

CEQA FINDINGS and STATEMENT OF OVERRIDING CONSIDERATIONS

I INTRODUCTION

The California Environmental Quality Act (CEQA) requires that a Lead Agency issue two sets of findings prior to approving a project that will result in a significant impact on the environment. The Statement of Facts and Findings is the first set of findings where the Lead Agency identifies the significant impacts, presents facts supporting the conclusions reached in the analysis, makes one or more of three findings for each impact, and explains the reasoning behind the agency's findings.

The Statement of Overriding Considerations is the second set of findings. Where a project will cause unavoidable, significant, adverse environmental effects, the Lead Agency may still approve the project if it determines that the project's benefits outweigh its adverse effects. In order to do so, the Lead Agency must adopt a Statement of Overriding Considerations, which sets forth specific the reasons that the benefits of the project outweigh its adverse environmental effects.

The following statement of findings has been prepared in accordance with the California Environmental Quality Act (CEQA) and Public Resources Code Section 21081. *CEQA Guidelines* Section 15091 (a) provides that:

No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding.

There are three possible finding categories available for the Findings pursuant to Section 15091 (a) of the *CEQA Guidelines*.

- (1) Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.*
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.*
- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.*

The City of Indio, the CEQA Lead Agency, finds and declares that the City of Indio Downtown Specific Plan Final Environmental Impact Report (Final EIR) has been completed in compliance with CEQA and the CEQA Guidelines. The City of Indio finds and certifies that the Final EIR was reviewed and information contained in the Final EIR was considered prior to any approval associated with the proposed Downtown Specific Plan, herein referred to as the "Project."

Based upon its review of the Final EIR, the City of Indio finds that the Final EIR is an adequate assessment of the potentially significant environmental impacts of the Project and represents the independent judgment of the City.

DESCRIPTION OF THE PROPOSED PROJECT

The proposed Project is the Indio Downtown Specific Plan (Specific Plan), which would supersede the 1997 Old Town Indio Specific Plan with a plan that emphasizes a walkable, mixed-use environment that complements the City's Old Town characteristics while allowing new development opportunities. The goal of the proposed Specific Plan is to encourage and promote economic development and revitalization to enhance the City's attractiveness in the local and regional marketplace. The proposed Specific Plan seeks to facilitate the adaptive reuse of existing structures and promote infill development on vacant and underutilized properties. The Specific Plan would also facilitate and encourage residential mixed-use, commercial/retail, and transit- supportive development.

The Specific Plan describes the goals and policies, development standards, design guidelines, infrastructure improvements, and implementation strategies for the Specific Plan area. The City's General Plan describes the City's vision to reestablish the Specific Plan area as a special place within the City and the Coachella Valley with enhanced commercial opportunities, public spaces, a pedestrian friendly environment (constructing features such as pedestrian paseos), and a multimodal transportation hub (nearby Amtrak facilities, bicycle lanes, public transit stops, etc.).

The standards and provisions of the proposed Specific Plan constitute the primary land use and development guidance for the Specific Plan area. The Specific Plan's standards and provisions would be applied in addition to the regulations set forth in the City of Indio Municipal Code. The Specific Plan's estimated growth forecast, which includes existing development, is 1,375,250 gross square feet (gsf) of non-residential development and 1,188 dwelling units totaling 1,113,074 gsf.

ENVIRONMENTAL EFFECTS DETERMINED TO BE SIGNIFICANT

The City of Indio, having reviewed and considered the information contained in the Downtown Specific Plan Final EIR, finds, pursuant to California Public Resources Code 21081 (a)(1) and *CEQA Guidelines* 15091 (a)(1), that the Downtown Specific Plan would result in significant environmental effects related to aesthetics, air quality, biological resources, cultural (historic) resources, geology and soils, hydrology and water quality,

noise, transportation/traffic, utilities and service systems. These effects are discussed below.

Aesthetics

Issue Light and Glare. Development in the Specific Plan area would increase the amount of light and glare compared to existing conditions. All development would be required to adhere to the Specific Plan's Development regulations, as well as City Municipal Code regulations that govern light and glare.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Facts in Support of Finding

Mitigation Measures AES-1 through AES-3 require review of all development proposals in the Specific Plan area for consistency with Development regulations and to minimize the amount of new light and glare sources.

MM AES-1

Project applicants shall submit plans as part of the design review submittal to the City of Indio identifying all potentially reflective building materials and surfaces and demonstrate how these materials and surfaces shall be painted or otherwise treated to minimize reflectivity, except as necessary to achieve desired green building objectives. All glass used on external building walls shall be low-reflectivity.

MM AES-2

Development plans shall be reviewed to assure their substantial compliance with the basic design parameters set forth in the Indio Downtown/Old Town Specific Plan and individual project architectural plans package.

MM AES-3

Prior to the issuance of grading and building permits, the landscaping palette and design, as well as lighting elements for the development project, shall be reviewed for conformance with the Indio Downtown Specific Plan architectural design and the specific project's responsiveness to design issues raised during individual project review.

With incorporation of Mitigation Measures AES-1 through AES-3, residual light and glare impacts would be less than significant.

Air Quality

Issue Construction and Operational Emissions. Development anticipated under the Downtown Specific Plan would generate construction-related and operational

emissions of criteria pollutants. While Mitigation Measures AQ-1 and AQ-2 would reduce emissions associated with construction and operation of anticipated developments, individual projects would have the potential to exceed SCAQMD significance thresholds. As such, this impact would be significant and unavoidable.

Findings

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

Facts in Support of Finding

The following mitigation measures would reduce potential impacts associated with construction and operational air quality emissions from future development projects under the Downtown Specific Plan to the extent feasible.

