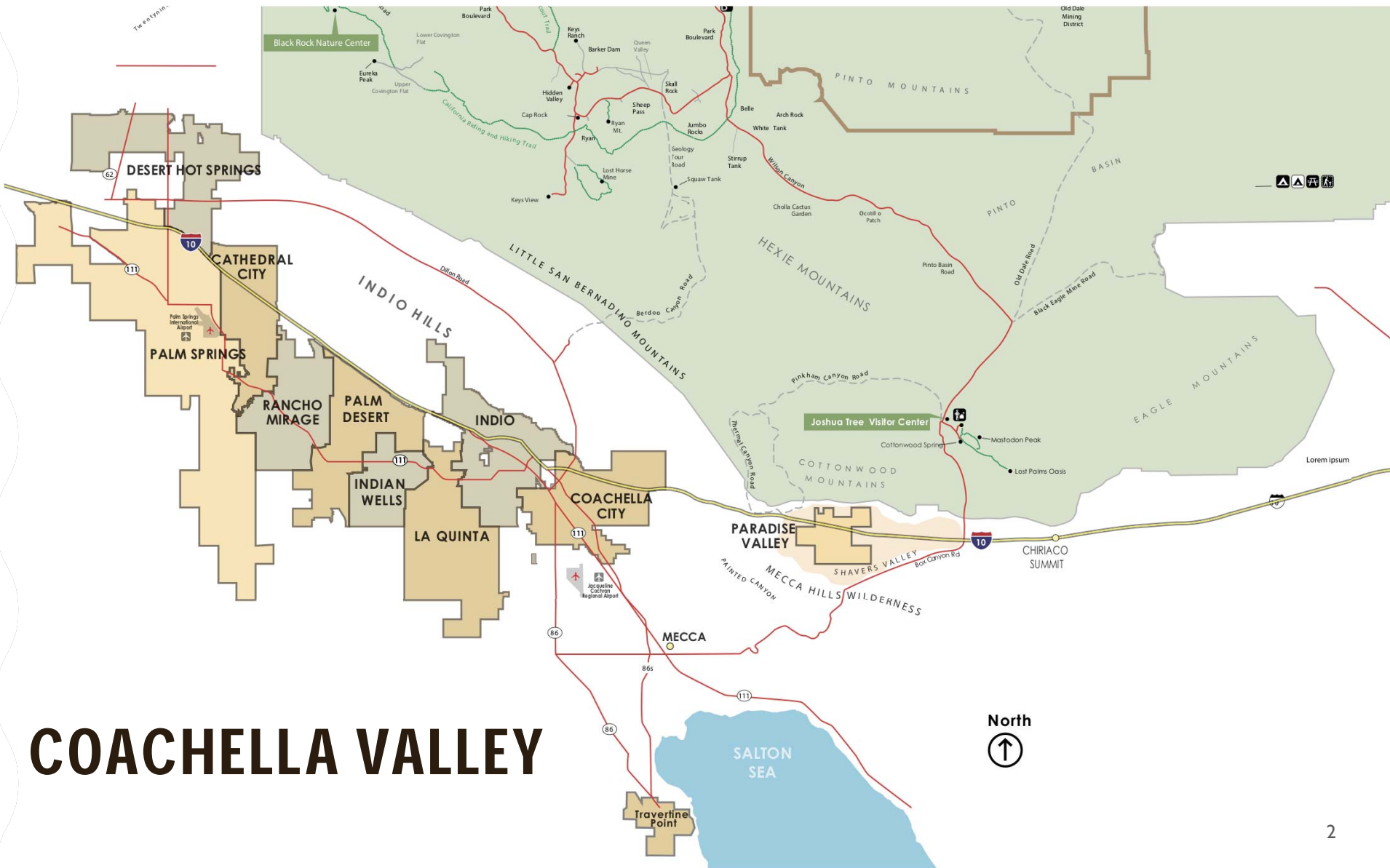


PARADISE VALLEY

A DESERT COMMUNITY OF
BALANCE, ORDER, RHYTHM AND HARMONY

COACHELLA VALLEY



EAST COACHELLA VALLEY AREA PLAN

POLICY GUIDANCE 2.3, A-J

- a. Planned community proposals may have urban characteristics with thematic elements (i.e., golf, equestrian opportunities, etc.), but also will have a rigid and permanent urban boundary.
- b. The plan must include a comprehensive water service program that addresses the long-term requirements of the project, conservation, and reliability.
- c. The proposed community must be located within a district that provides water and sewer services or a water and sewer district has agreed to annex and serve the project; and there is an agreement that such services will not be expanded beyond the limits of the proposed community.
- d. The proposed community must provide for all relevant public facilities and services, including public protection, road maintenance, library services, education facilities, and waste disposal; and, it must be demonstrated that such service can be efficiently delivered within the proposed community.
- e. The proposed community must provide a full range of parks and if necessary, parks large enough to accommodate organized sports activities.

EAST COACHELLA VALLEY AREA PLAN

POLICY GUIDANCE 2.3, A-J

- f. The proposed community must be consistent with, and advance the goals of, the County Housing Element and provide for a range of housing opportunities including low and moderate-income housing.
- g. At least 50% of the proposed community must be devoted to open space and recreation.
- h. The proposed community must be compatible with the achievement of the goals of the Coachella Valley Multi-Species Habitat Conservation Plan, as determined by the County in consultation with the Coachella Valley Association of Governments, the California Department of Fish and Game, and the United States Fish and Wildlife Service, if this habitat conservation plan has been adopted by the County.
- i. The plan must be based on "new urbanism" principles, and include elements that facilitate internal transit programs and encourage pedestrian mobility.
- j. The plan, to the extent feasible, must contain provisions for the use of innovative and state-of-the-art technology to reduce energy and resource consumption.

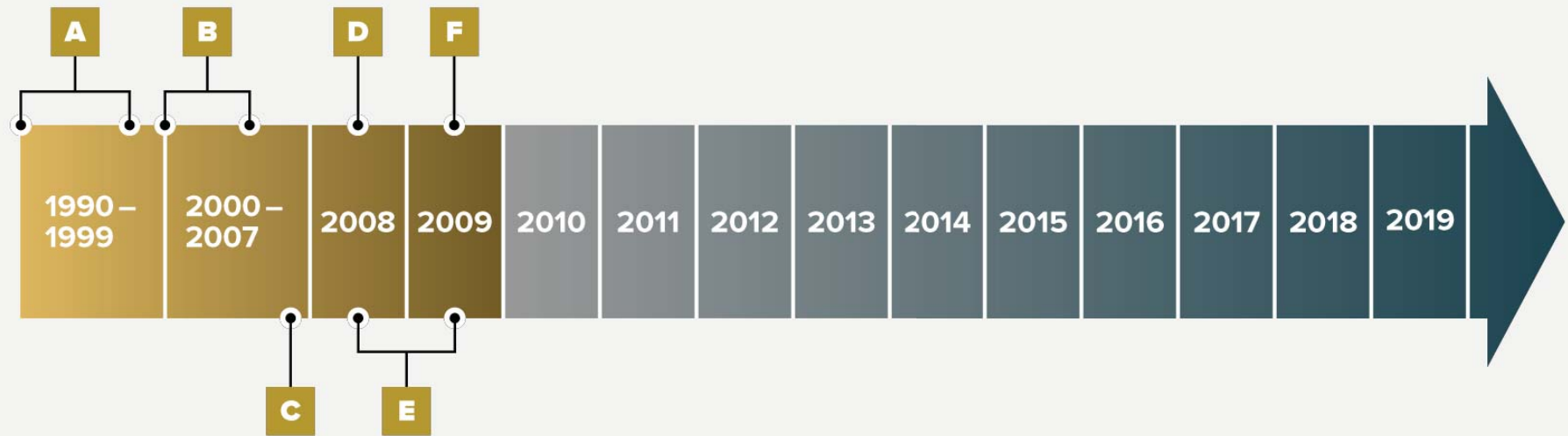
ABOUT THE PROJECT

The Paradise Valley Specific Plan (PVSP) is a programmatic plan that describes a balanced, compact and complete “new town” consisting of approximately 1,800-acres of development and approximately 3,100-acres of dedicated conservation land.

The project site is currently zoned W-2-10 (controlled development, 10 acre min. lot size) and N-A (natural assets, 20-acre minimum lot size) with an ECVAP land use designation of Open Space – Rural (20 d.u./acre).



