

Mitigation Measure Title	Mitigation Measure	Party Responsible for Implementing Mitigation	Implementation Timing	Party Responsible for Monitoring	Action by Monitor	Monitoring Timing
	<p>until the nest is either abandoned or the young have fledged. A qualified biologist would be required to closely monitor the nest until it is determined that the nest is no longer active, at which time vegetation removal and/or ground disturbance could continue. Vegetation removal and/or ground disturbance activities within the vicinity of the nest may commence at the discretion of the biological monitor.</p> <p>CLIMATE CHANGE</p>					
GCC-1	<p>The proposed East County Detention Center (ECDC) will employ a number of Leadership in Energy and Environmental Design (LEED) concepts, including: water and energy use reduction, construction products, and waste stream reduction. All main site lighting will be full-cutoff, neutral white light-emitting diode (LED) fixtures to minimize energy use. The following measures would be incorporated into the design and construction of the project (including specific building projects):</p> <p>Construction and Building Materials.</p> <ul style="list-style-type: none"> • Use locally produced and/or manufactured building materials for at least 10 percent of the construction materials used for the project. • Use "Green Building Materials," such as those materials that are 	<p>COR EDA Construction Contractor</p>	<p>Prior to final design</p>	<p>COR EDA Construction Contractor</p>	<p>Ensuring that the specified GHG reduction and efficiency enhancement measures are incorporated into the project.</p>	<p>Prior to final design</p>

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	<p>resource efficient, and recycled and manufactured in an environmentally friendly way, for at least 10 percent of the project.</p> <ul style="list-style-type: none"> Limit unnecessary idling of construction equipment. A reduction in equipment idling would reduce fuel consumption, and therefore, greenhouse gas (GHG) emissions. Maximize the use of electricity from the power grid by replacing diesel- or gasoline-powered equipment. This would reduce GHG emissions because electricity can be produced more efficiently at centralized power plants. <p>Energy Efficiency Measures.</p> <ul style="list-style-type: none"> Design all project buildings to exceed the California Building Code's (CBC) Title 24 energy standard, including, but not limited to, any combination of the following: <ul style="list-style-type: none"> Increase insulation such that heat transfer and thermal bridging is minimized. Limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption. Incorporate ENERGY STAR or better rated windows, space heating and cooling equipment, light fixtures, appliances, or 					

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	<p>other applicable electrical equipment.</p> <ul style="list-style-type: none"> • Provide a landscape and development plan for the project that takes advantage of shade, prevailing winds, and landscaping. • Install efficient lighting and lighting control systems. Use daylight as an integral part of the lighting systems in buildings. • Install light-colored "cool" roofs over conditioned space. • Install energy-efficient heating and cooling systems, appliances, equipment, and control systems. • Install solar or LEDs for outdoor lighting. • The project applicant will use less than 3,900 Global Warming Potential (GWP) hydrofluorocarbon (HFC) refrigerants or natural refrigerants (ammonia, propane, carbon dioxide [CO2]) for refrigeration and fire suppression equipment. • Provide vegetative or humanmade exterior wall shading devices or window treatments for east-, south-, and west-facing walls with windows. <p>Water Conservation and Efficiency Measures.</p> <ul style="list-style-type: none"> • Devise a comprehensive water conservation strategy appropriate for the project and its location. The 					

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	<p>strategy may include the following, plus other innovative measures that may be appropriate:</p> <ul style="list-style-type: none"> o Install drought-tolerant plants for landscaping. o Use reclaimed water for landscape irrigation within the project where available. Install the infrastructure to deliver and use reclaimed water. o Install water-efficient irrigations systems, such as weather-based and soil-moisture-based irrigation controllers and sensors for landscaping according to the California Department of Water Resources Model Efficient Landscape Ordinance. <p>Solid Waste Measure.</p> <ul style="list-style-type: none"> • Provide employee education about reducing waste and available recycling services. 					
	CULTURAL RESOURCES					
CR-1	<p>Discovery of Cultural or Paleontological Resources During Construction.</p> <p>If cultural or paleontological resources are discovered during project construction activities when a monitor is not present on site, construction will be redirected in the immediate vicinity of the discovery until a qualified professional archaeologist or paleontologist can assess the nature and</p>	COR EDA Construction Contractor	During grading and excavation	COR EDA Construction Contractor	Halting grading in an area where an archaeological or paleontological resource may be present and contacting the EDA Facilities Project Manager for inspection by a qualified professional.	During grading operations

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CR-2	<p>significance of the find. It may be necessary to excavate in order to determine significance. Work can resume in the area after the discovery has been removed or determined to not be a significant resource by the archaeologist or paleontologist.</p> <p>Discovery of Human Remains. If human remains are discovered, State Health and Safety Code Section 7050.5 states that further disturbances and activities shall cease in any area or nearby area suspected to overlie remains, and the County of Riverside (County) Coroner shall be contacted. Pursuant to Public Resources Code (PRC) Section 5097.98 and California Code of Regulations Section 15064.5, if the remains are thought to be Native American, the coroner will notify the Native American Heritage Commission (NAHC), which will then notify the Most Likely Descendant. Further provisions of PRC 5097.98 are to be followed as applicable.</p>	COR EDA Construction Contractor	During grading and excavation	COR EDA Construction Contractor	Halting grading upon the discovery of human remains and contacting the EDA Facilities Project Manager and the County Coroner.	During grading operations
CR-3	<p>Paleontological Resources Construction Monitoring. Monitoring of excavation activities by a qualified paleontological monitor following a Paleontological Resources Impact Monitoring Program (PRIMP) shall begin once a depth of 10 feet below the surface is reached. The monitor should be equipped to salvage fossils and/or matrix samples as they are unearthed in order to avoid construction delays. The monitor must</p>	COR EDA Qualified Paleontologist Construction Contractor	Prior to the issuance of a grading permit	COR EDA Construction Contractor	Ensuring that a qualified paleontological monitor is on site during excavation and grading activities exceeding 10 feet of depth	During grading operations

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	<p>be empowered to temporarily halt or divert equipment in the area of the find in order to allow removal of abundant or large specimens.</p> <p>a. Because the underlying sediments may contain abundant fossil remains that can only be recovered by a screening and picking matrix, it is recommended that these sediments occasionally be spot screened through 1/8 to 1/20-inch mesh screens to determine if small vertebrate fossils exist. If small fossils are encountered, additional sediment samples (up to 6,000 pounds) shall be collected and processed through 1/20-inch mesh screens to recover additional fossils.</p> <p>b. Recovered specimens shall be prepared to a point of identification and permanent preservation. This includes the washing and picking of mass samples to recover small invertebrate and vertebrate fossils and the removal of surplus sediment from around larger specimens to reduce the volume of storage for the repository and the storage cost for the developer.</p> <p>c. Collected and identified specimens shall be curated into a museum repository with permanent retrievable storage.</p> <p>d. Preparation of a report of findings with an appended itemized inventory catalog of specimens.</p>					

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	<p>When submitted to the Lead Agency, the report and inventory catalog would signify completion of the program to mitigate impacts to paleontological resources.</p> <p>GEOLOGY AND SOILS</p>					
GEO-1	<p>Prior to approval of final design, the final design plans shall incorporate earthquake-resistant design in accordance with the County of Riverside (County) requirements, the most current California Building Code (CBC), the recommended seismic design parameters of the Structural Engineers Association of California, and the recommendations included in the geotechnical reports on the proposed project site entitled Geotechnical Investigation for the Proposed Indio CAC/Law Library Improvements (2008) and Geotechnical Investigation for the Proposed Parking Structure Southeast of Oasis Street and Plaza Avenue (2013,) both prepared by C.H.J., Inc..</p> <p>Recommendations are summarized below, but are not limited to the following:</p> <ul style="list-style-type: none"> The County Building Official and a qualified geotechnical engineer or engineering geologist shall review final design plans for structural engineering compliance with CBC and professional registered 	<p>COR EDA Construction Contractor</p>	<p>Prior to final design</p>	<p>County Building Official and a qualified geotechnical engineer</p>	<p>Incorporating recommended soil stability measures from the geotechnical report</p>	<p>Prior to final design</p>

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	<p>Mitigation Measure</p> <p>geotechnical engineering requirements prior to the development of structures.</p> <ul style="list-style-type: none"> An on-site prejob meeting with the County, contractor, and geotechnical engineer shall occur prior to any grading operation. No grading operations shall be performed without the presence of a representative of the geotechnical engineer. The native loose and very loose soils should be removed to a minimum depth of 3 feet (ft) below ground surface (bgs). Depending on the foundation type selected, additional removal may be necessary. If conventional shallow foundations are utilized, all loose material in the parking structure pad area should be completely removed. A minimum removal of 8 ft should be performed. The removal should extend beyond the footing at the bottom of the excavation to a distance of 10 ft, where possible. For areas where the removal width is less than 10 ft, lateral retaining structures, such as sheet piles installed during excavation, should remain permanently. Design recommendations regarding grading, drainage, overexcavation, reinforcements and shorings, lateral loading, foundations, footings, site preparation, compacted fills, temporary construction slopes, 					

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	<p>shrinkage and subsidence, and design acceleration parameters shall be incorporated into final design.</p> <ul style="list-style-type: none"> Evaluation of soils for expansion potential shall be conducted by the geotechnical engineer prior and during the grading operation. A qualified corrosion engineer shall be consulted regarding corrosion effects of the on-site soils on underground metal utilities. The recommendations provided by the corrosion engineer shall be incorporated in a final written report and provisions in the report shall be included in building and utility plans, subject to review by the County Building Official. The erosion control plan prepared as part of the Storm Water Pollution Prevention Plan (SWPPP) shall be included as part of the grading plans. 					
	HAZARDOUS MATERIALS					
HM-1	<p>Predemolition Surveys and Air Monitoring for Asbestos Containing Materials and Lead Based Paint.</p> <p>Prior to issuance of any demolition permits, comprehensive predemolition surveys for asbestos-containing materials (ACMs) (Asbestos Hazard Emergency Response Act [AHERA] type level sampling survey) and lead-based paint (LBP) shall be performed. All inspections, surveys, and analyses shall be performed by appropriately</p>	COR EDA Construction Contractor	Prior to issuance of demolition permits	COR EDA Construction Contractor	Contracting a qualified firm to survey the structures to be demolished for ACMs and LBP; and ensuring that a qualified remediation firm is employed to remove/remediate all such materials	Prior to demolition of structures

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	<p>licensed and qualified individuals in accordance with applicable regulations (i.e., American Society for Testing and Materials [ASTM] E 1527-00, and 40 Code of Federal Regulations [CFR], Subchapter R, Toxic Substances Control Act [TSCA], Part 716). All identified ACMs and lead-containing materials shall be removed, handled, and properly disposed of by appropriately licensed contractors according to applicable regulations during demolition of structures (40 CFR, Subchapter R, TSCA, Parts 745, 761, and 763).</p> <p>Air monitoring shall be completed by appropriately licensed and qualified individuals in accordance with applicable regulations both to ensure adherence to applicable regulations (e.g., South Coast Air Quality Management District [SCAQMD]) and to provide safety to workers and the adjacent community. The County of Riverside (County) shall provide documentation (e.g., all required waste manifests, sampling, and air monitoring analytical results) to the Riverside County Department of Environmental Health (RCDEH) showing that abatement of any ACMs and lead containing materials identified in the project structures has been completed in full compliance with all applicable regulations and approved by the appropriate regulatory agency(ies) (40</p>					

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HM-2	<p>Mitigation Measure CFR, Subchapter R, TSCA, Parts 716, 745, 761, 763, and 795 and CCR Title 8, Article 2.6).</p> <p>Removal of Underground Storage Tanks. The existing USTs shall be removed as a part of the demolition activities and confirmation samples must be collected and removed from the resulting excavation in accordance with the directives from the RCDEH.</p>	COR EDA COR DEH Construction Contractor	During demolition and excavation	COR EDA COR DEH Construction Contractor	Ensuring that USTs are removed and soil remediation is completed during and as part of the excavation activities	During demolition and excavation
HM-3	<p>Remediation and Disposal of Hazardous Materials. Prior to issuance of any demolition permits, compliance will be obtained with all applicable regulations regarding the remediation and disposal of hazardous materials (e.g., Site Assessment and Cleanup Corrective Action Guidelines). The County shall provide documentation to the RCDEH showing that site remediation has been completed in full compliance with all applicable regulations and approved by the appropriate regulatory agency(ies).</p>	COR EDA COR DEH Construction Contractor	Prior to issuance of demolition permits	COR EDA COR DEH Construction Contractor	Ensuring demolition and remediation activities are appropriately coordinated	Prior to demolition
WQ-1	<p>HYDROLOGY AND WATER QUALITY Construction Phase Storm Water Pollution Prevention Plan. Prior to construction, the County of Riverside (County) shall prepare a Storm Water Pollution Prevention Plan (SWPPP) that complies with the General Construction Permit and that will:</p> <p>a. Require implementation of Best</p>	COR EDA Construction Contractor	Prior to final design	COR EDA Construction Contractor	Ensuring that SWPPP is prepared and that relevant BMPs are incorporated into Final Design specification and construction plans. SWPPP approval may need to be acquired from RWQCB.	Approval of Final Design Plans

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WQ-2	<p>Mitigation Measure</p> <p>Management Practices (BMPs) designed with a goal of preventing a net increase in sediment load in storm water discharges relative to preconstruction levels.</p> <p>b. Prohibit discharges of storm water or nonstorm water at levels that would cause or contribute to an exceedance of applicable water quality standards contained in the Basin Plan.</p> <p>c. Discuss in detail the BMPs planned for the project related to control of sediment and erosion, nonsediment pollutants, and potential pollutants in nonstorm water discharges.</p> <p>d. Describe postconstruction BMPs for the project.</p> <p>e. Explain the maintenance program for the project BMPs.</p> <p>f. During construction, require reporting of violations to the Regional Water Quality Control Board (RWQCB).</p> <p>g. List the parties responsible for SWPPP implementation and BMP maintenance during and after grading. The project proponent shall implement the SWPPP and will modify the SWPPP as directed by the General Construction Permit.</p> <p>Water Quality Management Plan. Prior to final design, the County shall prepare a WQMP. The WQMP shall identify the BMPs that will be used on-site to control predictable pollutant</p>	COR EDA Construction Contractor	Prior to final design	COR EDA Construction Contractor	Ensuring that WQMP is prepared and that relevant BMPs are incorporated into Final Design specification and construction	Approval of Final Design Plans

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	<p>runoff.</p> <p>More specifically, the WQMP shall, in accordance with the SWMP, do the following:</p> <ol style="list-style-type: none"> Describe the Site Design, Source Control, and Treatment BMPs to be used at the proposed development site (including both structural and nonstructural measures); Describe responsibility for the initial implementation and long-term maintenance of the BMPs; and Provide narrative with the graphic materials as necessary to specify the locations of the structural BMPs. 				plans	
	NOISE					
NO-1	<p>Construction Equipment Mufflers.</p> <p>The project contractor shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards.</p>	COR EDA Construction Contractor	Preparation of final plans	COR EDA Construction Contractor	Notation on all demolition and construction plans	Approval of final demolition and construction plans
NO-2	<p>Stationary Construction Equipment Placement.</p> <p>The project contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors to the east of the site.</p>	COR EDA Construction Contractor	Preparation of final plans	COR EDA Construction Contractor	Notation on all demolition and construction plans	Approval of final demolition and construction plans
NO-3	<p>Equipment Staging Areas.</p> <p>The construction contractor shall locate equipment staging in areas that will create the greatest distance between construction-related noise sources and</p>	COR EDA Construction Contractor	Preparation of final plans	COR EDA Construction Contractor	Notation on all demolition and construction plans	Approval of final demolition and construction

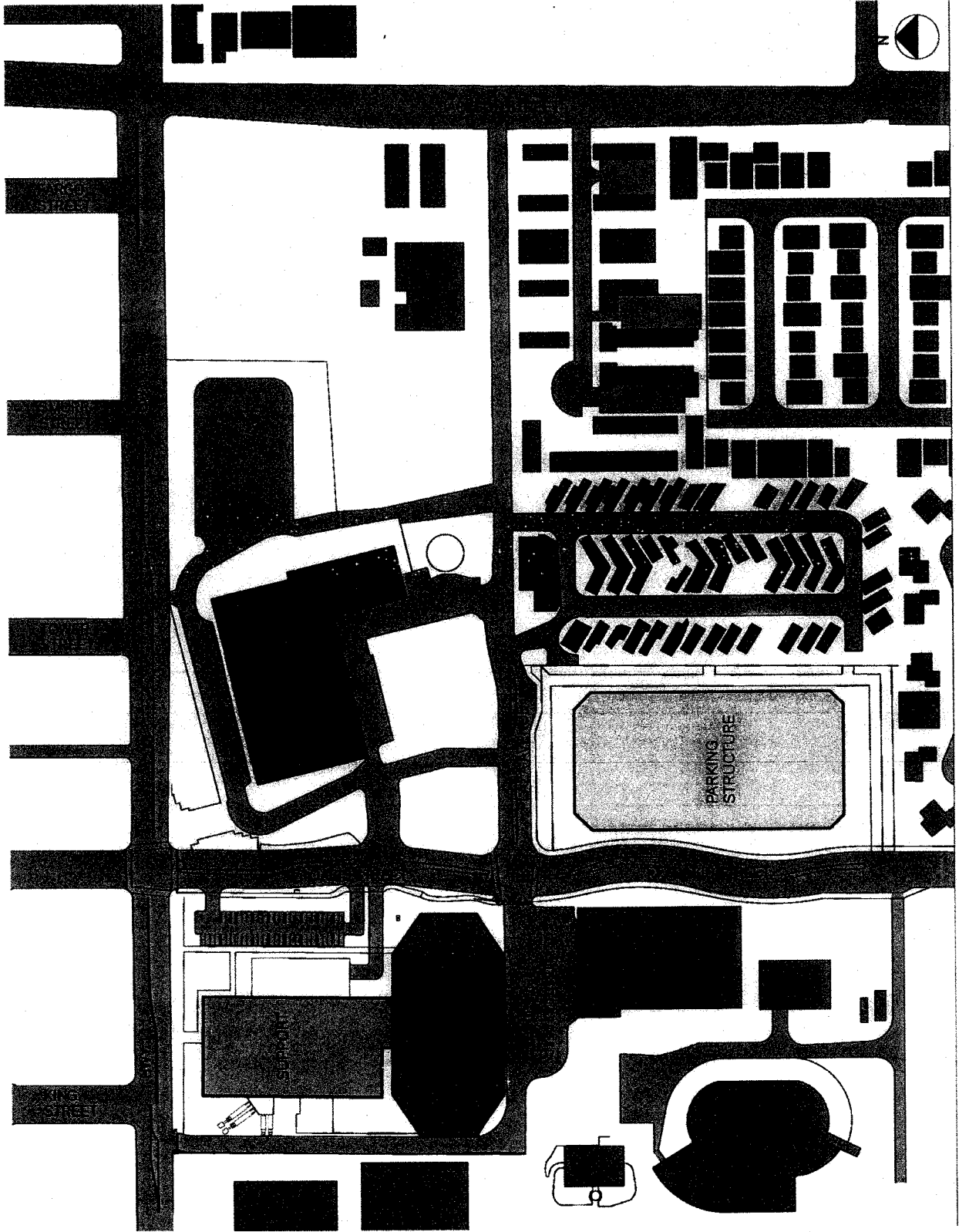
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NO-4	<p>noise-sensitive receptors to the east of the site during all project construction.</p> <p>Construction Hours. All construction, maintenance, or demolition activities within the City of Indio's (City) boundary shall be limited to the following hours:</p> <p>1. Pacific Standard Time a. Monday through Friday, 7:00 a.m. through 6:00 p.m. b. Saturday, 8:00 a.m. through 6:00 p.m. c. Sunday, 9:00 a.m. through 5:00 p.m. d. Government Holidays, 9:00 a.m. through 5:00 p.m.</p> <p>2. Pacific Daylight Time a. Monday through Friday, 6:00 a.m. through 6:00 p.m. b. Saturday, 7:00 a.m. through 6:00 p.m. c. Sunday, 9:00 a.m. through 5:00 p.m. d. Government Holidays, 9:00 a.m. through 5:00 p.m.</p> <p>PUBLIC SERVICES</p> <p>Fire Services Review. In order to ensure acceptable service ratios and response times are maintained at the City of Indio's (City) Fire Department, the County of Riverside (County) shall coordinate annually with the City and the California Department of Forestry and Fire Protection (CalFire) as part of fire services agreements, to ensure adequate</p>	COR EDA Construction Contractor	Preparation of final plans	COR EDA Construction Contractor	Ensuring the grading and building contractors are appraised and follow the City of Indio's Noise Control policies by notation on all construction plans	Approval of final demolition and construction plans
FS-1	<p>PUBLIC SERVICES</p> <p>Fire Services Review. In order to ensure acceptable service ratios and response times are maintained at the City of Indio's (City) Fire Department, the County of Riverside (County) shall coordinate annually with the City and the California Department of Forestry and Fire Protection (CalFire) as part of fire services agreements, to ensure adequate</p>	COR EDA Construction Contractor	Annual review of fire service agreements for the City of Indio	COR EDA in consultation with CalFire Construction Contractor	Ensuring that COR EDA participates in annual review of the Fire Service Agreement with the City of Indio and providing any additional funding to ensure adequate fire service to the fire service district serving ECDC	Annually