MM AQ-1

The City shall require future development projects that are subject to discretionary review to incorporate the following measures:

- a. Contractors shall use high-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50 percent;
- b. Use required coatings and solvents with a VOC content lower than required under SCAQMD Rule 1113. To the extent locally available, use zero VOC content paints.
- c. Diesel-powered off-road construction equipment (50 hp, or greater) shall meet U.S. EPA Tier 4 emissions standards, to the extent locally available.
- d. Idling of all on- and off-road diesel-fueled vehicles shall not be permitted when not in use. Signs shall be posted in the designated queuing areas and or job site to remind drivers and operators of the no idling limitation.
- e. Fuel all off-road and portable diesel powered equipment with the Air Resources Board (ARB) certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);
- f. Construction equipment engines shall be maintained in good conditions and properly tuned, in accordance with manufacturer's specifications;
- g. Building materials that do not require painting shall be used during construction to the extent available.
- h. Use alternatively-fueled (e.g., compressed natural gas, liquefied natural gas, propane, biodiesel) or electrically powered equipment, to the extent locally available.
- i. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled

commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:

- j. Prohibit idling of a vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,
- k. Prohibit the operation of a diesel-fueled auxiliary power system to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.
- l. All demolition and construction activities that can generate fugitive dust shall be required to implement dust control measures in accordance with South Coast Air Quality Management District (SCAQMD) Rule 403, Fugitive Dust, and Rule 403.1, Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources. In accordance with SCAQMD requirements, larger construction projects (e.g., activities with a disturbed area of more than 5,000 square feet) may also be required to prepare a fugitive dust control plan. Fugitive dust control measures to be implemented are identified in Rule 403 and Rule 403.1

MM AQ-2

The City shall require future development projects that are subject to discretionary review to incorporate emission-reduction measures to address significant long-term regional air quality impacts. Such measures may include, but are not limited to, the following:

- a. Increase building envelope energy efficiency standards in excess of applicable building standards and encourage new development to achieve zero net energy use.
- b. Install energy-efficient appliances, interior lighting, and building mechanical systems. Encourage installation of solar panels for new residential and commercial development.
- c. Incorporate renewable energy sources in the project design (e.g., solar photovoltaic panels).
- d. Install higher efficacy public street and exterior lighting.
- e. Use daylight as an integral part of lighting systems in buildings.
- f. Use trees, landscaping and sun screens on west and south exterior building walls to reduce energy use.
- g. Install light colored "cool" roofs, cool pavements.
- h. Install solar and tankless hot water heaters.
- i. Encourage energy audits to be performed on residences prior to sale or other transfer of title. Provide prospective owners with recommendations for retrofit measures to be given to the buyer prior to transfer of title.
- j. Include mixed-use, infill, and higher density in development projects to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and promote efficient delivery of services and goods.
- k. Limit idling time for commercial vehicles, including delivery and construction

- vehicles.
- l. Prohibit the installation of wood-burning fireplaces and stoves.
 - m. Incorporate design measures and infrastructure that promotes safe and efficient use of alternative modes of transportation (e.g., neighborhood electric vehicles, bicycles) pedestrian access, and public transportation use. Such measures may include incorporation of electric vehicle charging stations, bike lanes, bicycle-friendly intersections, and bicycle parking and storage facilities.
 - n. Incorporate design measures that promote ride sharing programs (e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride sharing vehicles, and providing a web site or message board for coordinating rides).
 - o. Incorporate measures that reduce water use (e.g., installation of low-flow fixtures, water-efficient irrigation systems and landscaping)
 - p. Incorporate measures that reduce waste generation.
 - q. Encourage new residential development to be constructed to allow for easy implementation of gray water systems that redirect water from washbasins, showers, and tubs for use in toilet flushing, irrigation, and other non-potable uses.

While Mitigation Measure AQ-1 and AQ-2 would reduce impacts associated with construction and operational air quality emissions, respectively, individual projects constructed under the Downtown Specific Plan would potentially generate emissions exceeding SCAQMD regional and localized significance thresholds, even with mitigation. Therefore, although the above measures would substantially reduce the severity of this impact, the impact would remain significant and unavoidable.

Issue Toxic Air Contaminants. Development activities associated with growth under the Downtown Specific Plan would emit Toxic Air Contaminants (TACs), such as diesel-exhaust particulate matter. Future projects in the Specific Plan area have the potential to be large enough that the project-level significance thresholds would be exceeded during construction.

Findings

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Facts in Support of Finding

Mitigation Measure AQ-3 would be required to reduce impacts associated with construction-related emissions of TACs for future projects anticipated under the Downtown Specific Plan.

MM AQ-3

To reduce the potential for short-term exposure of sensitive receptors to TACs emitted during demolition and construction-related activities, the following measures shall be implemented:

- a. Implement MM AQ-1.
- b. Demolition of onsite structures shall comply with SCAQMD Rule 1403, Asbestos Emissions From Demolition/Renovation.
- c. If during demolition of existing structures, paint is separated from the construction materials (e.g. chemically or physically), the paint waste shall be evaluated independently from the building material by a qualified hazardous materials inspector to determine its proper management. All hazardous materials shall be handled and disposed in accordance with local, State and federal regulations. According to the Department of Toxic Substances Control, if paint is not removed from the building material during demolition (and is not chipping or peeling), the material can be disposed of as construction debris (a non-hazardous waste). The landfill operator shall be contacted prior to disposal of building material debris to determine any specific requirements the landfill may have regarding the disposal of lead-based paint materials. The disposal of demolition debris shall comply with any such requirements.
- d. Projects exceeding five acres of disturbance area shall prepare a construction Health Risk Assessment (HRA) consistent with SCAQMD methodology and modeling guidelines for HRAs. The HRA shall use project-specific dispersion modeling to analyze potential health risks at nearby receptors. If health risks from construction activities are determined to exceed SCAQMD significance thresholds of maximum incremental cancer risk of 10 in one million or greater, a cancer burden of greater than 0.5, or a chronic and/or acute hazard index of 1.0 or greater, measures such as phasing of ground disturbance, shall be implemented to reduce construction-related health risks below such thresholds.

