RIVERSIDE COUNTY
PLANNING DEPARTMENT

9:30 A.M. **AUGUST 21, 2019**

AGENDA
REGULAR MEETING
RIVERSIDE COUNTY PLANNING COMMISSION
STEVE ROBBINS ADMINISTRATION BUILDING
Coachella Valley Water District - Administration Board Room
75515 Hovley Lane East, Palm Desert, CA 92211
Teleconference Location: 7908 NE Loowit Loop #52, Vancouver, WA 98662

Planning Commissioners 2019

1st District
Carl Bruce Shaffer

2nd District
Aaron Hake

3rd District
Ruthanne Taylor-Berger

4th District
Bill Sanchez
Chairman

5th District
Eric Kroencke
Vice-Chairman

Assistant TLMA Director
Charissa Leach, P.E.

Legal Counsel
Michelle Clack
Deputy County Counsel

Any person wishing to speak must complete a "SPEAKER IDENTIFICATION FORM" and submit it to the Hearing Secretary. The purpose of the public hearing is to allow interested parties to express their concerns. Please do not repeat information already given. If you have no additional information, but wish to be on record, simply provide your name and address and state that you agree with the previous speaker(s).

Any person wishing to make a presentation that includes printed material, video or another form of electronic media must provide the material to the Project Planner at least 48 hours prior to the meeting.

In compliance with the Americans with Disabilities Act, if you require reasonable accommodations please contact Elizabeth Sarabia, TLMA Commission Secretary, at (951) 955-7436 or e-mail at esarabia@rivco.org. Requests should be made at least 72 hours prior to the scheduled meeting. Alternative formats are available upon request.

CALL TO ORDER:
SALUTE TO THE FLAG – ROLL CALL

1.0 CONSENT CALENDAR: 9:30 a.m. or as soon as possible thereafter (Presentation available upon Commissioners' request)

NONE

2.0 GENERAL PLAN AMENDMENT INITIATION PROCEEDINGS: 9:30 a.m. or as soon as possible thereafter (Presentation available upon Commissioners' request)

NONE

3.0 PUBLIC HEARING – CONTINUED ITEMS: 9:30 a.m. or as soon as possible thereafter.

3.1 **SPECIFIC PLAN NO. 339, GENERAL PLAN AMENDMENT NO. 686, CHANGE OF ZONE NO. 6915 – Intent to Certify an Environmental Impact Report** – EIR00506 – Applicant: GLC Enterprises, LLC – Specific Plan Representative: Danielan Associates – CEQA Consultant: Envicom Corporation – Engineer: KWC Engineers – Fourth Supervisorial District – Chuckwalla Zoning Area – Eastern Coachella Valley Area Plan – Open Space: Rural (OS-RUR) – Location: Westerly of Cotton Springs Road, northerly of Box Canyon Road, easterly of Interstate 10 Cactus City Rest Area, and southerly of Joshua Tree National Park, on either side of Interstate 10 – Zoning: Controlled Development Areas – 10 Acre Minimum (W-2-10) – Natural Assets (N-A) – **REQUEST: Specific Plan No. 339** is a proposal to establish a Specific Plan which would allow for a maximum of 8,490 dwelling units and up to 1.38 million sq. ft. of non-residential uses within an approximately 1,848 acre development footprint divided between six (6) villages within an overall 5,000 acre Specific Plan area. **General Plan Amendment No. 686** is a proposal for a General Plan Foundation Component Amendment and General Plan Entitlement/Policy Amendment to change the underlying Foundation from Open Space to Community Development and change the land use designation from Open Space: Rural (OS-RUR) to those as reflected in the Specific Plan land use plan, which includes Open Space-Conservation Habitat (OS-CH), Open Space-Recreation (OS-R), Mixed Use (MU), Commercial Retail (CR), Medium Density Residential (MDR), Medium High Density Residential (MHDR), High Density Residential (HDR), Highest Density Residential (HHDR), and Public Facilities (PF) designations. **Change of Zone No. 6915** is a proposal to change the zoning classification of the subject site from a mix of Controlled Development Areas, 10 Acre Minimum (W-2-10) and Natural Assets (N-A) to Specific Plan (SP) and adopt a Specific Plan zoning ordinance to establish the permitted uses and development standards for the Specific Plan Planning Areas.