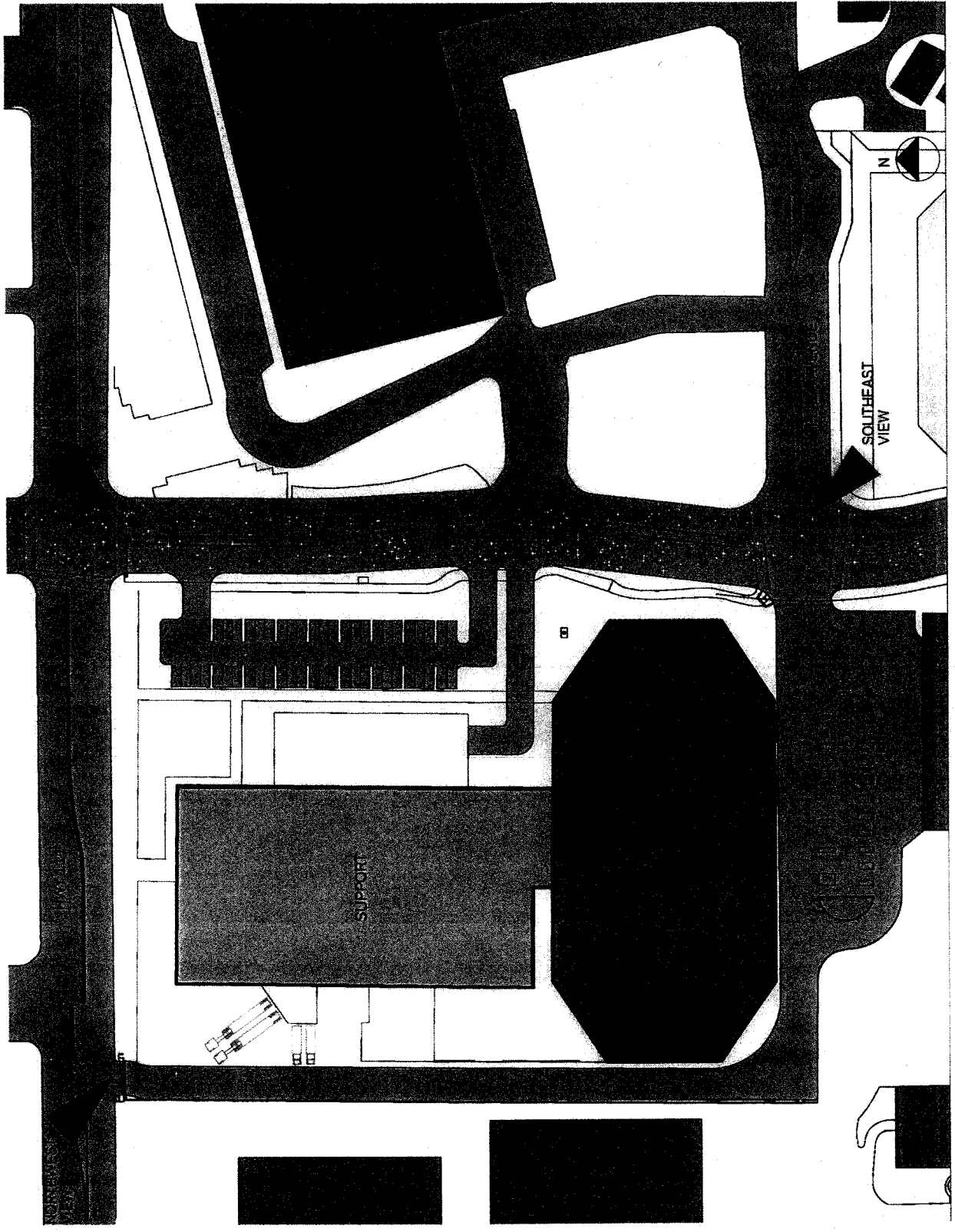
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WW-1	<p>staffing and equipment are provided. The County shall fund its share of any additional staffing and equipment required to adequately serve the East County Detention Center (ECDC) development, as mutually agreed upon by the City, County, and CalFire.</p> <p>Wastewater System Upgrade Agreement. Prior to issuance of grading permits, the County as part of its connection agreement with the Valley Sanitary District (VSD) for wastewater service will contribute fees (on a pro-rata basis) negotiated with VSD to upgrade the sewer main in Highway 111. Any upgrades shall be supported by a needs analysis and study performed by VSD and reviewed by the County. In the event, the County disagrees with the findings of VSD's study, the County can elect to provide its own study as part of the determination for the pro-rata fees.</p>	COR EDA Construction Contractor	Prior to issuance of grading permits	COR EDA Construction Contractor	Ensuring that the connection agreement with VSD is executed with the fee contribution for the improvement based on the appropriate study(ies)	Negotiation of the terms of the connection agreement
SW-1	<p>Solid Waste Management Plan. Prior to final design of the East County Detention Center (ECDC), the Solid Waste Management Plan for the proposed project shall be developed by the Sheriff's Department in consultation with the Riverside County Waste Management Department and the Economic Development Agency, Facilities Management. The plan shall incorporate source reduction, recycling, and composting into the project design. The plan shall also identify methods to</p>	Riverside County Sheriff's Department	Prior to final design plans	Riverside County Sheriff's Department in consultation with EDA Facilities Project Manager	Preparation and implementation strategy for a Solid Waste Management Plan	Approval of final design

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SW-2	<p>reuse materials and containers or utilize recyclable materials in compliance with State and local requirements.</p> <p>Construction Waste Recycling. Prior to the issuance of demolition, grading or building permits, all construction documents at all phases shall be required by notation on the construction plans that the following contractor requirement is included:</p> <p>All construction phases are required to employ a construction waste recycling plan consistent with Form B of the County Construction and Demolition Waste Diversion Program. Regular monitoring and reporting consistent with Form C of the County Construction and Demolition Waste Diversion Program is required on a bi-weekly basis.</p>	COR EDA Construction Contractor	Prior to the issuance of demolition permits	COR EDA Construction Contractor	Ensuring the note is included on final demolition and construction plans.	Approval of final plans
ES-1	<p>Electric Service and Upgrade Agreement. Prior to issuance of grading permits, the County as part of its connection agreement with the Imperial Irrigation District (IID) for electric service will contribute fees for a new primary distribution feeder in the area (conduit installation and cable for an underground route or overhead line extension, whichever is applicable, from the existing IID Jackson substation.</p>	COR EDA Construction Contractor	Prior to issuance of grading permits	COR EDA Construction Contractor	Ensuring that the connection agreement with IID is executed with the fee contribution for the improvement	Negotiation of the terms of the connection agreement

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PS-1	<p>CUMULATIVE IMPACTS</p> <p>Combined Public Services Needs. Notwithstanding Mitigation Measures FS-1, WW-1, and ES-1, additional consideration of the future County of Riverside (County) Law Building (assuming approval) will be included in the discussions with the service providers for fire services, wastewater services, and electrical services. In the event that the proposed County Law Building project is delayed, then best estimates to include the needs for that project will be accounted for in the agreements and fees. If the proposed County Law Building is not approved, this mitigation measure shall not apply.</p>	COR EDA	In concert with the proposed project and the County Law Building project	COR EDA	Ensuring that cumulative public services impacts from the two projects are addressed at the same time.	Review or entering of service agreements with the service providers and utilities

AREA PLAN



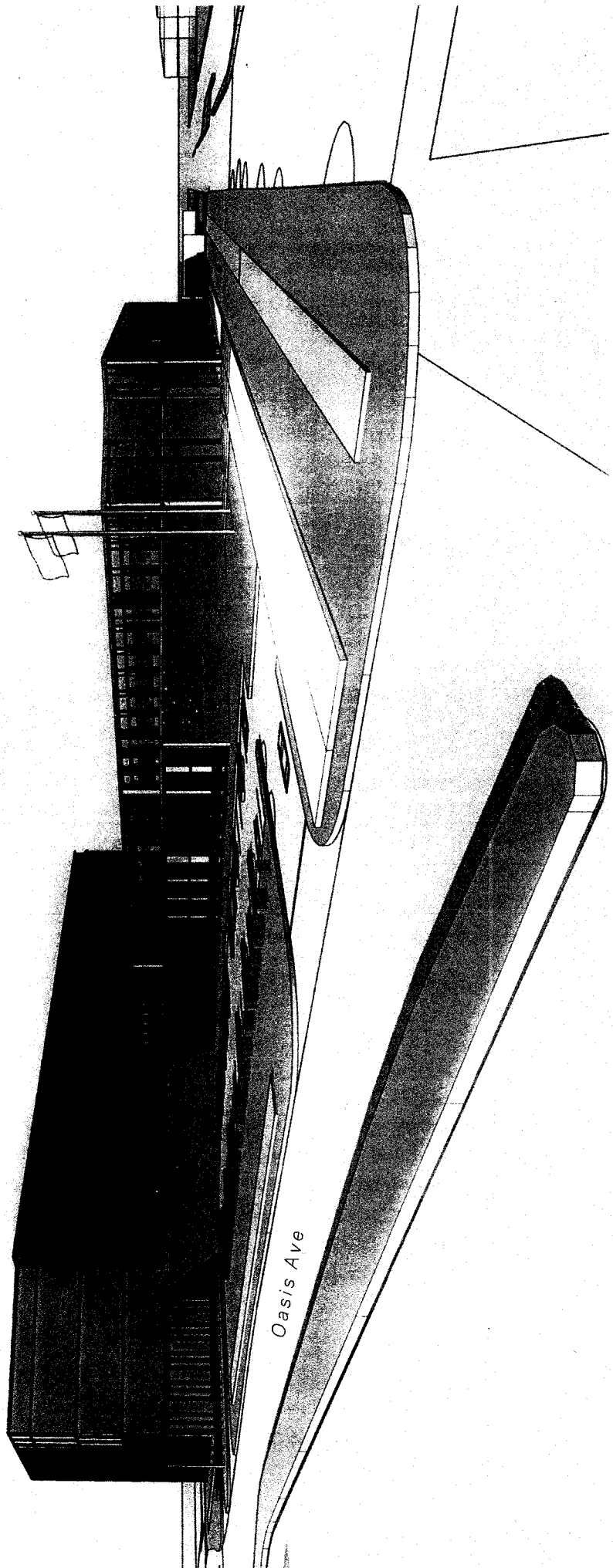


AERIAL VIEW



HOUSING

SUPPORT BUILDING



NORTHWEST PERSPECTIVE 1

SUPPORT BUILDING

HOUSING

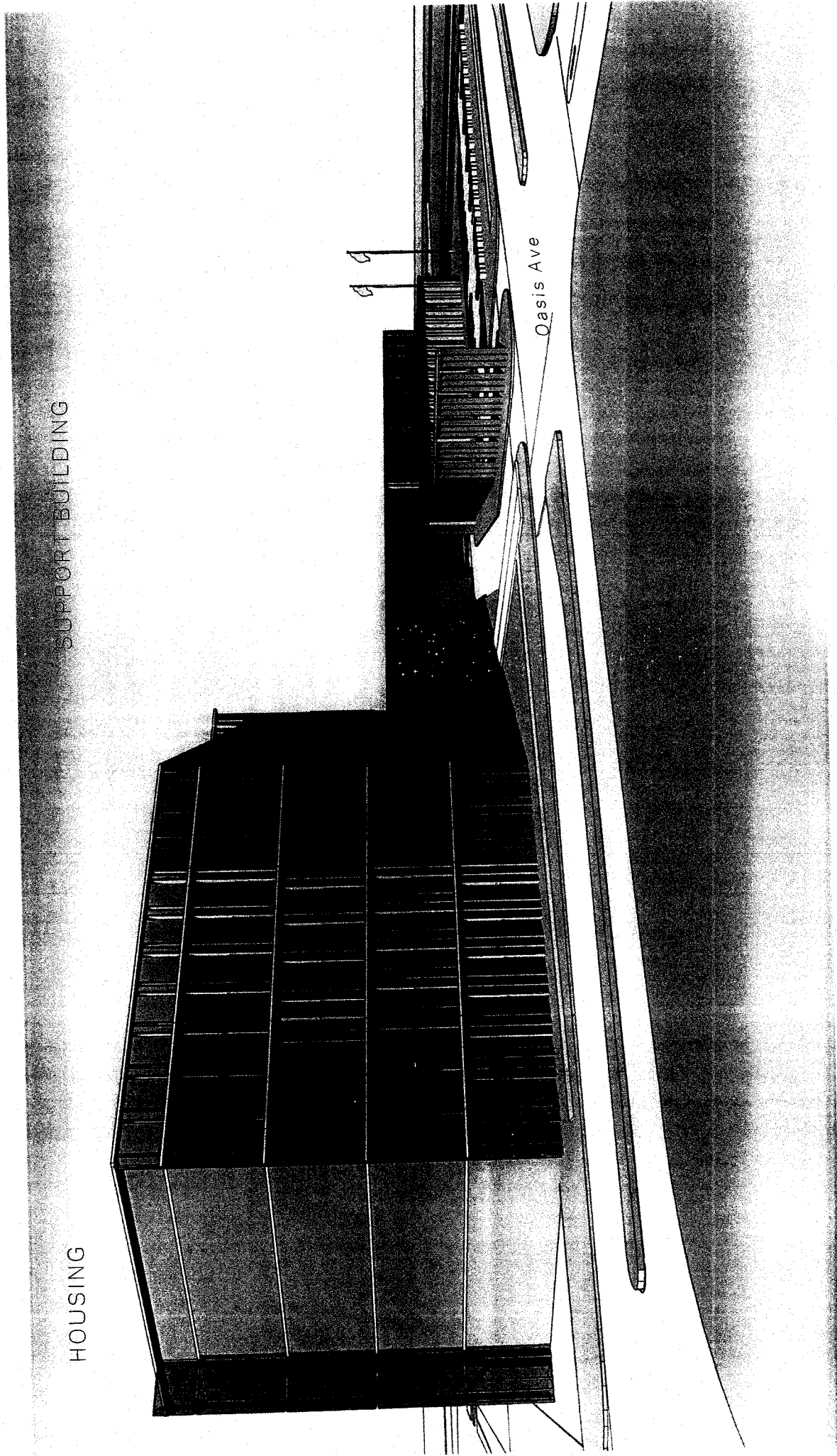


SOUTHEAST PERSPECTIVE 1



SUPPORT BUILDING

HOUSING



MINUTES OF THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA



3-48

On motion of Supervisor Tavaglione, seconded by Supervisor Ashley and duly carried by unanimous vote, IT WAS ORDERED that the recommendation from Economic Development Agency regarding East County Detention Center – Adoption of Final Environmental Impact Report is continued to Tuesday, July 16, 2013 at 9:00 a.m.

I hereby certify that the foregoing is a full true, and correct copy of an order made and entered on July 2, 2013 of Supervisors Minutes.

WITNESS my hand and the seal of the Board of Supervisors

Dated: July 2, 2013

Kecia Harper-Ihem, Clerk of the Board of Supervisors, in
and for the County of Riverside, State of California.

(seal)

By: *Kecia Harper-Ihem* Deputy

AGENDA NO.
3-48

xc: EDA, COB

3-18



JAY E. ORR
COUNTY EXECUTIVE OFFICER

**MEMORANDUM
COUNTY OF RIVERSIDE
EXECUTIVE OFFICE**

GEORGE A. JOHNSON
CHIEF ASSISTANT COUNTY EXECUTIVE OFFICER

ROB FIELD
ASSISTANT COUNTY EXECUTIVE OFFICER
ECONOMIC DEVELOPMENT AGENCY

BARBARA OLIVIER
ASSISTANT COUNTY EXECUTIVE OFFICER
HUMAN RESOURCES

ED CORSER
COUNTY FINANCE DIRECTOR

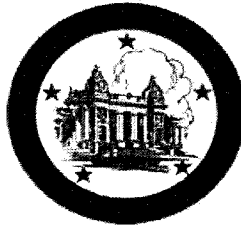
CHRISTOPHER HANS
CHIEF DEPUTY COUNTY EXECUTIVE OFFICER

TO: Kecia Harper-Ihem, COB
FROM: George A. Johnson, Chief Assistant CEO
DATE: June 27, 2013
RE: CONTINUANCE

Please continue the following item to July 16, 2013:

3-48 – EDA: East County Detention Center – Adoption of Final Environmental Impact Report.

*Clerk's
Copy*



**ENVIRONMENTAL IMPACT REPORT FOR
THE
EAST COUNTY DETENTION CENTER
STATE CLEARINGHOUSE NO. 2013021047**

Response to the City of Indio's correspondence letter dated July 12, 2013

EDA

07-16-2013

3-18

**Responses to City of Indio Comment Letter on the East County Detention Center (ECDC)
Dated July 12, 2013**

The following comments were submitted by the City of Indio to the County regarding the Final EIR for the ECDC Project and specifically relate to the "Responses to Comments" document transmitted to the City of Indio on June 20, 2013. See the attached letter for reference.

Indio Introductory Comments

"The City of Indio (City) has reviewed the May 2013 Draft EIR and the June 2013 Final EIR (collectively, the "EIR") for the proposed East County Detention Center Project and believes that the documents do not sufficiently comply with the requirements of the California Environmental Quality Act ("CEQA") because the EIR fails to adequately address several significant environmental effects of the Project. Therefore, the City of Indio submits the following comments for the County of Riverside consideration:

The responses by LSA are extremely brief, cursory, and incomplete. The responses do not address the numerous errors and omissions in the May 2013 Draft EIR that we have pointed out. The following provides further information on the inadequate responses in the EIR for the East County Detention Center:"

County Response:

The Responses to Comments document includes the City's Draft EIR comment letter of June 5, 2013. The responses address each of the comments previously submitted by the City. It should be noted that a significant number of the comments submitted do not relate to environmental topics, but to the processing of the project and how that process will work. While this is a legitimate concern for the project, it is not a topic that is required to be addressed in the Draft EIR. Simply disagreeing with a response does not render the EIR inadequate.