Mitigation Measure AQ-3 would require projects with the potential to result in health risks in excess of SCAQMD thresholds to prepare project-specific HRAs and implement measures, such as phasing of ground disturbance, to reduce potential health risks. Residual impacts would be less than significant.

Issue Cumulative Air Pollutant Emissions. Mitigation Measures AQ-1 and AQ-2 would reduce potential construction and operational air quality emissions associated with future projects anticipated under the Downtown Specific Plan. However, individual projects would still have the potential to exceed applicable SCAQMD thresholds; therefore, cumulative impacts related to increased emissions of criteria pollutants would be significant and unavoidable.

Findings

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

Facts in Support of Finding

Mitigation Measures AQ-1 and AQ-2 (as listed above) would reduce potential construction and operational air quality emissions associated with future projects anticipated under the Downtown Specific Plan. Thus, these measures would substantially reduce the severity of this impact. However, because individual projects would still have the potential to generate emissions exceeding applicable thresholds, cumulative impacts related to increased emissions of criteria pollutants would be significant and unavoidable.

Biological Resources

Issue Special Status Species. Although the likelihood of encountering special status species in the Downtown Specific Plan area is low, development could occur where vegetation and potential habitat may be present. While most trees in the Specific Plan area are non-native species, they can provide roosting for special status species as well as migratory birds, and vacant parcels could contain ground dwelling species.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Facts in Support of Finding

To ensure that special status species and migratory birds are not directly or indirectly impacted as a result of any development project, Mitigation Measures BIO-1 through BIO-3 are required.

MM BIO-1

As determined appropriate by the City of Indio Community Development Department, prior to issuance of any development project permits, pre-construction surveys shall be conducted focusing the survey on vegetation and unpaved property. Preconstruction surveys shall be conducted prior to the start of construction activities and within the typical blooming season or spring and early summer (generally March/April to August) for easy identification. If special-status species are identified, the area shall be flagged for avoidance. If a special-status species is identified and cannot be fully avoided, a mitigation plan shall be prepared and approved by both the City of Indio and the California Department of Fish and Wildlife. Activities shall comply with any other development permits, including the National Pollutant Discharge Elimination Systems Permit, as well as regulatory agency standards, including, but not limited to, the California Department

of Fish and Wildlife, Regional Water Quality Control Board, and the Coachella Valley Conservation Commission.

MM BIO-2

For all construction-related activities that take place during the nesting season, accepted as February 15 through August 31, a preconstruction nesting-bird survey for migratory birds shall be conducted by a qualified biologist no more than two weeks prior to project initiation within the project development site and a 300-foot buffer. If active nests are found, a no-disturbance buffer zone shall be established, the size of which will be determined in consultation with the California Department of Fish and Wildlife. Within this buffer zone, no construction shall take place until August 31 or the project biologist determines that the nest is no longer active.

MM BIO-3

Individual project developers shall continuously comply with the following during construction activities for any development in the Indio Downtown Specific Plan area:

- Prior to any earth disturbing activities for any development project on undeveloped and unpaved parcels, all construction personnel shall be trained in sensitive species identification and avoidance techniques. Proof of training shall be submitted to the City of Indio Community Development Department. Any evidence, such as ground squirrel/burrowing owl burrows, observed at any time during construction, shall be promptly reports to the project's biologist, the City of Indio Community Development Department, the Coachella Valley Conservation Commission, and any other applicable reviewing agency to determine the appropriate course of action.
- During construction activities, if an injured or dead State or federally listed species (or candidate species) is encountered, the project proponent shall stop work within the immediate vicinity. The project proponent and or their lead biologist shall notify the City of Indio Community Development Department, the Coachella Valley Conservation Commission, and the appropriate resources agency (e.g., United States Fish and Wildlife Service [USFWS] or California Department of Fish and Wildlife [CDFW]) to determine the appropriate course of action, such as the need for an Incidental Take Permit, if not covered by the Coachella Valley MSHCP.
- At the end of each work day, the project contractor shall ensure that all potential wildlife pitfalls (trenches, bores, and other excavations) have been backfilled. If backfilling is not feasible, all trenches, bores, and other excavations shall be sloped at a 3:1 ratio at the ends to provide wildlife escape ramps, or covered completely to prevent wildlife access, or fully enclosed with exclusion fencing. If any wildlife species become entrapped within the immediate vicinity, construction shall not occur until the animal has left the trench or has been removed by a qualified biological monitor as feasible. Employees and contractors shall look under vehicles and equipment for the presence of wildlife before moving vehicles and equipment. If wildlife is observed, no vehicles or equipment would be moved until the animal has left voluntarily or is removed by the project biologist. No listed species will be

- handled without appropriate permits.
- If an entrapped special-status species is encountered, the project biologist (or their designee) shall stop work within the immediate vicinity. Prior to the recommencement of construction, the project proponent shall notify the City of Indio Community Development Department, the Coachella Valley Conservation Commission, and the appropriate resources agency (e.g., USFWS or CDFW) and shall consult with the appropriate resource agencies to determine the appropriate course of action. Any entrapped species that is listed under the federal Endangered Species Act (FESA) or California Endangered Species Act (CESA) shall not be disturbed unless the appropriate authorization is obtained from the appropriate resource agency.

These mitigation measures are designed to ensure that pre-construction surveys are conducted as determined by the City when potential biological species and habitat may be present and to avoid impacts to such resources if they are found to be present. With adherence to Mitigation Measures BIO-1 through BIO-3 and existing City plans, policies, regulations, and ordinances as well as the Coachella Valley MSHCP policies, regulations, and requirements, impacts would be reduced to a less-than-significant level.