Environmental Impact Report No. 506 studies the impacts of the project. Continued from November 28, 2018, December 5, 2018, January 30, 2019, and June 5, 2019. Project Planner: Russell Brady at (951) 955-3025 or email at rbrady@rivco.org.

4.0 PUBLIC HEARING – NEW ITEMS: 9:30 a.m. or as soon as possible thereafter

NONE

5.0 WORKSHOPS:

NONE

6.0 ORAL COMMUNICATION ON ANY MATTER NOT ON THE AGENDA

7.0 DIRECTOR'S REPORT

8.0 COMMISSIONERS' COMMENTS

COUNTY OF RIVERSIDE PLANNING DEPARTMENT STAFF REPORT

Agenda Item No.

3.1

Planning Commission Hearing: August 21, 2019

PROPOSED PROJECT

Case Number(s):	Specific Plan No. 339, General Plan Amendment No. 686, Change of Zone No. 6915
EIR No.:	506
Area Plan:	Eastern Coachella Valley
Zoning Area/District:	Chuckawalla Area
Supervisorial District:	Fourth District
Project Planner:	Russell Brady
Continued from:	November 28, 2018, December 5, 2018, January 30, 2019, May 15, 2019, and June 5, 2019
Project APN(s):	713-031-004, 713-031-005, 713-031-006, 713-032-001, 713-040-002, 713-040-003, 713-040-004, 713-040-005, 713-040-006, 713-040-007, 713-050-002, 713-060-001, 713-060-002, 713-060-003, 713-060-004, 713-072-001, 713-072-005

Applicant(s): GLC Enterprises LLC

Representative(s): Envicom Corporation

Danielian Associates

KWC Engineers

Charissa Leach, P.E.
Assistant TLMA Director

PROJECT DESCRIPTION AND LOCATION

SPECIFIC PLAN NO. 339 is a proposal to establish a Specific Plan which would allow for a maximum of 8,490 dwelling units and up to 1.38 million square feet of non-residential uses within an approximately 1,848-acre development footprint divided between 6 Villages within an overall 5,000-acre Specific Plan area. Land use designations proposed by the Specific Plan include Residential, Commercial Retail, Mixed Use, Public Facilities, Open Space-Recreation, and Open Space-Conservation Habitat.

The Specific Plan area is located east of the greater Coachella Valley on either side of Interstate-10 in an area known as Shavers Valley, generally located 8 miles east of the City of Coachella (generally 15 miles from the closest interchange in Coachella at Dillon Road to the project's interchange) and 10 miles west of Chiriaco Summit. The project abuts the southern boundary of the Joshua Tree National Park. The Mecca Hills bound the site on the south and west and the Orocopia Mountains are located to the southeast.

Access from Interstate-10 to the project site is provided by an existing interchange with Frontage Road with on- and off-ramps.

The project site is located within the Desert Tortoise and Linkage Conservation Area of the Coachella Valley Multiple Species Habitat Conservation Plan.

The majority of the site, approximately 3,100 acres, is to be left as natural open space and designated as Open Space-Conservation.

The project is intended to be a largely self-sustaining community whereby future residents will have significant access to employment, retail and commercial, industrial uses, recreation, school, health care, and other supporting amenities within the project limits, limiting the need to commute out of the project area for these services.

The residentially designated areas within the Specific Plan include a range of residential categories from Medium Density Residential to Highest Density Residential with an overall density range of 2 to 20+ dwelling units per acre.

Of the 4 Mixed Use Planning Areas totaling approximately 177 acres, 3 Mixed Use Planning Areas could accommodate either residential or commercial development or a combination of residential and commercial and the other 1 Mixed Use Planning Area could accommodate either commercial or business park/industrial development.

A total of approximately 54.9 acres is designated for larger park areas throughout the development area, while additional smaller parks are anticipated to be developed within some of the planning areas as outlined in the Specific Plan.