In addition, County staff has been involved with numerous discussions and coordination with the City regarding the project and will continue that process as the project proceeds. In fact, coordination discussions with the City occurred as recently as July 15, 2013.

Indio Comment: Construction Impacts

"Construction Impacts - The Response indicates there is "no mechanism in place" to mitigate deterioration of City streets caused by construction traffic. There is no analysis whatsoever of the construction traffic impacts to City streets in the Draft EIR. There will be over 3,200 fully loaded trucks required to export material from the site plus thousands of other heavy trucks required to haul building materials and construction equipment to the site. The EIR fails to address the fact that Oasis Street is not a Truck Route in the City and that the City must approve haul routes to and from the site. Furthermore, the City will require reconstruction of any and all damaged streets following completion of the 36 months of Project construction."

County Response:

If a haul route permit from the City is required, the County will obtain one. As previously noted in the Responses to Comments document, this is not a topic subject to CEQA review.

Indio Comment: Replacement Parking

“Parking Structure Impacts - During construction of the parking structure, the Response indicates temporary parking for employees and jurors will be accommodated within County property along the east side of Arabia Street between Highway 111 and John Nobles Avenue. This parking area is over 1,500' further away from the parking lot now used on the east side of Oasis Street just south of Plaza Avenue. There is no plan presented during parking structure construction to require displaced parking in these remote areas or to transport pedestrians to the courthouse. Instead, jurors and employees will park on the streets and in parking lots in Downtown Indio north of Highway 111, creating numerous highly undesirable random midblock pedestrian crossings of Highway 111. The Response did not address how the pedestrian traffic created by construction of the parking structure for the Proposed Project that will generate parking north of Highway 111 will be addressed and mitigated. Further, the Response does not address our prior comments that the Plaza Avenue access to the parking structure must be "Entrance Only" and that only one access for the parking structure on Oasis Street has been studied rather than the two that are shown in Figure 3-15.”

County Response:

The comment is based upon unsupported assumptions regarding the parking behavior of future users of parking in the area. Pedestrian traffic across Highway (Hwy) 111 would be regulated by the signal at Hwy 111 and Oasis Street. The assumption that there would be “numerous mid-block crossings” is speculative, not based on any facts and analysis and, therefore, is not an impact subject to CEQA review. However, the County is prepared to provide signage and informational literature for users of the area during the construction of the parking structure and has added the following condition. This condition does not address or relate to a new significant impact under CEQA, but instead addresses a concern that the City has expressed.

New Condition No.1: Parking Signage and Information

As part of the coordination process with the City for the construction of the Parking Structure, the County Economic Development Agency will coordinate with the City of Indio on a signage program as well as an information program to be provided to patrons of the Larsson Justice Center regarding parking availability and access points to the building, and in particular regarding cautionary advice on parking north of Hwy 111.

Indio Comment: Eastbound Hwy 111 Right Turn at Oasis Street

“Right Turn Lane on Highway 111 at Oasis Street - Eight different figures in the EIR including the Cover of the Draft EIR, several in the Project Description including Figure 3-9 (Proposed Site

Plan), Figure 3-10 Sheet 2 (Demolition/Construction Phasing Plan), Figure 3-11 (Proposed Site Plan Concept Perspective Aerial), Figure 3-12 (proposed Site Plan Concept Perspective Street Level), and Figure 3-14 (Site A Landscape Plan), as well as the Cover to the Response to Comments and Figure 2 (Conceptual Site Plan) in the Revised Traffic Study, all very clearly illustrate an eastbound right turn on Highway 111 approaching Oasis Street as a design feature. As a part of the Project, the eastbound right turn lane must be properly designed and the traffic signal at Highway 111 at Oasis Street must be modified by the County under an encroachment permit issued by the City.”

County Response:

As previously stated in the Responses to Comments, while the referenced improvement is reflected on some of the figures in the EIR, it was not included and not described in the Project Description in the EIR. Therefore, it is not a part of the project. For it to be included as part of the project, it would be required to be included in the Project Description (Chapter 3.0) and analyzed as such throughout the EIR.

Indio Comment: Hwy 111 Median Improvements

“Perimeter Access Roadway - In response to our concerns about circulation for the perimeter access roadway, the Response indicates "Deliveries and trucks in particular will not take access to the site from Highway 111." Since circulation within the site will apparently be one-way in a clockwise direction, the access to Highway 111 will be an exit-only. As a result, modification of the existing raised median on Highway 111 including removal of the westbound entry left turn lane into the driveway and reconstruction of the raised median and landscaping on Highway 111 will be required under an encroachment permit issued by the City.”

County Response:

The County is under no obligation to provide the improvement and it is not an item requiring CEQA review. This is a request for improvement to the Hwy 111 median.

Indio Comment: Intersection Geometry

“Intersection Geometry - Comment 8 referred to lane geometry that was erroneously shown in both the Draft EIR and in the Traffic Study including lanes that did not and will not exist. The Response indicated that all "de-facto" right turn lanes were removed from the analysis. The Response simply does not apply to the incorrect lane configurations that were previously used in the Traffic Study.”

County Response:

In the revised traffic study (which was attached to the Responses to Comments document), the geometrics (and resulting levels of service) were updated to reflect the City's comments. Each individual comment has been addressed in the Responses to Comments.

Indio Comment: Future 2035 Conditions

"Future (2035) Conditions - The La Entrada Project in the City of Coachella, located many miles away from Downtown Indio south of 1-10 and east of the All-American Canal, will generate nominal new trips through the intersections studied in the ECDC Draft EIR. According to the City of Coachella website, the La Entrada Project will be presented to the City of Coachella Planning Commission and City Council in Fall 2013. At this point, the La Entrada Project has not been approved. Leaving it in the text of the ECDC EIR simply demonstrates unfamiliarity with the La Entrada Project and the travel patterns in the Coachella Valley by the EIR authors."

County Response:

The La Entrada project is likely to be partially constructed under year 2035 conditions, but not during opening day of the ECDC. The traffic study does not include trips from the La Entrada project for the opening year cumulative conditions, but includes it for year 2035 conditions. Travel patterns for the ECDC project were forecast based on discussion with City of Indio staff, and travel patterns from the La Entrada project were forecast based on the traffic model (RivTAM) and during discussion with City of Coachella staff.

Indio Comment: Environmental Engineering Requirements

"Environmental Engineering Requirements - Response to Comments 21 through 39, and 41 through 47 states "The County will adhere to regulations it deems necessary for the proposed project. The proposed project, because it is located on County owned property within the City, is exempt from the City of Indio's General Plan, Municipal Code, and other planning and zoning requirements." The County is NOT exempt from complying with requirements of the City of Indio, wherein significant adverse impacts may be attributed to a Project. The County is advised that encroachment permits for the Proposed Project for any work within public right of way on the City streets will be required and that approval of haul routes during construction is also required. Finally, several of the City's comments including, but not limited to comment nos. 43, 46 and 47, raise serious potential health and safety concerns relating to the proposed perimeter wall height and location, which have not been addressed by LSA's response."

County Response:

Regarding the first part of this comment, refer to the response for construction impacts and haul routes. Again, the County will work cooperatively with the City and apply for any applicable required permits from the City.

Regarding the last part of this comment, the City alleges that there are serious public health and safety concerns regarding the wall height. There is no sufficient evidence that a 10-foot wall would provide additional security. As noted in Section 3.6 of the EIR, the design of the new housing building and site is updated with state-of-the-art security measures, thus improving the security over the existing

conditions. Because the facility is a secure facility, the perimeter of the facility would be monitored as part of the routine security measures for the detention facility. Therefore, the claim that there are public safety risks related the proposed wall design is not supported.

Indio Comment: Traffic Study

“A Traffic Study approval is required in order to adopt the proposed EIR - while the Traffic Study for the Proposed Project has been partially revised, there are still errors and omissions as noted above. As a result, the June 20, 2013 Revised Traffic Study has not been approved and will not be approved until the issues, concerns, and omissions above are corrected.”

County Response: The scoping process for the traffic study was conducted with the City to discuss project traffic assumptions on City roadways, and as a courtesy to the City.

Attachment: Indio Letter Dated July 12, 2013



CITY OF INDIO

100 CIVIC CENTER MALL • INDIO, CA 92201
760.391.4000 • FAX 760.391.4008 • WWW.INDIO.ORG

Development Services Department
July 12, 2013

County of Riverside
Economic Development Agency
Attn.: Robert Field, Assistant County Executive Officer/EDA
P.O. Box 1180
Riverside, CA 92502
Email: RivcoECDCcomments@co.riverside.ca.us
Website: <http://RivCoECDC.org>

RE: Response to LSA Associates Response to Comments on Proposed East County Detention Center Project – Draft Environmental Impact Report (DEIR) Comments (SCH 2013021047)

Dear Mr. Field:

The City of Indio has reviewed the May 2013 Draft EIR and the June 2013 Final EIR (collectively, the "EIR") for the proposed East County Detention Center Project and believes that the documents do not sufficiently comply with the requirements of the California Environmental Quality Act ("CEQA") because the EIR fails to adequately address several significant environmental effects of the Project. Therefore, the City of Indio submits the following comments for the County of Riverside consideration:

The responses by LSA are extremely brief, cursory, and incomplete. The responses do not address the numerous errors and omissions in the May 2013 Draft EIR that we have pointed out. The following provides further information on the inadequate responses in the EIR for the East County Detention Center:

Project Description Omissions

- **Construction Impacts** – The Response indicates there is "no mechanism in place" to mitigate deterioration of City streets caused by construction traffic. There is no analysis whatsoever of the construction traffic impacts to City streets in the Draft EIR. There will be over 3,200 fully loaded trucks required to export material from the site plus thousands of other heavy trucks required to haul building materials and construction equipment to the site. The EIR fails to address the fact that Oasis Street is not a Truck Route in the City and that the City must approve haul routes to and from the site. Furthermore, the City will require reconstruction of any and all damaged streets following completion of the 36 months of Project construction.
- **Parking Structure Impacts** – During construction of the parking structure, the Response indicates temporary parking for employees and jurors will be accommodated within County property along the east side of Arabia Street between Highway 111 and John Nobles Avenue. This parking area is over 1,500' further away from the parking lot now

used on the east side of Oasis Street just south of Plaza Avenue. There is no plan presented during parking structure construction to require displaced parking in these remote areas or to transport pedestrians to the courthouse. Instead, jurors and employees will park on the streets and in parking lots in Downtown Indio north of Highway 111, creating numerous highly undesirable random midblock pedestrian crossings of Highway 111. The Response did not address how the pedestrian traffic created by construction of the parking structure for the Proposed Project that will generate parking north of Highway 111 will be addressed and mitigated. Further, the Response does not address our prior comments that the Plaza Avenue access to the parking structure must be "Entrance Only" and that only one access for the parking structure on Oasis Street has been studied rather than the two that are shown in Figure 3-15.

- Right Turn Lane on Highway 111 at Oasis Street – Eight different figures in the EIR including the Cover of the Draft EIR, several in the Project Description including Figure 3-9 (Proposed Site Plan), Figure 3-10 Sheet 2 (Demolition/Construction Phasing Plan), Figure 3-11 (Proposed Site Plan Concept Perspective Aerial), Figure 3-12 (proposed Site Plan Concept Perspective Street Level), and Figure 3-14 (Site A Landscape Plan), as well as the Cover to the Response to Comments and Figure 2 (Conceptual Site Plan) in the Revised Traffic Study, all very clearly illustrate an eastbound right turn on Highway 111 approaching Oasis Street as a design feature. As a part of the Project, the eastbound right turn lane must be properly designed and the traffic signal at Highway 111 at Oasis Street must be modified by the County under an encroachment permit issued by the City.
- Perimeter Access Roadway – In response to our concerns about circulation for the perimeter access roadway, the Response indicates "Deliveries and trucks in particular will not take access to the site from Highway 111." Since circulation within the site will apparently be one-way in a clockwise direction, the access to Highway 111 will be an exit-only. As a result, modification of the existing raised median on Highway 111 including removal of the westbound entry left turn lane into the driveway and reconstruction of the raised median and landscaping on Highway 111 will be required under an encroachment permit issued by the City.

Traffic and Circulation Issues (Chapter 4.12) – The following errors in the Draft EIR have not been properly corrected by the Draft "Errata" or by the revised Traffic Study:

- Intersection Geometry – Comment 8 referred to lane geometry that was erroneously shown in both the Draft EIR and in the Traffic Study including lanes that did not and will not exist. The Response indicated that all "de-facto" right turn lanes were removed from the analysis. The Response simply does not apply to the incorrect lane configurations that were previously used in the Traffic Study.
- Future (2035) Conditions – The La Entrada Project in the City of Coachella, located many miles away from Downtown Indio south of I-10 and east of the All-American Canal, will generate nominal new trips through the intersections studied in the ECDC Draft EIR. According to the City of Coachella website, the La Entrada Project will be presented to the City of Coachella Planning Commission and City Council in Fall 2013. At this point, the La Entrada Project has not been approved. Leaving it in the text of the

ECDC EIR simply demonstrates unfamiliarity with the La Entrada Project and the travel patterns in the Coachella Valley by the EIR authors.

Environmental Engineering Requirements – Response to Comments 21 through 39, and 41 through 47 states “The County will adhere to regulations it deems necessary for the proposed project. The proposed project, because it is located on County owned property within the City, is exempt from the City of Indio’s General Plan, Municipal Code, and other planning and zoning requirements.” The County is NOT exempt from complying with requirements of the City of Indio, wherein significant adverse impacts may be attributed to a Project. The County is advised that encroachment permits for the Proposed Project for any work within public right of way on the City streets will be required and that approval of haul routes during construction is also required. Finally, several of the City’s comments including, but not limited to comment nos. 43, 46 and 47, raise serious potential health and safety concerns relating to the proposed perimeter wall height and location, which have not been addressed by LSA’s response.

A Traffic Study approval is required in order to adopt the proposed EIR – while the Traffic Study for the Proposed Project has been partially revised, there are still errors and omissions as noted above. As a result, the June 20, 2013 Revised Traffic Study has not been approved and will not be approved until the issues, concerns, and omissions above are corrected.

Your timely attention and assistance in correcting these items with your consultant, LSA, prior to adoption of proposed Final EIR is required. If you have any questions regarding our comments please contact me at (760) 391-4120.

Sincerely,



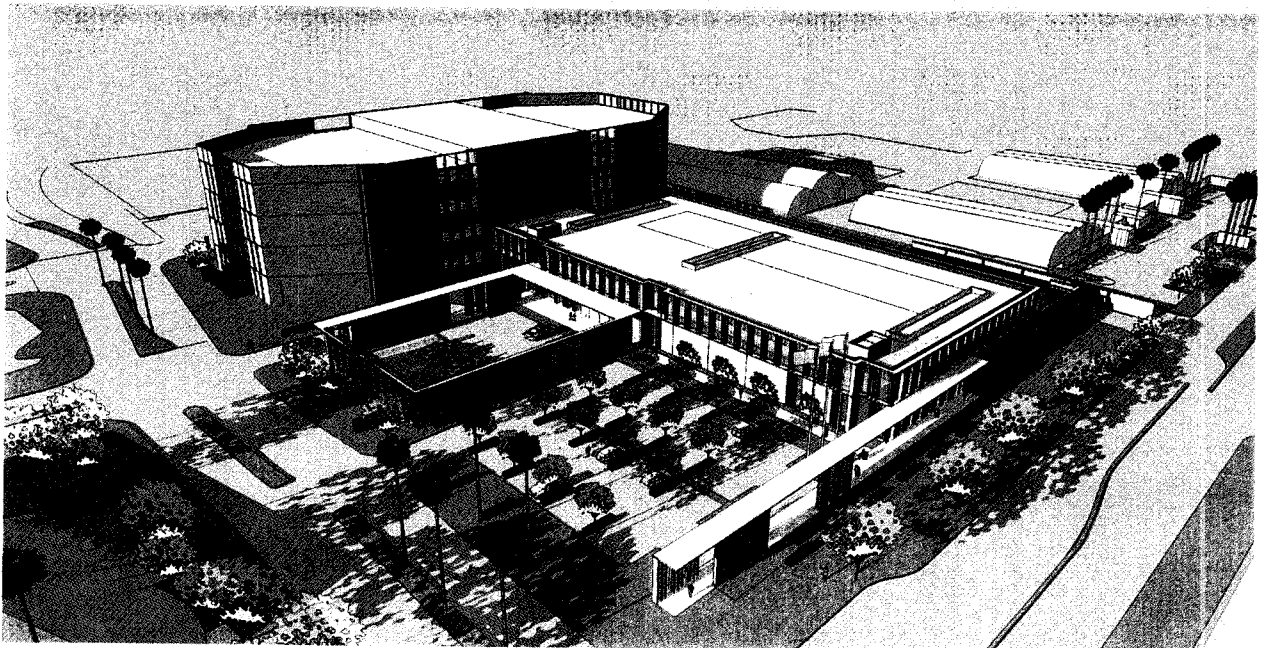
Joseph Lim, AICP
Development Services Director

Cc: Dan Martinez, City Manager, City of Indio
Indio City Council
Riverside County Supervisor John Benoit
Grant Eklund, Public Works Director/City Engineer, City of Indio
Richard Twiss, Police Chief, City of Indio



DRAFT
ENVIRONMENTAL IMPACT REPORT FOR
THE
EAST COUNTY DETENTION CENTER
STATE CLEARINGHOUSE NO. 2013021047

RESPONSES TO COMMENTS



LSA

June 2013

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DEIR COMMENT LETTERS

APPENDICES

A. Updated Traffic Impact Analysis

INTRODUCTION

This document comprises the Comments and Responses relating to the Draft Environmental Impact Report (DEIR) for the East County Detention Center (ECDC) project. The purpose of this document is to respond to all comments received by the County of Riverside (County) regarding the environmental information and analyses contained in the DEIR.

The DEIR was circulated for public review for a period of 31 days, from May 6, 2013 to June 5, 2013. Due to funding time constraints and the fact that the ECDC project is not a project of Statewide, Regional, or Areawide Significance as defined by CEQA Guidelines Section 15206, the EIR qualified for shortened review of 30 days pursuant CEQA Section 21091(e)(2). Copies of the DEIR were distributed to all Responsible Agencies and to the State Clearinghouse in addition to various public agencies, citizen groups and interested individuals. Copies of the DEIR were also made available for public review at the County Administrative Center at the project site and County Economic Development Agency Offices, the Indio Branch Library and on the internet.

A total of 7 comment letters were received during the public review period. Comments were received from a local agency (City of Indio), a utility provider, a local school district and two comment letters were received from private individuals/interested parties. In addition, the County received a letter dated June 5, 2013, from the State Clearinghouse indicating the completion of State agency review.

Information provided in this Response to Comments document clarifies, amplifies or makes minor modifications to the DEIR. No significant changes have been made to the information contained in the DEIR as a result of the responses to comments and no significant new information has been added that would require recirculation of the document under CEQA Guidelines Section 15088.5.

An Errata to the DEIR has been prepared to make minor corrections and clarifications to the DEIR as a result of the County's review and comments received during the public review period. Therefore, this Response to Comments document, along with the Errata is included as part of the Final EIR for consideration by the Riverside County Board of Supervisors prior to taking any action on certification of the proposed Final EIR or approval of the ECDC project.

COMMENTS RECEIVED

The following is an index list of the agencies, organizations and individuals that commented on the Draft EIR prior to the close of the public comment period or thereafter. The comments received have been organized by date received and in a manner that facilitates finding a particular comment or set of comments.

