

Appendix M-2

Paradise Valley Draft EIR Recreation
Impact Assessment, Alta, September 5, 2017

APPENDIX M



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MEMORANDUM

To: Paul Lin, Glorious Land Company
From: Jeff Knowles, Emily Tracy, Alta Planning + Design
Date: September 5, 2017
Re: **Paradise Valley Draft EIR Recreation Impact Assessment**

**PRELIMINARY / WORKING DRAFT DOCUMENT
INTRA-AGENCY COMMUNICATION
NOT FOR PUBLIC CIRCULATION
ATTORNEY-CLIENT PRIVILEGED COMMUNICATION**

Revised Memo

The attached draft memo describes potential impacts to public recreation facilities (parks, open space, and trails) linked to implementing the Paradise Valley Specific Plan. Alta was tasked with assessing project impacts compared to thresholds or performance measures as set by municipal, regional, state, and/or federal park management plans or other adopted regulations. In the absence of these regulations, Alta communicated directly with park agency staff to discuss potential impacts after sharing estimates on new visitation attributable to the Paradise Valley development. At the time this memo was drafted, only Joshua Tree National Park had responded with anticipated impacts along the perimeter of their facility, which may be less than significant when mitigated.

Introduction

Alta Planning + Design has conducted an evaluation of the Paradise Valley development project in Riverside County in order to determine, in accordance with significance thresholds included in Appendix G of the State CEQA Guidelines, whether the project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and whether the impact would be:

- ◆ Significant
- ◆ Less than significant with mitigation incorporated
- ◆ Less than significant
- ◆ No impact

According to the Paradise Valley Specific Plan (PVSP), Paradise Valley is expected to bring 15,707 new residents to the Coachella Valley.¹ Regional parks evaluated are listed in Table 1, including the distance from Paradise Valley to the park or recreation area. Distances are generally straight-line miles from Paradise Valley to the regional park edge, with the exception of the Mecca Hills Wilderness Area. Although the wilderness area is just one mile south of Paradise Valley, a multi-species habitat conservation preserve where hiking is prohibited separates the two. To more accurately represent the travel distance required to reach the Mecca Hills Wilderness Area, driving distance to the nearest entrance was used.

Table 1: Regional Parks

Park	Distance (miles)
Anza-Borrego Desert State Park	90
Big Morongo Canyon Preserve	56
Coachella Valley Preserve System	31
Joshua Tree National Park	1
Lake Cahuilla Recreation Area	29
Mecca Hills Wilderness Area	19
Orocochia Mountains Wilderness Area	28
Salton Sea State Recreation Area	35
Santa Rosa and San Jacinto Mountains National Monument	46

Impacts to local neighborhood parks in nearby communities are addressed in section 4.19.3.1 of the draft EIR, and are expected to be minimal. Paradise Valley provides numerous local parks, trails, and open spaces within the project and it is unlikely residents would travel to a nearby community to use a park.

Thresholds & Assumptions

In order to evaluate whether the Paradise Valley population would result in an increase in use of any of the regional parks such that a substantial physical deterioration would occur, several data sources were used. These include:

- ◆ Interviews with staff of the appropriate park agency
- ◆ Publicly available visitor use data
- ◆ *State Parks Survey on Public Opinions and Attitudes on Outdoor Recreation in California*
- ◆ *Paradise Valley Specific Plan*

¹ Riverside County, "Paradise Valley Specific Plan." SP-339. February 2017.

Together, these data sources were used to estimate the number of new park users likely to result from the Paradise Valley development, and evaluate whether the increased use would have a significant impact based on the CEQA Appendix G guidelines.

Anticipated visitation increases to regional parks were estimated based on a California State Parks survey that established the distance people commonly travel to reach an outdoor recreation area, as well as the type of outdoor recreation area visited. Riverside County is included in the Southern California region.²

The average travel time to reach the outdoor recreation opportunity they visit the most often for Southern California residents is outlined in Table 2, for walking and driving.

Table 2: Travel Time to Outdoor Recreation Areas

Mode	<5 min	6-10 min	11-20 min	21-60 min	>60 min
Driving	20.1%	17.2%	20.8%	31.3%	10.6%
Walking	27.5%	20.3%	31.5%	18.9%	1.8%

Based on average highway speeds of 70 mph and average walking speeds of 3 mph, the following distances fall into the travel time brackets shown in Table 3.