Cultural Resources

Issue **Historic Resources.** Future development projects in the Downtown Specific Plan area, through either demolition or alteration activities, may have the potential to damage/change existing or currently undesignated historical resources. Although Mitigation Measure CR-1 would the identification and, as feasible, avoidance of impacts to historic resources, individual development projects could result in the permanent loss or alteration of historical resources. This would result in a significant and unavoidable impact.

Findings

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

Facts in Support of Finding

Because permanent alterations to or demolition of both identified and potential historic resources could occur, Mitigation Measure CR-1 requires evaluation of individual development projects with the potential to adversely affect historic resources and development of feasible mitigation plans for any identified significant impacts.

MM-CR-1

The applicant for individual development proposals in the Downtown Specific Plan Area with the potential to disturb historic resources identified as part of Mitigation Measure MM-CR-1 of the City of Indio General Plan Final EIR (June 2019) shall commission a historic evaluation of the proposal. The historic evaluation shall be conducted by a qualified historian approved by the City and shall be subject to City review and approval. If the evaluation concludes that the proposal would significantly affect a historic resource, feasible methods to avoid or minimize the historic resource impact shall be implemented. Such methods include, but are not limited to the standards that guide new development and alterations to existing structures in historic districts and local conservation zones to be developed in accordance with MM-CR-2 of the City of Indio General Plan Final EIR (June 2019).

Implementation of the mitigation measures included in the City of Indio General Plan Final EIR, in combination with Mitigation Measure CR-1, would reduce the potential for impacts to historic resources to the degree feasible through identification of historic resources and, as feasible, avoidance of adverse effects to such resources. Thus, this measure would substantially lessen significant effects to historic resources. Nevertheless, because future Specific Plan Area development could still involve permanent alterations to or demolition of historic resources, this impact would be significant and unavoidable.

Issue Historic Resources (Cumulative). Development under the Specific Plan may result in significant and unavoidable impacts to historic resources in the Downtown Area. Because these sites are resources that hold historical value to the City and the Downtown area, potential impacts from the Specific Plan on historical resources would be cumulatively considerable. Cumulative impacts related to archaeological and cultural resources would be less than significant with mitigation.

Findings

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

Facts in Support of Finding

Cumulative archaeological and tribal cultural resource impacts would be less than significant as development projects in the Downtown Specific Plan Area would be adequately screened and surveyed prior to development, and if resources are found, procedures such as halting work, site-specific investigations, and submittal of mitigation plans would be required. Implementation of the mitigation measures included in the City

of Indio General Plan Final EIR, in combination with Mitigation Measure CR-1, would reduce impacts to historic resources to the degree feasible. Nevertheless, cumulative historic resource impacts would remain significant and unavoidable due to the potential permanent loss or alteration of historic resources.

Geology and Soils

Issue Seismic Groundshaking. Development in the Specific Plan area would not increase ground shaking potential, but would expose workers and residents to strong seismic ground shaking.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Facts in Support of Finding

Implementation of Mitigation Measures GEO-1 and GEO-2 would require building plan review and submittal of geotechnical surveys in order to identify appropriate engineering design measures to reduce potential impacts from strong seismic ground shaking to a less than significant level.

MM GEO-1

Prior to any development project permits, building plans shall be prepared and submitted to the Indio Building Department for review and approval. Plans will show that all structures on the development site have been designed, and will be constructed, in accordance with seismic safety design criteria specified in the most recent California Building Code requirements, at a minimum, or as otherwise recommended by a qualified registered structural engineer. This measure shall be implemented on a project-by-project basis by each development applicant at the time of final design of improvements for project development under the Indio Downtown Specific Plan. Plans for improvements shall be subject to approval by the City of Indio Building and Safety Division and/or the Engineering Services Division.

MM GEO-2

Prior to any development project permits, building plans shall be prepared and submitted to the Indio Building Department for review and approval. Plans will show that all structures on the development site have been designed, and will be constructed, in accordance with seismic safety design criteria specified in the most recent California Building Code requirements, at a minimum, or as otherwise recommended by a qualified

registered structural engineer. This measure shall be implemented on a project-by-project basis by each development applicant at the time of final design of improvements for project development under the Indio Downtown Specific Plan. Plans for improvements shall be subject to approval by the City of Indio Building and Safety Division and/or the Engineering Services Division.

With implementation of Mitigation Measures GEO-1 and GEO-2, impacts related to site specific seismic ground shaking would be less than significant, as development projects would adequately reviewed for building safety, and geotechnical surveys would be prepared to identify and require incorporation of engineering design parameters to minimize exposure to geologic related hazards.

Issue Liquefaction. Development in the Specific Plan area would not exacerbate liquefaction potential, but would expose workers and residents to liquefaction hazards.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Facts in Support of Finding

Implementation of Mitigation Measure GEO-3 would require the development of detailed project-specific geotechnical mitigation measures meeting specific standards and based on design-level geotechnical reports.

MM GEO-3

Prior to issuance of any project-specific permits, detailed project-specific geotechnical mitigation measures shall be developed based on design-level geotechnical reports and depicted on plans prepared by the geotechnical engineer of record or on plan sheets included within final grading plans. Proposed mitigation methods shall be subject to approval by the City of Indio Building and Safety Division, the Engineering Services Division, and/or Fire Safety Division. Mitigation shall be implemented by the individual project proponent, where appropriate, based on cost, and constructability considerations, and project specific requirements, and may include the following:

- a. Removal of any liquefiable/collapsible soils, if present, and replacement with engineered fill. Removal and replacement will be feasible above the water table or in dewatered excavations; and,
- b. Liquefiable/collapsible soils both above and below the water table, if present, can be improved by in situ ground densification using deep dynamic compaction, rapid impact compaction, compaction with vibratory probes (e.g., vibroflotation, terraprobe), stone columns, and/or compaction piles; and,
- c. Increase soil density and shear strength and reduce soil moisture content of

- soils subject to cyclic softening, ground lurching, and static compression through consolidation under fills. The level of soil improvement will be sufficient to bring estimated post-construction settlement or seismic ground deformation to acceptable levels. Depending on the proposed fill thickness and site-specific soil conditions, mitigation could be effected either by project fills or by the application of temporary surcharge fills; and,
- d. Support large, heavy, or multi-story structures on deep foundations, such as driven piles, reinforced concrete caissons, or structural mat foundations, if ground improvement by placement of surcharge fills will not be effective; and,
 - e. Dewater, if necessary, and remove soft, compressible soils, if present, and replace them with engineered fill; and,
 - f. Design any proposed project to avoid areas underlain by soils subject to cyclic softening, ground lurching, and static compression.