INITIAL PROCESS TIMELINE



A GLC Acquires Properties
1990–1998

B Water & Wildlife Negotiations
2000–2005

C Original Specific Plan Developed
2007

D CVMSHCP Adopted
2008

E Draft EIR for Original Specific Plan Prepared
2008–2009

F Decision to Stop Processing Original Specific Plan
2009



PROJECT APPROACH

PROJECT VISION



Respect, Protect
and Preserve the
Environment

Embrace and honor the desert setting to **minimize environmental impacts** as well as maintain a fixed and permanent boundary to protect sensitive species and habitats



Commit to a
Thoughtful
Process

Guided by the County's General Plan, the East Coachella Valley Area Plan and the Coachella Valley Multiple Species Habitat Conservation Plan, as well as industry **best practices and research on building sustainable, environmentally friendly communities**



Meet Resident
Needs On-site

By **clustering development**, we are able to design a **compact and complete community** that is economically self-sufficient, and meets day-to-day resident needs on-site



Generate Long Term
Economic Benefit

Create thousands of **on-site jobs** for project residents while generating new revenues for the County

LAND USE



PVSP is comprised of approximately 4,948 contiguous acres under one ownership



The development footprint is approximately 1,848 acres



Approximately 3,100 acres—or nearly **63% of the contiguous project site**—**will be permanently preserved** as Open Space Conservation Habitat

SUSTAINABILITY STRATEGIES

- Conservation Development
- Dark Sky Sensitive
- Water Conservation
- Native and/or Water Efficient Landscape Palette
- Vehicle Miles Traveled (VMT)/Air Quality
- One-third of the project targeted to 55+ aged residents which have the lowest trip generation rate of any adult demographic
- Green Storm Water Infrastructure
- Multi-Modal Transportation and Complete Streets
- Climate & Energy
- Energy Conservation and Generation
- Jobs-Housing Balance
- Affordable Housing Component
- Public Facilities
- Environmental Outreach/Education

SUSTAINABILITY STRATEGIES

- Paradise Valley is a **Balanced, Compact and Complete** New Town with an estimated **64% capture rate** of vehicles within the project, 84% of jobs needed being supplied on-site and 93% of workers being able to afford to live there.
- Solar energy shall supply **60% of the electricity needs** of the entire project by buildout in 2035.
- **Exceeds Title 24 Standards** and Strict Lighting Controls.
- **Internal pedestrian, bicycle and full access NEV infrastructure** prioritizes non-vehicular transportation.
- **Trip reduction program** for businesses with over 100 employees.
- Consistent with the County of Riverside Climate Action Plan (CAP), **the Paradise Valley CAP shows that it more than meets its target** for its fair-share contribution towards the County's GHG reduction goals.

| | |
|---------------------------|--------------------|
| TOTAL PROJECT AREA | 4,948 acres |
|---------------------------|--------------------|

| | |
|--------------------|--------------------|
| Development | 1,848 acres |
|--------------------|--------------------|

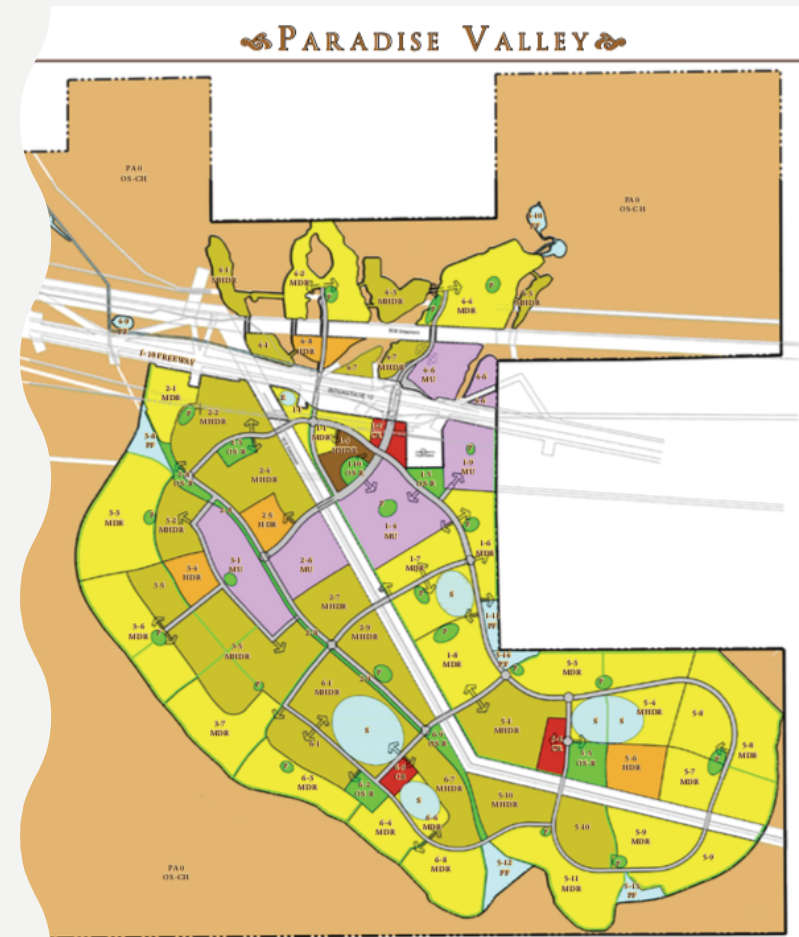
- *Residential Units: 8,490 dwelling units*
- *Mixed Use (non-residential): 1,182,000 sq. ft*
- *Commercial Retail: 198,950 sq. ft*
- *Open Space/Recreation: 109.9 acres*
- *Public Facilities: 44.8 acres*

| | |
|--|--------------------|
| Open Space/Conservation Habitat | 3,100 acres |
|--|--------------------|

LAND USE PLAN

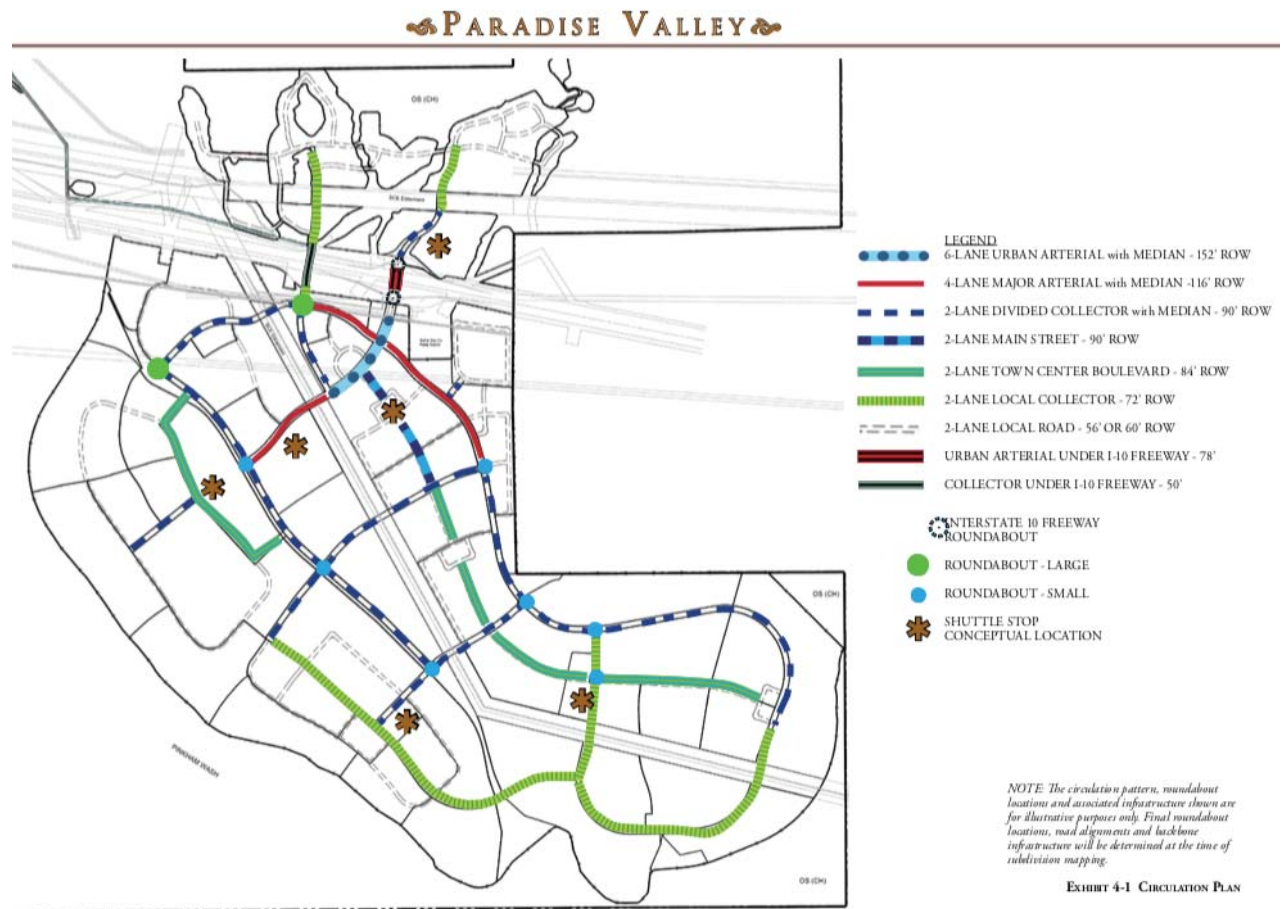
MEETS RESIDENT NEEDS ON-SITE

- Basic recreational, educational and commercial needs are **within half-mile** of the majority of residents
- Jobs created within the project will provide **employment opportunities for up to 84%** of the project's residents
- Proximity to jobs and wide range of services encourages pedestrian and alternative modes of transport – **minimizing the need to drive**
- Every home is **less than a quarter-mile** from parks and trails
- Full range of linear, neighborhood, pocket parks and trails enhance and **promote a walkable community**



MOBILITY

A comprehensive roadway and trail system will provide **internal mobility** for automobiles, pedestrians, bicycles, neighborhood electric vehicles (NEV) and other modes of transportation within the community. **External connectivity** will be realized through a shuttle service and I-10 interchange improvements.