Commenting Agency or Person	Date
State	
State Clearinghouse	6-5-13
Local	
City of Indio	6-5-13

Commenting Agency or Person	Date
Utilities and Agencies	
Imperial Irrigation District	6-3-13
Desert Sands Unified School District	6-3-13
	5-8-13
Public/Interested Groups	
Douglas McCauley	6-4-13
Towne Mobile Home Park Petition	6-4-13

FORMAT OF RESPONSES TO COMMENTS

Responses to each of the comment letters are provided on the following pages. The comment letters are contained in Attachment A of this document. The County's responses correspond to each comment letter as numbered in the letter or in topical order of the content of the letter. This letter is included in Attachment B to this document as part of the public record. An Errata, with text revisions, has been prepared to provide corrections and clarifications to the DEIR where required.

STATE AND LOCAL AGENCIES

STATE CLEARINGHOUSE

DATE: June 5, 2013

Response:

The comment is introductory and states that the State Clearinghouse submitted the DEIR to selected state agencies for review and that no comment letters were received. The comment acknowledges that Riverside County has complied with State Clearinghouse notification and review requirements. These comments do not raise any environmental issues under CEQA or their treatment in the DEIR, and no further response is necessary.

CITY OF INDIO

DATE: June 5, 2013

Responses:

Comment 1

The comment suggests that the County is required to mitigate for the deterioration of local streets due to construction in the City of Indio. At present, no mechanism is in place to do that. In addition, existing infrastructure maintenance and repair is not included as an environmental topic under CEQA.

Comment 2

Temporary replacement parking for the existing jail and jurors will be accommodated at the existing Fairgrounds to the west and south of the ECDC site. Refer to the diagram at the end of these responses showing the location of the parking areas.

Comment 3

This design feature is not included in the project description, and therefore, not included in the analysis. The eastbound right turn lane is not required to maintain levels of service at the intersection. Since the geometrics will remain unchanged, no signal modifications will be required.

Comment 4

Deliveries and trucks in particular will not take access to the site from Highway 111. Trucks would be directed to the entrance off of Oasis Street to ensure that adequate turn radius is provided and that secure screening procedures are employed for deliveries.

Comments 5 through 7

The referenced data has been included in the revised analysis included the EIR Errata and the Updated Traffic Impact Analysis in Appendix A.

Comment 8

The Traffic Study and the Draft EIR section included de-facto right turn lanes where such patterns were observed. All de-facto right turns have been removed based on this comment and the analysis was revised to reflect this change. The findings of the Draft EIR have not changed due to this revision. In addition, the referenced data has been included in the revised analysis included the EIR Errata and the Updated Traffic Impact Analysis in Appendix A.

Comment 9

The referenced policy was corrected and is included in the EIR Errata.

Comment 10

The referenced text referring to Caltrans was corrected and is included in the EIR Errata.

Comment 11

The referenced text was corrected and is included in the EIR Errata.

Comment 12

Based on discussion with City staff, the base and future year model volumes from the General Plan were compared and the growth rate calculated based on growth on the major roadways included in this analysis.

With regard to deleting the La Entrada project from consideration, it is recommended that these trips are included in the analysis since it is a known Cumulative project.

Comments 13 through 16

The calculations are not erroneous. The Highway Capacity Manual reports v/c ratios and delays. The delays are average delays. Therefore, it is possible that when the increase in traffic volumes is higher at non critical movements (i.e. movements with lesser delay), the average delay at the intersection decreases even with an overall increase in total traffic at that intersections. The referenced numbers have changed based on Comment 8. Updated tables are included in the EIR Errata.

Comments 17 and 18

The referenced data has been included in the revised analysis included the EIR Errata and the Updated Traffic Impact Analysis in Appendix A.

Comments 19 and 20

The permitting agencies for NPDES compliance and air quality compliance are noted.

Comments 21 through 39, and 41 through 47

This comment is noted. The County will adhere to regulations it deems necessary for the proposed project. The proposed project, because it is located on County owned property within the City, is exempt from the City of Indio's General Plan, Municipal Code and other planning and zoning regulations. [See Gov. Code §§ 53090-53091; 40 Ops. Cal. Atty. Gen. 243 (1962); Lawler v. City of Redding, 7 Cal. App.4th 778,783-784 (1992)] However, the General Plan analysis contained in the DEIR throughout each section was included to show that the project is generally consistent with the City's General Plan Goals and Policies Report.

Comment 40

The referenced data has been included in the revised analysis included the EIR Errata and the Updated Traffic Impact Analysis in Appendix A.

Comment 48

TUMF fees are not applicable to the project because it is a public facility.

Comment 49

The County will comply with any applicable MSHCP fees.

Comment 50

The comment states that the removal of trees will impact view of the site from Highway 111. It is noted that some trees will be removed. However, trees and landscaping will be replaced as shown on Figure 3-14 of the DEIR.

Comment 51

The comment states that the southern project area boundary shown on Figures 3-3 and 3-4 should be slightly further south to be consistent with the site plan shown throughout the document. This is correct. However, Figures 3-3 and 3-4 are included to show existing conditions. These Figures have been corrected and are included in the EIR Errata.

Comment 52

LSA had coordinated with the City when the analysis was started. At that time, the only projects identified by the City were the College of the Desert project and the I-10 Jefferson Interchange project. This was based on personal communications with Joe Lim on September 25, 2012. The relevant email is included at the end of these responses.

Temporary Replacement Parking Areas



Email from City of Indio re: Cumulative Projects

Sandipan Bhattacharjee

From: Tom Brohard <tbrohard@earthlink.net>
Sent: Monday, October 01, 2012 3:08 PM
To: Sandipan Bhattacharjee
Cc: 'Joe Lim'; tbrohard@indio.org
Subject: RE: East County Detention Center
Attachments: Circ Plan Cross Sections 09 08.pdf; Indio Circ Plan Adoption 09 17 2008.pdf; Circ Plan Roadway Classifications 09 08.pdf; Existing ADT 2007.pdf; Build Out ADT Forecasts.pdf

Sandi -

As we discussed earlier this afternoon, please:

1. Delete intersection #'s 3, 4, 5, 8, 9, 11, and 12 and add:
 - a. Jackson Street/I-10 WB Ramps
 - b. Jackson Street/I-10 EB Ramps
 - c. Jackson Street/Plaza Avenue
 - d. Jackson Street/Avenue 48
 - e. Oasis Street/Indio Boulevard
 - f. Oasis Street/Miles Avenue
2. While we discussed expanding the study to include Oasis Street/Bliss Street and Oasis Street/Requa Avenue, local streets in the Downtown area were closed today for six weeks to facilitate construction of street improvements in the area of the College of the Desert Campus (east side of Oasis Street between Bliss Street and Requa Avenue). It is suggested that these two intersections not be included in the TIA because of construction and the lack of future project related turning movements at these two intersections.
3. Take two 24 hour traffic volumes at the same time as the turning movement counts are made (one on Highway 111 between Monroe Street and Jackson Street and on Monroe Street north of Highway 111), and factor the turning movement counts to 2011 CVAG "in season" traffic volumes.
4. Assume that 75% of the attached Indio Circulation Plan "Buildout" traffic volumes will be achieved in Year 2035 and use a growth rate plus the COD Project for Year 2035 volumes.
5. I will email separately the COD TIA as well as the Jefferson I/C TIA that was approved by the County of Riverside and by Caltrans.

Let me know if there are questions.

Thanks. Tom

From: Joe Lim [mailto:jlim@indio.org]
Sent: Tuesday, September 25, 2012 5:01 PM
To: Tom Brohard
Subject: Fwd: East County Detention Center

Can you take a look at the list of intersections and let me know if there are any other areas they should add.

Joe

Begin forwarded message:

From: "Sandipan Bhattacharjee" <Sandipan.Bhattacharjee@lsa-assoc.com>
To: "jim@indio.org" <jim@indio.org>
Subject: East County Detention Center

Hello Mr. Lim,

Hope you are doing well.

Attached is the proposed scope of work for the East County Detention Center traffic study. Please let me know if the scope of work is acceptable and/or if you have any specific concerns. Also, could you please send us a list of cumulative projects that you think should be included in the traffic study.

Thanks,
Sandipan

Sandipan Bhattacharjee, AICP
Associate
LSA Associates, Inc.
1500 Iowa Avenue, Suite 200,
Riverside, CA 92507
(951) 781-9310 (Phone)
(951) 781-4277 (Fax)

UTILITIES AND AGENCIES

IMPERIAL IRRIGATION DISTRICT

DATE: June 3, 2013

Responses:

The comments provided are the resubmittal of comments on the ECDC Notice of Preparation dated March 14, 2013 and April 24, 2013. These previous comments were acknowledged in the DEIR, specifically on pages 4.11-12 and 4.11-13. The impact discussion states that an increase in demand would occur with the proposed project and cites specifically the nature improvement and that fee payment will be made to the Imperial Irrigation District (IID). Mitigation Measure ES-1 on page 4.11-13 of the DEIR (repeated below) states specifically that fees will be paid as part of the connection agreement with IID. The County has disclosed the impacts and provided for mitigation as requested in the comment. Therefore, the County has met its obligations under CEQA as requested in the previous comment letters.

ES-1 Electric Service and Upgrade Agreement. Prior to issuance of grading permits, the County as part of its connection agreement with the Imperial Irrigation District (IID) for electric service will contribute fees for a new primary distribution feeder in the area (conduit installation and cable for an underground route or overhead line extension, whichever is applicable, from the existing IID Jackson substation).

DESERT SANDS UNIFIED SCHOOL DISTRICT

DATES: June 5, 2013 and May 8, 2013

Responses:

Letter of June 5, 2013

The comment letter expresses two issues of concern, school fees and notification.

School fees would not apply to the ECDC project because it is a County-initiated project and does not involve new residential housing that would impact enrollment at any school district. Any education programs associated with ECDC would be overseen by the County pursuant to State requirements. Therefore, fees are not applicable or an issue due to the lack of impact of the project and that it is a non-residential public facility.

With regard to notification and coordination, the County will provide any and all notification regarding the EIR, hearings and construction scheduling to the Desert Sands Unified School District as requested.

Letter of May 8, 2013

The comment letter is identical to the letter received in response to the Notice of Preparation for the DEIR. It cites the commercial development would impact the School District. The proposed ECDC project is not a commercial development and therefore this comment does not apply to the proposed project. This was addressed in Chapter 1 of the DEIR on page 1-3 in Table 1.A.

PUBLIC AND INTERESTED PARTIES

DOUGLAS MCCAULEY

DATE: June 4, 2013

Responses:

This comment letter expresses the opinion of the commenter representing the Towne Mobile Home Park and does not address any specific issue in the DEIR or environmental issues. It is acknowledged that the proposed ECDC project, in particular the proposed parking structure, is located adjacent to the mobile home park. All construction nuisance issues were analyzed in the DEIR and were found to be less than significant due to the presence of existing walls and landscaping that will remain in place during construction. Construction hours are proposed to follow the City of Indio's Noise Policies, as noted in the DEIR project description and the noise analysis.

The comment is forwarded to the decision makers as part of their consideration of the Final EIR and the ECDC project.

TOWNE MOBILE HOME PARK PETITION

DATE: June 4, 2013

Responses:

This comment expresses the opinion of the signatories of the petition and that they are opposed to the project. The petition does not address any specific detail the DEIR or environmental issues. The comment is forwarded to the decision makers as part of their consideration of the Final EIR and the ECDC project.

EIR ERRATA

INTRODUCTION

Any corrections to the DEIR text and figures generated either from responses to comments or independently by the County, are stated in this section of the DEIR. The DEIR text and figures have not been modified to reflect these DEIR modifications.

These DEIR errata are provided to clarify, refine, and provide supplemental information for the ECDC Project DEIR. Changes may be corrections or clarifications to the text and figures of the original DEIR. Other changes to the DEIR clarify the analysis in the DEIR based upon the information and concerns raised by commenters during the public review period. None of the information contained in these DEIR modifications constitutes significant new information or changes to the analysis or conclusions of the DEIR.

The information included in these DEIR errata that resulted from the public comment process does not constitute substantial new information that requires recirculation of the DEIR. The California Environmental Quality Act (CEQA) Guidelines, Section 15088.5, states in part:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:
 - (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
 - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The changes to the Draft EIR included in these EIR modifications do not constitute “significant” new information because:

- No new significant environmental impact would result from the project or from a new mitigation measure;
- There is no substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted that reduce the identified significant impacts to a level of insignificance;
- No feasible project alternative or mitigation measure considerably different from others previously analyzed has been proposed or identified that would clearly lessen the significant environmental impacts of the project; and
- The Draft EIR is not fundamentally or basically inadequate or conclusory in nature such that meaningful public review and comment were precluded.

Therefore, recirculation of the Draft EIR is not required because the new information added to the Draft EIR through these modifications clarifies or amplifies information already provided or makes insignificant modifications to the already adequate Draft EIR.

For simplicity, the Draft EIR modifications contained in the following pages are in the same order as the information appears in the Draft EIR. Changes in text are signified by strikeouts (~~strikeouts~~) where text has been removed and by underlining (underline) where text has been added. The applicable page numbers from the Draft EIR are also provided where necessary for easy reference.

Draft EIR Page ES-10

Summary of Impacts Table, 4.1 Aesthetics, second row third column, second sentence: "Measure AE-2 is included to disclose the required dust control measures."

The referenced sentence is moved to Page ES-11 under 4.2 Air Quality and should refer to Measure AQ-1.

Draft EIR Page ES-17

For Mitigation Measure GCC-1, the referenced numbering (ES.9.1, ES.9.2 and ES.9.3) for each subheading should be deleted.

Draft EIR Page 1-2

Section 1.4 regarding shortened review, the first sentence should read as follows:

Because of the tight time frame for meeting the State funding deadlines, on ~~March~~, 2013 May 6, 2013, the County of Riverside applied for and received approval of a public review period of 30 days for the DEIR from the Office of Planning and Research State Clearinghouse.

Draft EIR Page 4.12-1

Revision

This section analyzes the potential traffic and circulation impacts of the proposed ECDC based on the *Traffic Study* (LSA Associates, Inc. [LSA], April 2013), which is included as Appendix I to this Environmental Impact Report (EIR). The analysis contained in the *Traffic Study* has been prepared to meet the California Environmental Quality Act (CEQA) requirements for the County of Riverside (County). However, because of the location of the project, the City of Indio (City) standards were applied. The City of Indio follows the guidelines provided in Transportation Impact Analyses for Site Development. An ITE Recommended Practice published by the Institute of Transportation Engineers. The *Traffic Study*, including trip generation, trip distribution, study area, and analysis methodologies, has been reviewed and approved by City of Indio staff and has been prepared in accordance with the *Traffic Impact Analysis Preparation Guidelines*, Riverside County Transportation Department, April 2008 (County guidelines).

Revision

All of the roadways are maintained by and under the jurisdiction of the City, ~~with the exception of Highway 111, which is maintained by and under the jurisdiction of the California Department of Transportation (Caltrans)~~ and the County of Riverside. Highway 111 is operated and maintained by the City of Indio. Oasis Street from Highway to approximately 1,300' south of Highway 111 is a roadway operated and maintained by the County. Plaza Avenue from Oasis Street to Jackson Street is a roadway operated and maintained by the County.

Draft EIR Pages 4.12-2 and 4.12-3

Draft EIR Revisions

The following revisions were made to the description of the local roadway network.

- **Monroe Street:** A four-lane north-south arterial roadway south of the I-10 interchange and to the southern City limits and beyond, and a two-lane arterial in the vicinity of the I-10 interchange. The roadway is classified in the City's General Plan Circulation Element as a widened (six-lane) arterial in the vicinity of the I-10 interchange and secondary arterial elsewhere.
- **Arabia Street:** A two-lane north-south collector street extending between Requa Avenue and south to Avenue 48.
- **Oasis Street:** A four-lane north-south secondary arterial roadway extending from Indio Boulevard to Dr. Carreon Boulevard and a two-lane secondary arterial roadway extending from Dr. Carreon Boulevard to Avenue 48.
- **Jackson Street:** A north-south secondary arterial roadway extending from Avenue 41 south to the City limits at Avenue 52 and beyond. Jackson Street contains two southbound lanes throughout its alignment, two northbound lanes from Avenue 41 south to Odlum Drive, and one northbound lane from Odlum Drive to Avenue 52. It is classified in the City's General Plan Circulation Element as a widened (six-lane) arterial highway from Avenue 42 southerly through the I-10 Interchange and then as a secondary highway (4 lanes) southerly to Avenue 45, and then as an arterial highway (4 to 6 lanes) southerly to Highway 111.
- **Avenue 44:** An east-west secondary arterial roadway extending from Monroe Street east to the eastern City limits at Dillon Road. Avenue 44 contains four lanes from Monroe Street to just west of the I-10 undercrossing and two lanes from the undercrossing to its terminus at Dillon Road.
- **Fred Waring Drive:** A six-lane arterial east-west arterial west of Monroe Street and a two-lane east-west arterial between Monroe Street east to its terminus at Indio Boulevard.
- **Miles Avenue:** A four-lane east-west secondary arterial west of Monroe Street and a two-lane secondary arterial local street east of Monroe Street.
- **Requa-Shadow Palm Avenue:** A two-lane east-west collector street extending from west of Monroe Street to Indio Boulevard.
- **Highway 111:** A four-lane east-west arterial roadway west of Monroe Street, a six-lane east-west arterial roadway east of Monroe Street to Rubidoux Street, and a four-lane secondary arterial from Rubidoux Street east to Indio Boulevard.
- **Indio Boulevard:** A four-lane east-west arterial roadway on the east and west sides of Oasis Street.
- **Dr. Carreon Boulevard:** A four-lane east-west secondary arterial roadway on the east and west sides of Oasis Street.
- **Avenue 48:** A four-lane east-west secondary arterial west of Oasis Street and a four-lane east-west arterial east of Oasis Street.
- **Highway 111:** A four-lane east-west arterial roadway west of Monroe Street, a six-lane east-west arterial roadway east of Monroe Street to Rubidoux Street, and a four-lane secondary arterial from Rubidoux Street east to Indio Boulevard. Highway 111 is classified as a 4 to 6 lane widened arterial highway west of Rubidoux Street and the portion between Madison Street and Monroe Street is planned to be widened to six-lanes in 2014.

Page 4.12-5

Draft EIR Revision

CIR 1.1: Maintain a minimum Level of Service "C" at all intersections during nonpeak hours and Level of Service "D" at all intersections during peak hours to ensure that traffic delays are kept to a minimum. Please note that CIR 1.1 was superseded by the Circulation Plan Update adopted in September 2008 (LOS "D" is the operating standard and LOS "E" may be acceptable under certain conditions and constraints). However, none of the study intersections included in this analysis operates at LOS E under any analysis scenario.

Draft EIR Page 4.12-5

Revision

The ramp terminus intersections on I-10 and ~~intersection on Highway 111~~ are under the jurisdiction of Caltrans; all other study area intersections are under the jurisdiction of the City or the County.