Geotechnical surveys shall be used to determine the appropriate engineering for foundations and support structures as well as building requirements to minimize geotechnical hazard impacts when implementing the Indio Downtown Specific Plan. Copies of all analyses shall be submitted to the City of Indio Building and Safety Division and/or the Engineering Services Division for review and approval. An approved copy of the evaluation shall be submitted to the City of Indio Community Development Department.

With implementation of Mitigation Measure GEO-3, impacts related to exposure to liquefaction hazards would be less than significant because engineering design parameters would be incorporated into project design.

Issue Erosion. Construction activities in the Specific Plan area would result in the exposure of topsoil with the potential for erosion.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Facts in Support of Finding

Adherence to the City's Municipal Code and Mitigation Measure GEO-4 would ensure that site specific best management practices are implemented to reduce impacts related to loss of topsoil and erosion. This impact would be less than significant with mitigation incorporated.

MM GEO-4

For discretionary development projects in the Indio Downtown Specific Plan area, individual project developers shall limit grading to the minimum area necessary for construction and operation of a project. Final grading plans shall include best

management practices (BMPs) to limit on-site and off-site erosion and a water plan to treat disturbed areas during construction and reduce dust. The plans shall be submitted to the City of Indio Building and Safety Division and/or the Engineering Services Division for review and approval. A copy of the approved plan shall be submitted to the City of Indio Community Development Department.

With implementation of Mitigation Measures GEO-4, impacts related to soil erosion and loss of topsoil would be less than significant, as grading would be limited to the minimum area necessary and BMPs would be implemented to minimize erosion and fugitive dust.

Issue Paleontological Resources. Although the likelihood of discovering paleontological resources in the Specific Plan Area is low, the potential exists during ground disturbing and excavation related activities.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Facts in Support of Finding

Mitigation Measures GEO-5 and GEO-6 would require project proponents to provide awareness training on potential paleontological resources and provide appropriate course of action if resources are identified, ensuring that any encountered resources are not destroyed. Impacts would be less than significant with mitigation incorporated.

MM GEO-5

Prior to the commencement of construction activities, the project proponent shall provide for a qualified paleontologist to provide construction personnel with orientation and awareness training on potential paleontological resources. Such training shall include familiarization with the stop-work restrictions, noticing, and handling procedures, and ultimate disposition of ratifications. An information package shall be provided for construction personnel not present at the initial preconstruction briefing. The operator shall provide the City of Indio Community Development Department with verification of the employees completing the orientation.

MM GEO-6

If paleontological resources are discovered during of any development project within the Indio Downtown Specific Plan area, the contractor shall stop all earth-moving activities within and around the immediate discovery area and the project proponent shall retain a qualified paleontologist to evaluate the significance of the finding and appropriate course of action. The person who made the discovery shall contact the City's Community Development Department so that they may coordinate an appropriate plan of action. If the find is determined by paleontologists to require further treatment, the area of discovery will be protected from disturbance while qualified paleontologists and appropriate officials,

in consultation with a recognized museum repository (e.g., the San Diego Natural History Museum or the University of California Museum of Paleontology), determine an appropriate treatment plan.

With implementation of Mitigation Measures GEO-5 and GEO-6, impacts related to paleontological resources would be less than significant as proper training, identification, and handling procedures would be implemented, ensuring that no paleontological resources are destroyed.

Hydrology and Water Quality

Issue Water Quality. Construction activities associated with development under the Downtown Specific Plan would result in ground disturbance and use of construction-related chemicals, such as oil, lubricants, and solvents. The Downtown Specific Plan would generally involve redevelopment of existing developed and vacant land. Such development would have the potential to increase impervious surface cover, resulting in potential water quality impacts.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Facts in Support of Finding

Mitigation Measures HYD-1 through HYD-3 would require future projects under the Downtown Specific Plan to implement erosion-control BMPs during construction and LID techniques to capture and treat on-site runoff during operation, in turn reducing potential short-term and long-term water quality impacts.

MM HYD-1

Prior to the issuance of any discretionary permits for any development projects under the Indio Downtown Specific Plan, the project proponent shall submit to the Public Works Department an approved copy of the following: a) Storm Water Pollution Prevention Plan (SWPPP); b) the Notice of Intent (NOI) to comply with the General National Pollutant Discharge Elimination System (NPDES); and c) Waste Discharge Requirements (WDRs) from the Colorado River Regional Water Quality Control Board to include the project site.

The requirements of the SWPPP and NPDES shall be incorporated into design specifications and construction contracts. Recommended best management practices for the construction phases may include the following:

1. Stockpiling and disposing of demolition debris, concrete, and soil properly.
2. Protecting existing storm drain inlets and stabilizing disturbed areas.
3. Implementing erosion controls.

4. Properly managing construction materials.
5. Managing waste, aggressively controlling litter, and implementing sediment controls.