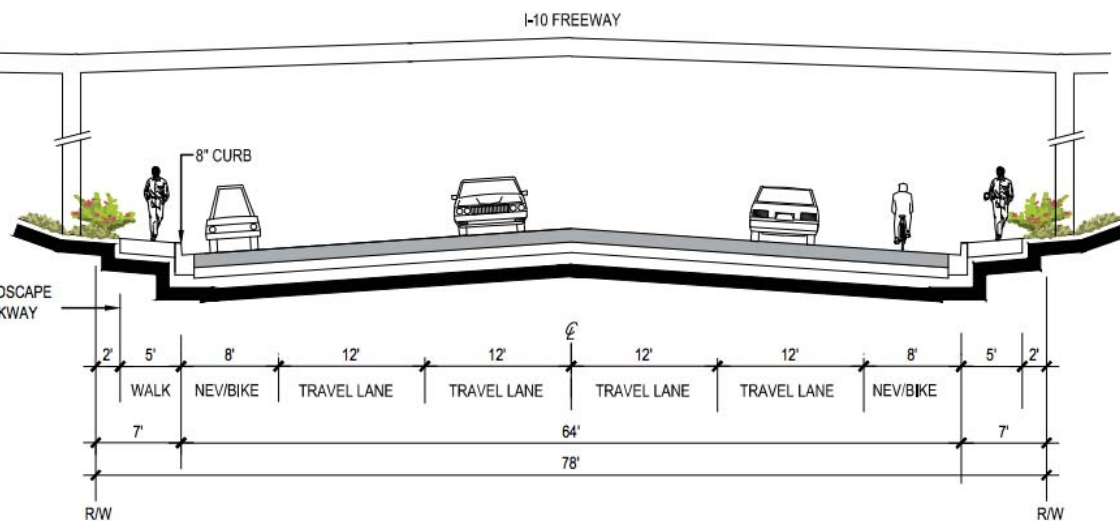
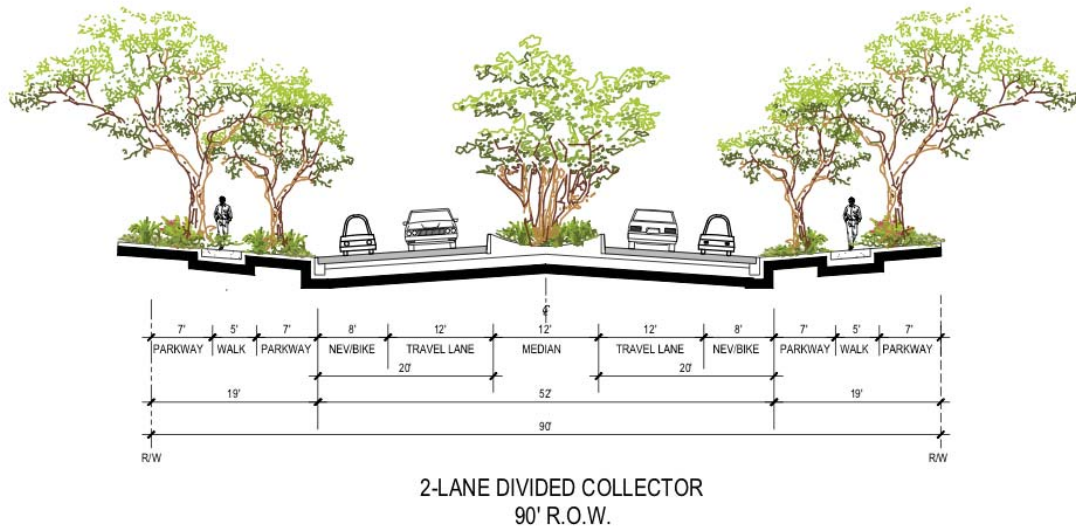


COMPLETE STREETS

“The Complete Streets movement aims to develop integrated, connected networks of streets that are safe and accessible for all people, regardless of age, ability, income, ethnicity, or chosen mode of travel. Complete Streets makes active transportation such as walking and bicycling convenient; provide increased access to employment centers, commerce, and educational institutions; and **allow greater choice** in traveling **so that transportation doesn't drain a family's piggy bank.**”

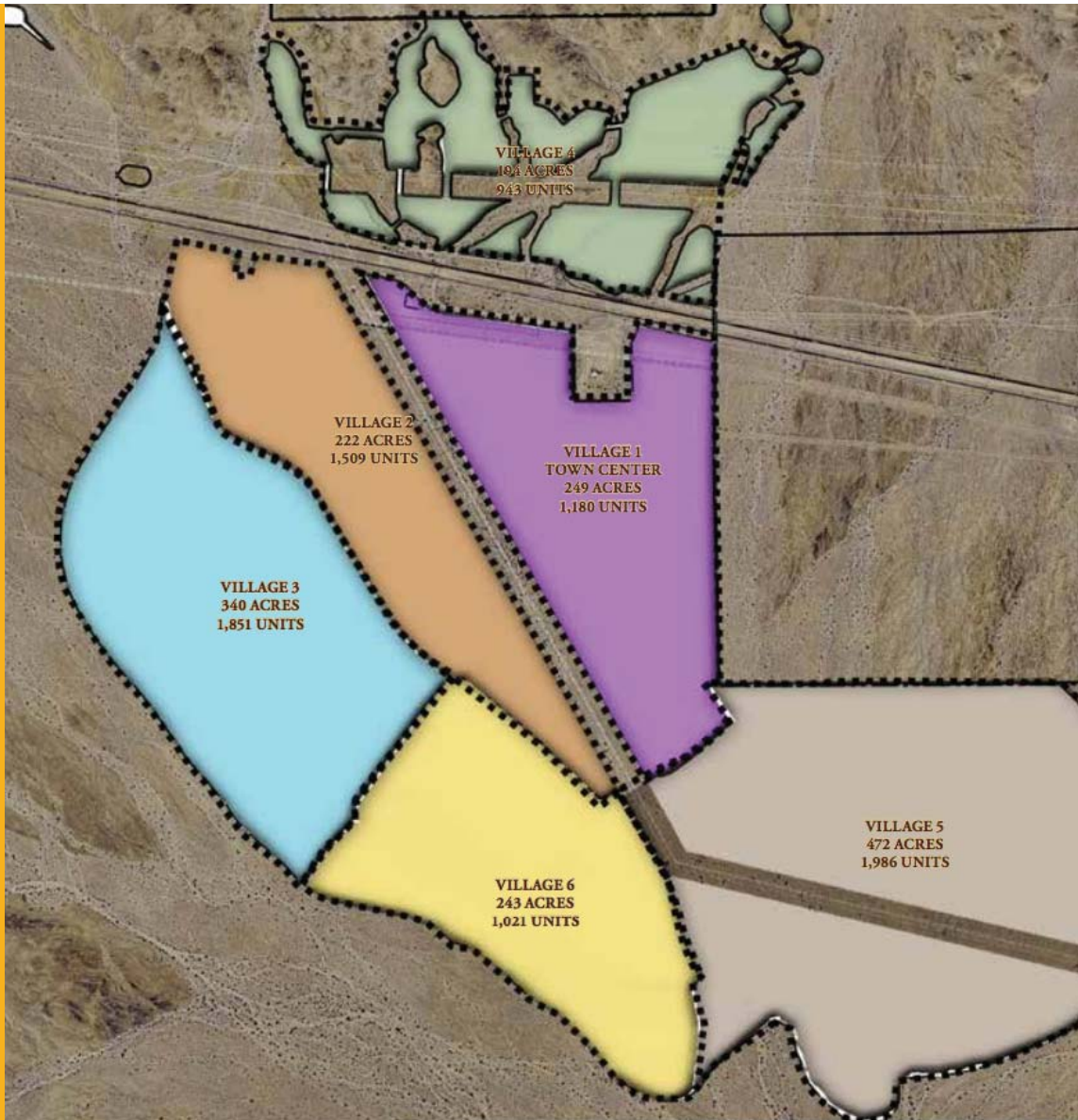
—*Smart Growth America, Complete Streets Local Policy Workbook, Spring 2013*





COMPLETE STREETS

- Paradise Valley incorporates Complete Street elements with emphasis on:
 - **A network of sustainable transportation options** that reduce vehicular use and promote walkability and connectivity
 - **Safety of movement** for pedestrians, bicycles, neighborhood electric vehicles (NEVs) and automobiles throughout the community
 - **Comprehensive, on-road striped Class II bicycle and NEV lane** on the backbone circulation system



THE SIX VILLAGES

Each village with its own identity differentiated by their distinct function, lifestyle, physical setting, mix of uses and home types.

