occur, as specified by Palm Springs Noise Ordinance (11.74.041). Construction is expected to occur only during the prescribed

hours, when ambient levels of noise are higher, and therefore construction noise is less perceptible. Impacts associated with construction noise are expected to be less than significant.

e- f) ***No Impact.*** The proposed project is not located within the noise impact areas of the Palm Springs International Airport, and no other airstrip occurs in the City. There will be no impacts associated with aircraft noise.

XII. POPULATION AND HOUSING Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Setting

From 1990 to 2000, the City of Palm Springs' population grew from 40,181 to 42,807 people. This represents a 6.5% increase over the ten-year period. In 2009, the City's population was estimated at 47,601, an increase of 11.1% since 2000. Housing units increased from 30,517 to 30,823 from 1990 to 2000, and to 33,558 in 2009. The high number of housing units as compared to population is indicative of the City's part-time residents and second home market. The City has an average household size of 2.1 persons per household.

Discussion of Impacts

a-c) ***No Impact.*** The proposed project site is currently vacant. Development of the site will result in 108 assisted living beds, which will be available for existing and future City residents. The project will have a capacity of 109 beds, and will not result in growth beyond that expected to occur in the City. The project occurs on the City's established street system, and will not extend or expand City streets. Similarly, the project occurs in an area where all utilities are currently available, and therefore the project will not be required to expand or extend infrastructure. The site is vacant, and will not displace either structures or people. No impact is expected.

XIII. PUBLIC SERVICES **Would the project result in:**	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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**:**				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☐	☒

Setting

The proposed project is located in the northern portion of the City's downtown, and bordered on two sides by City streets, including Palm Canyon Drive and Indian Canyon Drive. The project site will be served by the Palm Springs Fire Department, the Palm Springs Police Department, the Palm Springs Unified School District, and existing City parks.

Discussion of Impacts

The proposed project would result in a 0.23% population increase to the City of Palm Springs. Therefore, direct impacts of this project would be less than significant.

a) ***Less than Significant Impact.*** The Palm Springs Fire Department will provide service to the proposed project site. The Department currently operates five fire stations located throughout the city. The station closest to the project site is station #441, located at 277 North Indian Canyon, about one mile south of the project site. The station houses one 85' aerial platform, one 1,800 gallon water tender, and one breathing support vehicle. The station is manned on a 24 hour basis with one Captain, one Engineer, and one Firefighter. Also available to serve the project site are station #442, located at 300 N. El Cielo, 3 miles from the project site, and station #443, located at 590 E. Racquet Club, about 1.5 miles from the project site. The project site is within the 5 minute response time from station #441. The Department currently has an Insurance Office Rating (ISO) of 3.

b) ***Less than Significant Impact.*** The City of Palm Springs Police Department provides law enforcement services within the City Limits. The Department does not have a standard ratio of officers to population, but does have a desired response time of 6 minutes for emergency calls and 20 minutes for non-emergency calls. The proposed project is

located in the center of the City, and will not significantly add to the number of police calls generated annually, due to its size.

c) ***No Impact.*** The Palm Springs Unified School District (PSUSD) provides educational services for grades K-12 in the City of Palm Springs. Currently, there are 4 elementary schools, 1 middle school and 1 high school in the City. The PSUSD is authorized to collect school facilities fees as provided for in Government Code Section 53080 et. seq. and 65995 et seq., for the construction of new school facilities. The proposed project will be occupied by senior citizens, however, and will not generate any demand on school facilities.

d) ***Less than Significant Impact.*** The City of Palm Springs has seven parks located on approximately 140-acres within its boundaries. These include Desert Highland Park, Victoria Park, Ruth Hardy Park, Sunrise Park, Baristo Park, Demuth Park and Palm Springs dog park. In addition, there are several golf courses in the City which are open to the public including the Mesquite County Club and the Tahquitz Creek Golf Course. The City has a standard park ratio of 5 acres of parkland for every 1,000 population as required by City Ordinance 1632. The proposed project will be required to contribute Quimby fees to offset the use of local parks by project residents. Quimby fees are designed to mitigate the project's impacts, and reduce them to less than significant levels.

e) ***No Impact.*** The proposed project is not expected to cause significant environmental impacts to the service levels of any other public service providers.

XIV. RECREATION Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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?	☐	☐	☒	☐

Setting

The City of Palm Springs offers a wide variety of recreational opportunities. In addition to over 140-acres of developed parkland and several public and private golf courses, the City also includes a system of hiking/equestrian trails as well as bikeways. Other recreational offerings in the area include the Senior Center, the Whitewater Wilderness Study Area and the Murray, Andreas and Palm Canyon recreation areas, which are operated by the Agua Caliente Band of Cahuilla Indians.