Of the Public Facilities areas, 5 future school sites are conceptually designated and the remaining Public Facilities areas are anticipated to accommodate infrastructure for drainage, water wells, and electrical substations.

GENERAL PLAN AMENDMENT NO. 686 is a proposal for a General Plan Foundation Component Amendment and General Plan Entitlement/Policy Amendment.

The General Plan Foundation Component Amendment is a proposal to change the Foundation of the site in the Eastern Coachella Valley Area Plan from Open Space to Community Development and Open Space.

The General Plan Entitlement/Policy Amendment is a proposal to change the underlying land use designation in the Eastern Coachella Valley Area Plan from Open Space: Rural (OS:RUR) to the following land use designations::: Open Space-: Conservation Habitat as reflected on the Land Use Plan for Specific Plan No. 339 (OS:CH), Open Space: Recreation as reflected on the Land Use Plan for Specific Plan No. 339 (OS:R), Community Development: Mixed Use as reflected on the Land Use Plan for Specific Plan No. 339 (CD:MU), Community Development: Commercial Retail as reflected on the Land Use Plan for Specific Plan No. 339 (CD:CR), Community Development: Medium Density Residential as reflected on the Land Use Plan for Specific Plan No. 339 (CD: MDR), Community Development: Medium High Density Residential as reflected on the Land Use Plan for Specific Plan No. 339 (CD:MHDR), Community Development: High Density Residential as reflected on the Land Use Plan for Specific Plan No. 339 (CD:HDR), Community Development: Highest Density Residential as reflected on the Land Use Plan for Specific Plan No. 339 (CD:HHDR), and Community Development: Public Facilities as reflected on the Land Use Plan for Specific Plan No. 339 (CD:PF).

CHANGE OF ZONE NO. 6915 is a proposal to change the zoning classification of the subject site from a mix of Controlled Development Areas, ten-acre minimum (W-2-10) and Natural Assets (N-A) to Specific

Plan (SP) and adopt a Specific Plan zoning ordinance to establish the permitted uses and development standards for the Specific Plan Planning Areas.

All of the above discretionary legislative actions are hereinafter referred to as the "Project."

ENVIRONMENTAL IMPACT REPORT NO. 506 studies the impacts of the project.

PROJECT RECOMMENDATION

STAFF RECOMMENDATIONS:

DIRECT STAFF TO PREPARE FINDINGS AND A RECOMMENDATION FOR DENIAL TO BE SENT TO THE BOARD OF SUPERVISORS consistent with and based on the significant concerns noted in this staff report, testimony and questions raised at the Planning Commission Hearings, and Planning Commission deliberations on the Project;

OR

CONTINUE OFF-CALENDAR and request that the Applicant address the concerns stated herein and any other items discussed at this Hearing and at prior Planning Commission Hearings, work with staff to make further revisions to the project to address these concerns, and bring the project back to the Planning Commission for future consideration. This may potentially require re-circulation of the environmental document for public review.

PROJECT DATA

Land Use and Zoning:

Existing Specific Plan:	None
Proposed Specific Plan	339
Existing General Plan Foundation Component:	Open Space
Proposed General Plan Foundation Component:	Community Development and Open Space
Existing General Plan Land Use Designation:	Open Space: Rural as reflected on the Land Use Plan for Specific Plan No. 339 (OS:RUR)
Proposed General Plan Land Use Designation:	Multiple land use designations, consisting of: Open Space: Conservation Habitat (OS:CH), Open Space: Recreation (OS:R), Community Development: Mixed Use (CD:MU), Community Development: Commercial Retail (CD:CR), Community Development: Medium Density Residential (CD:MDR), Community Development: Medium High Density Residential (CD:MHDR), Community Development: High Density Residential (CD: HDR), Community Development: Highest Density Residential (CD:HHDR), and Community Development: Public Facilities (CD:PF),