Village 1 – *Town Center*

Village 2 – *The Resort Area*

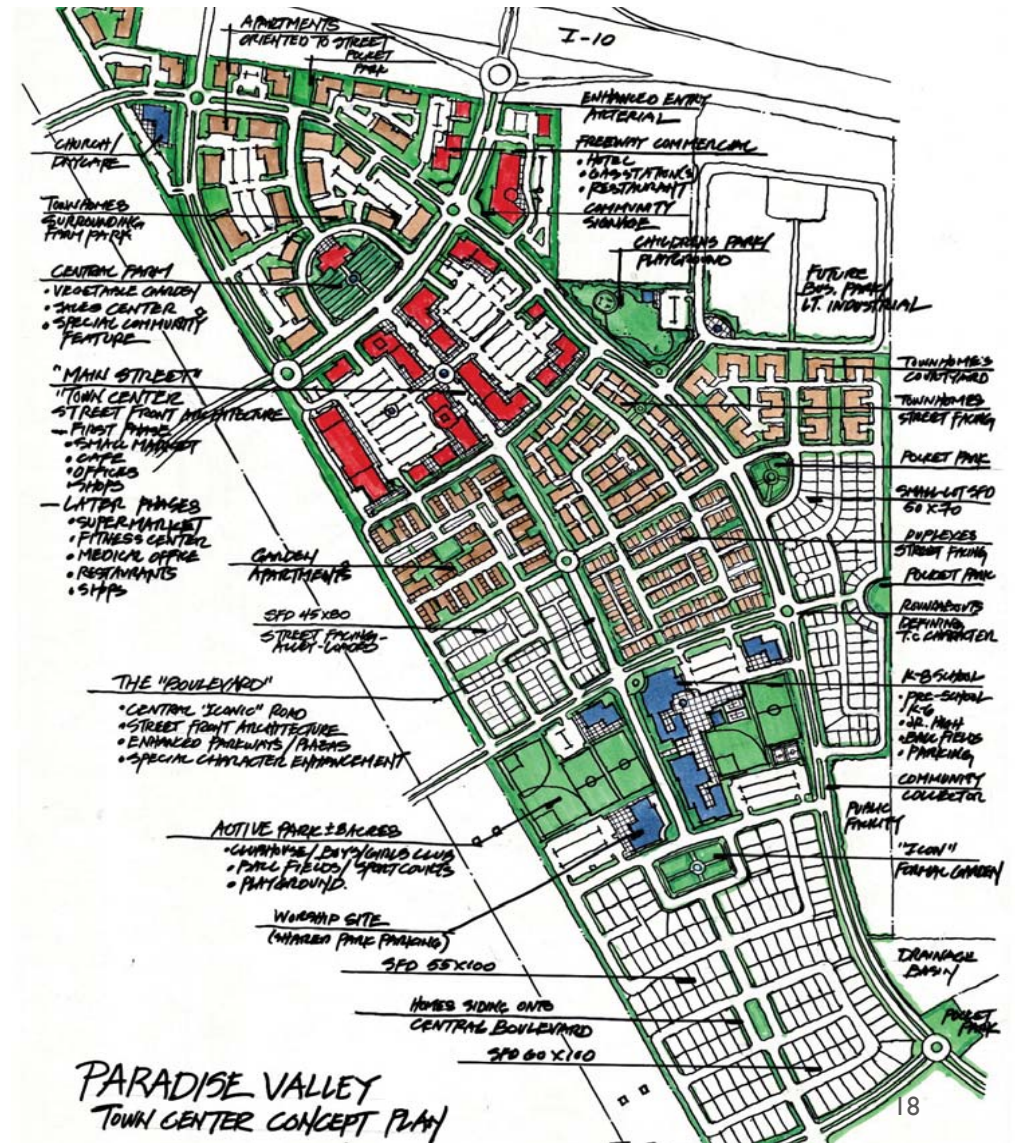
Village 3 – *Age Restricted Community*

Village 4 – *The Hillside Area*

Village 5 – *The Family Village*

Village 6 – *The Family and Pre-Retiree Village*

TOWN CENTER VISION & ELEMENTS





RESIDENTIAL: MEDIUM TO HIGHEST DENSITY



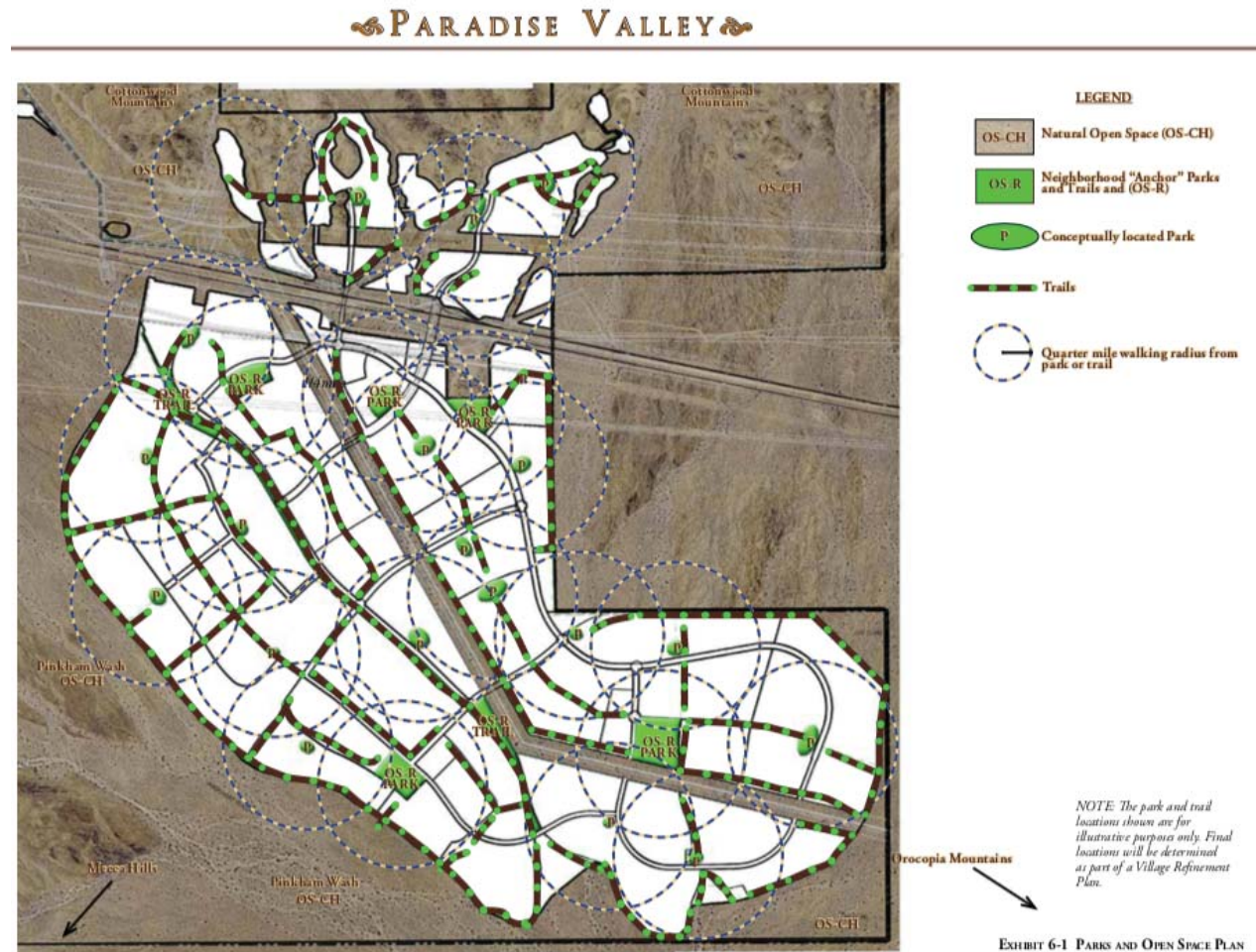
MIXED USE AND COMMERCIAL

PARKS & OPEN SPACE PLAN

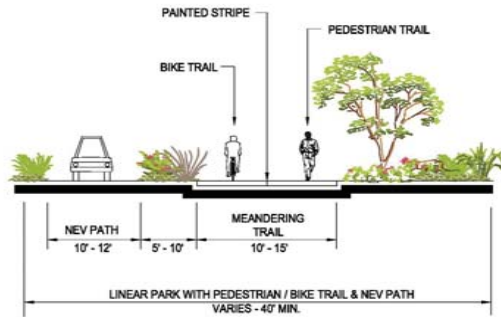
The PVSP will satisfy park requirements through a combination of dedicated “anchor” parks and trails.

