



## PUBLIC NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION

**PROJECT NAME:** Indio Housing Element Update

**LEAD AGENCY:** City of Indio Community Development Department

**PROJECT LOCATION:** City-wide

**PROJECT APPLICANT:** City of Indio Community Development Department  
100 Civic Center Mall  
Indio, CA 92201

**PROJECT DESCRIPTION:** The project proposes an amendment to the City of Indio General Plan 2040 adopted on September 18, 2019 to update Housing Element. As required under State Law every eight years, the City of Indio is preparing an update to the City's Housing Element. The City's existing Housing Element was adopted in 2013 and is set to expire in October 2021. The State Department of Housing and Community Development has provided a Regional Housing Needs Allocation (RHNA) to the Southern California Association of Governments (SCAG) and the City has been assigned a RHNA of 7,812 housing units in the City between 2021 and 2029 of which 2,963 or 38% of the housing units must be affordable. The updated Housing Element will provide the capacity to accommodate the RHNA for the planning period with the necessary goals and policies to ensure adequate development of housing for the City during the housing cycle. This Element is a policy document, and its adoption would not result in any direct or indirect physical impacts because no development or construction is authorized by this action.

**NOTICE IS HEREBY GIVEN:** The City of Indio is circulating the Housing Element Update, Initial Study and proposed Negative Declaration for a 30-day public review and comment period for responsible agencies, interested organizations and members of the public. This comment period begins on **Tuesday, August 17, 2021 and will end on Monday, September 20, 2021**. Public hearings for the project at the Planning Commission and the City Council are anticipated to follow in the fall and winter of 2021 and early 2022 and will be further noticed.

The documents can be reviewed online at [https://www.indio.org/your\\_government/development\\_services/housing\\_element\\_update.htm](https://www.indio.org/your_government/development_services/housing_element_update.htm). Additionally, a copy is available for public review at the Planning Counter at the Indio City Hall, 100 Civic Center Mall, Indio, CA 92201.

Please provide written comments **by 5:00 PM on Monday, September 20, 2021** by mail to the City of Indio Housing Element Update, Attn: Kevin Snyder, 100 Civic Center Mall, Indio, CA 92201 or by email at [ksnyder@indio.org](mailto:ksnyder@indio.org).

*NOTICE: Pursuant to the provisions of the California Environmental Quality Act (CEQA-Public Resources Code, Section 21000 et seq.), the City of Indio has determined that the project referenced herein will not have a significant effect on the environment provided, and a Negative Declaration has been prepared.*

**DRAFT INITIAL STUDY**

**CITY OF INDIO GENERAL PLAN AMENDMENT:  
HOUSING ELEMENT UPDATE**

*Prepared for:*

**City of Indio**

100 Civic Center Mall

Indio, CA 92201

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**AUGUST 2021**



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# Acronyms and Abbreviations

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Acronym/Abbreviation	Definition
ADU	Accessory Dwelling Unit
AMI	Area Median Income
BMP	Best Management Practice
CBC	California Building Code
CDBG	Community Development Block Grant
CEQA	California Environmental Quality Act
City	City of Indio
EIR	Environmental Impact Report
FAR	Floor Area Ratio
GHG	Greenhouse Gas
GPA	General Plan Amendment
HCD	Housing and Community Development
HFHSZ	High Fire Hazard Severity Zone
IS	Initial Study
M-U	Mixed-Use Overlay Zone
ND	Negative Declaration
NPDES	National Pollution Discharge Elimination System
RHNA	Regional Housing Needs Assessment
SCAG	Southern California Association of Governments
SB 1000	Senate Bill 1000
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SWPPP	Stormwater Pollution Prevention Plans
TDSP	Transit District Specific Plan

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# 1 Introduction

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## 1.1 Project Overview

The purpose of the proposed project is to provide an update to the Housing Element of the City of Indio's (City's) General Plan 2040. The City's General Plan, which was adopted in 2019, provides the policy framework for the long-range planning of physical development in the community. The City's General Plan 2040 consists of the following elements: 1) Land Use and Urban Design, 2) Mobility, 3) Economic Development, 4) Health and Equity, 5) Parks, Recreation and Open Space, 6) Conservation, 7) Infrastructure and Public Facilities, 8) Safety, 9) Noise, 10) Implementation Element, and 11) Housing Element. This project involves an amendment to the General Plan in order to adopt, as required by State Law, an updated Housing Element of the General Plan. The intent of the Housing Element is to address the comprehensive housing needs of the City. State law requires jurisdictions to update their Housing Elements every eight years to outline their existing and projected housing needs, to discuss barriers to providing that housing, and to propose actions to address housing needs and barriers.

## 1.2 California Environmental Quality Act Compliance

The California Environmental Quality Act (CEQA), a statewide environmental law described in California Public Resources Code, Sections 21000–21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies identify the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the public an opportunity to comment on the information. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an environmental impact report (EIR) and balance the project's environmental concerns with other goals and benefits in a statement of overriding considerations.

The City's Community Development Department directed and supervised the preparation of this Initial Study (IS)/Negative Declaration (ND). Although prepared with assistance from the consulting firm Dudek, the content contained within and the conclusions drawn by this IS/ND reflect the independent judgment of the City.

## 1.3 Initial Study Checklist

Dudek, under the City's guidance, prepared the project's Environmental Checklist (i.e., IS) per CEQA Guidelines Sections 15063–15065. The CEQA Guidelines include a suggested checklist to indicate whether a project would have an adverse impact on the environment. The checklist is found in Section 3 of this document. Following the Environmental Checklist, Sections 3.1 through 3.21 include an explanation and discussion of each significance determination made in the checklist for the project.

For this IS/ND, the following four possible responses to each individual environmental issue area are included in the checklist:

1. Potentially Significant Impact

2. Less-than-Significant Impact with Mitigation Incorporated
3. Less-than-Significant Impact
4. No Impact

The checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the project. In doing so, the City will determine the extent of additional environmental review, if any, for the project.

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## 2 Project Description

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The project proposes an amendment to the City of Indio's (City's) General Plan. The City's General Plan serves as the policy framework for the long-range planning of physical development in the community. The City's General Plan, which was adopted in 2019, provides the policy framework for the long-range planning of physical development in the community. The City's General Plan 2040 consists of the following elements: 1) Land Use and Urban Design, 2) Mobility, 3) Economic Development, 4) Health and Equity, 5) Parks, Recreation and Open Space, 6) Conservation, 7) Infrastructure and Public Facilities, 8) Safety, 9) Noise, 10) Implementation Element, and 11) Housing Element. Under the proposed project, the General Plan would be amended with updates to the Housing Element, as detailed below.

### 2.1 Background

Since 1969, the State of California has required all local governments to adequately plan to meet the housing needs of everyone in the community. California's local governments meet this requirement by adopting housing plans as part of their "general plan." The law mandating that housing be included as an element of each jurisdiction's general plan is known as "housing-element law."