Projects which are not subject to the requirements of the NPDES Construction General Permit because they involve less than one acre of disturbance area shall implement, at a minimum, the following measures:

- Silt fencing, straw bales composed of rice straw (that are certified to be free of weed seed), fiber rolls, gravel bags, mulching erosion control blankets, soil stabilizers, and storm drain filters shall be used, in conjunction with other methods, to prevent erosion throughout the entire project site.
- Temporary berms and sediment basins shall be constructed to avoid unnecessary siltation into local waterways or the storm drain during construction activities.
- Erosion controls that protect and stabilize stockpiles and exposed soils shall be used to prevent movement of materials. Potential erosion control devices include plastic sheeting held down with rocks or sandbags over stockpiles, silt fences, or berms of hay bales.
- Temporary stockpiling of excavated material shall be minimized. However, excavated material shall be stockpiled in areas where it cannot enter the waterways or the storm drain system. Available stockpiling sites at or near the project site shall be determined prior to the start of construction.
- Upon completion of project construction, all exposed soils present in and around the project site shall be stabilized within seven days using mulch, revegetation, geotextile binding fabrics or other appropriate erosion control technique.
- An adequate supply of erosion control materials (gravel, straw bales, shovels, etc.) shall be maintained on-site to facilitate a quick response to unanticipated storm events or emergencies.

MM HYD-2

Prior to the issuance of any discretionary permits for any development projects under the Indio Downtown Specific Plan, the project proponent shall submit to the Public Works Department all storm water control and storm drain plans that include low impact development (LID) techniques. LID techniques shall include, but are not limited to:

- Onsite surface water collection and bio-filtration treatment of runoff;
- Subsurface drainage facilities within each development site to store and percolate onsite runoff;
- Specific to each development site, onsite capacity to store up to 100 percent of the 100-year onsite runoff; and
- Bio-remediation for runoff prior to percolating into subsurface soils;
- Rain barrels and cisterns that allow rainwater to be captured and used for irrigation purposes; and
- Permeable paving materials that allow water to percolate into the ground.

MM HYD-3

Prior to the issuance of any discretionary permits for any development projects under the Indio Downtown Specific Plan, the project proponent shall submit to the City of Indio Public Works Department a Water Quality Management Plan for review and approval. The Water Quality Management Plan shall include details regarding the control and reduction of urban runoff, incorporating the measures taken through MM HYD-1 and MM HYD-2, at any development sites in the Indio Downtown Specific Plan.

With implementation of Mitigation Measures HYD-1 through HYD-3, residual impacts related to water quality would be less than significant.

Issue Groundwater Management. Anticipated development in the Downtown Specific Plan area would require temporary water supply for construction activities, such as dust suppression and concrete manufacturing, as well as long-term operational supply for indoor potable uses, outdoor landscaping, and fire suppression.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Facts in Support of Finding

While development in the Downtown Specific Plan area would be required to comply with federal, state, and local plans, policies and regulation, Mitigation Measures HYD-4 and HYD-5 and UTIL-1 through UTIL-6 under Utilities and Service Systems would aid in reducing water use as the Downtown Specific Plan is implemented.

MM HYD-4

Prior to the issuance of any grading or building permit for any development projects under the Indio Downtown Specific Plan, the project proponent shall submit a landscape plan to the City of Indio Public Works Department and/or Community Development Department. The landscape plan for any development projects under the Indio Downtown Specific Plan shall include, but is not limited to, the following:

- To the greatest extent practicable for each development site, native plant materials and other approved drought-tolerant plants shall be used in all project landscaping.
- Any proposed irrigation systems shall be reviewed and an irrigation system performance analysis shall be conducted to maximize the efficiency of the system and further reduce water demands.
- Any irrigation system installed shall be maintained effectively to ensure that runoff and evaporation is kept to a minimum. This includes maximizing the effective watering of plant roots, using drip irrigation, moisture detectors, and

computer- controlled systems to increase the efficiency.

MM HYD-5

Prior to the issuance of a building permit for any development projects under the Indio Downtown Specific Plan, the project proponent shall submit final design plans. These plans shall include the use of low-flush toilets and water-conserving shower heads and faucets shall be required in conformance with Section 17921.3 of the Health and Safety Code, Title 20, California Code of Regulations 1601(b), and applicable sections of Title 24 CCR.

Mitigation Measures HYD-4, HYD-5, and UTIL-1 through UTIL-6 would reduce potential water demand associated with future development under the Downtown Specific Plan. Because anticipated development would be required to implement these water conservation measures and growth assumptions would be consistent with population estimates that form the basis of IWA's demand projections, such development would not impede sustainable management of the Indio Subbasin.

Noise

Issue **Construction Noise.** Construction of new development in the Specific Plan area could result in noise levels that exceed established thresholds.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Facts in Support of Finding

Mitigation Measures N-1 and N-2 would reduce potential construction-related noise impacts by requiring projects to comply with all applicable City regulations and limiting construction to daytime hours specified in the City's Municipal Code. Impacts would be less than significant with mitigation incorporated.

MM N-1

The City shall ensure that future demolition and construction activities occur in accordance with applicable regulations and, if necessary, shall require implementation of site-specific noise reduction measures to minimize impacts to nearby land uses. Mitigation measures typically implemented to reduce construction-related impacts include, but are not limited to, the following:

- Utilize best available noise control techniques for construction equipment, including the use of intake silencers, mufflers, and engine shrouds.
- To the extent locally available, utilize quieter construction techniques and alternatively powered equipment, such as electrically powered equipment.
- Stationary construction equipment, such as power generators, should be

- located as far from adjacent sensitive receptors as possible.
- Use of portable barriers or other measures as determined by the City (or other appropriate government agency) when demolition or construction activities are expected to exceed 90 dBA Leq at nearby noise sensitive receptors

MM N-2

Noise-generating construction activities shall be limited to the hours set forth in Section 95C.08.B of the City's Municipal Code:

a. Pacific Standard Time.