Parks and trails are conceptually located for convenience throughout each village and **within ¼ mile of all homes.**

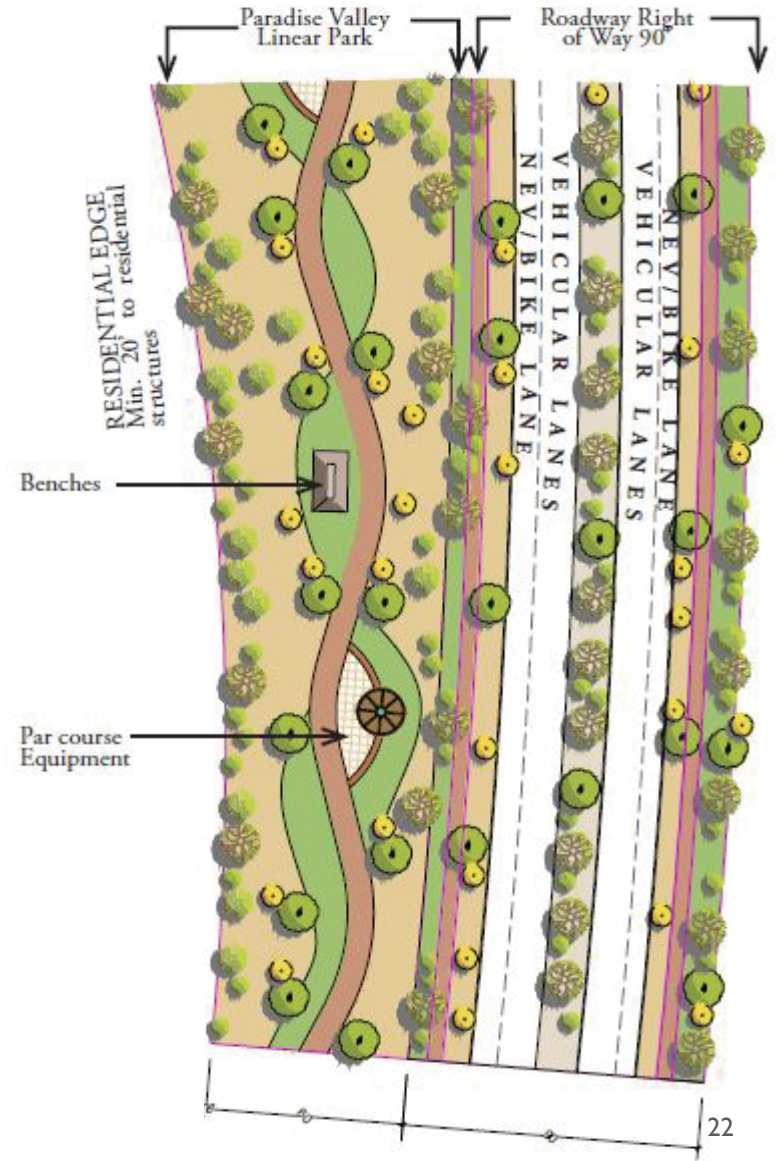
Specific recreational components will foster connectivity and contain both **active and passive uses.**



PARKS & OPEN SPACE PLAN



Linear Park



TRAILS PLAN

Trails and linear parks encourage walking, biking and other alternative modes of mobility promoting good health and reducing parking demand. Community trails are conceptually located to traverse the PVSP area linking residents to shopping, entertainment, schools and other uses.

PARADISE VALLEY



- LEGEND
- PARADISE VALLEY LINEAR PARK
 - PERIMETER TRAIL
 - NEIGHBORHOOD TRAIL
 - VILLAGE CORE
 - CONNECTION TO PUBLIC TRAIL

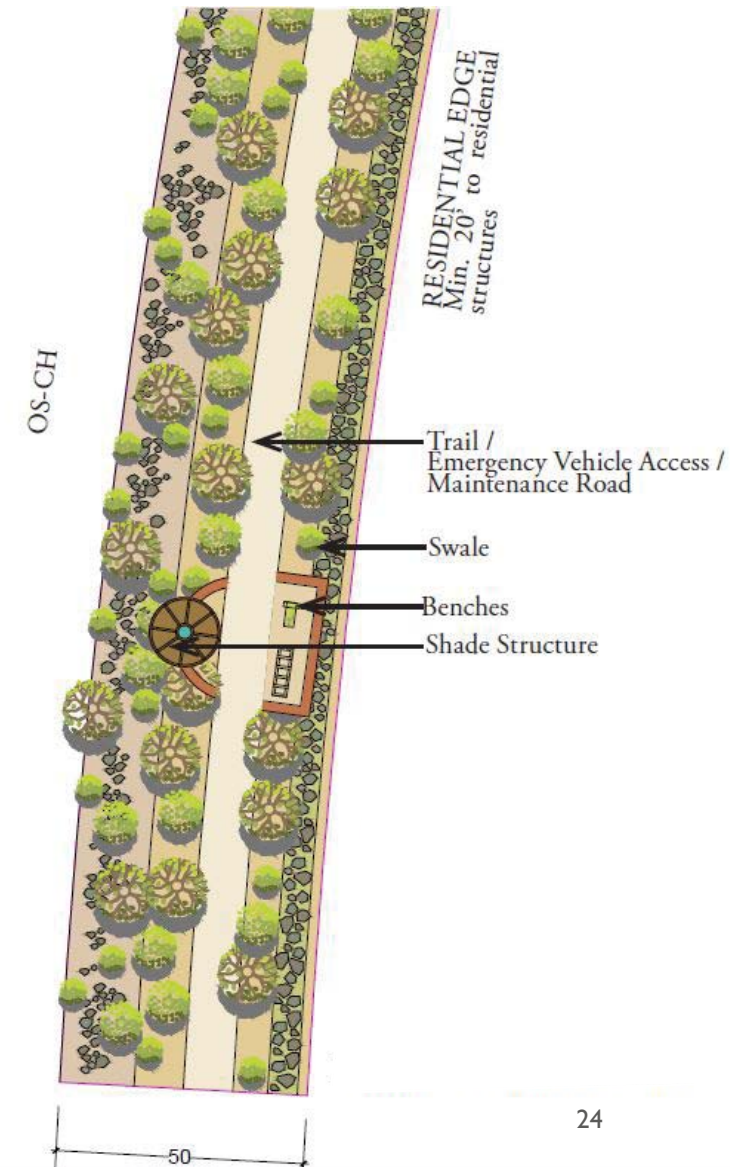
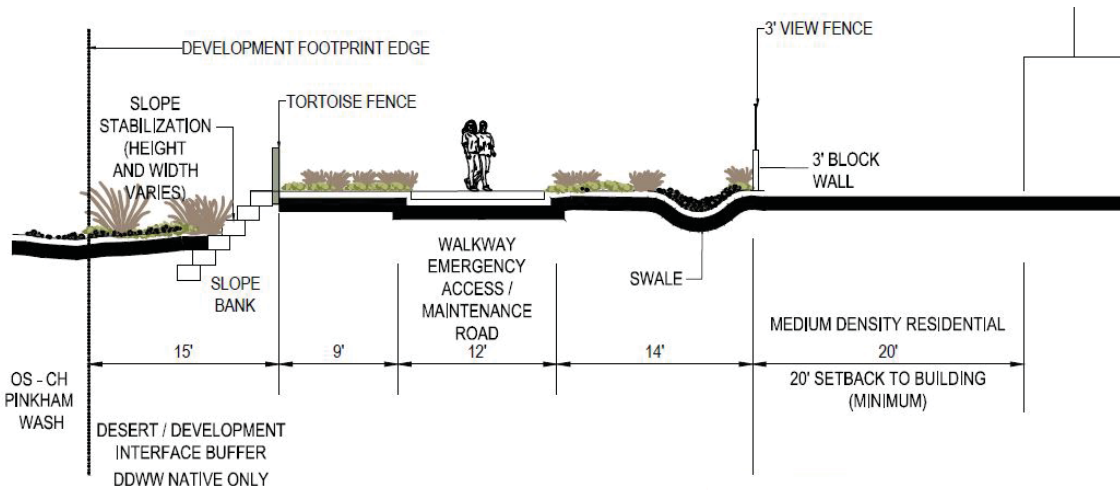
NOTE: The park and trail locations shown are for illustrative purposes only. Final locations will be determined at the time of subdivision mapping.

PERIMETER TRAIL AND BUFFER ZONE

The transition zone to conservation open space will include **only native plantings**.

Tortoise fencing will be included as set forth in the CVMSHCP.

Additionally, there will be **strict, enforceable leash policies regarding pets**.



CONSERVATION DEDICATION



Paradise Valley is a “**Conservation Development.**”



Over 21,000 acres of sensitive habitat including 3,100 acres on-site **would be conserved in perpetuity** as natural open space.



The development of Paradise Valley will result in a **conservation dedication** which will help the CVMSHCP Desert Tortoise Linkage Conservation Area achieve **one-half of its 75-year goal** for obtaining private lands.



Limit edge effects consistent with CVMSHCP Land Use Adjacency Guidelines.

BY THE NUMBERS



4,700 permanent jobs



More than 18,000 construction-related jobs



On-site jobs will provide employment opportunities for up to 84% of the project's residents



Project is fiscally self-sustaining and is expected to yield a new net annual surplus at buildout of approximately 5.7M