The proposed 2021-2029 Housing Element represents the City's effort in fulfilling the requirements under State Housing Element law. The California State Legislature has identified the attainment of a decent home and suitable living environment for every Californian as the State's major housing goal. Recognizing the important role of local planning and housing programs in the pursuit of this goal, the Legislature has mandated that all cities and counties prepare a housing element as part of the comprehensive General Plan.

Pursuant to State law, the Housing Element must be updated periodically according to statutory deadlines. The proposed Housing Element covers the planning period of October 15, 2021 to October 15, 2029.

State Law requires that the Housing Element include the following components:

- An evaluation of the efficacy of the previous Housing Element's progress in plan implementation and appropriateness of the goals, policies, and programs.
- An analysis of the City's population, household, and employment base, and the characteristics of the housing stock.
- A summary of the present and projected housing needs of the City's households.
- A review of potential constraints to meeting the City's identified housing needs.
- An evaluation of Fair Housing to identify disproportionate housing needs.
- A statement of the Housing Plan to address the identified housing needs, including housing goals, policies, objectives, and programs.

The Housing Element is being updated at this time in conformance with the 2021-2029 update cycle for jurisdictions in the Southern California Association of Governments (SCAG) region. The Housing Element builds upon the other General Plan elements and is consistent with the policies set forth by the General Plan, as amended. As portions of the General Plan are amended in the future, the Plan (including the Housing Element) will be reviewed to ensure that internal consistency is maintained.



## 2.2 Regional Housing Needs Assessment (RHNA)

The California Department of Housing and Community Development (HCD) is required to prepare a Regional Housing Needs Assessment (RHNA) for each Council of Governments in the State that identifies projected housing units needed for all economic segments based on Department of Finance population estimates. The Southern California Association of Governments (SCAG) is the Council of Governments for Riverside County (as well as Ventura, Los Angeles, Orange, San Bernardino, and Imperial Counties) and allocates to the six counties and 191 cities and the unincorporated county areas their fair share of the total RHNA housing needed for each income category. Each local government must demonstrate that it has planned to accommodate all of its regional housing need allocation in its Housing Element. The City has been assigned a RHNA of 7,812 units for the 2021–2029 Housing Element, broken down as follows: 1,793 very-low income units, 1,170 low income units, 1,315 moderate income units, and 3,534 above-moderate income units. To accommodate the 7,812 units, the City prepared an Adequate Sites Analysis and Inventory which identifies vacant sites that could be developed with dwelling units, underutilized sites that could be redeveloped to include more dwelling units, development that is currently underway, which counts towards the City's housing need; and details the expected number of Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) that could be developed within the planning period. The Adequate Sites Analysis also breaks down the methodology by which realistic development capacity was determined. Because the City does have large swaths of land available for development, there are opportunities to identify new housing capacity on undeveloped lands. Additionally, with the number of vacant sites, much of the City's housing capacity is identified in the form undeveloped sites that are most suitable for redevelopment. The undeveloped and/or underutilization of these sites paired with programs identified in the Housing Element and outlined below will ensure that the City can realistically meet the RHNA targets at all income levels during the Housing Element planning period.

## 2.3 RHNA Approach

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction's share of the regional growth. The development of the sites inventory started with the vacant and non-vacant sites that were identified by the City based on staff knowledge of existing conditions and development interests expressed by property owners and developers. Then a series of GIS analyses were conducted to identify additional vacant and non-vacant sites in the City within the land use categories that can accommodate housing (i.e., Agriculture, Low Density Residential, Medium Density Residential, High Density Residential, and Mixed Use) using data from SCAG and County Assessor's Office and criteria that demonstrate feasibility for redevelopment.

### *Vacant and Underutilized Sites*

State law requires each jurisdiction to include a land inventory to identify specific sites that are suitable for residential development and to demonstrate that sufficient land is available to provide adequate housing capacity to meet the RHNA for each income level. As part of the sites analysis, the City and consulting team had to identify specific sites that are suitable for residential development to determine whether there are sufficient sites to accommodate the City's regional housing need in total and by income category. With the large quantities of vacant land that exist in the City, the sites analysis largely depends on those vacant sites within City limits that permit for residential development under their existing General Plan land use designation (land use designation). However, a small number of sites identified in the sites inventory are on non-vacant, underutilized parcels. Determining which non-vacant sites are underutilized and have the strongest potential for redevelopment can help identify ideal areas



for accommodating new housing through redevelopment. the methodology for identifying and prioritizing underutilized sites was largely based on the following factors:

- **Building Age** – Buildings built prior to 1980 (most sites identified are more than 50 years old)
- **Under Valued** – An assessed improvement-to-land-value ratio less than 1
- **Site Size** – Parcel greater than 0.5 acres or less than 10 acres, or smaller parcels with the potential for lot consolidation resulting in a site greater than 0.5 acres

The City currently allows standalone, multi-unit residential development as a use permitted by-right in most mixed-use designations throughout the City, including in the Neighborhood Center (NC), Connected Neighborhood (CN), Midtown (MT), and Downtown (DT) designations. Therefore, the City assumes that many of the identified sites may be developed as purely residential projects at densities far above the minimum densities and the assumptions used to calculate the realistic capacity.

### **Lower-Income Sites Inventory**

The Mixed Use Neighborhood (MUN) land use designation provides for moderate- to higher-intensity neighborhood development that features a variety of multifamily housing choices and limited neighborhood-serving commercial uses in a walkable environment at densities up to 40 dwelling units per acre. Based on a realistic residential development potential of 20 dwelling units per acre in the MUN zone, a total of 38 sites with 2,334 units on approximately 117 total acres have been included in the sites inventory.

The Midtown (MT) land use designation provides for an active, mixed-use center by allowing multistory, mixed-use buildings at higher intensities, including multifamily standalone residential uses, community gathering spaces, and land uses to support residents and visitors at densities up to 40 dwelling units per acre. Based on a realistic residential development potential of 20 dwelling units per acre in the MT zone, a total of 13 sites (including 2 consolidated sites) with 853 units on approximately 43 total acres have been included in the sites inventory.

The Downtown Indio Specific Plan (DTSP), adopted in April 2020, incentives redevelopment and revelational efforts within the downtown area of the City. The Downtown (DT) land use designation supports a lively, thriving Downtown area by accommodating multistory, mixed-use buildings at higher intensities, including multifamily standalone residential and live/work uses at densities up to 60 dwelling units per acre. Based on a realistic residential development potential of 20 dwelling units per acre in the DT zone, a total of 14 sites with 253 units on approximately 13 total acres have been included in the sites inventory.

As such, based on available land for development within the MUN, MT and DT areas of the City, the land inventory includes capacity to accommodate 3,443 lower-income units, enough to accommodate the City's 6th Cycle RHNA allocation for lower-income units and a buffer to ensure capacity throughout the Housing Element Period.

### **Moderate- to Above-Moderate Income Sites Inventory**

The Suburban Neighborhood (SN) land use designation provides low-intensity neighborhood development for single-family and small, low intensity multifamily dwelling groupings organized along walkable streetscapes with commercial/retail activity nearby. Based on the permitted densities, range of single-family and multifamily housing, and opportunities for medium-intensity residential development permitted in the SN designation, the sites have been identified as appropriate to accommodate moderate-income housing. A total of 252 units on approximately 63 acres of vacant sites in the SN zone have been included in the sites inventory.