Table 4.12.A: Existing (2013) Baseline Intersection Levels of Service without Project

Intersection	Control	Existing without Project					
		A.M. Peak Hour			P.M. Peak Hour		
		V/C	Delay	LOS	V/C	Delay	LOS
1 Monroe Street/I-10 Westbound Ramps	Signal	0.66	22.3	C	0.62	20.4	C
2 Monroe Street/I-10 Eastbound Ramps	Signal	0.77	24.2	C	0.76	23.5	C
3 Monroe Street/Oleander Avenue	Signal	0.36	17.9	B	0.43	16.3	B
4 Monroe Street/Avenue 44	Signal	0.49	24.3	C	0.55	20.3	C
5 Monroe Street/Fred Waring Drive	Signal	0.54	25.2	C	0.54	29.6	C
6 Monroe Street/Miles Avenue	Signal	0.60	28.9	C	0.62	29.4	C
7 Monroe Street/Requa-Shadow Palm Avenue	Signal	0.44	17.7	B	0.49	22.0	C
8 Monroe Street/Highway 111	Signal	0.45	31.3	C	0.59	33.0	C
9 Arabia Street/Highway 111	Signal	0.26	16.3	B	0.36	18.1	B
10 Driveway 1-King Street/Highway 111	TWSC	-	10.7	B	-	11.6	B
11 Driveway 2/Highway 111	TWSC	-	10.7	B	-	11.3	B
12 Oasis Street/Indio Boulevard	Signal	0.34	10.7	B	0.40	18.7	B
13 Oasis Street/Miles Boulevard	Signal	0.15	15.2	B	0.13	15.1	B
14 Oasis Street/Bliss Avenue	AWSC	0.24	9.1	A	0.22	8.9	A
15 Oasis Street/Requa Avenue	Signal	0.35	27.6	C	0.41	28.3	C
16 Oasis Street/Highway 111	Signal	0.37	23.3	C	0.33	18.2	B
17 Oasis Street/Driveway 3	TWSC	<i>Future Intersection</i>			<i>Future Intersection</i>		
18 Oasis Street/Court House Driveway-Driveway 4	AWSC	0.39	9.8	A	0.38	9.3	A
19 Oasis Street/Plaza Avenue	AWSC	0.21	8.9	A	0.29	9.8	A
20 Oasis Street/PS Driveway	TWSC	<i>Future Intersection</i>			<i>Future Intersection</i>		
21 Oasis Street/Dr. Carreon Boulevard	Signal	0.21	11.5	B	0.21	12.9	B
22 Oasis Street/Avenue 48	TWSC	-	17.0	C	-	15.2	C
23 Courthouse Driveway/Plaza Avenue	TWSC	-	11.5	B	-	9.3	A
24 Jackson Street/I-10 Westbound Ramps	Signal	0.53	15.9	B	0.55	17.5	B
25 Jackson Street/I-10 Eastbound Ramps	Signal	0.53	22.3	C	0.56	19.7	B
26 Jackson Street/Highway 111	Signal	0.51	32.8	C	0.53	33.5	C
27 Jackson Street/Plaza Avenue	TWSC	-	14.6	B	-	13.4	B
28 Jackson Street/Avenue 48	Signal	0.37	31.2	C	0.54	31.8	C

Source: *Traffic Study*, LSA Associates, Inc., 2013.

Note: Delay = Average control delay in seconds. At TWSC intersections, worst-case approach is reported.

I-10 = Interstate 10

LOS = level of service

PS = parking structure

TWSC = Two-Way Stop Control

V/C = Volume/capacity ratio

Table 4.12.D: Applicable County of Riverside City of Indio Circulation Element Policies

Circulation Element Policies	Analysis
<p>CIR 1.1: Maintain a minimum Level of Service "C" at all intersections during nonpeak hours and Level of Service "D" at all intersections during peak hours to ensure that traffic delays are kept to a minimum. <u>Please note that CIR 1.1 was superseded by the Circulation Plan Update adopted in September 2008 (LOS "D" is the operating standard and LOS "E" may be acceptable under certain conditions and constraints).</u></p>	<p>The <i>Traffic Study</i> for the proposed project (included as Appendix I to this EIR) has been prepared to meet the requirements of the City, and consistent with the Riverside County traffic study guidelines. The scope of work for the <i>Traffic Study</i>, including trip generation, trip distribution, study area, and analysis methodologies, has been reviewed and approved by City staff. The City's LOS standards for local street intersections and Caltrans LOS standards for freeway ramp terminus intersections with local streets and intersections on state highways have been applied to the <i>Traffic Study</i> to assess the impacts created by projected traffic from the project. None of the study intersections included in this analysis operates at LOS E under any analysis scenario. Mitigation measures to offset traffic impacts created by the proposed project are not required because the proposed project would not result in significant traffic impacts. Therefore, the project is compliant with Policy CIR 1.1 and the General Plan Update.</p>
<p>CIR 2.1: Require dedication and/or construction of appropriate facilities in support of a public transportation system.</p>	<p>The project site is located within walking distance of four bus routes that would serve the transit needs of the proposed project. No additional transit improvements are required. Therefore, the project is compliant with Policy CIR 2.1.</p>
<p>CIR 2.2: Provide a circulation network that accommodates the safe and efficient movement of cyclists on bike lanes and bike trails.</p>	<p>The project site is located near the designated bicycle route on Arabia Street. The project would not otherwise affect bicycle transportation. No additional bicycle improvements are required. Therefore, the project is compliant with Policy CIR 2.2.</p>
<p>CIR 2.3: Provide a system of sidewalks or pathways in residential and commercial areas that provides a safe environment for pedestrians.</p>	<p>The project site is located adjacent to the Old Town Specific Plan. The project vicinity includes numerous commercial, office, and retail uses with adequate pedestrian accommodations via sidewalks. The project would result in the construction of new street-adjacent sidewalks and would not otherwise affect pedestrian movements. No additional pedestrian/bicycle improvements are required. Therefore, the project is compliant with Policy CIR 2.3.</p>
<p>CIR 3.1: Interface with appropriate jurisdictions and agencies to encourage the timely improvement of roadway and transit facilities, which address area-wide and regional travel needs.</p>	<p>As indicated in the <i>Traffic Study</i> for the proposed project and discussed subsequently in this section of the EIR, the project would result in a less than significant impact to the local and regional roadway system, and no mitigation is required. Therefore, the project is compliant with Policy CIR 3.1.</p>
<p>CIR 4.2: Provide joint-use and public parking facilities where needed by special assessment districts or other mechanisms.</p>	<p>The proposed project includes construction of an on-site PS and surface parking spaces to accommodate the parking demand from employees and visitors. No additional parking improvements are required. Therefore, the project is compliant with Policy CIR 4.2.</p>

Source: County of Riverside Circulation Element, 2008.

CEQA = California Environmental Quality Act

LOS = level of service

EIR = Environmental Impact Report

PS = parking structure

Table 4.12.E: Opening Year (2014) Cumulative Intersection Levels of Service without Project

Intersection	Control	Opening Year Cumulative without Project					
		A.M. Peak Hour			P.M. Peak Hour		
		V/C	Delay	LOS	V/C	Delay	LOS
1 Monroe Street/I-10 Westbound Ramps	Signal	0.67	22.8	C	0.62	20.8	C
2 Monroe Street/I-10 Eastbound Ramps	Signal	0.81	25.9	C	0.79	24.3	C
3 Monroe Street/Oleander Avenue	Signal	0.37	17.7	B	0.44	16.1	B
4 Monroe Street/Avenue 44	Signal	0.50	24.3	C	0.57	20.4	C
5 Monroe Street/Fred Waring Drive	Signal	0.55	25.2	C	0.56	29.6	C
6 Monroe Street/Miles Avenue	Signal	0.61	29.0	C	0.64	29.5	C
7 Monroe Street/Requa-Shadow Palm Avenue	Signal	0.45	17.5	B	0.50	21.8	C
8 Monroe Street/Highway 111	Signal	0.46	31.4	C	0.60	33.1	C
9 Arabia Street/Highway 111	Signal	0.29	15.8	B	0.38	17.8	B
10 Driveway 1-King Street/Highway 111	TWSC	-	11.0	B	-	11.9	B
11 Driveway 2/Highway 111	TWSC	-	11.0	B	-	11.5	B
12 Oasis Street/Indio Boulevard	Signal	0.35	11.0	B	0.42	19.2	B
13 Oasis Street/Miles Boulevard	Signal	0.16	14.7	B	0.13	14.8	B
14 Oasis Street/Bliss Avenue	AWSC	0.29	9.6	A	0.25	9.3	A
15 Oasis Street/Requa Avenue	Signal	0.37	28.0	C	0.43	28.7	C
16 Oasis Street/Highway 111	Signal	0.40	23.5	C	0.36	19.4	B
17 Oasis Street/Driveway 3	TWSC	Future Intersection			Future Intersection		
18 Oasis Street/Court House Driveway-Driveway 4	AWSC	0.50	10.7	B	0.47	10.2	B
19 Oasis Street/Plaza Avenue	AWSC	0.27	9.6	A	0.34	10.5	B
20 Oasis Street/PS Driveway	TWSC	Future Intersection			Future Intersection		
21 Oasis Street/Dr. Carreon Boulevard	Signal	0.22	12.3	B	0.22	13.5	B
22 Oasis Street/Avenue 48	TWSC	-	17.9	C	-	16.0	C
23 Courthouse Driveway/Plaza Avenue	TWSC	-	12.9	B	-	9.9	A
24 Jackson Street/I-10 Westbound Ramps	Signal	0.54	16.0	B	0.56	17.8	B
25 Jackson Street/I-10 Eastbound Ramps	Signal	0.54	22.6	C	0.57	19.9	B
26 Jackson Street/Highway 111	Signal	0.55	33.2	C	0.54	33.7	C
27 Jackson Street/Plaza Avenue	TWSC	-	15.6	C	-	14.8	B
28 Jackson Street/Avenue 48	Signal	0.39	31.2	C	0.55	32.0	C

Source: *Traffic Study*, LSA Associates, Inc., 2013.

Note: Delay = Average control delay in seconds. At TWSC intersections, worst-case approach is reported.

AWSC = All-Way Stop Control

PS = parking structure

I-10 = Interstate 10

TWSC = Two-Way Stop Control

LOS = level of service

V/C = volume/capacity ratio

Table 4.12.F: Future (2035) Intersection Levels of Service without Project

Intersection	Control	Year 2035 without Project					
		A.M. Peak Hour			P.M. Peak Hour		
		V/C	Delay	LOS	V/C	Delay	LOS
1 Monroe Street/I-10 Westbound Ramps	Signal	0.87	34.8	C	0.80	27.3	C
2 Monroe Street/I-10 Eastbound Ramps	Signal	0.97	39.3	D	0.94	31.9	C
3 Monroe Street/Oleander Avenue	Signal	0.50	17.6	B	0.58	16.1	B
4 Monroe Street/Avenue 44	Signal	0.64	26.2	C	0.74	23.1	C
5 Monroe Street/Fred Waring Drive	Signal	0.78	28.6	C	0.73	33.9	C
6 Monroe Street/Miles Avenue	Signal	0.73	32.1	C	0.77	32.7	C
7 Monroe Street/Requa-Shadow Palm Avenue	Signal	0.53	18.4	B	0.62	23.1	C
8 Monroe Street/Highway 111	Signal	0.56	32.2	C	0.74	35.5	D
9 Arabia Street/Highway 111	Signal	0.35	15.9	B	0.47	18.4	B
10 Driveway 1-King Street/Highway 111	TWSC	-	11.5	B	-	13.3	B
11 Driveway 2/Highway 111	TWSC	-	11.5	B	-	12.7	B
12 Oasis Street/Indio Boulevard	Signal	0.41	10.9	B	0.52	19.8	B
13 Oasis Street/Miles Boulevard	Signal	0.17	14.9	B	0.17	15.1	B
14 Oasis Street/Bliss Avenue	AWSC	0.29	9.6	A	0.31	9.9	A
15 Oasis Street/Requa Avenue	Signal	0.38	28.0	C	0.48	29.0	C
16 Oasis Street/Highway 111	Signal	0.49	23.8	C	0.45	19.2	B
17 Oasis Street/Driveway 3	TWSC	Future Intersection			Future Intersection		
18 Oasis Street/Court House Driveway-Driveway 4	AWSC	0.52	11.0	B	0.51	10.8	B
19 Oasis Street/Plaza Avenue	AWSC	0.31	10.2	B	0.37	10.8	B
20 Oasis Street/PS Driveway	TWSC	Future Intersection			Future Intersection		
21 Oasis Street/Dr. Carreon Boulevard	Signal	0.24	12.2	B	0.25	13.6	B
22 Oasis Street/Avenue 48	TWSC	-	20.8	C	-	22.4	C
23 Courthouse Driveway/Plaza Avenue	TWSC	-	14.3	B	-	9.9	A
24 Jackson Street/I-10 Westbound Ramps	Signal	0.61	16.9	B	0.65	19.8	B
25 Jackson Street/I-10 Eastbound Ramps	Signal	0.60	23.5	C	0.66	21.9	C
26 Jackson Street/Highway 111	Signal	0.57	33.5	C	0.68	36.0	D
27 Jackson Street/Plaza Avenue	TWSC	-	15.9	C	-	20.9	C
28 Jackson Street/Avenue 48	Signal	0.48	31.3	C	0.69	33.9	C

Source: *Traffic Study*, LSA Associates, Inc., 2013.

Note: Delay = Average control delay in seconds. At TWSC intersections, worst-case approach is reported.

AWSC = All-Way Stop Control

PS = parking structure

I-10 = Interstate 10

TWSC = Two-Way Stop Control

LOS = level of service

V/C = volume/capacity ratio

Table 4.12.H: Existing (2013) Baseline with Project Levels of Service

Intersection	Control	Existing with Project					
		A.M. Peak Hour			P.M. Peak Hour		
		V/C	Delay	LOS	V/C	Delay	LOS
1 Monroe Street/I-10 Westbound Ramps	Signal	0.66	22.4	C	0.62	20.6	C
2 Monroe Street/I-10 Eastbound Ramps	Signal	0.79	25.2	C	0.78	24.2	C
3 Monroe Street/Oleander Avenue	Signal	0.37	17.7	B	0.43	16.1	B
4 Monroe Street/Avenue 44	Signal	0.50	24.3	C	0.56	20.3	C
5 Monroe Street/Fred Waring Drive	Signal	0.54	25.2	C	0.55	29.5	C
6 Monroe Street/Miles Avenue	Signal	0.61	28.9	C	0.63	29.3	C
7 Monroe Street/Requa-Shadow Palm Avenue	Signal	0.44	17.5	B	0.49	21.8	C
8 Monroe Street/Highway 111	Signal	0.45	31.4	C	0.60	33.2	C
9 Arabia Street/Highway 111	Signal	0.27	15.9	B	0.37	17.9	B
10 Driveway 1-King Street/Highway 111	TWSC	-	10.7	B	-	11.8	B
11 Driveway 2/Highway 111	TWSC	<i>Does Not Exist</i>			<i>Does Not Exist</i>		
12 Oasis Street/Indio Boulevard	Signal	0.34	10.8	B	0.41	18.9	B
13 Oasis Street/Miles Boulevard	Signal	0.15	15.1	B	0.13	15.0	B
14 Oasis Street/Bliss Avenue	AWSC	0.25	9.2	A	0.23	9.0	A
15 Oasis Street/Requa Avenue	Signal	0.36	27.5	C	0.41	28.4	C
16 Oasis Street/Highway 111	Signal	0.41	24.2	C	0.34	19.2	B
17 Oasis Street/Driveway 3	TWSC	-	9.8	A	-	8.9	A
18 Oasis Street/Court House Driveway-Driveway 4	AWSC	0.49	10.6	B	0.48	10.4	B
19 Oasis Street/Plaza Avenue	AWSC	0.27	9.6	A	0.47	11.5	B
20 Oasis Street/PS Driveway	TWSC	-	9.7	A	-	10.2	B
21 Oasis Street/Dr. Carreon Boulevard	Signal	0.21	12.0	B	0.21	13.4	B
22 Oasis Street/Avenue 48	TWSC	-	17.4	C	-	15.7	C
23 Courthouse Driveway/Plaza Avenue	TWSC	-	12.3	B	-	9.1	A
24 Jackson Street/I-10 Westbound Ramps	Signal	0.53	16.1	B	0.56	18.0	B
25 Jackson Street/I-10 Eastbound Ramps	Signal	0.54	22.8	C	0.58	20.2	C
26 Jackson Street/Highway 111	Signal	0.52	32.9	C	0.54	33.7	C
27 Jackson Street/Plaza Avenue	TWSC	-	14.6	B	-	13.5	B
28 Jackson Street/Avenue 48	Signal	0.38	31.2	C	0.55	31.9	C

Source: *Traffic Study*, LSA Associates, Inc., 2013.

Note: Delay = Average control delay in seconds. At TWSC intersections, worst-case approach is reported.

AWSC = All-Way Stop Control

PS = parking structure

I-10 = Interstate 10

TWSC = Two-Way Stop Control

LOS = level of service

V/C = volume/capacity ratio

Table 4.12.I: Opening Year (2014) Cumulative with Project Levels of Service

Intersection	Control	Opening Year Cumulative with Project					
		A.M. Peak Hour			P.M. Peak Hour		
		V/C	Delay	LOS	V/C	Delay	LOS
1 Monroe Street/I-10 Westbound Ramps	Signal	0.67	22.9	C	0.62	21.1	C
2 Monroe Street/I-10 Eastbound Ramps	Signal	0.83	27.0	C	0.81	25.2	C
3 Monroe Street/Oleander Avenue	Signal	0.38	17.5	B	0.45	15.9	B
4 Monroe Street/Avenue 44	Signal	0.51	24.3	C	0.57	20.4	C
5 Monroe Street/Fred Waring Drive	Signal	0.55	25.2	C	0.56	29.4	C
6 Monroe Street/Miles Avenue	Signal	0.63	29.1	C	0.64	29.4	C
7 Monroe Street/Requa-Shadow Palm Avenue	Signal	0.46	17.4	B	0.51	21.7	C
8 Monroe Street/Highway 111	Signal	0.46	31.5	C	0.61	33.3	C
9 Arabia Street/Highway 111	Signal	0.30	15.4	B	0.39	17.6	B
10 Driveway 1-King Street/Highway 111	TWSC	-	10.8	B	-	12.1	B
11 Driveway 2/Highway 111	TWSC	Does Not Exist			Does Not Exist		
12 Oasis Street/Indio Boulevard	Signal	0.35	11.1	B	0.43	19.4	B
13 Oasis Street/Miles Boulevard	Signal	0.17	14.6	B	0.14	14.7	B
14 Oasis Street/Bliss Avenue	AWSC	0.30	9.7	A	0.26	9.4	A
15 Oasis Street/Requa Avenue	Signal	0.37	27.9	C	0.43	28.8	C
16 Oasis Street/Highway 111	Signal	0.44	24.4	C	0.37	20.0	B
17 Oasis Street/Driveway 3	TWSC	-	10.1	B	-	9.0	A
18 Oasis Street/Court House Driveway-Driveway 4	AWSC	0.60	12.0	B	0.57	11.7	B
19 Oasis Street/Plaza Avenue	AWSC	0.37	10.4	B	0.53	12.5	B
20 Oasis Street/PS Driveway	TWSC	-	10.0	A	-	10.4	B
21 Oasis Street/Dr. Carreon Boulevard	Signal	0.23	12.8	B	0.23	14.0	B
22 Oasis Street/Avenue 48	TWSC	-	18.4	C	-	16.7	C
23 Courthouse Driveway/Plaza Avenue	TWSC	-	13.9	B	-	9.6	A
24 Jackson Street/I-10 Westbound Ramps	Signal	0.54	16.1	B	0.57	18.3	B
25 Jackson Street/I-10 Eastbound Ramps	Signal	0.56	23.0	C	0.59	20.3	C
26 Jackson Street/Highway 111	Signal	0.55	33.3	C	0.55	33.9	C
27 Jackson Street/Plaza Avenue	TWSC	-	16.2	C	-	15.0	B
28 Jackson Street/Avenue 48	Signal	0.40	31.2	C	0.56	32.0	C

Source: *Traffic Study*, LSA Associates, Inc., 2013.

Note: Delay = Average control delay in seconds. At TWSC intersections, worst-case approach is reported.