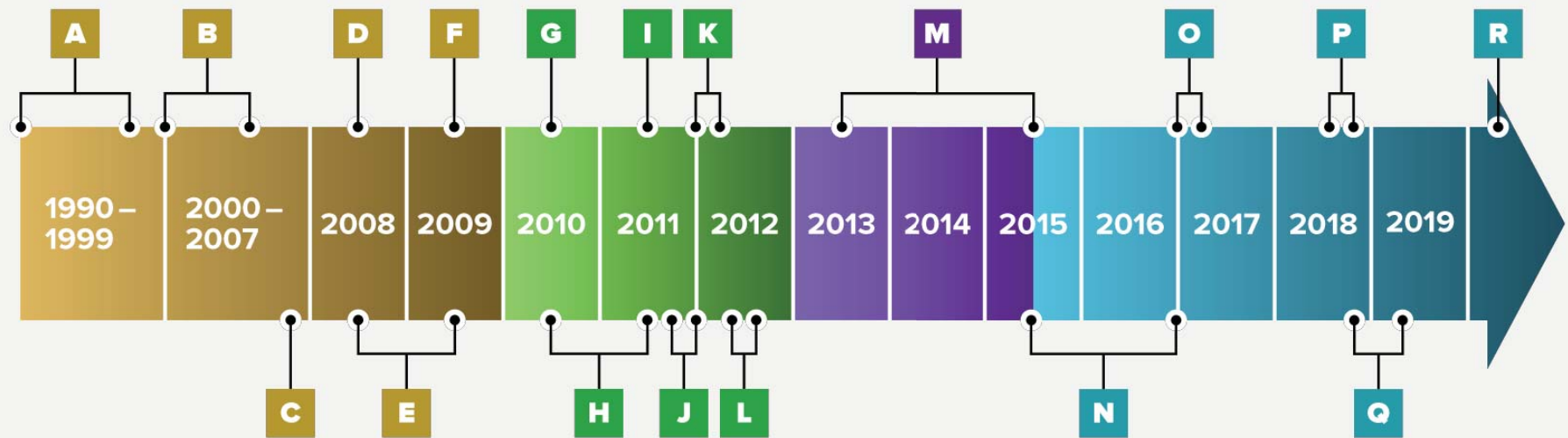


REGULATORY CONTEXT

MULTIPLE SPECIES HABITAT CONSERVATION PLAN

- The MSHCP was written with the understanding that:
 - 8% of the lands within the MSHCP Area boundary could be developed; and
 - 92% of the lands within the MSHCP Area boundary would be conserved as natural open space.
- PV's conservation dedication requirement will ultimately provide over 21,000 acres to be conserved within the MSHCP, which is approximately one-half of the MSCHP's 75-year goal for conservation acreage within the Desert Tortoise Linkage Conservation Area.

CURRENT PROCESS TIMELINE



- A** GLC Acquires Properties
1990–1998
- B** Water & Wildlife Negotiations
2000–2005
- C** Original Specific Plan Developed
2007
- D** CVMSHCP Adopted
2008
- E** Draft EIR for Original Specific Plan Prepared
2008–2009
- F** Decision to Stop Processing Original Specific Plan
2009

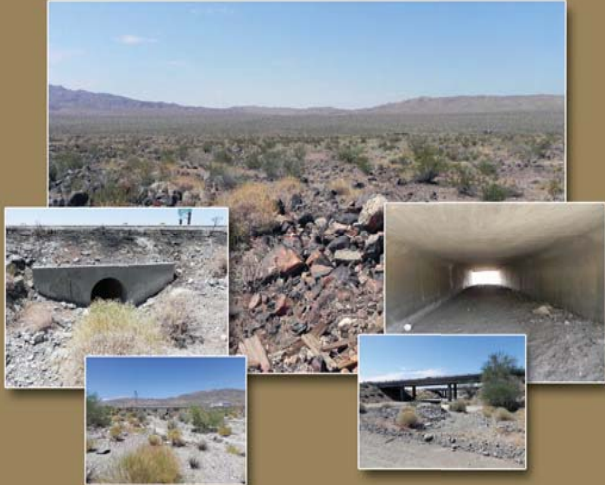
- G** Development of CVMSHCP Constraints Analysis
2010
- H** Pre-JPR Design Consultation
2010–2011
- I** Development Footprint Revisions per CVCC/Wildlife Agency Comments
2011
- J** JPR Process for Revised Development Footprint
June–December 2011
- K** Development Footprint Revisions per JPR Process Comments
January–April 2012
- L** JPR Process for Further Revised Development Footprint
April–September 2012

- M** Preparation of Current Specific Plan
2013–2015
- N** Preparation of Draft EIR
2015–January 2, 2017
- O** Draft EIR Public Circulation
January–February 15, 2017; extended to March 19, 2017
- P** Final EIR Public Circulation
November 1–December 1, 2018
- Q** Planning Commission Hearings
December 2018–May 2019
- R** BOS Project
Timing TBD


2010 JPR PROCESS FOR PROJECT/PROGRAMMATIC ENTITLEMENTS

- February 23, 2010 - CVMSHCP Meeting with Riverside County
- May 4, 2010 – Meeting with CVCC at Riverside County
- May 21, 2010 – Meeting with USFWS
- May 26, 2010 – Conference call with USFWS
- June 1, 2010 – Meeting with CVCC, Wildlife Agencies and County
- September 16, 2010 – JPR Document provided to Riverside County
- November 23, 2010 – Meeting with Riverside County regarding JPR
- December 28, 2010 – Meeting with Riverside County (Ken Baez)
- February 9, 2011 - Meeting with CVCC and Wildlife Agencies
- March 24, 2011 - Meeting on-site with Carol Roberts (CDFW) and Katie Barrows
- April 13, 2011 - Meeting at Riverside County

Paradise Valley Specific Plan
Joint Project Review Process Application
Quantitative and Qualitative Biological Assessment of Potential Impacts
Coachella Valley MSHCP Desert Tortoise and Linkage Conservation Area Biological Corridors



PREPARED FOR:
GLC Enterprises, LLC
21700 Copley Drive, #130, Diamond Bar, CA 91765
(909) 860-3107

PREPARED BY:

Envicom Corporation
28328 Agoura Road, Agoura Hills, California 91301
(818) 879-4700

2011 JPR PROCESS FOR PROJECT/PROGRAMMATIC ENTITLEMENTS


- June 17, 2011 – JPR Document Submitted to Riverside County
- June 27, 2011 - Meeting with Greg Neal and Ken Baez
- July 14, 2011 - JPR Application Submittal
- August 2, 2011 - JPR Application Deemed Complete by Riverside County
- September 2, 2011 - End 30-day CVCC JPR review
- September 12, 2011 – CVCC Issues JPR Process Comment Letter
- September 15, 2011 - Wildlife Agencies Comments on CVCC JPR analysis due
- October 12, 2011 - Meeting at Riverside County
- October 17, 2011 - Meeting at CVCC
- November 17, 2011 – CDFW provides comments on JPR application
- December 1, 2011 - Meeting with Riverside County to discuss JPR issues

**Paradise Valley
Specific Plan**

JOINT PROJECT REVIEW PROCESS – FORMAL APPLICATION

Assessment of Potential Impacts and Consistency with Coachella Valley MSHCP
Desert Tortoise and Linkage Conservation Area Conservation Objectives

PREPARED FOR:
GLC Enterprises, LLC
21700 Copley Drive, #130
Diamond Bar, California 91765
(909) 860-3107

PREPARED BY:

Envicom Corporation
28328 Agoura Road
Agoura Hills, California 91301
Contact: Mr. Travis Cullen, Chief Operating Officer
(818) 879-4700

June 17, 2011

2012 JPR PROCESS FOR PROJECT/PROGRAMMATIC ENTITLEMENTS


- March 7, 2012 - Meeting with County regarding Updated JPR Analysis
- April 6, 2012 - JPR Application submitted to County
- May 9, 2012 - JPR Review Process Started
- June 9, 2012 - CVCC 30-day review process end
- June 9, 2012 - End 30-day CVCC JPR review due
- July 6, 2012 - CVCC comment letter received.
- July 17, 2012 - Meeting with Riverside County regarding CVCC Meeting
- August 6, 2012 - Wildlife Agencies Comments Due
- August 16, 2012 – Wildlife Agencies Comments provided by CVCC
- August 23, 2012 - Meeting with Riverside County Biologist
- September 4, 2012 - JPR Meeting with CVCC
- September 5, 2012 - County Deems JPR process complete
- September 19, 2012 – CVCC Issues JPR Letter

**Paradise Valley
Specific Plan**

JOINT PROJECT REVIEW PROCESS – FORMAL APPLICATION

Assessment of Consistency with Coachella Valley MSHCP
Desert Tortoise and Linkage Conservation Area Conservation Objectives

PREPARED FOR:
GLC Enterprises, LLC
21700 Copley Drive, #130
Diamond Bar, California 91765
(909) 860-3107

PREPARED BY:

Envicom Corporation
28328 Agoura Road
Agoura Hills, California 91301
(818) 879-4700