The Neighborhood Center (NC) land use designation provides for areas with a variety of neighborhood-serving retail and commercial uses, housing of various types, other neighborhood-serving amenities, and community gathering spaces for residents at a density ranging between 10 and 20 dwelling units per acre. Based on the permitted densities and range of single-family and multifamily housing, neighborhood-serving amenities, and commercial uses permitted in the NC designation, the sites have been identified as appropriate to accommodate moderate-income housing. A total of 251 units on approximately 25 acres of vacant sites in the NC zone have been included in the sites inventory.

The Connected Neighborhood (CN) land use designation provides a broad range of housing choices within a walkable neighborhood setting within a short distance of goods and services. Based on the maximum allowed density and range of single-family and multifamily housing permitted in the CN designation, the sites have been identified as appropriate to accommodate moderate-income housing. A total of 912 units on approximately 77 acres of vacant sites in the CN zone have been included in the sites inventory.

In total, the land inventory includes capacity to accommodate 1,415 moderate-income units in areas zoned SN, NC, and CN, which is enough to accommodate the City's 6th Cycle RHNA allocation for moderate-income units and a buffer to ensure capacity throughout the Housing Element Period.

#### *Current Development*

The City has a significant pipeline of development projects that are seeking entitlements or are actively pursuing construction. A total of 9,448 above moderate-income units have been entitled yet are not current constructed, and the Indio Marketplace project proposes to construct an additional 400 above moderate-income units. The proposed Arroyo Crossing project is planning to include 320 lower-income units as well as 80 moderate income units. As such, current development and projects could result in the construction of 10,248 new units, with 320 lower-income units, 80 moderate income units, and 9,848 above moderate-income units.

#### *Accessory Dwelling Units*

The Housing Element may satisfy its RHNA requirement through methods alternative to the identification of sites. One such methodology is through an analysis of the expected number of accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) to be developed within the planning period. Between 2018 and 2020, 28 ADUs were permitted in the City. Because ADU and JADU legislation has been revised several times since 2017, providing increased opportunities for the development of housing, it is expected that development trends will continue upward. Based on the local incentives and ADU and JADU trends since January 2018, a conservative estimate of the number of units to be produced under this approach is 10 units each year during the planning period (June 30, 2021, to October 31, 2029), for a total of 84 units, with a breakdown as follows: 19 ADUs for very low-income, 29 ADUs for low-income, 29 ADUs for moderate-income, and 7 ADUs for above moderate-income.

Based on the inventory of available sites, Table 1 presents the total RHNA compared to credits and capacity identified through the preparation of the Housing Element Update. As shown therein, the land inventory includes capacity to accommodate the City's 6th Cycle RHNA allocation for all income categories.

**Table 1. Total RHNA Compared to Credits and Capacity Identified**

Category	Total Units	Lower Income Units	Moderate and Above Moderate-Income Units
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<b>RHNA</b>	<b>7,812</b>	<b>2,963</b>	<b>4,849</b>
Development to be Completed During RHNA	10,248	320	9,928
Potential ADUs	84	48	36
Vacant and Underutilized Site Capacity	4,858	3,440	1,415
<b>Totals</b>	<b>15,187</b>	<b>3,808</b>	<b>11,379</b>
<b>Capacity Surplus (+)/Deficit (-)</b>	<b>-</b>	<b>+845</b>	<b>+6,530</b>

Source: City of Indio 2021-2029 Housing Element

## 2.4 Housing Plan

As required by State Housing Element law, the Housing Element Update includes a Housing Plan to facilitate and encourage the provision of housing consistent with the RHNA allocation. The goals, objectives, policies, and implementing programs of the Housing Plan emphasize: methods of encouraging and assisting in the development of new housing for all income levels; providing and maintaining adequate capacity to meet the housing need; removing government constraints to development, where feasible and legally possible; conserving and improving existing housing; providing increased opportunities for home ownership; reducing impediments to fair housing choice; and monitoring and preserving units at risk of converting from affordable to market rate. The Housing Plan also includes numerous policies to better guide decisions and achieve desired outcomes related to the development, improvement, preservation, and maintenance of housing.

The following is a summary of the key programs that would be included in the City's proposed Housing Element Update. Many of these are a continuation of programs from the previous 2013–2021 Housing Element.

### Program 1: Accessibility

To increase opportunities for persons with temporary, developing, or permanent disabilities including older adults with changing levels of ability the City will promote increased accessibility by connecting developers and residents to resources on design features that are accessible and safe to all people regardless of age, size, ability, or disability. Additionally, the City will consider developing a program that further incentivizes accessibility in housing development and design above and beyond what is required under State law.

### Program 2: Accessory Dwelling Unit Assistance

The City will identify and develop additional mechanisms for incentivizing the production of accessory dwelling units (ADUs). The City will consider developing handouts, frequently asked questions (FAQs) brochures, checklists, and permit-ready ADU building plans to assist property owners with ADU development.

### Program 3: ADU Permitting

The City permits ADUs and JADUs in all zones that permit residential uses. Consistent with State law, the City will submit the adopted ADU ordinance to the California Department of Housing and Community Development (HCD) for review, and will review and consider any necessary changes.

### Program 4: Affordable Homeownership Opportunities

Increase opportunities for homeownership for moderate and lower-income households through collaboration with affordable housing developers, community land trusts, and limited equity cooperatives. To support affordable housing development and creative ownership models, identify opportunities to dedicate staff to assist with

navigating the permitting process, identify surplus lands available for housing, expand permit streamlining opportunities, and provide informational resources on the City's website.

#### Program 5: Analysis of Impediments to Fair Housing Choice

The City will continue to assess fair housing conditions within Indio through the Analysis of Impediments to Fair Housing Choice. The Analysis of Impediments to Fair Housing Choice provides an overview of laws, regulations, conditions, and other possible obstacles that could affect an individual's or household's access to housing in Indio. The City will affirmatively further fair housing by taking meaningful steps in fair housing education through proactive outreach to individuals and organizations that represent lower-income households, people in protected classes, and households with special needs.

#### Program 6: Annual Progress Reports

The City will continue to report annually on the City's progress toward its eight-year RHNA housing production targets and toward the implementation of the programs identified in the Housing Element to the legislative body, the Office of Planning and Research, and the Department of Housing and Community Development.

#### Program 7: By-Right Development

The City will allow development by-right pursuant to Government Code section 65583.2(i) when 20 percent or more of the units are affordable to lower income households on vacant sites identified in the Sites Inventory as previously identified for both the 5th and 4th cycle housing elements.