AWSC = All-Way Stop Control

PS = parking structure

I-10 = Interstate 10

TWSC = Two-Way Stop Control

LOS = level of service

V/C = volume/capacity ratio

Table 4.12.J: Future (2035) Cumulative with Project Levels of Service

Intersection	Control	Year 2035 with Project					
		A.M. Peak Hour			P.M. Peak Hour		
		V/C	Delay	LOS	V/C	Delay	LOS
1 Monroe Street/I-10 Westbound Ramps	Signal	0.88	35.1	D	0.80	27.5	C
2 Monroe Street/I-10 Eastbound Ramps	Signal	0.98	42.2	D	0.96	34.4	C
3 Monroe Street/Oleander Avenue	Signal	0.51	17.5	B	0.59	16.1	B
4 Monroe Street/Avenue 44	Signal	0.64	26.2	C	0.74	23.2	C
5 Monroe Street/Fred Waring Drive	Signal	0.78	28.6	C	0.73	33.9	C
6 Monroe Street/Miles Avenue	Signal	0.74	32.2	C	0.78	32.8	C
7 Monroe Street/Requa-Shadow Palm Avenue	Signal	0.54	18.4	B	0.63	23.1	C
8 Monroe Street/Highway 111	Signal	0.56	32.4	C	0.75	35.7	D
9 Arabia Street/Highway 111	Signal	0.36	15.7	B	0.48	18.3	B
10 Driveway 1-King Street/Highway 111	TWSC	-	11.3	B	-	13.5	B
11 Driveway 2/Highway 111	TWSC	<i>Does Not Exist</i>			<i>Does Not Exist</i>		
12 Oasis Street/Indio Boulevard	Signal	0.41	11.0	B	0.53	20.0	B
13 Oasis Street/Miles Boulevard	Signal	0.17	14.8	B	0.17	15.0	B
14 Oasis Street/Bliss Avenue	AWSC	0.30	9.7	A	0.32	10.1	B
15 Oasis Street/Requa Avenue	Signal	0.39	27.9	C	0.49	29.1	C
16 Oasis Street/Highway 111	Signal	0.53	24.7	C	0.48	20.3	C
17 Oasis Street/Driveway 3	TWSC	-	10.6	B	-	9.2	A
18 Oasis Street/Court House Driveway-Driveway 4	AWSC	0.60	12.0	B	0.60	12.2	B
19 Oasis Street/Plaza Avenue	AWSC	0.40	11.1	B	0.54	12.7	B
20 Oasis Street/PS Driveway	TWSC	-	10.5	B	-	11.0	B
21 Oasis Street/Dr. Carreon Boulevard	Signal	0.24	12.6	B	0.26	13.9	B
22 Oasis Street/Avenue 48	TWSC	-	21.3	C	-	23.9	C
23 Courthouse Driveway/Plaza Avenue	TWSC	-	15.5	C	-	9.6	A
24 Jackson Street/I-10 Westbound Ramps	Signal	0.61	17.0	B	0.66	20.4	C
25 Jackson Street/I-10 Eastbound Ramps	Signal	0.61	23.9	C	0.68	22.4	C
26 Jackson Street/Highway 111	Signal	0.58	33.6	C	0.69	36.3	D
27 Jackson Street/Plaza Avenue	TWSC	-	16.3	C	-	21.4	C
28 Jackson Street/Avenue 48	Signal	0.49	31.4	C	0.70	34.0	C

Source: *Traffic Study*, LSA Associates, Inc., 2013.

Note: Delay = Average control delay in seconds. At TWSC intersections, worst-case approach is reported.

AWSC = All-Way Stop Control

PS = parking structure

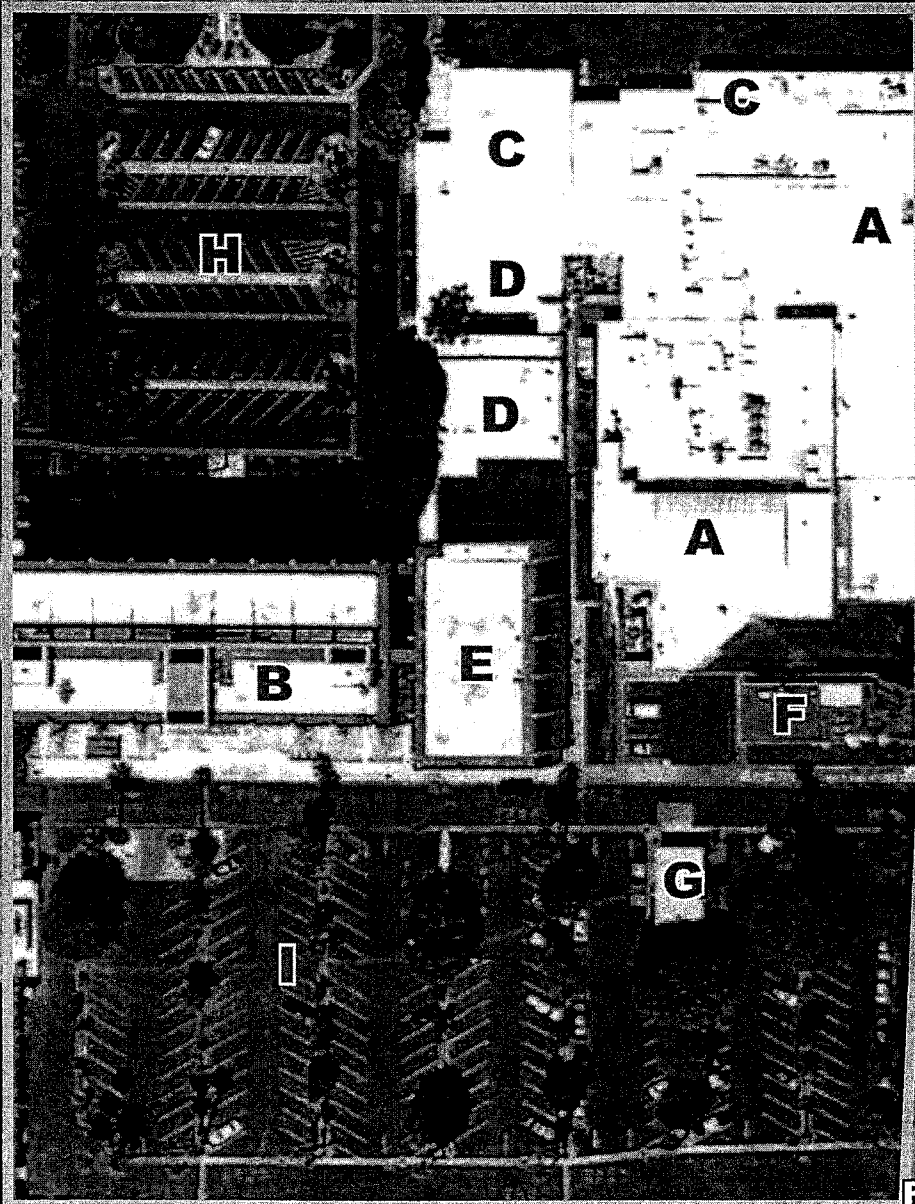
I-10 = Interstate 10

TWSC = Two-Way Stop Control

LOS = level of service

V/C = volume/capacity ratio

HIGHWAY 111

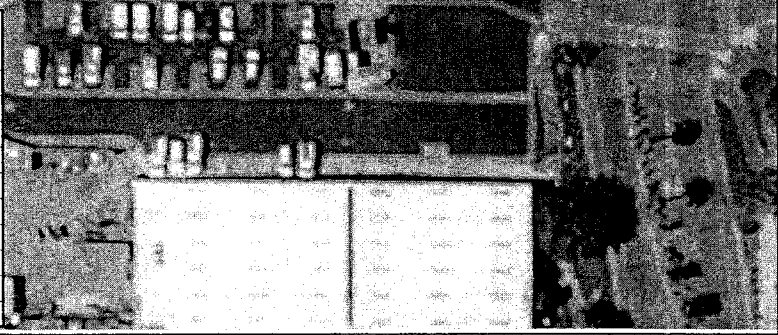


OASIS ST.

PLAZA AVE. →

LEGEND

	Project Area
Reference Number and Title	
A.	Indio Jail
B.	County Administrative Center (CAC) Building
C.	Court Annex
D.	Courtroom Department 1B and Small Claims Court
E.	Law Library
F.	Communications Building and 800 megahertz (Mhz) Tower
G.	Generator 1 Building
H.	North Parking Lot
I.	South Parking Lot



LSA

FIGURE 3-3



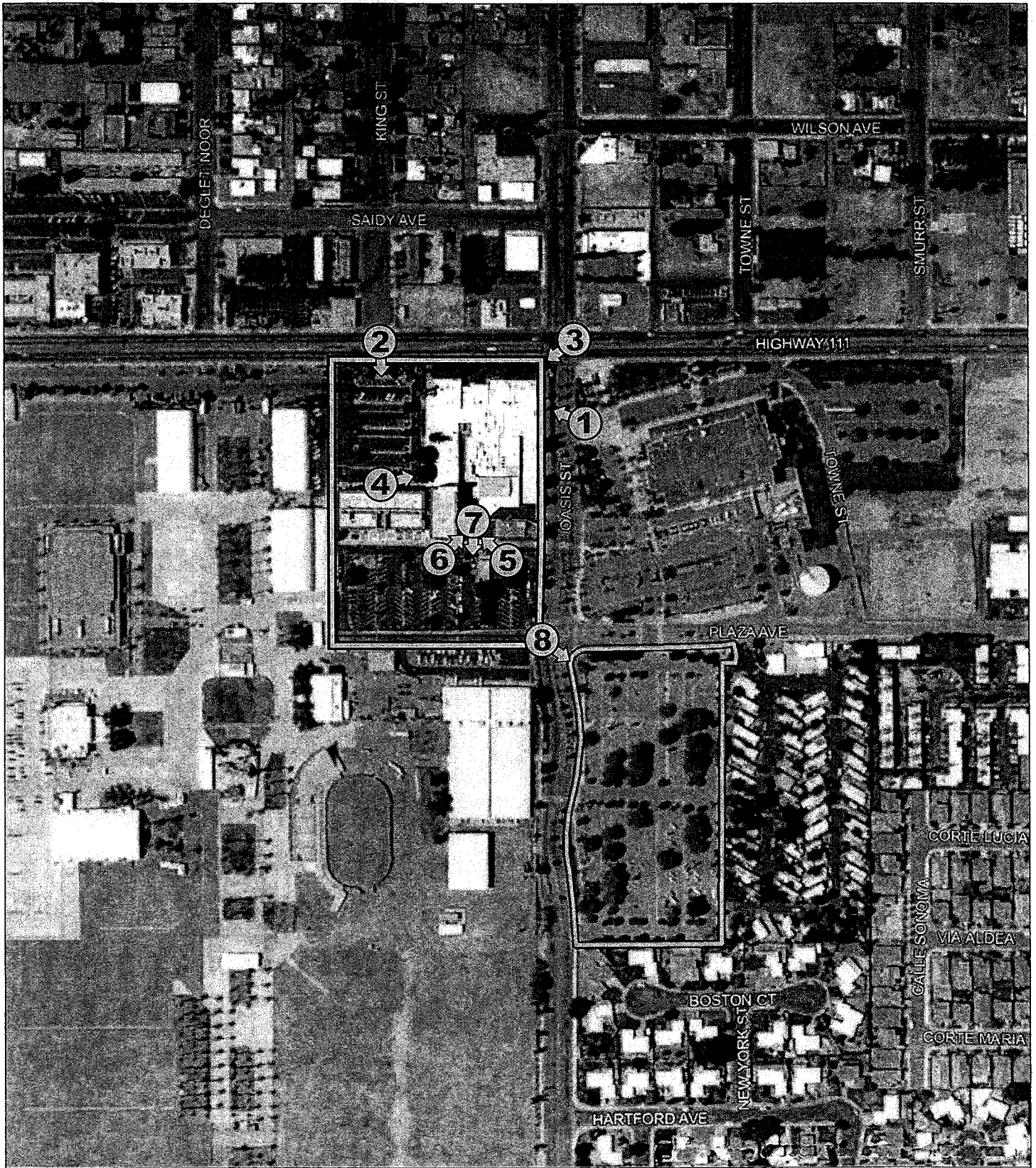
0 50 100
FEET

SOURCE: Bing (c. 2010)

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East County Detention Center

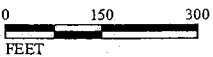
Site A Existing Buildings



LSA

LEGEND

-  Project Location
-  Key View Points



SOURCE: Bing (c. 2010)

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FIGURE 3-4

East County Detention Center
Existing Views Key

TIMELY RECEIVED COMMENT LETTERS

1. STATE CLEARINGHOUSE
2. CITY OF INDIO
3. IMPERIAL IRRIGATION DISTRICT
4. DESERT SANDS UNIFIED SCHOOL DISTRICT (2 LETTERS)
5. DOUGLAS MCCAULEY
6. TOWNE MOBILE HOME PART PETITION



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

June 5, 2013

Vikki Kuntz
Riverside County
3403 Tenth Street, Suite 400
Riverside, CA 92501

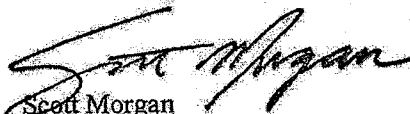
Subject: East County Detention Center
SCH#: 2013021047

Dear Vikki Kuntz:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on June 4, 2013, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,


Scott Morgan
Director, State Clearinghouse

PROJECT MGMT DEPT
2013 JUN 10 PM 5:00

the resulting undesirable random pedestrian crossings of Highway 111 in the vicinity of the Proposed Project during construction. While Figure 3-15 shows an entrance/exit at Plaza Avenue, the Traffic Impact Analysis has evaluated the driveway access for the parking structure at Plaza Avenue as an "Entrance Only". The Plaza Avenue access must be "Entrance Only" and the Draft EIR must include measures and design features to make sure this access operates in this fashion. Further, Figure 3-15 in the Project Description clearly shows two driveways on Oasis Street for the parking structure but the Traffic Impact Analysis has evaluated only one of these access driveways.

- 3) Right Turn Lane on Highway 111 at Oasis Street – All of the site plan figures within the Project Description clearly show a new eastbound right turn lane on Highway 111 at Oasis Street, and the City concurs that this measure is appropriate. However, the length of this proposed right turn lane appears to be too short to accommodate queuing and partial deceleration from the outside eastbound through lane on Highway 111. The Draft EIR must analyze this design feature of the Proposed Project and provide recommendations for safe and appropriate design in accordance with AASHTO'S Geometric Design of Highways and Streets. Modification and upgrading of the existing traffic signal on Highway 111 at Oasis Street is also necessary to implement this right turn lane.
- 4) Perimeter Access Roadway – Figure 3-16 shows a gated perimeter access roadway around the ECDC site with a back-in truck loading dock just inside the gate off Highway 111. The Traffic Impact Analysis did not evaluate the area on the outside of either access control gate to make sure queuing does not spill back into the adjacent streets. Further, the ability of all vehicles, but particularly semi-trailer trucks, other delivery trucks, and inmate busses to make a greater than 90 degree right turn from Highway 111 and then turnaround inside the secured area to access the loading areas just south of Highway 111 has not been analyzed. The Draft EIR should analyze this perimeter access roadway as a one-way clockwise facility to mitigate the various issues identified above. This would include closure of the existing westbound left turn lane on Highway 111 into the perimeter roadway and the extension of the eastbound left turn lane on Highway 111 at Oasis Street.

Traffic and Circulation Issues (Chapter 4.12) – Each of the following errors in the Draft EIR (and in the Traffic Impact Analysis in Appendix I) must be corrected:

- 5) Introduction (Page 4.12-1) – In the preparation of traffic studies, the City of Indio follows the guidelines provided in Transportation Impact Analyses for Site Development, An ITE Recommended Practice published by the Institute of Transportation Engineers. Portions of the Traffic Study were reviewed and discussed with City staff but the Traffic Study itself was not and has not been "approved" by City staff.
- 6) Existing Roadway Network (Pages 4.12-1 and 4.12-2)
 - a) Highway 111 was relinquished to the City of Indio in 2007 and has not been a State Highway for the last six years. It is operated and maintained by the City of Indio.
 - b) Oasis Street from Highway 111 to approximately 1,300' south of Highway 111 is a roadway operated and maintained by the County, not by the City of Indio.
 - c) Plaza Avenue from Oasis Street to Jackson Street is a roadway operated and maintained by the County, not by the City of Indio.
 - d) Jackson Street is classified in the City's General Plan Circulation Element as a widened (six-lane) arterial highway from Avenue 42 southerly through the I-10 Interchange and

- then as a secondary highway (4 lanes) southerly to Avenue 45, and then as an arterial highway (4 to 6 lanes) southerly to Highway 111.
- e) Miles Avenue is a two-lane local street east of Monroe Street.
 - f) Highway 111 is classified as a 4 to 6 lane widened arterial highway west of Rubidoux Street and the portion between Madison Street and Monroe Street is planned to be widened to six-lanes in 2014.
- 7) Existing Traffic Conditions (Pages 4.12-3 and 4.12-4) - Traffic counts were made in December 2012, February 2013, and March 2013, not in January and February 2013 as stated. Some traffic count data sheets are not included in Appendix I of the Traffic Study (PM peak hour at Monroe Street/Fred Waring Drive as well as both peak hours at Oasis Street/Miles Avenue and Oasis Street/Avenue 48). Other traffic count sheets are duplicated (Oasis Street/Indio Boulevard), others do not match the location name in the EIR, and the counts at I-10/Monroe Street Interchange are identified as being in the City of Coachella.
- 8) Intersection Geometry (Figure 4.12-2) – The number of lanes identified in the Draft EIR and Traffic Study and then used in the calculation of intersection operations throughout the traffic analyses are incorrect as follows:
- a) Monroe Street/Oleander Avenue – Westbound has 1 shared thru/left turn lane and 1 right turn lane.
 - b) Monroe Street/Miles Avenue – Westbound has 1 left turn lane and 1 shared thru/right turn lane.
 - c) Monroe Street/Requa Avenue/Shadow Palm Avenue - Westbound has 1 left turn lane and 1 shared thru/right turn lane.
 - d) Driveway 1/Highway 111/King Street – Eastbound has 1 thru lane and 1 thru/right turn lane.
 - e) Driveway 2/Highway 111 – Westbound has 2 thru lanes.
 - f) Oasis Street/Indio Boulevard – Northbound has 1 left turn lane and 1 shared left turn/right turn lane.
 - g) Oasis Street/Miles Avenue – Westbound has 1 shared left turn/thru/right turn lane.
 - h) Oasis Street/Courthouse Driveway/Driveway 4 – Southbound has 1 left turn and 1 thru/right turn lane.
 - i) Oasis Street/Avenue 48 – Southbound has 1 left turn and 1 right turn lane.
 - j) Jackson Street/I-10 Eastbound Ramps – Northbound has 1 thru lane and 1 right turn lane.
 - k) Jackson Street/Plaza Avenue – Southbound has 1 left turn lane, 1 thru lane, and 1 shared thru/right turn lane.
 - l) Jackson Street/Avenue 48 – Eastbound has 1 left turn lane, 2 thru lanes, and 1 right turn lane with right turn green arrow overlap.
 - m) Proposed future lane configurations at Intersections #16, 17, 20, and 23 must be shown.
- 9) Regulatory Setting (Page 4.12-5) – City of Indio Circulation Element Policy CIR 1.1 was superseded by the Circulation Plan Update adopted in September 2008 (LOS "D" is the operating standard and LOS "E" may be acceptable under certain conditions and constraints).
- 10) Methodology (Page 4.12-6) – Highway 111 is a City street and is not under the jurisdiction of Caltrans.
- 11) Impacts and Mitigation Measures (Page 4.12-9)

- a) Table 4.12.D identifies applicable City of Indio Circulation Element Policies, not those of the County of Riverside.
- b) CIR 1.1 has been superseded and must be replaced by the Circulation Plan Update adopted in September 2008.
- c) Under CIR 2.2, a designated bicycle route is identified on Arabia Street. There is no bicycle route on Arabia Street – it is a golf cart facility.