April 3, 2012

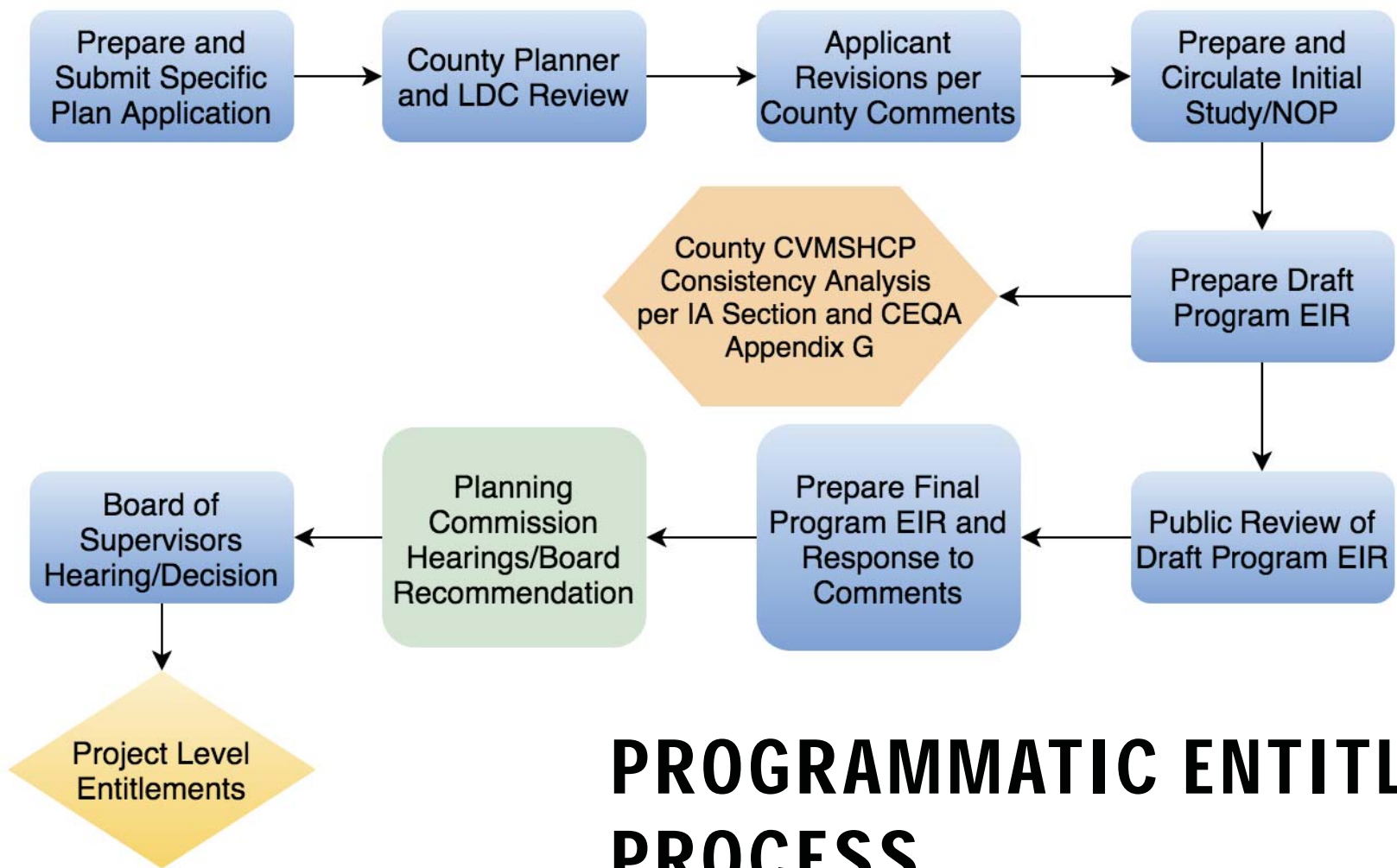
CVMSHCP: PROGRAM v. PROJECT

Programmatic Entitlements

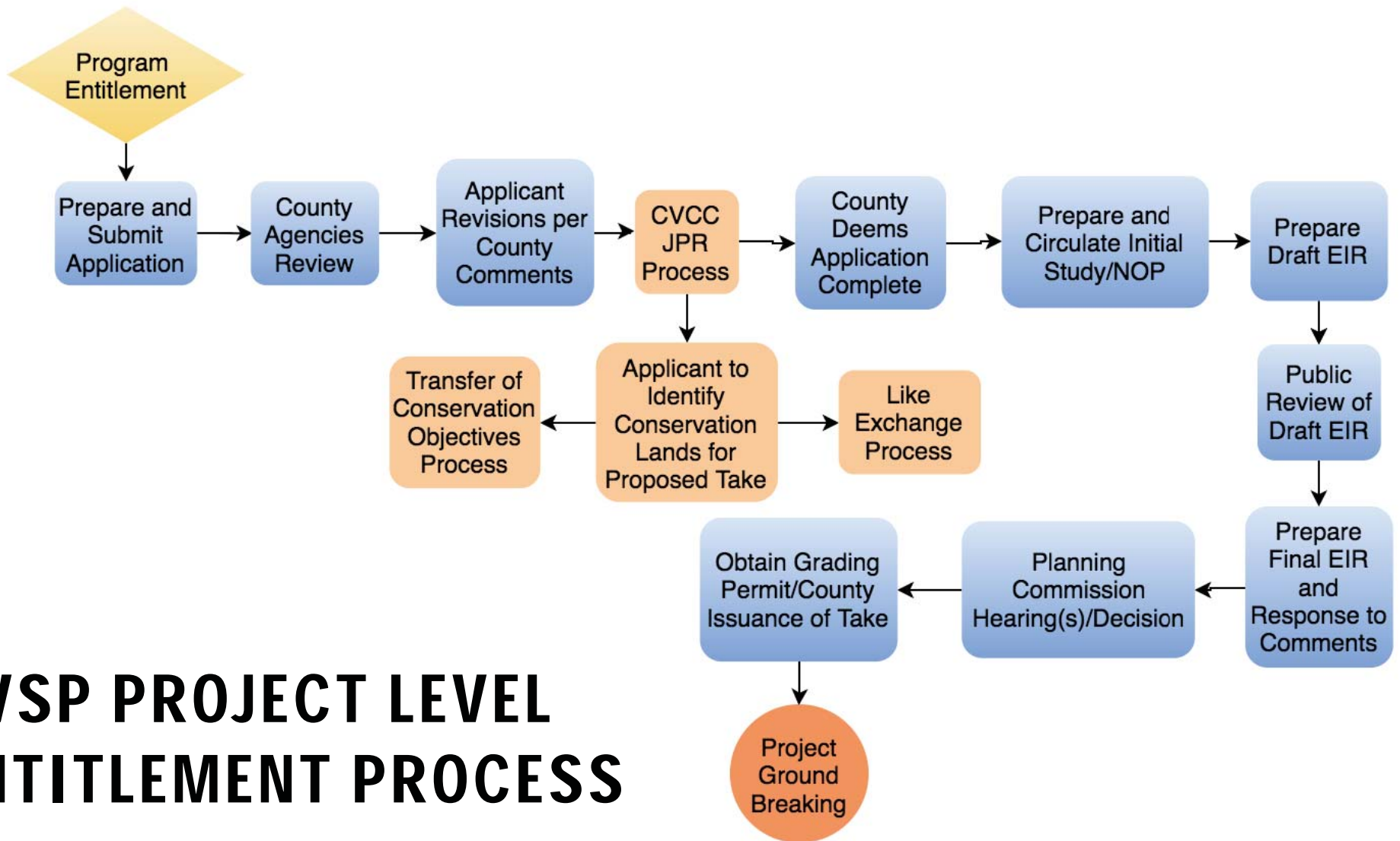
- Entitlements will not result in ground disturbance therefore JPR process is **not** required
- MSHCP consistency analysis provided in EIR

Project Entitlements

- Entitlements will result in Take or disturbance to habitat, natural communities, biological corridors or essential ecological processes therefore JPR process required

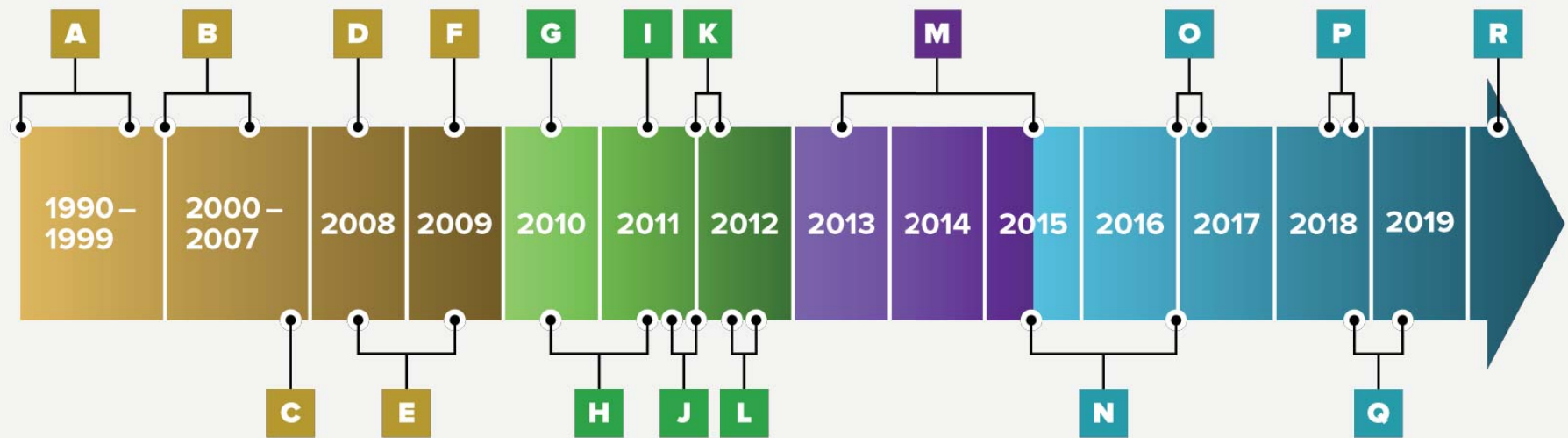


PROGRAMMATIC ENTITLEMENT PROCESS



PVSP PROJECT LEVEL ENTITLEMENT PROCESS

CURRENT PROCESS TIMELINE



- A** GLC Acquires Properties
1990–1998
- B** Water & Wildlife Negotiations
2000–2005
- C** Original Specific Plan Developed
2007
- D** CVMSHCP Adopted
2008
- E** Draft EIR for Original Specific Plan Prepared
2008–2009
- F** Decision to Stop Processing Original Specific Plan
2009