Discussion of Impacts

a) ***Less than Significant Impact.*** As previously described, the proposed project will result in the addition of 108 people who will have some need for recreational facilities. The City's recreational facilities will not be significantly impacted by the proposed project.

b) ***Less than Significant Impact.*** The project includes amenities such as an exercise room, pool, and a billiard room, which will provide a degree of recreational activities appropriate to accommodate an assisted living community. Impacts to recreational resources are expected to be negligible.

XV. TRANSPORTATION/TRAFFIC **Would the project:**	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	☒	☐
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c) 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?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Result in inadequate parking capacity?	☐	☐	☐	☒
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	☒

Setting

The proposed project occurs within the center of the City, and is bordered by Palm Canyon and Indian Canyon Drives, both of which are designated Major Thoroughfares in the General Plan, and are built out in the entire downtown area. The project site is designated Neighborhood/Community Commercial, and was assessed as such in the General Plan EIR. Therefore, the site was expected to generate approximately 680 average daily trips. The General Plan EIR determined that both Palm Canyon and Indian Canyon currently operate at a Level of Service (LOS) of A, and that they will operate at LOS A and B, respectively, at General Plan build out.

Discussion of Impacts

a) ***Less Than Significant Impact.*** The proposed project will result in an assisted living facility, with 108 beds. These facilities are typically low traffic generators. The Institute of Transportation Engineers' *Trip Generation, 7th Edition,* estimates that for the "Assisted Living" category, 2.66 trips per bed per day will occur. On that basis, the proposed project will generate 287 average daily trips. By comparison, a "Specialty Retail Center"

of 22,000 square feet (the maximum which could occur in the commercial zone currently applies to the property), would generate 975 daily trips, or more than twice the number of trips as the proposed project. If the site were to be developed with apartments, the ITE estimates that 43 apartments (the maximum which could be built on the site), would generate 289 daily trips, or about the same number of trips as the proposed project.

The General Plan considered commercial development of the site, and therefore analyzed a higher trip generation rate for the site in the General Plan EIR. As a result of the proposed General Plan Amendment and proposed project, it is expected that the traffic generated at the site will be lower than that previously analyzed, and that less than significant impact on local roadways will occur.

b) ***No Impact.*** As stated above, both Indian Canyon and Palm Canyon Drives are expected to operate at LOS A and B, respectively, at General Plan build out. Trips generated by the proposed project will be less than anticipated in the General Plan. As a result, the proposed project will have no impact on levels of service.

c) ***No Impact.*** The proposed project is not located in the vicinity of the Palm Springs International Airport, and will have no impact on air traffic patterns.

d) ***No Impact.*** The proposed project includes an underground parking structure on a small lot. The ingress and egress to the structure, and adequate visibility, may be an issue in project design. However, both the City Engineer and the Fire Department will review all aspects of project plans, and will require safe and adequate turning radii and sight distance be demonstrated by the project proponent. These City requirements will assure that the proposed project does not create hazards associated with design features.

e) ***No Impact.*** As stated above, the proposed project includes a parking structure, which will be reviewed and approved by the Fire Department for access requirements. Further, the Fire Department will review and approve building plans, and will require that all Fire Code building standards for facilities of this type are adequately addressed. These City requirements will assure that there are no impacts to emergency access.

f) ***No Impact.*** The proposed project includes 77 parking spaces. Parking standards will be established as one of the components of the requested Planned Development Permit. No impacts are expected.

g) ***No Impact.*** The proposed project occurs on Indian Canyon and Palm Canyon Drives, both of which carry SunLine Transit bus routes. The residents will have convenient access to bus transportation, and no impacts to transit facilities are expected.

XVI. UTILITIES AND SERVICE SYSTEMS **Would the project:**	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) 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?	☐	☐	☐	☒
c) 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?	☐	☐	☐	☒
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) 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?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

Setting

The City of Palm Springs provides wastewater treatment to properties located within its boundaries. The City owns a wastewater treatment plant (WWTP) located at 4375 Mesquite Avenue. The City contracts with Veolia Water North America to operate a comprehensive wastewater treatment program, including its 10.9 million gallon per day (mgd) trickling filter wastewater treatment plant, five pump stations, 225 miles of sewer collection pipelines, six percolation ponds, and a biosolids disposal program. The treatment plant currently accommodates a range of approximately 5.5 to 6.5 mgd of sewage flow.

Desert Water Agency (DWA) also operates a wastewater recycling facility. The City provides primary and secondary treated domestic sewage to DWA, who then provides tertiary treatment.

The recycled tertiary treated water is supplied at reduced rates to large water users, and is used to irrigate public facilities within the City.