12) Future (2035) Conditions (Page 4.12-10)

- a) Calculations must be provided to support the annual growth rate of 1.43 percent for 22 years.
- b) The La Entrada Specific Plan in the City of Coachella is many miles away from the ECDC Project. References to and traffic volumes associated with that project must be removed.

13) Baseline Traffic Operations (Pages 4-12.5, 4.12-11, and 4.12-12) – These tables identify intersection operations without project traffic added in 2013, 2014, and 2035. Some calculations show improving traffic operating conditions at several intersections over time, when the tables are compared to each other, even with the annual growth in traffic volumes. Without additional travel lanes (and none are planned), delay will not be reduced while traffic volumes increase at 1.43 percent per year. Erroneous calculations are apparent at these intersections:

- a) Monroe Street/Oleander Avenue – AM Peak Hour – Delay is reduced from 17.8 seconds in 2013 to 17.6 seconds in 2014 to 17.5 seconds in 2035.
- b) Monroe Street/Oleander Avenue – PM Peak Hour – Delay is reduced from 16.0 seconds in 2013 to 15.8 seconds in 2014 to 15.7 seconds in 2035.
- c) Monroe Street/Requa Avenue/Shadow Palm Avenue – AM Peak Hour - Delay is reduced from 16.4 seconds in 2013 to 16.2 seconds in 2014.
- d) Monroe Street/Requa Avenue/Shadow Palm Avenue – PM Peak Hour - Delay is reduced from 20.6 seconds in 2013 to 20.4 seconds in 2014.
- e) Highway 111/Arabia Street – PM Peak Hour - Delay is reduced from 18.1 seconds in 2013 to 17.8 seconds in 2014.
- f) Oasis Street/Indio Boulevard – AM Peak Hour - Delay is reduced from 11.0 seconds in 2014 to 10.9 seconds in 2035.
- g) Oasis Street/Miles Avenue – AM Peak Hour - Delay is reduced from 15.1 seconds in 2013 to 14.8 seconds in 2014.
- h) Oasis Street/Miles Avenue – PM Peak Hour - Delay is reduced from 15.1 seconds in 2013 to 14.8 seconds in 2014.
- i) Oasis Street/Doctor Carreon Boulevard – AM Peak Hour - Delay is reduced from 12.3 seconds in 2014 to 12.2 seconds in 2035.

14) Existing (2013) Without and With Project Traffic Operations (Pages 4-12.5 and 4.12-14)

These tables identify intersection operations without project traffic in 2013 and then with project traffic added in 2013. Some calculations show improving traffic operating conditions at several intersections over time, when the tables are compared to each other, even with the project traffic added. Without additional travel lanes (and none are planned), delay will not be reduced with project traffic added. Erroneous calculations are apparent at these intersections:

- a) Monroe Street/Oleander Avenue – AM Peak Hour – Delay is reduced from 17.8 seconds to 17.6 seconds when project traffic is added.

- b) Monroe Street/Oleander Avenue – PM Peak Hour – Delay is reduced from 16.0 seconds to 15.8 seconds when project traffic is added.
- c) Monroe Street/Fred Waring Drive – AM Peak Hour – Delay is reduced from 25.3 seconds to 25.2 seconds when project traffic is added.
- d) Monroe Street/Fred Waring Drive – PM Peak Hour – Delay is reduced from 29.6 seconds to 29.5 seconds when project traffic is added.
- e) Monroe Street/Requa Avenue/Shadow Palm Avenue – AM Peak Hour - Delay is reduced from 16.4 seconds to 16.3 seconds when project traffic is added.
- f) Monroe Street/Requa Avenue/Shadow Palm Avenue – PM Peak Hour - Delay is reduced from 20.6 seconds to 20.4 seconds when project traffic is added.
- g) Highway 111/Arabia Street – AM Peak Hour - Delay is reduced from 16.4 seconds to 15.9 seconds when project traffic is added.
- h) Highway 111/Arabia Street – PM Peak Hour - Delay is reduced from 18.1 seconds to 17.9 seconds when project traffic is added.
- i) Oasis Street/Miles Avenue – PM Peak Hour - Delay is reduced from 15.1 seconds to 15.0 seconds when project traffic is added.

15) Opening Year (2014) Without and With Project Traffic Operations (Pages 4-12.11 and 4.12-15) – These tables identify intersection operations without project traffic in 2014 and then with project traffic added in 2014. Some calculations show improving traffic operating conditions at several intersections over time, when the tables are compared to each other, even with the project traffic added. Without additional travel lanes (and none are planned), delay will not be reduced with project traffic added. Erroneous calculations are apparent at these intersections:

- a) Monroe Street/Oleander Avenue – AM Peak Hour – Delay is reduced from 17.6 seconds to 17.4 seconds when project traffic is added.
- b) Monroe Street/Oleander Avenue – PM Peak Hour – Delay is reduced from 15.8 seconds to 15.6 seconds when project traffic is added.
- c) Monroe Street/Fred Waring Drive – PM Peak Hour – Delay is reduced from 29.6 seconds to 29.4 seconds when project traffic is added.
- d) Monroe Street/Requa Avenue/Shadow Palm Avenue – AM Peak Hour - Delay is reduced from 16.2 seconds to 16.1 seconds when project traffic is added.
- e) Monroe Street/Requa Avenue/Shadow Palm Avenue – PM Peak Hour - Delay is reduced from 20.4 seconds to 20.2 seconds when project traffic is added.
- f) Highway 111/Arabia Street – AM Peak Hour - Delay is reduced from 15.8 seconds to 15.4 seconds when project traffic is added.
- g) Highway 111/Arabia Street – PM Peak Hour - Delay is reduced from 17.8 seconds to 17.6 seconds when project traffic is added.
- h) Oasis Street/Miles Avenue – AM Peak Hour - Delay is reduced from 14.8 seconds to 14.6 seconds when project traffic is added.
- i) Oasis Street/Miles Avenue – PM Peak Hour - Delay is reduced from 14.8 seconds to 14.6 seconds when project traffic is added.
- j) Oasis Street/Requa Avenue – AM Peak Hour - Delay is reduced from 28.0 seconds to 27.9 seconds when project traffic is added.

16) Future Year (2035) Without and With Project Traffic Operations (Pages 4-12.12 and 4.12-16) – These tables identify intersection operations without project traffic in 2035 and then with project traffic added in 2035. Some calculations show improving traffic operating conditions at several intersections over time, when the tables are compared to each other, even with the project traffic added. Without additional travel lanes (and none are planned),

delay will not be reduced with project traffic added. Erroneous calculations are apparent at these intersections:

- a) Monroe Street/Oleander Avenue – AM Peak Hour – Delay is reduced from 17.5 seconds to 17.4 seconds when project traffic is added.
- b) Monroe Street/Oleander Avenue – PM Peak Hour – Delay is reduced from 15.7 seconds to 15.6 seconds when project traffic is added.
- c) Monroe Street/Requa Avenue/Shadow Palm Avenue – AM Peak Hour - Delay is reduced from 17.0 seconds to 16.9 seconds when project traffic is added.
- d) Monroe Street/Requa Avenue/Shadow Palm Avenue – PM Peak Hour - Delay is reduced from 21.3 seconds to 21.2 seconds when project traffic is added.
- e) Highway 111/Arabia Street – AM Peak Hour - Delay is reduced from 15.9 seconds to 15.7 seconds when project traffic is added.
- f) Highway 111/Arabia Street – PM Peak Hour - Delay is reduced from 18.4 seconds to 18.3 seconds when project traffic is added.
- g) Oasis Street/Miles Avenue – AM Peak Hour - Delay is reduced from 14.9 seconds to 14.8 seconds when project traffic is added.
- h) Oasis Street/Miles Avenue – PM Peak Hour - Delay is reduced from 15.1 seconds to 15.0 seconds when project traffic is added.
- i) Oasis Street/Requa Avenue – AM Peak Hour - Delay is reduced from 28.0 seconds to 27.9 seconds when project traffic is added.

Traffic Impact Analysis (Appendix I to the Draft EIR) – The comments above regarding Chapter 4.12 of the Draft EIR must also be corrected in the April 16, 2013 Traffic Impact Analysis. The following additional corrections must be made to the Traffic Impact Analysis:

- 17) Cumulative Projects (Page 8) – The College of the Desert facility is being constructed in Downtown Indio at the northeast corner of Oasis Street and Requa Avenue, not in the City of Palm Desert at the northeast corner of Monterey Avenue and Fred Waring Drive.
- 18) Project Trip Figures 4 and 5 – Arrows identifying turning movements at intersections are missing on the right side of the figures showing project trip distribution.

Environmental Engineering Requirements

- 19) Applicant shall comply with National Pollution Discharge Elimination System (NPDES) requirements per state regulations. For further information contact:
California Regional Water Quality Control Board (RWQCB),
Colorado River Basin Region,
73-720 Fred Waring Drive #100
Palm Desert, CA 92260
(760) 346-7491
www.waterboards.ca.gov/coloradoriver

*Please note: Prior to the issuance of the any grading permit, a copy of the NOI (Notice of Intent) and the WDID# (Waste Discharge Identification No.), must be filed with the City of Indio's Engineering Division.

- 20) Applicant shall submit PM10 implementation plans for City approval. Also to South Coast Air Quality Management District (SCAQMD) for grading plans greater than 10 acres in size. For further information contact:

South Coast Air Quality Management District (SCAQMD)
21865 Copley Drive
Diamond Bar, CA 91765
(800) CUT-SMOG (288-7664)

Curb/Guttering and Demolition Requirements

- 21) Applicant shall:
- a) Dispose of all concrete and asphalt removals within proposed project to an approved recyclable site.
 - b) Applicant shall provide City of Indio Public Works Department with a copy of receipt showing tonnage for the disposal of recyclable concrete and asphalt.
 - c) Dispose of all material removals within proposed project to an approved disposal site.

Landscaping and Irrigation Requirements

- 22) Applicant shall submit landscape and irrigation plans for City approval.
- 23) Applicant shall form a Landscaping Lighting and Maintenance District, prior to the issuance of an encroachment permit, for the maintenance of:
- a) Highway 111, street median landscaping and hardscaping.
 - b) Highway 111 frontage street lights.
- 24) Applicant shall pay \$10,000.00 for the City's consultant to form the Landscaping Lighting and Maintenance District and the City cost for processing the request.

Street Requirements

- 25) Applicant shall submit for City approval the following items:
- a) Street improvement plans
 - b) Streetlight plans
- 26) Applicant shall construct full off-site street improvements on the following streets:
- a) Highway 111 full-width street improvements (both sides) from Arabia Street to Towne Street, including the entire intersections of Arabia Street and Towne Street.
 - b) Oasis Street full-width street improvements (both sides) from Highway 111 to approximately 1,340 feet south of Highway 111.
- 27) The improvements shall include construction of asphalt concrete pavement, curb/gutter, sidewalk, streetlights, catch basins, storm drains, and fully landscaped and irrigated raised curb medians and parkways.
- 28) The improvements shall include the removal of the existing landscaping in the medians on Highway 111 and installation of new landscaping to the satisfaction of the Public Works Director/City Engineer.

- 29) Applicant shall remove and replace existing street lights with underground power along Highway 111.
- 30) Applicant shall obtain encroachment permit prior to starting any street improvements within the public right-of-way.
- 31) The proposed driveways shall be a radius driveway per City of Indio Standard Plan No. 130.
- 32) Existing asphalt pavement along the full-width of Highway 111 and Oasis Street shall be pulverized and used as part of the base material and new pavement shall be placed for the full-width.
- 33) Applicant shall remove and replace any damaged or broken concrete curb and gutter and sidewalk on Highway 111 and Oasis Street.
- 34) The proposed project shall comply with American with Disabilities Act (ADA) requirements.
- 35) All improvements shall comply with City standards, requirements and policies. Applicant is required to construct all transition and missing links between existing and proposed improvements.

Drainage Requirements

- 36) Applicant shall use Riverside County Flood Control District standards and submit local on-site and regional hydrology, hydraulic storm calculations for City review and approval.
- 37) The applicant shall provide on-site storm water retention basin(s) or system(s) designed to the satisfaction of the Public Works Director/City Engineer. Each retention basin shall include a sufficient number of underground vertical drywells designed to eliminate standing water in the basin. The retention basin shall be sized to retain all post-development storm water runoff within the limits of the project based on a 100-year storm event of 24-hour duration and shall completely drain/percolate any storm event within 72 hours. All upstream runoff from adjacent properties that has historically been directed onto the proposed project may be considered to pass through the project with the exception of historical retention that occurred on-site. The retention basin shall be designed with a maximum depth of 5 feet and maximum side slopes of 3:1 and shall not be used for purposes other than for the collection of storm water, nuisance water and well blow-off water.
- 38) The applicant shall construct regional storm drain improvements on Highway 111 and Oasis Street. Such improvements shall consist of an engineered storm drain line along Highway 111 and Oasis Street, which will end at the retention basin located on the northwest corner of Oasis Street and Dr. Carreon Boulevard, to the satisfaction of the Public Works Director/City Engineer.
- 39) The design of the project street improvements and the storm drainage improvements shall be design coordinated with all adjacent projects to the satisfaction of the Public Works Director/City Engineer.

Traffic Requirements

- 40) Applicant shall submit a traffic study with recommended traffic mitigations for review and approval by City of Indio Public Works Director/City Engineer designated traffic engineer. Applicant must comply with the recommended traffic mitigations.
- 41) Applicant shall submit signage and striping plans for City approval.
- 42) Applicant shall be responsible for upgrading the existing traffic signals at Highway 111 and Arabia Street, and at Highway 111 and Oasis Street.

Planning & Design Requirements

- 43) The proposed perimeter walls with varying heights (6' and 16'), as well as the proposed wall locations create safety and design concerns. There is no discussion about why the wall height changes are necessary. Further consideration is required. Location of the 6' wall is adjacent to existing low roofs, and therefore structures on adjacent properties pose a significant security risk. Further review and analysis must be considered before taking action on the EIR. Construction of a more uniform perimeter wall, at least 10 feet high throughout the project, and higher where it is adjacent to existing structures, to sufficiently secure the facility is warranted.
- 44) There is significant potential for graffiti on the large expanse of walls being proposed. Consideration of the materials used for construction must be made that will lend itself to removal rather than painting over the surface. Non-porous wall materials or finish must be used.
- 45) Aesthetics analysis of perimeter walls were not addressed sufficiently. Because a significant number of trees and landscaping are being removed and new walls are being placed along property lines, the new perimeter walls will have a substantial visual impact, especially along the western property line to east bound travelers as well as persons visiting the Riverside County Fairgrounds. Therefore, the following conditions shall be added related to design of perimeter walls:
 - a) Pilasters or pillars shall be required at an interval of no less than 50 feet on center. Such features shall be of a height equal to or greater than the wall itself and may be of a contrasting color.
 - b) Any block wall visible from a public right-of-way shall be decorative in nature in order to achieve a sense of texture and depth. "Decorative" shall include, but not be limited to: slump stone, split face, stucco finish or grooved.
 - c) Block walls shall not be of a single color, but instead shall contain an accent feature such as a tile band or a course of block in a contrasting color. Accent features can be of any contrasting color, ranging from dark to bright.
 - d) Block walls shall include a "cap" to overhang the wall face, as well as a "cap" on top of pilasters or pillars to add variety.
- 46) The wall separating the Riverside County Fairgrounds from the ECDC's west perimeter must either have a zero setback or be closed off as to prevent creating an alleyway or walkway which could be used to establish a homeless shelter, allow for individuals to graffiti, engage in other illegal behavior, or present a hiding place for individuals to prey on employees of the ECDC or citizens coming and going from the area.

- 47) South of the project boundary/perimeter wall is the County maintenance facility & parking, as well as some existing sea containers. It appears that the proposed wall will render a portion of the property unusable, and removal of the existing sea containers is warranted. Access and reconfiguration of the parking to the existing county maintenance facility must be addressed.
- 48) Shall comply with Transportation Uniform Mitigation Fee requirements.
- 49) Shall comply with Coachella Valley Multi Species Habitat Conservation Plan and Local Development Mitigation Fee requirements.
- 50) Significant landscaping, trees and palms (at least 10 trees and 8 palms) are being removed from the current site due to the increase in building sizes. Additional trees/palms must be included along Highway 111 to further mitigate aesthetic and visual impacts of a new larger facility and to break up the massing of the building and walls along Highway 111.
- 51) Figures need to be corrected and reflect exact project boundaries. Project Description – Figure 3-3 shows the project boundary down the north side of the Plaza Avenue extension while Figure 3-16 shows the wall on the south side, effectively cutting off the surface parking along the south side.
- 52) There was no consultation with Indio Planning Staff to identify other projects in the area that would likely contribute to the cumulative impacts of the Project. The following are a list of projects and descriptions that must be included in the cumulative analysis:

Project Name	Location	Description
Fred Young Phase 1	Southwest corner of Van Buren and Dr. Carreon Blvd.	85 unit farm labor apartment facility
Stonefield	Southwest corner of Avenue 49 and Madison St.	70 SFD units
Mountain Estates	Southeast corner of Calhoun and Avenue 42	100 SFD units
Madison Estates	Southeast corner of Avenue 48 and Madison St.	80 SFD units
Ford Fiesta Expansion	Northwest corner of Varner Rd. and Adams St.	New 500 sq.ft. office expansion, 2,000 sq.ft. showroom improvements with exterior façade enhancements
I-10 Toyota Expansion	Northside of Varner Rd. between Adams St. and Fifties Way	24,000 sq.ft. maintenance, sales and showroom expansion with façade enhancements
Holiday Inn Express	Northside of Indio Springs Rd., east of Golf Center Pkwy.	new 48,000 sq.ft., 89 room hotel
Aliante	Northside of Avenue 44, east of Golf Center Parkway	112 SFD units

Vista Serena	Northeast corner of Monroe St. and Avenue 50	30 SFD units
Yunes Laundromat	Northeast corner of Avenue 44 and Towne St.	new 4,000 sq.ft. laundromat
Sun City Shadow Hills Phase 3	North of Avenue 40 between Madison and Monroe Street	300 SFD units
Palazzo	Westside of Monroe St. north of Avenue 42	80 SFD units
Terra Lago East	Terra Lago Parkway, east of Golf Center Pkwy.	800 SFD units
K&R Carwash	Southside of Highway 111, west of Monroe St.	5,900 sq.ft. carwash facility
Palm Senior Living	Southside of Highway 111, between Jefferson St. and Shields Rd.	190 assisted living apartment unit facility
Parkwood Senior Living	Southside of Avenue 48, west of Monroe St.	136 senior living apartment facility (market rate)
Pacific Indio Retail	Southeast corner of Monroe St. and Avenue 42	185,000 commercial retail bldg.
ARCO am/pm	Southeast corner of Jefferson St. and Avenue 42 in the Northgate Development	8,000 sq.ft. convenience store, carwash, and 12 pump island gas station
Dollar General	Northwest corner of Monroe St. and Oleander St.	9,000 sq.ft. general retail store
Lopez Medical Office Building	Northwest corner of Monroe St. and Dr. Carreon Blvd.	10,000 sq.ft. medical office building
Trilogy @ Polo Estates	Northwest corner of Avenue 52 and Jackson St.	940 SFD units
JRHA	Northwest corner of Avenue 42 and Burr St. in Northgate Development	30,400 sq.ft. specialty surgical center
Select Medical Assisted Living	Northside of Avenue 48, west of Monroe St.	100 assisted living apartment unit facility
California Desert Trial Academy	Northeast corner of Bliss St. and Fargo St.	8,000 sq.ft. law school
Fred Young Phase 2	Southwest corner of Van Buren and Dr. Carreon Blvd.	85 unit farm labor apartment facility
Auto Zone	Southwest corner of Rubidoux and Highway 111	6,500 sq.ft. retail auto parts sales store
County Administrative/Law Building	Southwest corner of Highway 111 and Jackson St.	95,000 sq.ft. county administrative office and law building

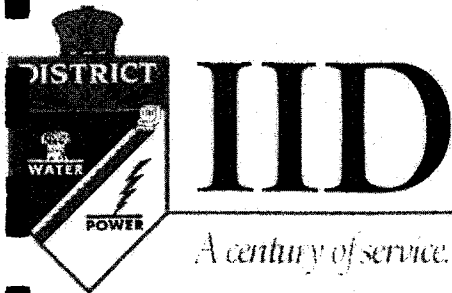
IHOP	Northwest corner of Showcase and Jackson St. in the Regency Center	6,500 sq.ft. restaurant
Whittier Ranch	Northwest corner of Avenue 48 and Jackson St.	85 SFD units
Giant RV	Northside of Varner Rd. east of Adams St.	10,000 sq.ft. showroom for RV sales
Westward Ho Estates	Northeast corner of Westward Ho and Jefferson St.	25 SFD units
All Inside Storage	Northeast corner of Cabazon Rd. and Cabazon Center Dr.	42,000 sq.ft., 21 unit RV storage facility expansion
Paradiso	Northeast corner of Avenue 41 and Monroe St.	140 SFD units
IPCC Various Tracts	Various unfinished properties within Indian Palms Country Club	106 unfinished lots at various locations within IPCC
Shadow Ranch	Southwest corner of Avenue 42 and Calhoun St.	77 SFD units
Indio Pit Center	Southside of Indio Spring Dr., east of Golf Center Pkwy.	18,000 sq.ft. commercial center with convenience store and gas station
Indio Monroe East	Southeast corner of Monroe St. and Avenue 42	180,000 sq.ft. commercial retail center
Desert Trace	Southeast corner of Avenue 41 and Gore St.	60 SFD units
Espana	Northeast corner of Avenue 40 and Adams St.	300 SFD units
Trieste	Northeast corner of Avenue 38 and Dunes Palms	100 SFD units
Cochran Estates	IPCC - Tract 31389	82 SFD units

If you have any questions regarding our comments please contact me at (760) 391-4120.