- G** Development of CVMSHCP Constraints Analysis
2010
- H** Pre-JPR Design Consultation
2010–2011
- I** Development Footprint Revisions per CVCC/Wildlife Agency Comments
2011
- J** JPR Process for Revised Development Footprint
June–December 2011
- K** Development Footprint Revisions per JPR Process Comments
January–April 2012
- L** JPR Process for Further Revised Development Footprint
April–September 2012

- M** Preparation of Current Specific Plan
2013–2015
- N** Preparation of Draft EIR
2015–January 2, 2017
- O** Draft EIR Public Circulation
January–February 15, 2017; extended to March 19, 2017
- P** Final EIR Public Circulation
November 1–December 1, 2018
- Q** Planning Commission Hearings
December 2018–May 2019
- R** BOS Project
Timing TBD

RESPONSE TO CVCC COMMENTS

- May 9, 2019 Memo Submitted by CVCC
- Inaccuracies and Misstatements in CVCC Memo
- GLC's Detailed Responses to CVCC Comments



COACHELLA VALLEY MSHCP & JPR PROCESS

CONTROLLING DOCUMENTS FOR THE CVMSHCP

There are two controlling documents which govern the CVMSHCP:

- The implementing agreement (the IA)
- The MSHCP

NATURE AND PURPOSE OF CVMSHCP

- The CVMSHCP is a Natural Community Conservation Plan prepared in accordance with:
 - Natural Community Conservation Planning Act
 - California Endangered Species Act (“CESA”), and
 - Federal Endangered Species Act Section 10(a)(1)(B) (“ESA”)
- Primary purpose of the CVMSHCP is to satisfy the legal requirements for issuance of Permits that will allow the take of species covered by the plan.

DEFINITION OF TAKE

- The ESA defines “Take” as:
 - To harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or to attempt to engage in any such conduct.
- The CESA similarly defines “Take” as:
 - Hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.
- By definition, “Take” requires physical conduct.
- Planning activities such as the County’s approval of a Specific Plan which does not permit ground disturbance would not result in “Take.”

TRIGGER FOR INCIDENTAL TAKE

- USFWS Guidance on Trigger for an Incidental Take Permit Under Section 10(a)(1)(B) dated April 26, 2018
 - Principal Deputy Director of USFWS clarified, “...a Section 10(a)(1)(B) incidental take permit is only needed in situations where a non-federal project is likely to result in “take” of a listed species of fish or wildlife.”
- Chapter 3 of the USFWS Habitat Conservation Plan Handbook clarifies
 - “the standard for determining if activities are likely to result in incidental take is whether that take is ‘reasonably certain to occur.’”
- Unlike other Specific Plans, Take is not reasonably certain to occur as a result of the programmatic approvals being sought by the Paradise Valley SP.
- Take will not occur until later implementing projects have completed a JPR process, project level CEQA analysis, and discretionary project level entitlements are approved.

IMPLEMENTING AGREEMENT SECTION 7.5 CONSISTENCY ANALYSIS

- *“7.5 Review of Development Proposals in Conservation Areas. As set forth in Section 4.3 of the MSHCP, Development in Conservation Areas will be limited to uses that are compatible with the Conservation Objectives for the specific Conservation Area. **Discretionary Projects in Conservation Areas**, other than second units on parcels with an existing residence **shall be required to assess the project’s ability to meet the Conservation Objectives in the Conservation Area**. Additionally, the Permittees will participate in the Joint Project Review Process set forth in Section 6.6.1.1 of the MSHCP.”*
- Section 7.5 of the IA requires the County as the permittee to assess the project’s consistency with the Conservation Objectives.
- This requirement of the County is separate from the CVCC’s requirement to complete the JPR process.
- **The JPR process is not required until entitlements are requested that would result in disturbance, per CVMSHCP Section 6.6.1.1.**

WHEN IS THE CVMSHCP JPR PROCESS REQUIRED?

- “**6.6.1.1 Joint Project Review Process within Conservation Areas** For Purposes of overseeing compliance with the requirements of the MSHCP and the IA, **a Joint Project Review Process shall be instituted by CVCC for all projects under the Local Permittees’ jurisdiction in a conservation area that would result in disturbance to Habitat, natural communities, Biological Corridors, or Essential Ecological Processes...**”
- Section 6.6.1.1 requires a JPR process **only** for projects that would result in Take or disturbance to Habitat, natural communities, Biological Corridors or Essential Ecological Processes.
- Under section 17.2 of the IA, Take authorization shall occur upon issuance of a grading permit.
- No grading permit, building permit, or subdivision map is being requested as part of the PVSP. The programmatic entitlements requested for the PVSP would not result in disturbance, **therefore JPR is not required at this stage.**
- Subsequent Implementing Projects **would** result in disturbance and **will have to** complete a JPR process.

TIMING FOR CVMESHCP CONSISTENCY ANALYSIS VS. CVCC JPR PROCESS

| | County CVMESHCP Consistency Analysis per IA Section 7.5 and CEQA Appendix G | CVCC JPR Process |
|---|---|---|
| Programmatic Entitlement (no request for Take Authorization or disturbance) | Yes. Provided in PVSP Final EIR | Not applicable because Take Authorization/disturbance not requested |
| Implementing Projects (request for Take Authorization) | Yes. To be provided in Project Level EIR(s) | Yes, prior to County deeming application complete |

NO DISTURBANCE PRIOR TO JPR AND ISSUANCE OF TAKE AUTHORIZATION

“MM BIO-1 CVMSHCP Take Permit. Prior to the County deeming an application complete for any implementing project that will result in any ground disturbance, vegetation removal, grading, or actual development including construction activities, the Applicant, in consultation with the Riverside County Planning Department shall complete a JPR process pursuant to the requirements of CVMHSCP Section 6.6.1.1 or provide evidence that the implementing project was addressed in a previously completed JPR process. Additionally, the Applicant shall obtain Take authorization from the County under the CVMSHCP for the Covered Species within the area to be developed pursuant to the project-level entitlement. To obtain authorization, the Applicant shall conserve sufficient mitigation lands through the methods allowed under the CVMSHCP to compensate for the impacts consistent with the requirements of the Desert Tortoise Linkage Conservation Area (DTLCA) and Mecca Hills/Orocopia Mountains Conservation Area (MHOMCA) Conservation Objectives, Required Measures, and Land Use Adjacency Guidelines.”

NO DISTURBANCE PRIOR TO JPR AND ISSUANCE OF TAKE AUTHORIZATION

- Mitigation Measure BIO-1 makes it clear that:
 - a JPR process must be completed prior to the County deeming the application complete for any implementing project that will result in disturbance of any type; and
 - The applicant must obtain take authorization from the County and conserve sufficient mitigation lands to maintain consistency with the CVMSHCP Conservation Objectives through the methods allowed under the CVMSHCP.
- Mitigation Measure BIO-1 will ensure that each implementing development project within the PVSP will maintain consistency with the CVMSHCP.

PVSP FINAL EIR CVMSHCP CONSISTENCY ANALYSIS

In order to comply with CEQA and IA Section 7.5 the PVSP Final EIR Biological Resources Section includes:

- a detailed consistency analysis with the DTLCA and MHOMCA Conservation Objectives which documents that the PVSP would be consistent with and would have the ability to meet the Conservation Objectives of the CVMSHCP; and
- 34 pages are dedicated to the Consistency Analysis.

KEY TAKEAWAY

1

The JPR process is not required until entitlements are requested that would result in ground disturbance.

KEY TAKEAWAY

2

For Programmatic Entitlements:
the County is only required to assess the project's consistency with the Conservation Objectives.

KEY TAKEAWAY

3

This requirement is separate from the CVCC's requirement to complete the JPR process for approvals that would result in ground disturbance.

KEY TAKEAWAY

4

MM BIO-I will ensure that each implementing development project (resulting in ground disturbance) will complete a JPR process and maintain consistency with the CVMSHCP.

FOUR KEY TAKEAWAYS

1

The JPR process is not required until entitlements are requested that would result in ground disturbance.

2

For Programmatic Entitlements: the County is only required to assess the project's consistency with the Conservation Objectives.

3

This requirement is separate from the CVCC's requirement to complete the JPR process for approvals that would result in ground disturbance.

4

MM BIO-1 will ensure that each implementing development project (resulting in ground disturbance) will complete a JPR process and maintain consistency with the CVMSHCP.



RESPONSE TO COMMENTS

WATER



The project's complete water system is designed to not impact other jurisdictions.



The project has contracted for a 121-year supply of replenishment water with 36 years-worth already pre-delivered and in storage for the project.



The Shavers Valley groundwater basin—fully charged with nearly 2.6 million-acre feet of groundwater—will be used to store and recapture water.



Every aspect of the system is oriented towards water conservation, placing our projected per capita usage below 18% of the Coachella Valley's goal.

DARK SKY PRESERVATION



The project sees the protection of night sky visibility not only as a way to protect the Joshua Tree National Park night sky, but as a highly positive attribute of the community and for the future residents that will live there.



Implementation of the PVSP dark sky guidelines will be consistent with the mission statement of the international dark-sky association: “...to *preserve and protect the nighttime environment and our heritage of dark skies through quality outdoor lighting.*”



The dark sky guidelines will apply to residential uses and the overall project, commercial uses, recreational uses, signage and street lights.





RESPONSE TO COMMENTS