	each as reflected on the Land Use Plan for Specific Plan No. 339
Policy / Overlay Area:	N/A
Surrounding General Plan Land Uses	
North:	Open Space: Conservation Habitat (OS:CH) Open Space: Rural (OS:RUR)
East:	Open Space: Conservation Habitat (OS:CH) Open Space: Rural (OS:RUR)
South:	Open Space: Conservation Habitat (OS:CH) Open Space: Rural (OS:RUR)
West:	Open Space: Conservation Habitat (OS:CH) Open Space: Rural (OS:RUR)
Existing Zoning Classification:	Controlled Development Areas, ten-acre minimum (W-2-10), Natural Assets (N-A)
Proposed Zoning Classification:	Specific Plan (SP)
Surrounding Zoning Classifications	
North:	Controlled Development Areas, ten-acre minimum (W-2-10), Natural Assets (N-A)
East:	Controlled Development Areas, ten-acre minimum (W-2-10), Natural Assets (N-A)
South:	Controlled Development Areas, ten-acre minimum (W-2-10), Natural Assets (N-A)
West:	Controlled Development Areas, ten-acre minimum (W-2-10), Natural Assets (N-A)
Existing Use:	Vacant land, natural gas pipeline and compressor station, electrical transmission lines
Surrounding Uses	
North:	Vacant land, Joshua Tree National Park
South:	Vacant land
East:	Vacant land
West:	Vacant land

Project Details:

Item	*Value*	*Min./Max. Development Standard*
Project Site (acres):	5,000	N/A
Maximum Residential Units:	8,490	N/A
Maximum Non-Residential Area (sq. ft.):	1,380,000	N/A
Undevelopable area within Specific Plan (acres)	3,100	N/A

Located Within:

City's Sphere of Influence:	No
Community Service Area ("CSA"):	No
Special Flood Hazard Zone:	Yes, located partially within a 100-year floodplain
Agricultural Preserve:	No
Liquefaction Area:	Yes, moderate and low potential
Subsidence Area:	Yes, active and susceptible
Fault Zone:	No
Fire Zone:	No
Mount Palomar Observatory Lighting Zone:	No
WRCMSHCP Criteria Cell:	No
CVMSHCP Conservation Boundary:	Yes, Desert Tortoise and Linkage Conservation Area
Stephens Kangaroo Rat ("SKR") Fee Area:	No
Airport Influence Area ("AIA"):	No