Sincerely,



Joseph Lim, AICP
 Development Services Director



Executive-ES

June 3, 2013

County of Riverside
Attn: Economic Development Agency
P.O. Box 725
Riverside, CA 92502

SUBJECT: East County Detention Center Project DEIR; County of Riverside

On May 8, 2013, we received from the County of Riverside a Draft Environmental Impact Report (DEIR) for a proposed 1,373-bed expansion of the existing 353-bed detention center in Indio, CA. The purpose of the expansion is to accommodate the immediate jail capacity needs of the County. The detention center is located at 46077 Oasis Street in the City of Indio.

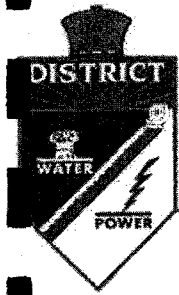
Previously, the Imperial Irrigation District (IID) reviewed the Notice of Preparation for the DEIR and issued comment letters dated March 14, 2013 and April 24 2013 (see attached letters). After examining the DEIR proper, we find that our earlier submitted remarks still apply.

Should you have any questions, please do not hesitate to contact me by phone at 760-482-3609 or by e-mail at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,

Donald Vargas
Environmental Analyst

Kevin Kelley – General Manager
Jesse Silva – Manager, Water Dept.
Carl Stills – Interim Manager, Energy Dept.
Vance Taylor – Asst. General Counsel
Tom King – Interim Project Management Officer, Portfolio Mgmt. Office
Carlos Villalon – Asst. Mgr., Water Dept. System Control & Monitoring
Juan Carlos Sandoval. – Asst. Mgr., Energy Dept. System Planning
Michael P. Kemp – Interim Superintendent, Environmental & Real Estate
Shayne Ferber – Asst. Supervisor, Real Estate
Vikki Dee Bradshaw – Asst. Supervisor, Environmental Services



IID

A century of service.

www.iid.com

Executive-ES

March 14, 2013

County of Riverside
Attn: Economic Development Agency
P.O. Box 725
Riverside, CA 92502

SUBJECT: NOP of a DEIR East County Detention Center Project; County of Riverside

On February 19, 2013, we received from the County of Riverside the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for a proposed 1,373-bed expansion of the existing 353-bed detention center in Indio, CA. The purpose of the expansion is to accommodate the immediate jail capacity needs of the County. The detention center is located at 46077 Oasis Street in the City of Indio.

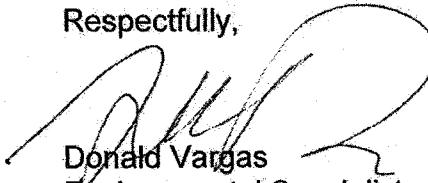
The Imperial Irrigation District (IID) has reviewed the document and has the following comments:

1. An initial review of the preliminary information provided for the project, reveals that this project could potentially impact the electrical service to the area. The impact could be significant and more than likely mitigation measures would be required. For additional information please contact IID-Energy La Quinta Division Customer Operations and Planning Section, 81-600 Avenue 58 La Quinta, CA 92253, at (760) 398-5863 and (760) 398-5841.
2. Any construction or operation on IID property or within its existing and proposed rights-of-way or easements will require an encroachment permit or encroachment agreement (depending on the circumstances), including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities. No foundations, buildings or leach lines will be allowed within IID's right of way. A copy of the encroachment permit application is included in the IID's *Developer Project Guide 2008*, accessed at the IID website: <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2328>. In addition, instructions for the completion of encroachment applications can be found at <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2335>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits.

3. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, canals, drains, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully mitigated. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**

Should you have any questions, please do not hesitate to contact me by phone at 760-482-3609 or by e-mail at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,



Donald Vargas
Environmental Specialist

Kevin Kelley – General Manager
Jesse Silva – Manager, Water Dept.
Carl Stills – Interim Manager, Energy Dept.
Vance Taylor – Asst. General Counsel
Tom King – Interim Project Management Officer, Portfolio Mgmt. Office
Carlos Villalon – Asst. Mgr., Water Dept. System Control & Monitoring
Juan Carlos Sandoval – Asst. Mgr., Energy Dept. System Planning
Michael P. Kemp – Interim Superintendent, Environmental & Real Estate
Shayne Ferber – Asst. Supervisor, Real Estate
Vikki Dee Bradshaw – Asst. Supervisor, Environmental Services



IMPERIAL IRRIGATION DISTRICT

81-600 AVENUE 58 • LA QUINTA, CA 92253 • www.iid.com

April 24, 2013

County of Riverside
Attn: Economic Development Agency
P.O. Box 725
Riverside, CA 92502

SUBJECT: NOP of a DEIR East County Detention Center Project; County of Riverside

On February 19, 2013, we received from the County of Riverside the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for a proposed 1,373-bed expansion of the existing 353-bed detention center in Indio, CA. The purpose of the expansion is to accommodate the immediate jail capacity needs of the County. The detention center is located at 46077 Oasis Street in the City of Indio. Consider the letter below a revision of the letter sent by Imperial Irrigation District dated March 14, 2013.

The Imperial Irrigation District (IID) has reviewed the document and has the following comments:

1. An initial review of the preliminary information provided for the project, reveals that this project could potentially impact the electrical service to the area.
2. Any construction or operation on IID property or within its existing and proposed Rights-of-way or easements will require an encroachment permit or encroachment Agreement (depending on the circumstances), including but not limited to: surface Improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities. No foundations, buildings or leach lines will be allowed within IID's right of way. A copy of the encroachment permit application is included in the IID's *Developer Project Guide 2008*, accessed at the IID website: <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2328>. In addition, instructions for the completion of encroachment applications can be found at <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2335>. The IID Real Estate Section should be contacted at (760)339-9239 for additional information regarding encroachment permits.

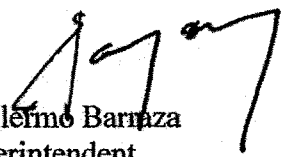
PROJECT MGMT OFFICE
2013 MAY -8 AM 8:01

3. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, canals, drains, etc.) need to be included as part of the projects's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully mitigated. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**
4. The Imperial Irrigation District (IID) policy is willing to extend its electrical facilities to those developments that have obtained the approval of the City of County Planning Commission or such other governmental authority having jurisdiction over said developments. In addition, easements and rights-of-way must be provided where required.
5. Limited electrical service is available to serve this project. It is anticipated that the additional power load requirement of the proposed project would necessitate the construction of a new primary distribution feeder in the area (conduit installation and cable for an underground route or overhead line extension if applicable) from existing IID substation.
6. Line extensions to serve this facility will be made in accordance with IID Regulation No. 15 and Regulation No. 2. In accordance with our regulations, and provided the conditions described above are fulfilled, normal electrical service is available for the location mentioned above.
7. Due to unforeseen development, other projects could impact existing resources which could affect our ability to serve this load if not completed in a timely manner.
8. The Imperial Irrigation District cannot provide a cost without a complete set of

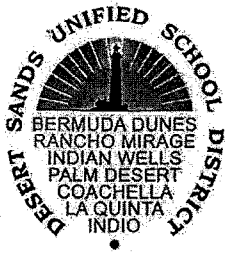
County of Riverside
April 24, 2013
Page 3

plans and advanced engineering fee. Please contact Mr. Carlos Partida, Project Manager Senior, Customer Service, at (760) 398-5820 for project initiation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Guillermo Barraza', written over the printed name.

Guillermo Barraza
Superintendent
Customer Operations and Planning



Desert Sands Unified School District

47-950 Dune Palms Road • La Quinta, California 92253 • (760) 771-8515 • FAX: (760) 771-8522

BOARD OF EDUCATION: Gary Tomak, Michael Duran, Donald B. Griffith, Wendy Jonathan, Matteo Monica
SUPERINTENDENT: Dr. Gary Rutherford

- Facilities -

June 3, 2013

HAND-DELIVERED

County of Riverside
Economic Development Agency
P. O. Box 725
3403 – 10th Avenue
Riverside, CA 92502

**Re: Desert Sands Unified School District Comments Regarding
Proposed East County Detention Center (ECDC) Project (SCH 2013021047)**

Dear Staff Economic Development Agency:

On behalf of Desert Sands Unified School District ("District"), thank you for the opportunity to provide the following initial comments in regard to East County Detention Center (ECDC) Project (SCH 2013021047) ("Project"). District staff is continuing to review the information provided as to the Project. The District respectfully requests the opportunity to provide supplemental comments, if any, in the future.

The Project includes the construction of a County Detention Center. The District looks forward to working collaboratively with the County of Riverside ("County") and the developer as the District has done with other developers. The focus of the comments set forth herein is to seek to identify and quantify possible adverse impacts, both direct and indirect, on the District's school facilities from development that need to be addressed in the environmental impact report ("EIR").

Toward this end, we also look forward to working with the County to ensure that the analysis in the EIR is sufficient to meet the California Environmental Quality Act ("CEQA") requirements set forth in *Chawanakee Unified School District v County of Madera* (2011) 196 Cal. App. 4th 1016 ("*Chawanakee*").

In *Chawanakee*, the court rejected the notion that payment of school fees under Government Code 65995 *et seq.* and Education Code 17620 *et seq.* satisfies all obligations to consider and mitigate school related impacts in an EIR. The *Chawanakee* court held that the statutory framework governing school fees excludes from EIR consideration and mitigation only certain considerations regarding a school district's ability to accommodate enrollment, such as adverse physical changes to school grounds, school buildings, and any related school consideration. Therefore, indirect impacts such as traffic, even when related to school transportation, and reasonably foreseeable indirect impacts from the construction of school facilities such as dust and noise pollution, must be considered in a project's EIR.

June 3, 2013

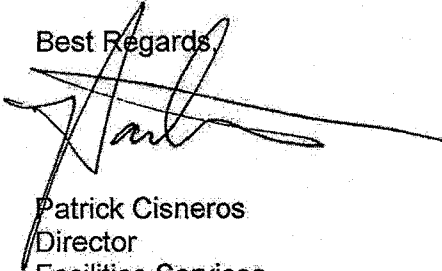
Page Two

If the Project EIR asserts that no mitigation beyond the payment of school fees is required or that payment of school fees is considered full and complete mitigation of any school impacts, those statements would be inaccurate and lead to a legal deficiency of the Project EIR to sufficiently identify, consider, and evaluate the impact of the Project on the District.

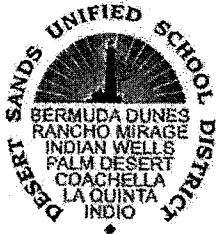
To further ensure that the District has all appropriate information to plan and potentially work with the developer, and pursuant to Public Resources Code Section 21092.2, we hereby request that copies of all notices and other documents mailed or distributed relative to the Project be furnished to the District at its office, located at 47-950 Dune Palms Road, La Quinta, CA 92253, to the attention of Patrick Cisneros, Director of Facilities. If there are any fees or charges required for the provision of such notices, please provide our office with an invoice for such costs and we will address costs accordingly. This request for notice specifically includes, but is not limited to, notices of all hearings, proposed actions to be taken with regard to the developmental process, requests for information, environmental documents, staff reports or commentaries, any EIR or responses provided with regard to this Project pursuant to CEQA, and all Planning Commission and County Council agendas where this matter will be calendared.

These comments are set forth to strengthen the ability of the Project and the District to provide high quality K-12 education for the community. Addressing cumulative impacts now may help to avoid violations of CEQA, and produce the most desirable long-term outcome. We submit this comment letter to prepare and work diligently with the Project toward providing students, parents, faculty, staff, and property owners with the school facilities they require and deserve, and to avoid significant adverse impacts on the existing facilities of the District. We appreciate your consideration on this important matter. Please do not hesitate to contact the undersigned if you have any questions or comments.

Best Regards,

A handwritten signature in black ink, appearing to read 'Patrick', with a long horizontal stroke extending to the right.

Patrick Cisneros
Director
Facilities Services



Desert Sands Unified School District

47-950 Dune Palms Road • La Quinta, California 92253 • (760) 771-8515 • FAX: (760) 771-8522

May 8, 2013

County of Riverside
Economic Development Agency
PO Box 725
Riverside, CA 92502

PROJECT MGMT OFFICE
2013 MAY 23 PM 3:34

Request for Comments: Proposed East County Detention Center (ECDC) Project (SCH 2013021047) - proposal for 1,626-bed facility located at 46057 Oasis Street, Indio

To whom it may concern,

This is in response to your request for input on the above referenced project and its effect on public schools.

All actions toward commercial development will potentially result in an impact on our school system. School overcrowding is a District-wide concern for Desert Sands Unified School District. The District's ability to meet the educational needs of the public with new schools has been seriously impaired in recent years by local, state and federal budget cuts that have had a devastating impact on the financing of new schools.

As you are aware, there is a school mitigation fee that is currently collected on all new development at the time building permits are issued.

Please feel free to call me if you have further questions. Thank you.

Sincerely,

Patrick Cisneros
Director
Facilities Services

From: McCauley, Douglas
To: Rivco ECDC Comments
Cc: "derbing@yahoo.com"
Subject: East County Detention Center
Date: Tuesday, June 04, 2013 3:52:06 PM

To Whom It May Concern:

I represent Mr. Kuan Jung Lin who is the owner of Towne Mobile Home Park, located at 46350 Towne Street, Indio, CA 92201.

After careful review of the Draft Environmental Impact Report, Mr. Kuan Jung Lin does not approve of the County proposed jail expansion and the construction of the three story parking structure for the following reasons:

1. Residents of the Towne Mobile Home Park loss of quality of life and quiet enjoyment during construction and after completion.
 - a.) Years to complete construction creating noise, traffic and roadway congestion.
 - b.) Three story parking structure towering above residents at Towne Mobile Home Park.
 - c.) Poor air quality and emissions from vehicles above Towne Mobile Home Park.
 - d.) Increased pollution.
 - e.) Colossal increase in housed criminals (1,273 additional beds) in this residential area.
 - f.) Increased traffic from visitation of family and friends of inmates throughout the day and night.

In addition to the residents loss of quality of life, the owner of Towne Mobile Home Park also faces significant loss for the following reasons:

1. The loss of current residents who decide to move out during and after construction.
2. The loss of future residents unwilling to live in the park due to the reasons stated above.
3. With an increase of vacancy at Towne Mobile Home Park, the owner will be forced to lower rents to attract new residents.
4. Any future sale of the Towne Mobile Home Park will be discounted by investors due to the above stated items.

In conclusion, the construction of the East County Detention Center and Parking Structure will have a tremendous negative impact on the residents of Towne Mobile Home Park and a deep financial loss to the current and future value of the park. Mr. Kuan Jung Lin would be happy to discuss his position in more detail in person.

Thank you for your time in this important matter.

Sincerely,

Douglas McCauley

*First Vice President Investments
Director, National Multi Housing Group*

Marcus & Millichap	(909) 456-3400 ext. 3493
3281 East Guasti Road	(626) 695-6776 mobile
Suite 800	(909) 456-3410 fax
Ontario, CA 91761	doug.mccauley@marcusmillichap.com

License: CA: 01155706

View my profile at <http://www.marcusmillichap.com/DouglasJMcCauley>

Follow us at <http://www.Twitter.com/mmreis>

Marcus & Millichap

Real Estate Investment Services

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WE, THE RESIDENTS OF THE TOWNE MOBILE HOME PARK, ARE STRONGLY OPPOSED TO THE CONSTRUCTION OF THE EAST VALLEY DETENTION CENTER NEXT TO OUR MOBILE HOME PARK, DUE TO THE INCREASED NOISE, DUST, POLLUTION, TRAFFIC CONGESTION, AND THE THREAT TO OUR WELFARE, QUALITY OF LIFE, AND NEGATIVE IMPACT TO THE VALUE OF OUR HOMES.

SP 51

Jose JOSE SP 51
SIGNATURE PRINTED NAME SPACE #

ERNESTO GONZALEZ SP 58
SIGNATURE PRINTED NAME SPACE #

Virginia Armentariz VIRGINIA ARMENDARIZ # 74
SIGNATURE PRINTED NAME SPACE #

Albanelia Romero Alejandra Romero 13
SIGNATURE PRINTED NAME SPACE #

Jesus Ochoa Torres Jesus Ochoa Torres SP 66
SIGNATURE PRINTED NAME SPACE #

Maribel Andrade Maribel Andrade 73
SIGNATURE PRINTED NAME SPACE #

Rosma Vasquez REYNA VASQUEZ 71
SIGNATURE PRINTED NAME SPACE #

Alicia Flores Alicia Flores 63
SIGNATURE PRINTED NAME SPACE #

H. E. Keller H. E. Keller 07
SIGNATURE PRINTED NAME SPACE #

Austreberia Martinez AUSTREBERIA MARTINEZ 72
SIGNATURE PRINTED NAME SPACE #

Alexandra Vasquez Alexandra Vasquez 6
SIGNATURE PRINTED NAME SPACE #

Julian Esquivel Julian Esquivel 6
SIGNATURE PRINTED NAME SPACE #

Elvira Sanchez Elvira Sanchez # 59
SIGNATURE PRINTED NAME SPACE #

Jesus Angulo Jesus Angulo 19
SIGNATURE PRINTED NAME SPACE #

APPENDIX A UPDATED TRAFFIC IMPACT ANALYSIS

The updated traffic impact analysis is included in the attached CD.