Table 3: Regional Parks by Travel Distance

Mode	<5 min	6-10 min	11-20 min	21-60 min	>60 min
Driving	<6 miles	7-12 miles	13-23 miles	24-70 miles	>70 miles
Walking	<0.25 miles	0.25-0.5 miles	0.6-1 miles	1-3 miles	>3 miles

The survey also provides visitation data based on the type of outdoor recreation area. For the purposes of this assessment, the percent of residents who spent 0 days in the last 12 months visiting a recreation area are assumed to be uninterested in visiting that type of recreation area.

Descriptions of each recreation area type, as listed in the survey, are as follows:

- Highly developed parks and recreation areas: In or near urban areas that may include playgrounds, sports facilities, and highly developed beaches; for example, city parks.
- Developed nature-oriented parks and recreation areas: Located outside or on the fringe of urban areas, including trails, picnic areas, campgrounds, and information centers. Generally includes national, state, large county and regional parks, beaches, reservoirs, and state and national recreation areas.
- Natural and undeveloped areas: Large areas in a natural or nearly natural condition, few developments; for example, forests, deserts, mountains, wetlands, and seashores.

Southern California visitation rates are listed in Table 4, which shows the percent of residents likely to be interested in visiting each type of recreation area.³

² California State Parks, "Survey on Public Opinions and Attitudes on Outdoor Recreation in California." January 2014.

³ California State Parks, "Survey on Public Opinions and Attitudes on Outdoor Recreation in California." Table 11.9.7. January 2014.

Table 4: Southern California Recreation Area Visitation by Type

Type	0 days	1 or more days
Highly developed parks and recreation areas	13.3%	86.7%
Developed nature-oriented parks and recreation areas	19.9%	80.1%
Natural and undeveloped areas	28.9%	71.1%

Based on Table 2 through Table 4, the anticipated number of new project-related annual visitors to each regional park is calculated in the following sections.

Anza-Borrego Desert State Park

Anza-Borrego Desert State Park is a developed nature-oriented park located 73.9 miles from Paradise Valley, or approximately 63 minutes driving. Based on Table 2 and Table 4, only 10.6 percent of Southern California residents are willing to drive more than 60 minutes to reach an outdoor recreation area, and 80.1 percent of Southern California residents are likely to visit a developed nature-oriented park.

Given the anticipated Paradise Valley population of 15,707, Anza-Borrego Desert State Park might expect approximately 1,334 new project-related visitors annually.

Big Morongo Canyon Preserve

Big Morongo Canyon Preserve is a natural and undeveloped area located 56 miles from Paradise Valley, or approximately 54 minutes driving. Based on Table 2 and Table 4, 41.9 percent of Southern California residents are willing to drive more than 21 minutes to reach an outdoor recreation area, and 71.1 percent are likely to visit a natural and undeveloped recreation area.

Given the anticipated Paradise Valley population of 15,707, Big Morongo Canyon Preserve might expect approximately 4,679 new project-related visitors annually.

Coachella Valley Preserve System

Coachella Valley Preserve System is a natural and undeveloped area located 31 miles from Paradise Valley, or approximately 26 minutes driving. Based on Table 2 and Table 4, 41.9 percent of Southern California residents are willing to drive more than 21 minutes to reach an outdoor recreation area, and 71.1 percent are likely to visit a natural and undeveloped recreation area.

Given the anticipated Paradise Valley population of 15,707, the Coachella Valley Preserve System might expect approximately 4,679 new project-related visitors annually.

Joshua Tree National Park

Joshua Tree National Park is a developed nature-oriented park located 1 mile from Paradise Valley, or less than 5 minutes driving. Based on Table 2 and Table 4, all Southern California residents are willing to drive less than 5 minutes to reach an outdoor recreation area, and 80.1 percent are likely to visit a developed nature-oriented park.

Given the anticipated Paradise Valley population of 15,707, Joshua Tree National Park might expect approximately 12,581 new project-related visitors annually. Joshua Tree National Park provided publicly available visitor use data, with just over 2.5 million visitors annually, for an overall increase of 0.5 percent.⁴

⁴ National Park Service, "Joshua Tree National Park Visitor Study." VSP Visitor Study 241.1. November 2010.

Lake Cahuilla Recreation Area

Lake Cahuilla Recreation Area is a highly developed park or recreation area located 29 miles from Paradise Valley, or approximately 25 minutes driving. Based on Table 2 and Table 4, 41.9 percent of Southern California residents are willing to drive more than 21 minutes to reach an outdoor recreation area, and 86.7 percent are likely to visit a highly developed park or recreation area.