PROJECT LOCATION MAP

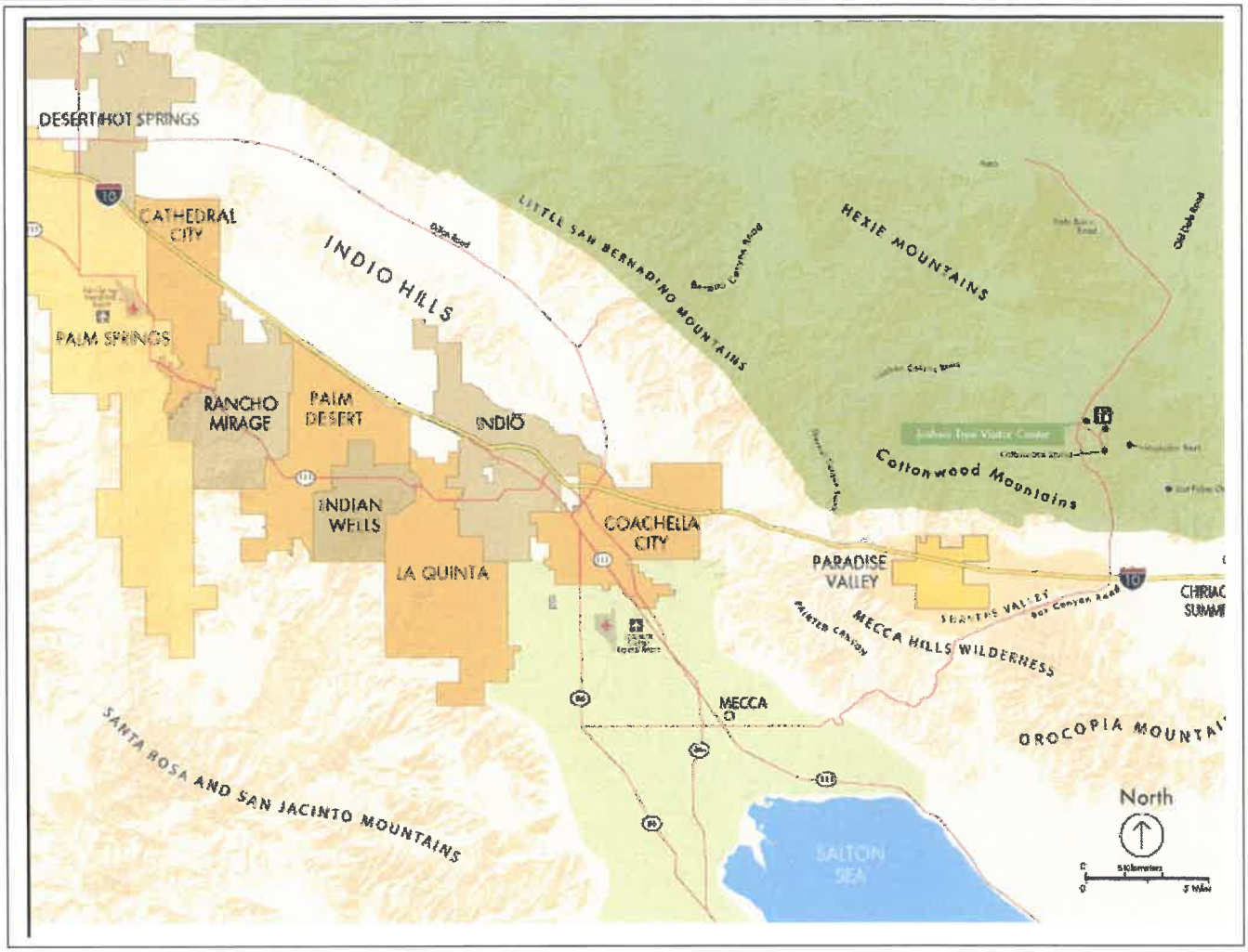


Figure 1: Regional Project Location Map

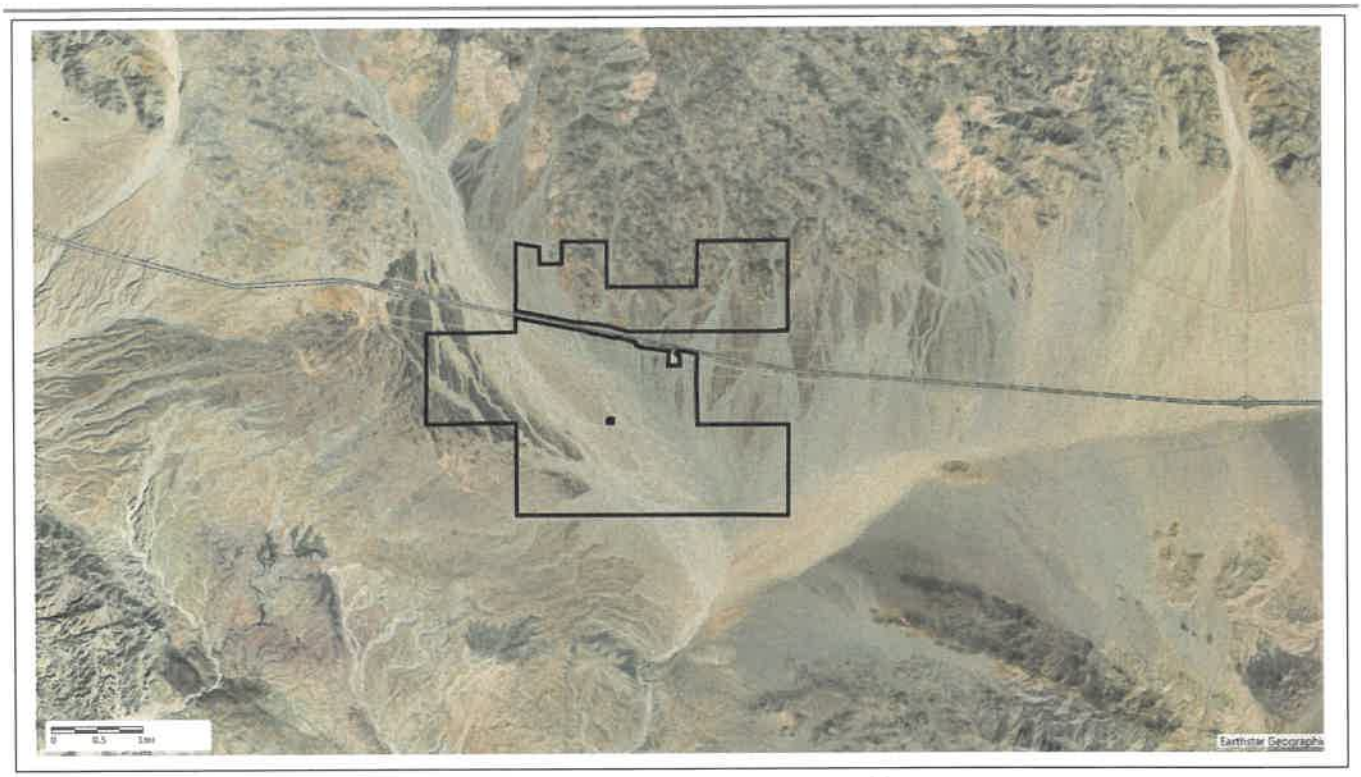


Figure 2: Local Project Location Map

Land Use Summary

LAND USE	GROSS ACRES	PERCENT OF DEVELOP-MENT FOOTPRINT	GROSS DENSITY (Dwelling Units / Acre)	DWELLING UNITS	MAX. NON-RESIDENTIAL FLOOR AREA (Square Feet)
RESIDENTIAL					
MEDIUM DENSITY RESIDENTIAL – MDR	820.5	44.4%	3.7	3,010	
MEDIUM HIGH DENSITY RESIDENTIAL – MHDR	539.1	29.2%	6.3	3,399	
HIGH DENSITY RESIDENTIAL – HDR	58.7	3.2%	9.1	535	
HIGHEST DENSITY RESIDENTIAL – HHDR	10.5	0.5%	20.0	211	
TOTAL RESIDENTIAL	**1,428.8**	**77.3%**	**5.0**	**7,155**	
MIXED USE – MU	177.0	9.6%	7.5	1,335	1,182,040
TOTAL MIXED USE	**177.0**	**9.6%**	**7.5**	**1,335**	**1,182,040**
NON-RESIDENTIAL					
COMMERCIAL RETAIL (CR)	23.4	1.3%			198,950
OPEN SPACE - RECREATION - OS (R)*	54.9	3.0%			
PUBLIC FACILITIES - PF**	44.8	2.4%			
BACKBONE ROADS ***	118.9	6.4%			
TOTAL NON-RESIDENTIAL	**242.0**	**13.1%**			**198,950**
SUMMARY DEVELOPED / UNDEVELOPED					
DEVELOPMENT FOOTPRINT TOTAL	**1,848**	**100%**	**4.6**	**8,490**	**1,380,990**
OPEN SPACE - CONSERVATION HABITAT	3,100				
PROJECT TOTAL	**4,948**				

Source: Danielian Associates, May 2016.

* Additional parks totaling 55 acres will be conceptually located throughout the development footprint area.

** Public facilities such as schools, basins, drainage structures, water wells and electrical substations, will be conceptually located throughout the development footprint area.