Monday through Friday, 7:00 AM through 6:00 PM Saturday, 8:00 AM through 6:00 PM
Sunday, 9:00 AM through 5:00 PM
Government Holidays, 9:00 AM through 5:00 PM

b. Pacific Daylight Time.

Monday through Friday, 7:00 AM through 6:00 PM Saturday, 8:00 AM through 6:00 PM
Sunday, 9:00 AM through 5:00 PM
Government Holidays, 9:00 AM through 5:00 PM

With incorporation of Mitigation Measures N-1 and N-2, residual construction noise impacts would be less than significant.

Issue Land Use Compatibility. Depending on the location, future development could be exposed to stationary source, roadway traffic, or rail noise exceeding the City's noise standards for land use compatibility.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Facts in Support of Finding

Mitigation Measure N-3 would require future projects to implement noise-reduction measures to meet land use compatibility standards, reducing potential operational noise impacts.

MM N-3

Future development projects undergoing discretionary review shall be required to analyze project-related noise impacts and incorporate necessary noise-reduction measures to ensure the compatibility of proposed land uses with applicable noise standards, including attainment of a 45 dBA CNEL interior noise level. Noise-reduction measures typically implemented to reduce traffic and rail noise include increased insulation, setbacks, and construction of sound barriers.

With implementation of Mitigation Measure N-3, future development in the Downtown Specific Plan area would be analyzed to ensure the compatibility of proposed land uses in comparison to applicable noise standards. Residual impacts related to land use compatibility would be less-than-significant level.

Transportation/Traffic

Issue Intersection and Roadway Level of Service. The intersection of Jackson Street and Highway 111 is projected to operate at a deficient LOS (E) during PM peak hours under both the Future and Future with project traffic conditions.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Facts in Support of Finding

Inclusion of Mitigation Measure T-1 would ensure that the intersection is monitored by the City to verify when the intersection operates deficiently and that the improvement(s) is implemented when necessary.

MM T-1

The City of Indio shall monitor traffic growth at the intersection of Jackson Street and State Route 111, in order to identify when the intersection operates at or below Level of Service (LOS) “E” conditions. When LOS “E” conditions are identified, the City shall implement the necessary improvement(s) to improve the LOS at the intersection to acceptable conditions (LOS D or better), such as adding a second eastbound left-turn lane.

With implementation of Mitigation Measure T-1, the intersection of Jackson Street at SR-111 would operate at an acceptable level of service (LOS D).

Utilities and Service Systems

Issue Increased Water Demand. Development under the proposed Specific Plan would increase demand for water supplies and services from the IWA.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Facts in Support of Finding

To ensure that the Specific Plan employs strategies to reduce water demand associated with development under the Specific Plan, Mitigation Measures UTIL-1 through UTIL-6 are required.

MM UTIL-1

Individual project developers shall utilize xeriscape planting principles and use of native and/or drought-tolerant plant materials that require little or no irrigation. Plants with similar water requirements shall be grouped together, a technique known as hydro zoning. Decorative water features shall be designed to minimize water consumption and evaporation.

MM UTIL-2

Automated, high-efficiency irrigation systems (such as bubbler irrigation and low-angle, low-flow spray heads) shall be installed to reduce water demand and use. Moisture sensors and other similar irrigation technology shall be utilized to ensure that landscaping is watered only as needed.

MM UTIL-3

Individual project developers shall minimize use of turf except within active outdoor recreation uses.

MM UTIL-4

When possible, individual project developers shall utilize the building construction class that minimizes the amount of fire flow required.

MM UTIL-5

If necessary, individual project developers shall incorporate fire wall(s) to allow a single structure to be essentially classified as two smaller buildings and reduce the fire flow.

MM UTIL-6

Individual project developers shall incorporate automatic fire suppression systems components that reduce the flow and pressure requirements.

With implementation of Mitigation Measures UTIL-1 through UTIL-6, development projects under the Specific would employ water conservation measures that would reduce water demand. Residual impacts related increased demand for water supplies would be reduced to a less than significant level.

Utilities and Service Systems

Issue Electrical Facilities. Future development projects in the Specific Plan Area would increase demand for electrical power.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the final EIR.

Facts in Support of Finding

The following mitigation measures are required for impacts related to requiring electrical facilities:

MM UTIL-7

“Dark Sky-Friendly” lighting shall be designed to protect the beauty of the desert sky and shall respect the requirements and guidelines of the Mount Palomar restricted nighttime light zone, as identified in Riverside County’s Ordinance No. 655. Up-lighting is discouraged except for well-shielded landscape accent lighting. Maximum lamp wattage requirements shall be established for different lighting types to minimize obtrusive and unnecessary lighting and conserve energy resources to the greatest extent possible.

MM UTIL-8

Automatic timers shall be programmed to maximize personal safety at night while conserving energy.

MM UTIL-9

Buildings shall be sited and designed to maximize the use of sunlight and shade for energy savings and respect the right to solar access of nearby and adjacent buildings. Whenever appropriate, buildings shall be oriented so that the long axis of the building is oriented east–west to maximize the opportunity for north- and south facing windows, which receive indirect, diffused light with low heat gain for the building, reducing cooling costs during summer months.

MM UTIL-10

The pursuit of already established sustainable best management practices, such as Leadership in Energy and Environmental Design (LEED) certification, ComfortWise and EnergyStar Home shall be utilized throughout the Specific Plan. For maximum flexibility, however, developers and builders shall implement sustainable building and development practices identified within the Voluntary Green Building Program and the Voluntary Green Building Manual.

MM UTIL-11

Individual project developers shall participate in programs offered or sponsored by local utilities such as California EnergyStar New Homes Program, Residential Property Development Program, California Home Energy Efficiency Rating System (CHEERS) Program, and Savings by Design Program.