Further, the City will identify a location, process, and procedure by which residential and mixed-use development can be permitted by-right, especially in areas near amenities and resources such as transit, parks, childcare facilities, within established commercial and near key areas of employment. This will include evaluation of opportunities to establish a Housing Sustainability District, a Workforce Opportunity Zone, or an affordable housing overlay where eligible projects would qualify for streamlined CEQA review, ministerial permit processing, and additional incentives beyond those allowed under the State density bonus. **Program 8: Code Compliance**

Continue to implement a code compliance program to assist property owners in addressing both building and zoning code violations. This program is implemented by responding to complaints and through field observations and assists property owners with bringing their property into compliance. To further expand upon this program, the City will utilize data collected on current housing conditions in Indio to better connect households with assistance resources as they become available.

#### Program 9: Density Bonus

The City will review and amend its local Density Bonus Program Ordinance to ensure consistency with State requirements, including the provision of a bonus for 100% affordable developments and student affordable housing.

#### Program 10: Development Fees

The City will review and update their development impact and processing fees in order to ensure that the fees charged do not exceed the estimated costs required to produce the services and that all fees are in compliance

with the California Government Code. The City will further evaluate development fees to identify opportunity to reduce fees in exchange for affordable housing development.

#### Program 11: Development Incentives and Programs

Implement a range of financial and regulatory incentive approaches to facilitate the development of housing for lower-income households. This will include evaluation of a local inclusionary ordinance to set aside a portion of new residential units for lower-income households, floor area ratio-based bonuses such as the one detailed in detailed in Government Code section 65917.2, opportunities for increased flexibility in development standards and permit processes in zones that permit residential uses, incentives in exchange for lot consolidation, and programs that allow densities that exceed ranges defined in the zone for projects providing affordable housing.

#### Program 12: Development Permit Streamlining

The City provides an affordable housing streamlined approval process in accordance with State requirements for qualifying development proposals and reports on affordable housing streamlining applications in the Housing Element Annual Progress Report. The City will identify opportunities to expand this streamlining to other developments, including developments that voluntarily participate in green building practices, to further assist with the reduction in permit processing times.

#### Program 13: Employee Housing

The City will amend the zoning code to ensure that employee housing for 6 or fewer people is permitted in accordance with the same regulations as a single-family residence in the same zone. Additionally, the zoning code will be amended to ensure that employee housing consisting of no more than 12 units or 36 beds is permitted as an agricultural use, in the same manner as other agricultural uses in the same zone in accordance with Section 17000 of the Health and Safety Code.

#### Program 14: Energy Conservation

Promote energy conservation through coordination with the Imperial Irrigation District to obtain information on loans, grants, or other incentives that might be available for voluntary energy reduction; and to obtain other relevant information on energy efficiency. The City shall provide energy conservation awareness resources on their website and update this information as needed to ensure current information is maintained.

#### Program 15: Extended Funding Opportunities

The City recognizes the opportunity to apply for available external funds for the construction, preservation and improvement or housing; as well as planning and infrastructure funding available to support housing development. External funding sources from State and Federal programs provide increased opportunities to develop and maintain housing affordable to Indio residents. To maximize the City's ability to secure outside funding, the City shall continue to monitor and apply for available funding/financing sources that may be used for housing, and support and adopt policies and programs that position Indio as a competitive applicant for funding opportunities, such as competitive State funding grant programs in the areas of housing, transportation, infrastructure, and land use.

#### Program 16: Fair Housing Referral and Mediation

The City contracts with the Inland Fair Housing and Mediation Board (IFHMB's) to provide fair housing services for its residents. The City will maintain this partnership and will provide information regarding available fair housing services on the City's website. The fair housing services provided by the IFHMB include providing information,

investigation, education, conciliation, and/or referral of housing discrimination complaints free of charge to individuals. It also involves fair housing workshops that are offered year-round to educate housing providers, tenants, homeowners, and financial and lending institutions on the key aspects of fair housing law. Further, IFHMB's mediation department provides information to landlords, tenants, mobile home park owners, and mobile home residents regarding their rights and responsibilities under the California Landlord and Tenant Laws and facilitates negotiations between parties in housing-related disputes.

#### Program 17: Housing Assistance Resources

To maximize participation in housing assistance programs, the City shall develop and disseminate informational materials and resources to inform residents of program availability, eligibility, and requirements. The City will dedicate and maintain a webpage to provide resources and information related to housing assistance.

#### Program 18: Preservation of Existing Affordable Housing Units

. The City will continue to work with the Riverside County Housing Authority to monitor affordable housing units identified as being at-risk of conversion to market-rate housing. This will include collaboration on the identification of financial resources and establishing partnerships with affordable housing developers and/or property owners willing to maintain units as affordable to low/lower-income households. Preventing the conversion of at-risk units to market-rate housing will ensure tenants are not displaced and that affordable units are not lost. The extension of existing project-based rental assistance covenants, or utilization of other funding sources, will help preserve affordability. The City will continue to find ways to identify solutions to housing preservation through collaboration with the Housing Authority.

#### Program 19: Housing Rehabilitation

The City provides housing rehabilitation support to eligible residents through the current Minor Home Repair Program. Eligible homeowners are those who live in Community Development Block Grant (CDBG) eligible areas within the City, own their homes, meet income requirements, and whose home are in need of urgent habitability repairs. Assistance includes grant funding to complete repairs to plumbing, electrical, HVAC units, water heaters, roofs, and complete other repairs that are urgently needed to keep homeowners/occupants in their homes. The City will also pursue a citywide Residential Façade Improvement Program to help preserve and maintain housing for households that may not be eligible for housing rehabilitation support outside of CDBG eligible census tracts.

#### Program 20: Increased Transparency

The City will maintain information on the City's website that is applicable for housing development project proposal requirements, including a current schedule of fees, exactions, applicable affordability requirements, all zoning ordinances, development standards, and annual fee reports or other relevant financial reports. Further, the City will identify opportunities to develop publicly available online map resources that identify vacant parcels, site zoning, and other site information to assist interested developers.

#### Program 21: Local Housing Trust Fund

The City will explore the establishment of a Local Housing Trust Fund dedicated to the creation, rehabilitation, or preservation of affordable housing, transitional housing, and emergency shelters. Alternatively, the City will explore funding sources, such as commercial linkage fees, an inclusionary housing ordinance, or other fees or taxes, and identify a dedicated revenue source that assures the availability of resources on a regular basis for affordable housing.



### Program 22: Low-Barrier Navigation Centers

Low-Barrier Navigation Centers are housing first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. The City will amend the zoning code to permit the development of Low-Barrier Navigation Centers as a use by-right in mixed-use and non-residential zones that permit residential uses.

### Program 23: Minimum Unit Sizes

To increase flexibility in development standards, the City will amend the zoning code to remove minimum unit size requirements. Minimum unit sizes will instead be mandated in accordance with Building Code requirements.

### Program 24: No Net Loss

The City will monitor development activity, proposed rezones, and identified capacity to ensure adequate remaining capacity is available to meet any remaining unmet share of the RHNA for all income levels throughout the entirety of the planning cycle, consistent with no-net-loss requirements. If at any time during the planning period, a development project results in fewer units by income category than identified in the sites inventory for that parcel and the City cannot find that the remaining sites in the housing element are adequate to accommodate the remaining RHNA by income level, the City will within 180 days identify and make available additional adequate sites to accommodate the remaining RHNA.