*** Local roads, "Town Center Boulevard" and "Main Street" are not calculated in the backbone road area.

Land Use Map

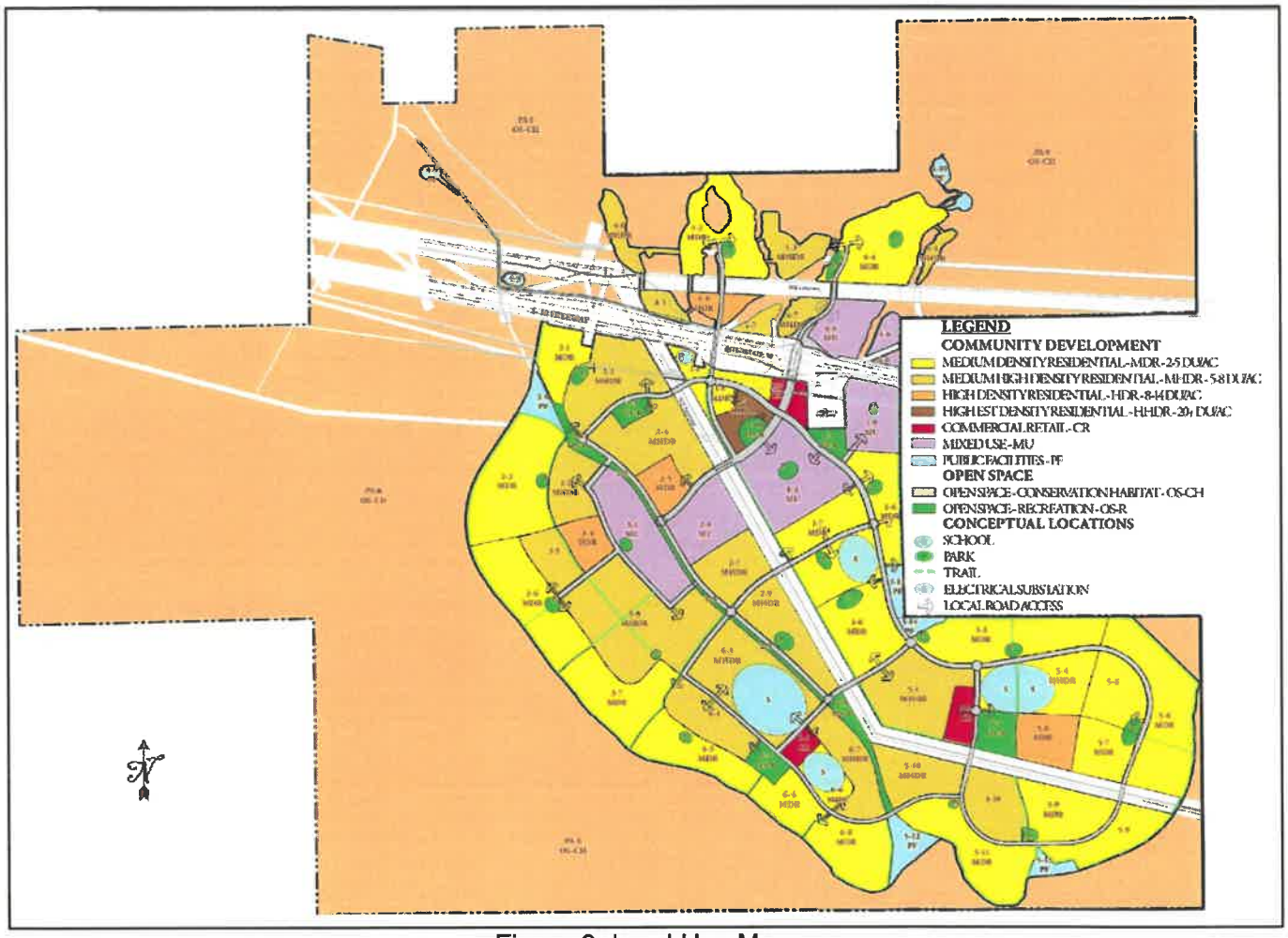


Figure 3: Land Use Map

PROJECT BACKGROUND AND ANALYSIS

Background:

Specific Plan No. 339 was first submitted to the County of Riverside on January 6, 2004. The project site is comprised of approximately 5,000 acres. When first submitted, the Specific Plan consisted of approximately 12,000 units and 2.8 million square feet of non-residential buildings on a developable area of approximately 3,000 acres.