Given the anticipated Paradise Valley population of 15,707, the Lake Cahuilla Recreation Area might expect approximately 5,706 new project-related visitors annually.

Mecca Hills Wilderness Area

Mecca Hills Wilderness Area is a natural and undeveloped area located 19 miles from Paradise Valley, or 16 minutes driving. Based on Table 2 and Table 4, 62.7 percent of Southern California residents are willing to drive more than 11 minutes to reach an outdoor recreation area, and 71.1 percent are likely to visit a natural and undeveloped area.

Given the anticipated Paradise Valley population of 15,707, the Mecca Hills Wilderness Area might expect approximately 7,002 new project-related visitors annually.

Orocochia Mountains Wilderness Area

Orocochia Mountains Wilderness Area is a natural and undeveloped area located 28 miles from Paradise Valley, or approximately 24 minutes driving. Based on Table 2 and Table 4, 41.9 percent of Southern California residents are willing to drive more than 21 minutes to reach an outdoor recreation area, and 71.1 percent are likely to visit a natural and undeveloped area.

Given the anticipated Paradise Valley population of 15,707, the Orocochia Mountains Wilderness Area might expect approximately 4,679 new project-related visitors annually.

Salton Sea State Recreation Area

Salton Sea State Recreation Area is a highly developed park or recreation area located 35 miles from Paradise Valley, or approximately 30 minutes driving. Based on Table 2 and Table 4, 41.9 percent of Southern California residents are willing to drive more than 21 minutes to reach an outdoor recreation area, and 86.7 percent are likely to visit a highly developed park or recreation area.

Given the anticipated Paradise Valley population of 15,707, the Salton Sea State Recreation Area might expect approximately 5,706 new project-related visitors annually.

Santa Rosa and San Jacinto Mountains National Monument

Santa Rosa and San Jacinto Mountains National Monument is a developed nature-oriented park located 46 miles from Paradise Valley, or approximately 39 minutes driving. Based on Table 2 and Table 4, 41.9 percent of Southern California residents are willing to drive more than 21 minutes to reach an outdoor recreation area, and 80.1 percent are likely to visit a developed nature-oriented park.

Given the anticipated Paradise Valley population of 15,707, the Santa Rosa and San Jacinto Mountains National Monument might expect approximately 5,272 new project-related visitors annually.

New Visitor Summary

Expected new project-related visitors to each of the regional parks near Paradise Valley are summarized in Table 5 below. Park types are abbreviated as HD (highly developed parks and recreation areas), DN (developed nature-oriented parks and recreation areas), and NU (natural and undeveloped areas). Percentages of residents likely to visit each park type and likely to drive the required length of time are based on Southern California resident data in Table 2 and Table 4.

Table 5: Expected New Project-Related Annual Visitors

Park	Park Type	Percent Likely to Visit Park Type	Driving Time (min)	Percent Willing to Drive	Estimated New Project-Related Annual Visitors
Anza-Borrego Desert State Park	DN	80.1%	63	10.6%	1,334
Big Morongo Canyon Preserve	NU	71.1%	54	41.9%	4,679
Coachella Valley Preserve System	NU	71.1%	26	41.9%	4,679
Joshua Tree National Park	DN	80.1%	2	100.0%	12,581
Lake Cahuilla Recreation Area	HD	86.7%	25	41.9%	5,706
Mecca Hills Wilderness Area	NU	71.1%	16	62.7%	7,002
Orocochia Mountains Wilderness Area	NU	71.1%	24	41.9%	4,679
Salton Sea State Recreation Area	HD	86.7%	30	41.9%	5,706
Santa Rosa and San Jacinto Mountains National Monument	DN	80.1%	39	41.9%	5,272

Impacts

In accordance with Appendix G of the *State CEQA Guidelines*, the impact of the Paradise Valley development on parks and recreational facilities would be considered significant if they would:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or
- Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

Table 6: Project-Related Visitation Increase as a Percent of Current Visitation

Park	New Project-Related Annual Visitors	Current Annual Visitation	Percent Increase
Anza-Borrego Desert State Park	1,334	403,602 ⁵	0.3%
Big Morongo Canyon Preserve	4,679	60,000 ⁶	7.8%
Coachella Valley Preserve System	4,679	Not available	
Joshua Tree National Park	12,581	2,505,286 ⁷	0.5%
Lake Cahuilla Recreation Area	5,706	Not available	
Mecca Hills Wilderness Area	7,002	107,586 ⁸	6.5%
Orocochia Mountains Wilderness Area	4,679	107,586 ⁹	4.3%
Salton Sea State Recreation Area	5,706	200,000 ¹⁰	2.9%
Santa Rosa and San Jacinto Mountains National Monument	5,272	Not available	