### Program 25: Objective Development Standards

Increase transparency and certainty in the development process through the creation of objective design standards. Any new design standards developed and imposed by the City shall be objective without involvement of personal or subjective judgement by a public official and shall be uniformly verifiable by reference to the City's regulations in accordance with the requirements of the Housing Crisis Act of 2019. Further, the City will identify opportunities to develop new objective development standards where subjective review currently applies.

### Program 26: Ongoing Code Updates

The City is currently in the process of comprehensively amending its zoning regulations to ensure consistency with the adopted 2040 General Plan. The City will continue to update its regulations, as necessary, in response to legislative changes. Further, the City will monitor opportunities and amend their zoning code to streamline, update, and simplify regulations related to housing, where possible.

### Program 27: Place-Based Strategies

Place-based planning strategies can be used to improve neighborhoods through localized solutions that increase opportunities for lower-income households. Using place-based strategies, the City will identify areas that are ideal for focused planning efforts such as prioritizing infrastructure needs to serve existing or planned affordable housing. This will include the evaluation of opportunities for Enhanced Infrastructure Financing Districts, gap funding for infrastructure through grant pursuits, and increased collaboration with other agencies to coordinate opportunities to capitalize on existing and planned projects. Additionally, the City will work with the local school districts to facilitate the coordination of existing and planned affordable housing with support services available to students and their parents such as after-school programs. Through the allocation of funding and resources the City will prioritize, invest in, and build-up underinvested communities to better meet the needs of lower-income households



### Program 28: Reasonable Accommodation Procedures

Reasonable accommodations (including waiver of regulations, policies, or procedures) are accommodations to afford persons with disabilities an equal opportunity to use and enjoy a dwelling. To ensure compliance with the federal Fair Housing Act, the City will develop a process by which reasonable accommodation requests can be made. Visitors to the public counter at City Hall will be informed via posted signs and/or notices of their right to request relief from Code regulations and permitting procedures that have a discriminatory effect on housing for individuals with disabilities. The City will develop a form that can be filled out and submitted by applicants. Requests will specify the regulation, policy, or procedure from which the applicant is seeking relief and the reason. Requests will be approved, approved with modifications, or declined once staff has made determinations as to the following:

- The development will be used by a person(s) with a disability;
- The deviation requested is necessary to make specific housing available to a person with a disability and complies with all applicable development regulations to the maximum extent feasible; and
- The deviation request will not impose an undue financial or administrative burden on the City.

### Program 29: Reduced Parking Requirements

The City will identify opportunities to reduce parking requirements for sites that are zoned to allow residential development through a data-informed approach that will reduce the overall cost of housing development. This will include, but not limited to, increased flexibility in parking requirements for affordable and mixed income developments as well as reductions in exchange for public amenities. Further, the City will ensure that appropriate parking reductions apply to any development proposals that would eliminate religious-use parking spaces in exchanged for housing developments, in accordance with State law.

### Program 30: Replacement Requirements

The City will mandate replacement requirements consistent with the Housing Crisis Act of 2019 for proposed housing developments on sites that currently have residential uses, or within the past 5 years have had residential uses that have been vacated or demolished, that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income, subject to any other form of rent or price control, or occupied by low- or very low-income households. Further, the City will work with tenants of units that could be redeveloped and provide them with education regarding tenant rights and replacement procedures.

### Program 31: Rezoning Opportunities

To maintain adequate capacity and to increase opportunities for development the City will continue to identify areas appropriate for increased residential densities, specifically in areas with access to resources, amenities, and public transit.

### Program 32: Section 8 – Housing Choice Voucher

The City will continue participation with the Riverside County Housing Authority to connect eligible Indio residents to Section 8 Housing Choice Vouchers. The City will provide information on the City's website on the availability of Section 8 programs and other relevant resources.

### Program 33: Supportive Housing

The City will amend the Zoning Code to allow supportive housing by right in all residential zones that permit multifamily uses and mixed-use zones that allow residential uses.

#### Program 34: Surplus Lands

The City will identify and prioritize State and local surplus lands available for housing development affordable to lower-income households and report on these lands annually through the Housing Element Annual Progress Reports.

The proposed Housing Element Update is available at:

[https://www.indio.org/your\\_government/development\\_services/housing\\_element\\_update.htm](https://www.indio.org/your_government/development_services/housing_element_update.htm)

# 3 Initial Study Checklist

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**1. Project title:**

City of Indio General Plan Amendment: Housing Element Update

**2. Lead agency name and address:**

City of Indio Community Development Department  
100 Civic Center Mall  
Indio, CA 92201

**3. Contact person and phone number:**

Kevin Snyder, AICP  
Director of Community Development  
City of Indio  
760.541.4255  
ksnyder@indio.org

**4. Project location:**

Citywide

**5. Project applicant's name and address:**

City of Indio Community Development Department  
100 Civic Center Mall  
Indio, CA 92201

**6. General plan designation:**

Not Applicable for Adoption of Housing Element Update

**7. Zoning:**

Not Applicable for Adoption of Housing Element Update

**8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):**

Proposed General Plan Amendment (GPA) to amend the City of Indio General Plan with updates to the Housing Element for the planning period of 2021 through 2029

**9. Surrounding land uses and setting (Briefly describe the project's surroundings):**

Indio is located in Riverside County, approximately 120 miles east of Los Angeles and 20 miles east of Palm Springs. The City is bordered by the City of La Quinta to the west, unincorporated Riverside County to the south and north, and the City of Coachella to the east. Indio is the fastest growing city in eastern Riverside County and is a tourist destination, as the City hosts several large festivals annually.

**10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

Approval from California Department of Housing and Community Development (HCD).

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

The City of Indio notified fourteen (14) California Native American tribes on August 11, 2021 pursuant to the requirements of AB 52/SB 18. Upon request, the City will engage in consultation efforts. The Housing Element Update is a policy document that establishes programs, policies and locations for future housing. As required, future housing will be subject to compliance with CEQA including requiring notification to Native American tribes.

**Environmental Factors Potentially Affected**

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

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources          | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology and Soils             | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards and Hazardous Materials    |
| <input type="checkbox"/> Hydrology and Water Quality   | <input type="checkbox"/> Land Use and Planning              | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                         | <input type="checkbox"/> Population and Housing             | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                    | <input type="checkbox"/> Transportation                     | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire                           | <input type="checkbox"/> Mandatory Findings of Significance |

**Determination (completed by the Lead Agency)**

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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

  
\_\_\_\_\_  
Signature

08.17.21  
\_\_\_\_\_  
Date

**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 a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, 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 Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With 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 “Earlier Analyses,” as described in (5) below, 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. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
  - d. The significance criteria or threshold, if any, used to evaluate each question; and
  - e. The mitigation measure identified, if any, to reduce the impact to less than significance

### 3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS</b> – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Explanation of Checklist Judgements:

##### a–d: No Impact.

The Housing Element update is a policy document, and adoption of this Element alone would not produce environmental impacts. The Housing Element Update consists of an updated housing program for which, no actual development or rezoning is proposed as part of the update. Implementation of the programs contained in the document would accommodate development required to meet the City's 2021-2029 RHNA allocation, which specifies a need for the construction of 7,812 housing units. To accommodate this RHNA allocation, City staff reviewed the inventory of vacant and underutilized sites that can accommodate the current RHNA allocation for the 2021-2029 Housing Element Update. Within the identified sites, the 7,812 units would be accommodated, with a majority of these units being accommodated on undeveloped sites in areas zoned for either mixed-use or residential development. Any such development would be expected to conform to existing General Plan policies, municipal code, and zoning code development standards. As such, the adoption of the General Plan Amendment and the Housing Element update would not degrade the visual character or quality, scenic resources, or generate light and glare impacts. No aesthetic impacts would occur from the adoption of this policy document.