With implementation of Mitigation Measures UTIL-7 through UTIL-11, the Specific Plan would incorporate numerous energy efficiency measures and design features to enhance efficiency in all aspects of a building's life-cycle. These designs would increase a structure's energy efficiency, and overall sustainability. The Specific Plan would also exceed Title 24 energy requirements by 15 percent, consistent with the Voluntary Green Building Program. Residual impacts would be less than significant.

ALTERNATIVES

The final EIR considers the following three alternatives to the proposed Downtown Specific Plan.

Alternative A - No Project/Existing Specific Plan

As required by CEQA Guidelines Section 15126.6(e), the No Project/Existing Specific Plan Alternative describes growth of the Specific Plan area consistent with the existing zoning and General Plan land use designations and policies of the 1997 Old Town Specific Plan. There are no estimated growth forecasts under Alternative A, as no forecasts were projected for the number of dwelling units or non-residential square footage in the 1997 Old Town Specific Plan boundaries. Due to the larger planning area of the 1997 Old Town Specific Plan compared to the proposed, the amount of potential development under this alternative could be greater than under the proposed Specific Plan.

Alternative B - No Project/No Development

The No Project Alternative assumes existing conditions in the Specific Plan area and no additional development would occur. Land uses within the Specific Plan area would remain the same as the existing conditions: 102 dwelling units, 799,232 sf of commercial, manufacturing and public/institutional development, and approximately 22 acres of vacant property.

Alternative C: Reduced Density

Under this Reduced Density Alternative, the Specific Plan would allow for and accommodate a growth forecast of around 650,000 square feet of net new non-residential uses and approximately 750 total dwelling units. The purpose of this Reduced Density Alternative is to provide for an Alternative that accommodates and allows new growth, with respect to potential market conditions and realistic growth assumptions.

Finding

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

Facts in Support of Finding

If the proposed Specific Plan is not implemented, the Specific Plan area would be developed under the guidelines of the existing Old Town Specific Plan and the General Plan (Alternative A). Alternative A would not reduce significant impacts associated with the Specific Plan and would result in slightly greater impacts relative to air pollutant emissions and historic resources due to the larger planning area of the 1997 Old Town Specific Plan compared to the proposed and the amount of potential development under Alternative A could be greater than the proposed Specific Plan.. Impacts under Alternative A related to exceeding air quality thresholds and potential removal/alteration of historical resources would remain significant and unavoidable similar to the proposed Specific Plan. Alternative A would not achieve most of the Specific Plan Project objectives, such as creating a policy and regulatory document to promote the revitalization and enhancement of Specific Plan area providing a pedestrian-friendly urban environment, and facilitating increases in transit options within the area, and would not implement the City's vision for the Downtown area to the degree that the currently proposed Specific Plan would.

Under Alternative B, the Specific Plan would not be implemented and no additional development would occur. Alternative B would eliminate the significant and unavoidable impacts associated with the proposed Specific Plan, which are due to growth and construction/development. Although the significant and unavoidable air quality and historic resource impacts would be eliminated, Alternative B would not achieve any of the Specific Plan's objectives, such as revitalization and enhancement of the Specific Plan area, establishment of a pedestrian-friendly urban environment, and facilitation of increased transit options in the area.

With implementation of Alternative C, significant and unavoidable impacts would be reduced, but not avoided when compared to the proposed Specific Plan. Although Alternative C would fulfill most of the Specific Plan's objectives by focusing on revitalization and enhancement of the Specific Plan area, establishing a pedestrian-friendly urban environment, and facilitating increased transit options within the area, it would not fully realize the objective of increasing housing opportunities in the Specific Plan area or increasing vibrancy in the Specific Plan area.

STATEMENT OF OVERRIDING CONSIDERATIONS

Section 15093 of the CEQA Guidelines requires lead agencies to adopt a Statement of Overriding Considerations if they elect to approve a project that has significant and unavoidable environmental impacts. As noted above, the proposed Downtown Specific Plan would have significant and unavoidable impacts related to air quality and cultural (historic) resources. As such, the City has identified the following overriding considerations that explain why the Project's benefits outweigh these significant environmental impacts:

- The Specific Plan would meet the City's planning objectives for Downtown, helps meet the City's housing and economic development goals, and helps implement the recently adopted General Plan (September 2019)
- The Plan is designed to achieve the overall community goals of providing:
 - A high quality of life for all residents.
 - A lively Downtown Indio, exceptional city-wide events, and regional parks and trails that will attract visitors and residents alike.
 - An interconnected transportation network that serves all users and modes in a healthy, equitable manner.
 - An efficient community that can persist for generations.
 - A wide variety of housing types to serve a broad and diverse community of new and existing residents, providing housing opportunities for households of all ages, types, incomes, and lifestyles.
 - Extensive educational and vocational training opportunities that help develop a diverse and well-trained workforce.
 - A strong, resilient economy that offers opportunities for entry level, service, technology, and entrepreneurial employment to meet the needs of Indio's residents and to attract future residents to the region.
 - A retail sector that fully serves the needs of all the City's residents, offering both quality every-day and specialty retail uses in the Downtown.
 - A well-planned and smartly-developed City that grows in concert with its ability to provide services.

To achieve these objectives, the Downtown Specific Plan focuses on improving how residents get around, meeting community needs with available services, providing a greater sense of identity, and preserving established residential neighborhoods. The City's current Downtown Specific Plan is outdated. New laws, standards, policies, and advancements in technology and information are addressed in the new Specific Plan to allow the City to adapt to changing needs and guide future growth in the Downtown Area. The Downtown Specific Plan will improve public health, restore the Downtown into a lively and economically viable portion of the City, and implement complete streets concepts that will serve and balance the needs of pedestrians, bicyclists, transit riders, and motorists. In addition, the Downtown Specific Plan will accommodate new development

in underutilized areas of the Downtown while providing policies for the protection and long-term maintenance of established neighborhoods.