Joshua Tree National Park

Impacts to Joshua Tree National Park were assessed based on an interview with park staff to discuss the anticipated increase in project-related visitation and significance of these potential impacts. Based on the project team's estimate of 12,581 new project-related visitors to Joshua Tree National Park each year, park representatives feel this is unlikely to be a significant impact on overall park use, including impacts to park infrastructure including campgrounds, visitor centers, and parking. Last year the park recorded over 2.5 million visitors. Park representatives anticipate Paradise Valley residents might use the park for hiking, dog walking, and similar day-use activities.

Increased use may be focused in the Cottonwood District and Pinkham Canyon area, which is closest to the Paradise Valley site and is currently one of the most infrequently visited areas of the park. Related concerns include:

- ◆ Increased "casual" trails in the area (informal paths not designated by the park)
- ◆ Increased incidental littering
- ◆ Increase in off-highway vehicle (OHV) use in park and other lands near Paradise Valley

⁵ California State Parks, "Statistical Report for Fiscal Year 2015/2016." Page 24-25, *Units and Properties of the California State Park System*.

⁶ Hill, Greg. "Re: Big Morongo Canyon Preserve annual visitors?" Message to Lola Torney. 5 September 2017. Email.

⁷ National Park Service, "Joshua Tree National Park Visitor Study." VSP Visitor Study 241.1. November 2010.

⁸ Bureau of Land Management, "2015 Recreation Management Information System report for the Palm Springs-South Coast Field Office." Report 23c. *Note: Data combines visitor information for Mecca Hills Wilderness Area and Orocochia Mountains Wilderness Area as a single item. This report assumes the two wilderness areas have equal annual visitation.*

⁹ Ibid.

¹⁰ California Department of Parks and Recreation. https://www.parks.ca.gov/?page_id=21261

Regional Parks

Estimated new project-related annual visitation was reported to each regional park agency staff in raw count and as a percent increase in annual visitation (if data was available). Staff were asked if this estimated increase in visitation would lead to substantial physical deterioration of the facility, and given the opportunity to provide information on impacts they anticipated.

A reasonable effort was made to reach staff from each evaluated park, including multiple rounds of telephone calls and emails sent to publicly available contact information listed on agency websites and other materials. Some staff did not respond to any contact attempts, and were therefore unable to provide comments on impacts. Park staff from five parks acknowledged the receipt of this information, but did not identify any perceived impacts which would lead to substantial physical deterioration. Based on our evaluation, we concur with this conclusion.

Significance of Impacts

Based on available data and interviews with park staff, impacts to regional parks would be less than significant without mitigation.

Mitigation

Impacts are less than significant and no mitigation measures are required.

Project Design Elements

While project impacts are deemed less than significant and do not require mitigation, the project proponent elects to further reduce the minimal impacts related to the propagation of “casual trails,” where residents wear multiple new pathways into an area based on their shortest natural route rather than consolidating travel onto one or more designated trails.

On the southern perimeter of the project, hiking is prohibited in the multi-species habitat conservation preserve. To discourage trespassing, a perimeter trail is planned within the project boundary to provide a walking path that does not intrude on the preserve. The project also includes edge treatments designed to both prevent trail users from trespassing, and to transition smoothly from the project to the preserve. See section 6.4.2 of the *Paradise Valley Specific Plan* for more detail.

On the northern edge of the project, where residents may choose to walk to Joshua Tree National Park, perimeter trails and wayfinding signage will direct residents to consolidated, established trails to minimize the propagation of casual trails in the area. Additional signage will discourage mountain biking and off-highway vehicle use on land adjacent to the development, and remind residents these activities are not permitted outside of dirt roads in Joshua Tree National Park.

Finally, educational materials and messaging will be incorporated into project communications and new resident materials. This effort will focus on park and public land stewardship, fostering a sense of ownership among residents that will encourage responsible recreation.

Alta Planning + Design

Alta's mission is to create active communities where bicycling and walking are safe, healthy, fun, and normal daily activities. Our team of planners, designers, and engineers work to help communities identify needs, build support, prioritize improvements, and implement a wide range of projects.

Alta staff include former park and open space agency managers and professional designers with experience taking these areas from concept through completion, and with managing them over the long term. We understand the opportunities, challenges, funding mechanisms, planning steps, and design, management, and maintenance standards specific to sites from urban to remote settings.