## 3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>II. AGRICULTURE AND FORESTRY RESOURCES</b> – 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation of Checklist Judgements:

**a – e: No Impact.**

Per the City of Indio Conservation Element of the General Plan, Indio includes a wide variety of agricultural soils and agricultural areas within the City. The City's agricultural industry produces off-season and specialty crops, including grapes, citrus, dates, and other fruit and vegetable crops. Within the City are a total of 3,327 acres of Prime Farmland, Unique Farmland, and Farmland of Local Importance (City of Indio 2019b).

The Housing Element Update is a policy document, consisting of a housing program, and its adoption would not, in itself, produce environmental impacts, because no actual development or rezoning is proposed as part of the update. Although implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation, such development would not impact agricultural resources and would not involve rezoning land designated for agricultural purposes. With maintaining the existing agricultural land within the City, there would be no impacts to important farmland from implementation of the Housing Element Update. The Housing Element Update does not change any boundaries or the potential for agricultural activities. There are also no programs that would conflict with existing agricultural zoning or a Williamson Act contract. For these reasons, no impacts to agricultural resources would occur.

### 3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>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:</b>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Explanation of Checklist Judgements:

**a–c: Less Than Significant Impact. d: No Impact.**

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. The City lies within the South Coast Air Basin (SCAB), and the South Coast Air Quality Management District (SCAQMD) is the regional government agency that monitors and regulates air pollution within the SCAB and is responsible for measuring the air quality of the region. The SCAB is designated as a nonattainment area for federal and state O<sub>3</sub> standards and federal and state PM<sub>2.5</sub> standards. The SCAB is designated as a nonattainment area for state PM<sub>10</sub> standards; however, it is designated as an attainment area for federal PM<sub>10</sub> standards. The SCAB is designated as an attainment area for federal and state CO standards, federal and state NO<sub>2</sub> standards, and federal and state SO<sub>2</sub> standards. While the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard.

The Housing Element Update would not conflict with or obstruct implementation of the State Implementation Plan by the SCAQMD because the growth anticipated in the Housing Element Update (RHNA allocation) is consistent with SCAG's growth projections that were also factored into the Regional Air Quality Strategy. The Housing Element Update would not violate any air quality standard or contribute substantially to an existing or projected air quality violation, nor would it result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. Lastly, because the Housing Element Update does not affect land uses that are typically associated with the creation of objectionable odors (such as rendering plants, landfills, treatment plants, etc.), its adoption would have no impact from odors.

Based on the above, the Housing Element Update would have a less than significant impact on air quality.

### 3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES – Would the project:</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Explanation of Checklist Judgements:

##### a-f: Less than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Future residential development to meet the RHNA allocation is expected to be located on infill sites within urbanized areas where little or no native vegetation exists and where little potential exists for the occurrence of sensitive species habitat, riparian habitat, a sensitive natural community, federally protected wetlands, or wildlife corridors or nursery sites.

The Housing Element Update would not alter any local, regional, State, or Federal biological protection standards, nor would they alter the City's existing general plan policies related to protection and preservation of sensitive biological resources. Although the policies and objectives of the Housing Element encourage housing, any new housing would have to comply with all current biological preservation policies, standards and regulations. The proposed Housing and Safety Element Updates do not encourage housing or development to be located in stream corridors, wetlands, riparian areas, or any other type of habitats for endangered or threatened species. Therefore, the Housing Element Update would have a less than significant impact on biological resources.

## 3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES – Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Explanation of Checklist Judgements:

#### a–c: Less than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation.

While new housing could ultimately be constructed on sites containing cultural resources, the following goal and policies within the Conservation Element of the City's General Plan (City of Indio 2019b) are designed to avoid impacts to cultural resources:

**Goal CE-8:** Historic, Archaeological, and Paleontological Resources. Historic, archaeological, and paleontological resources preserved for their scientific, educational, aesthetic, and cultural values.

#### CE-8 Policies

**CE-8.1 Site plan review.** Ensure adequate site plan review and mitigation measures are implemented for the development of sites with the potential to contain historic, archaeological, and paleontological resources.

**CE-8.2 Avoidance of impacts to historic resources.** For projects that could affect historic resources, ensure adequate study to identify eligible resources and project-level review to avoid or lessen negative impacts through conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

**CE-8.3 Incentivize retention of historic landmarks.** Explore opportunities to provide economic and regulatory incentives for the retention and sensitive upgrades and changes to historic landmarks and contributors to designated historic districts.

**CE-8.4 Monitoring.** Require monitoring on sites where grading has the potential to impact subsurface cultural and paleontological resources during excavation and construction activities.

**CE-8.5 Public Education.** Support opportunities to promote public awareness of the history and pre-history of the area as the oldest Valley City and the cultural center of the Coachella Valley.

**CE-8.6 Coordination with local tribes.** Periodically meet with representatives from local tribes to:

- Obtain input prior to making decisions, taking acres, or implementing programs/projects that may impact cultural resources;
- Discuss methods to preserve and protect highly sensitive cultural resources; and
- Ensure that there is agreement regarding the protocol to be followed when cultural resources are discovered.

Relative to human remains, there are no known burial sites or cemeteries zoned for residential use in the City. Therefore, it is not expected that human remains would be disturbed as a result of implementation of the Housing Element Update. In the unlikely event that human remains are discovered, then the provisions set forth in California Public Resources Code Section 5097.98 and state Health and Safety Code Section 7050.5 would be implemented in consultation with the assigned Most Likely Descendant as identified by the NAHC. No further construction activities would be permitted until the coroner is contacted, as well as any applicable Native American tribes. The City shall be required to comply with the California Native American Graves Protection and Repatriation Act (2001), the federal Native American Graves Protection and Repatriation Act (1990), as well as AB 52 early consultation requirements. As regulations are in place to treat any inadvertent uncovering of human remains during grading, impacts to human remains would be less than significant.

The Housing Element Update would not change or alter policies to protect and/or review cultural resources. Therefore, impacts are less than significant.

## 3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VI. Energy – Would the project:</b>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation of Checklist Judgements:

**a–b. No Impact.**

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. However, future development would be required to adhere to all state and/or local plans for renewable energy or energy efficiency.

Based on the above, the Housing Element Update would result in less than significant impacts associated with energy.