The DWA provides domestic water service throughout the City. DWA obtains most of its water supply from groundwater. The City is located within two subbasins of the Coachella Valley Ground Water Basin: The Mission Creek subbasin, and the Garnet Hill and Palm Springs subareas of the Whitewater or Indio Subbasin. In 2005, DWA had 60,450 acre feet per year in water supply, including all sources of water, and non-consumptive return[6]. In that same year, DWA had a demand for groundwater of 45,400 acre feet per year. It is estimated that DWA's water demand will be 55,800 acre feet per year in 2009, and 74,300 acre feet per year in 2030.

Palm Springs Disposal Service will provide solid waste service to the project site. Complete residential, commercial, industrial and roll-off trash services and recycling services are provided. Much of the solid waste collected in Palm Springs is transported to The Edom Hill Transfer Station (EHTS). EHTS is permitted to receive 2,600 tons of waste per day.[7] Solid waste from the transfer station is disposed of at one of three landfills: Lambs Canyon Landfill south of Beaumont, with a remaining capacity 20.908,000 cubic yards and estimated closing date 2023; Badlands Landfill near Moreno Valley, with a remaining capacity 21,866,000 cubic yards and estimated closing date 2016; or El Sobrante Landfill near Corona, with a remaining capacity 184,930,000 cubic yards and with more than 120 million cubic yards of remaining capacity. The City's recycling program increased waste diversion rates from 40% in 1995 to 60% in the year 2004[8].

Drainage from the surrounding mountains drains to the valley floor and is directed by sheet flow, channels, and other improvements including levees, reinforced concrete pipe and drainage channels to the Palm Canyon Wash and the Whitewater Wash. The project site is located in an area outside of the 500-year flood zone.

Discussion of Impacts

a) ***Less than Significant Impact.*** The proposed project will connect to the existing sanitary sewer system, which is operated by the City, and regulated by the Regional Water Quality Control Board. It operates according to the Board's standards and requirements, and is expected to continue to do so. The addition of the project's wastewater will have a less than significant impact on water treatment requirements.

b & e) ***No Impact.*** The proposed project will generate demand for approximately 17.77 acre feet per year of domestic water for both indoor use and landscaping. This represents 0.03% of the DWA's 2009 demand. The DWA will not be required to construct any new facilities as a result of the proposed project, and no impact is expected. The proposed project will generate a relatively small amount of effluent (approximately 90% of its water use), which is well within the City's treatment capacity currently. No impact to wastewater treatment facilities is expected.

c) ***No Impact.*** The proposed project is required to retain storm water on site, and cannot increase storm flows beyond the current condition. It will therefore have no impact on storm water drainage facilities.

6 "Desert Water Agency 2005 Urban Water Management Plan," prepared by Krieger & Stewart, December 2005.

7 City of Palm Springs 2007 General Plan EIR.

8 Waste Management web site: http://www.wm.com ; accessed October 8, 2009

d) ***Less than Significant Impact.*** The proposed project will generate demand for approximately 17.77 acre feet per year of domestic water for both indoor use and landscaping. This represents 0.03% of the DWA's 2009 demand. The proposed project will not significantly impact water supplies of the DWA.

f) ***Less than Significant Impact.*** The proposed project will be served by Palm Springs Disposal Services. Solid waste generated by the proposed project will be transported to one of three regional landfills, which all have capacity to serve the proposed project. Impacts associated with solid waste generation are expected to be less than significant.

g) ***No Impact.*** The City complies with federal, state and local requirements and regulations relating to solid waste, through Palm Springs Disposal Service. The Service will continue to be responsible for meeting these requirements. No impact is expected as a result of project build out.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE

NOTE: If there are significant environmental impacts which cannot be mitigated and no feasible project alternatives are available, then complete the mandatory findings of significance and attach to this initial study as an appendix. This is the first step for starting the environmental impact report (EIR) process.

Does the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) ***Less than Significant Impact.*** The proposed project occurs on a site which was previously developed, and which has no potential to harbor sensitive species or cultural resources. The proposed project will have less than significant impacts on these resources.

b) ***Less than Significant Impact.*** The proposed project will not have any significant cumulative impacts, and may reduce impacts associated with traffic volumes on Palm Canyon and Indian Canyon Drives.

c) ***Potentially Significant Unless Mitigation Incorporated.*** The proposed project has the potential to impact human beings as relates to interior noise levels. Mitigation measures included in this document, however, will reduce these impacts to less than significant levels.

REFERENCES

City of Palm Springs General Plan, 2007

City of Palm Springs General Plan EIR, 2007

Desert Water Agency 2005 Urban Water Management Plan

Legacy Palm Springs Final Noise Study

Preliminary Drainage Study Tappan Assisted Living

Geotechnical Investigation Proposed Assisted Living Development