### 3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS – Would the project:</b>				
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Explanation of Checklist Judgements:

#### a–f: Less than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation.

a: As the City lies within a region known to be seismically active, the potential exists for people and structures associated with new residential projects to be exposed to strong ground shaking, ground failure, and soil instability. The City is located in a seismically active region. There are three major faults located in Riverside County: the San Andreas, San Jacinto, and Elsinore faults. The San Andreas and San Jacinto are two of California's most active faults. These faults pose geologic and seismic hazards in the form of earthquakes, fault rupture, liquefaction, and landslides (City of Indio 2019c). Despite the potential of the nearby faults to produce severe ground shaking in the City, no significant impact regarding fault hazards would occur, because the Housing Element Update would be consistent with the other elements of the General Plan, including the Safety Element. Additionally, the potential for significant adverse impacts to result from these phenomena would be substantially reduced through adherence to requirements specified in the Alquist–Priolo Act, the Uniform Building Code, Title 24 of the California Building Code, and all development regulations of the City. Compliance with these building standards would minimize impacts associated with seismic hazards, and impacts would be less than significant.

b–e: As the City of Lomita contains liquefaction zones, and therefore poses a potential geologic hazard to the City. The City has in place geologic review procedures to address these hazards. Additionally, Goal SE-5 and Policies SE-4.1 through SE-4.8 are intended to reduce the risks seismic hazards pose to the City. The City's General Plan and zoning designations do not prohibit new development on areas of geologic hazard; however, many precautionary recommendations and restrictions are established in the policies and Municipal Code in order to minimize potential impacts from developing on geologically hazardous land or resulting in substantial soil erosion. City regulations and policies cover landslides, seismic shaking, surface rupture, seiches, liquefaction, subsidence, expansive soils, and soil erosion. All new development is required to be consistent with these regulations. As such, compliance with these regulations would minimize impacts associated with seismic hazards, and impacts would be less than significant.

f: Depending on the location, future development in the City has the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. However, as discussed in Section 3.5, Cultural Resources, above, the Conservation Element of the City's General Plan includes Goal CE-8 and Policies CE-8.1 through CE-8.5 for the protection of paleontological resources, and all new development must be consistent with these policies. The Housing Element Update would not change or alter these policies.

Based on the above, the Housing Element Update would result in less than significant impacts associated with geology and soils.

### 3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VIII. GREENHOUSE GAS EMISSIONS – Would the project:</b>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanation of Checklist Judgements:

**a – b: Less Than Significant Impact.**

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. According to the U.S. Environmental Protection Agency, the burning of fossil fuels, along with deforestation and other activities, has caused the concentrations of heat-trapping greenhouse gases (GHGs) to increase significantly in the earth's atmosphere (U.S. Environmental Protection Agency 2021). The increase in GHGs results in global warming, as more heat is trapped in the atmosphere. Given the already built-out nature of the City and lack of substantial vacant land, future residential projects that may be developed to meet the RHNA requirement are expected to be located on infill sites where pedestrian- and transit-oriented development is highly feasible and would be encouraged. Such development should reduce the number of new vehicle trips typically associated with residential projects and, thus, would help reduce GHG production resulting from the combustion of fossil fuels for transportation purposes. Based on the above, the Housing Element Update would result in less than significant impacts associated with GHG emissions. New development projects will be required to comply with the Green Building Code, which also reduces GHG emissions.

Based on the above, the Housing Element Update would have a less than significant impact on GHG emissions.

### 3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation of Checklist Judgements:

**a–c and e–g: No Impact. d: Less Than Significant Impact.**

a–c: The Housing Element Update is a policy document, and therefore, adoption would not, in itself, result in potential impacts from hazards and hazardous material that may endanger residents or the environment. Implementation of the updated Housing Element would also not result in the routine use, transport, or disposal of hazardous materials or generate significant quantities of hazardous materials. As such, no impacts would occur.

d: The Housing Element Update is a policy document and adoption will not, in itself, result in environmental impacts. However, implementation of the programs contained in the document will accommodate development required to meet the City's RHNA allocation.

All sites of future residential projects will be evaluated using appropriate databases including the California Department of Toxic Substances Control EnviroStor database which, pursuant to Government Code Section 65962.5, lists Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Hazardous Waste Permit, and Hazardous Waste Corrective Action sites. The potential impacts related to any listed hazardous materials sites associated with any specific future residential projects will be assessed at the time the projects are actually proposed. Mitigation measures would then be adopted if and as necessary, in conformance with CEQA. As such, the Housing Element Update would result in less than significant impacts.

e–g: The Housing Element Update would be consistent with General Plan policies related to hazards, and specifically Goal SE-7 and Policies SE-7.1 through SE-7.5 outlining guidance for hazardous materials management. Additionally, within the Safety Element Update are details related to the City's emergency response plan to prepare for, and respond to, natural hazards including extreme heat, flooding, geologic hazards such as earthquakes, exposure to hazardous materials, and wildfires. Future development would be consistent with the City's emergency response plans related to risk from fire. Based on the above, the Housing Element Update would result in no impact on hazards or hazardous materials.

## 3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. HYDROLOGY AND WATER QUALITY – Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Explanation of Checklist Judgements:

**a, c–d: Less than Significant Impact. b and e: No Impact.**

The Housing Element Update is a policy document, consisting of a housing program designed to assist the City in implementing its RHNA allocation. Therefore, adoption of this update would not, in itself, produce environmental impacts. However, implementation of the programs contained in the documents would accommodate development required to meet the City's RHNA allocation. Future residential development that would qualify to meet the RHNA

requirement are expected to be located on infill sites in urbanized areas and the City has procedures and regulations in place to ensure that there would be no significant impacts associated with hydrology and water quality.

a: Wastewater treatment services are provided by two treatment plants; one is owned by Valley Sanitary District, and the other is owned by Coachella Valley Water District. Sewage from the City is conveyed in sewer lines maintained by both Valley Sanitary District and the Coachella Valley Water District (City of Indio 2019b). All demolition, relocation and/or construction phases of future housing development would be subject to compliance with applicable local, regional, state and federal regulations designed to protect water resources, including those regulations requiring implementation of Best Management Practices (BMPs), preparation of Stormwater Pollution Prevention Plans (SWPPPs), and submittal of Erosion Control Plans in compliance with National Pollution Discharge Elimination System (NPDES) provisions. Consistency with this regulatory framework would adequately ensure that such impacts would be avoided or reduced to less than significant. The Housing Element Update would not generate a significant impact on water quality over current projections for population and housing units.

b: Groundwater within the City is managed by the Coachella Valley Water District. As outlined in the City's General Plan EIR, all future developments are required to comply with applicable state and local regulations that concern groundwater recharge, including the Municipal Code (City of Indio 2019b). As such, future development envisioned within the Housing Element Update would not adversely affect groundwater.

c–d: City regulations prohibit new development that would create runoff volumes or velocities that may cause the City's existing drainage system to exceed its design capacity. In regard to risks due to dam or levee failure, the City is not located within an area that would be impacted by any dam or levee failure. Seiche and mudflow risk would also be negligible, as the City is not located near a large contained body of water or downslope from an unstable hillside. With regard to tsunami risk the City is not located within a mapped tsunami inundation area. Based on the above, the Housing Element Update would result in no impact or a less than significant impact on or from hydrology and water quality.

e: As stated above, Lomita Water, which is part of the City's Water Division, provides potable water to residences and businesses within the City. The Housing Element Update would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan associated with the Lomita Water.

Based on the above, the Housing Element and Safety Element Updates would have a less than significant impact on hydrology and water quality.

### 3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. LAND USE AND PLANNING – Would the project:</b>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Explanation of Checklist Judgements:

a: No Impact. b: Less than Significant.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Although implementation of the programs contained in the document would encourage residential development required to meet the City's RHNA allocation, such residential projects are expected to be located on infill sites within existing neighborhoods, and because infill sites are part of the existing urban fabric, projects developed on them would not be likely to physically divide an established community. The proposed update would not conflict with General Plan policy or Municipal Code regulations, adopted for the purpose of avoiding or mitigating an environmental effect. As there are no approved habitat conservation or natural communities conservation plans applicable to infill sites, residential development would not conflict with such plans.

Based on the above, the Housing Element Update would have a less than significant impact on land use and planning.

### 3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. MINERAL RESOURCES – Would the project:</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Explanation of Checklist Judgements:

**a–b: No Impact.**

There are no known mineral resources of significant value or categorized as locally important within the City that would be lost due to residential development facilitated by the Housing Element Update. There would be no impact to mineral resources associated with adoption of the Housing Element Update as this would be merely the adoption of policies and not in themselves result in direct changes to the environment.

## 3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIII. NOISE – Would the project result in:</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Explanation of Checklist Judgements:

**a–b: Less Than Significant Impact. c: No Impact.**

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. The majority of such development is expected to be located on infill sites. Adherence to the City's Noise Ordinance and compliance with General Plan Noise Element Policies would ensure that any such noise and vibration increases, both temporary and permanent, would result in less than significant impacts within project areas.

Based on the above, the Housing Element Update would have a less than significant impact on noise.

### 3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIV. POPULATION AND HOUSING – Would the project:</b>				
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Explanation of Checklist Judgements:

##### a–b: Less Than Significant Impact.

The Housing Element Update utilizes the 2021-2029 RHNA to plan for and accommodate population growth. Therefore, it would not induce population growth within the City. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Future development would occur on vacant or underutilized sites. With the implementation of programs in the Housing Element Update to increase housing capacity, there would be adequate land available to accommodate the City's RHNA allocation. Therefore, the update would not necessitate the construction of replacement housing elsewhere (outside of the City) or result in environmental impacts related to growth. Based on the above, the Housing Element Update would result in a less than significant impact associated with population and housing.

Based on the above, the Housing Element Update would have a less than significant impact on population and housing.

## 3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XV. PUBLIC SERVICES</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Explanation of Checklist Judgements:

#### a(i-v): Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. As a highly urbanized community, all of the residentially designated land in the City is served with sewer and water lines, streets, storm drains, and other infrastructure and utilities.

The Housing Element Update, therefore, would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 listed above. This general plan update would not change or impact standards, policies, programs and regulations in place that ensure adequate provision of public services. Based on the above, the Housing Element Update would have a less than significant impact on public services.

### 3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVI. RECREATION</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Explanation of Checklist Judgements:

##### a-b: Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program. No specific recreational facilities or the construction or expansion of recreational facilities that might have an adverse physical effect on the environment are included in the Housing Element Update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. The availability, maintenance, and management of park and recreation facilities are covered under the General Plan and the Capital Improvement Program. Based on the above, the Housing Element Update would result in a less than significant impact on recreation.

### 3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVII. TRANSPORTATION – Would the project:</b>				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Explanation of Checklist Judgements:

**a–d: Less Than Significant Impact.**

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. The development anticipated by the Housing Element would occur primarily on urban infill sites and consist primarily of multi-family and mixed-use development. Therefore, future development associated with implementation of the Housing Element Update would be expected to generate fewer vehicle miles traveled and more multi-modal trips than conventional development. Potential traffic impacts related to increased transportation system demands associated with specific future residential projects would be assessed at the time the projects are actually proposed, using both level-of-service (LOS) and vehicle miles traveled (VMT) methodologies, consistency with local and state guidelines. Mitigation measures would then be adopted as necessary, in conformance with CEQA. The Housing Element Update would not increase hazards due to a design feature, result in inadequate emergency access, or conflict with adopted policies, plans, or programs supporting alternative transportation. Based on the above, the Housing Element Update would result in a less than significant impact on transportation/traffic.



### 3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVIII. TRIBAL CULTURAL RESOURCES</b>				
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Explanation of Checklist Judgements:

##### a–b: Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. The City's General Plan (City of Indio 2019c) contains Goal CE-8 and Policies CE-8.1 through CE-8.5 for the protection of tribal cultural resources, and all new development must be consistent with these policies. The Housing Element Update would not change or alter policies to protect tribal cultural resources.

Based on the above, the Housing Element Update would result in less than significant impacts to tribal cultural resources.

### 3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:</b>				
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 or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Explanation of Checklist Judgements:

**a–c and e: No Impact; d: Less than Significant Impact.**

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Because the development anticipated by the Housing Element would occur primarily on infill sites already served by well-established utilities service systems, the need for the expansion of existing systems or the construction of new systems, in compliance with applicable statutes and regulations, would be less than significant.

Based on the above, the Housing Element Update would have a less than significant impact on utilities and service systems.

## 3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</b>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Explanation of Checklist Judgements:

#### a–d: Less Than Significant Impact.

The Housing Element Update is a policy document, consisting of a housing program; no actual development or rezoning is proposed as part of the update. Therefore, its adoption would not, in itself, produce environmental impacts. Implementation of the programs contained in the document would accommodate development required to meet the City's RHNA allocation. Because the development anticipated by the Housing Element would occur primarily on infill sites identified outside of the High Fire Hazard Severity Zone the impacts associated with wildfire would be less than significant.

Based on the above, the Housing Element Update would have a less than significant impact on wildfire.

## 3.21 Mandatory Findings of Significance

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

### Explanation of Checklist Judgements:

#### a-c: Less Than Significant Impact.

As discussed throughout the above portions of the Initial Study Checklist, the Housing Element Update is a policy document and adoption of this Element Update alone would not produce environmental impacts. Although implementation of the programs contained in the Housing Element Update would accommodate development required to meet the City's RHNA allocation, the Housing Element does not identify, describe, promote, entitle, or permit any particular residential development project.

The Housing Element Update does not change the allowed densities or types of development that may occur within the City. The act of adopting the Housing Element Update does not, therefore, have the potential to result in environmental impacts, either limited or cumulative, affecting habitat; plant or animal communities; rare, endangered or threatened species; historic resources; or human beings.

# 4 References

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## 4.1 References Cited

14 CCR 15000–15387 and Appendices A through L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

California Public Resources Code, Section 21000–21177. California Environmental Quality Act, as amended.

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