Subsequently, in 2008 the Coachella Valley Multi-Species Habitat Conservation Plan (CVMSHCP) became effective. The CVMSHCP designates the project site nearly entirely within the Desert Tortoise and Linkage Conservation Area of the CVMSHCP with the remainder (approximately 112 acres) included within the Joshua Tree National Park Conservation Area. The CVMSHCP necessitated the project to be redesigned to accommodate greater area to be designated for conservation within the Specific Plan boundaries. The result is the Specific Plan as described above in the project description, and attached in

its entirety to the staff report, which now includes a maximum of 8,490 dwelling units and up to 1.38 million square feet of non-residential uses within a development footprint of 1,848 developable acres.

The Paradise Valley Specific Plan No. 339 includes a General Plan Amendment (GPA No. 686) and a Change of Zone (CZ No. 6915). The impacts of the project were studied via Environmental Impact Report No. 506, a Programmatic EIR. Project-level EIR's generally focus on the environmental changes caused by a development project, including planning, construction, and operation. A Programmatic EIR, on the other hand, generally looks at the broad policy of a planning document, i.e., a general plan, and anticipates that further CEQA analysis may be performed when implementing projects are submitted.

Environmental Impact Report No. 506 was circulated for public review in January 2018. Forty-seven comments were received during the 45-day public review period, and 2 comments were received following the close of the public review period. These comments were reviewed and detailed responses for each comment were included in the Final EIR, which was posted on November 1, 2018. Mailed notices to commenters were sent on October 26, 2018 and noted Final EIR availability of November 1, 2018.

Four noticed public hearings have been held before the Planning Commission; on November 28, 2018, December 5, 2018, January 30, 2019, and June 5, 2019, all of which were then continued. Public testimony has been provided by dozens of speakers, and questions have been raised by members of the Planning Commission and the public. Several meetings have been held with the applicant, staff from the Coachella Valley Conservation Commission (CVCC), the California Department of Fish & Wildlife (CDFW), and the U.S. Fish & Wildlife Service (USFWS), and correspondence has been received from these agencies, as well as responses from the applicant to the agency comments. Meetings have also been held with members of the Sierra Club, Center for Biological Diversity, National Parks Conservation Association, California Native Plant Society, and Eastern Coachella Valley Leadership Council.

Staff has not provided a recommendation to the Planning Commission prior to this staff report. This project is very large in size and scope. It is located on undeveloped land that is in an environmentally sensitive conservation area that is an important component of the CVMSHCP. It is an entirely new community that is removed by several miles from other existing communities and other public services, which requires that it be designed as a largely self-sustaining community that will require the extension and/or building of major infrastructure and facilities to serve this future community. As such, it requires very careful vetting and consideration, and the ample opportunity for comment that is provided through the extensive public review and hearing process that this project has undergone has provided for such vetting and consideration by staff and the Commission. Staff has carefully considered all of the testimony, questions raised, answers and comments provided, follow-up discussions with the applicant and interested parties, and correspondence received, as we arrive at the recommendations that are being presented in this staff report.

Recommendation:

It is our conclusion that staff is not able to recommend approval of the project at this time. Several concerns and questions raised by staff, the Planning Commission, other agencies, and the public remain not addressed in a satisfactory manner. The options, from staff's perspective, are for either the Planning Commission to 1) Direct staff to prepare findings and a Recommendation for Denial based on the significant concerns noted in this staff report and testimony and questions raised at prior Planning Commission Hearings; or 2) Continue Off- Calendar and request that the applicant address the concerns stated herein and at prior Planning Commission Hearings, work with staff to make further revisions to the project to address the concerns set forth below, and bring the project back to the Planning Commission for future consideration. This may potentially require recirculation of the environmental document for public review. This option would require the applicant's willingness to continue to pursue what has been

an already lengthy development review, and to take meaningful steps to modify the project and/or provide further studies to address these concerns.

Required Findings:

Given staff's remaining issues of concern, it is not able to recommend the appropriate findings to the Planning Commission at this time that would be needed to approve the project. In order for the County to approve the project, including GPA No. 686, it would have to adopt certain findings for an Entitlement/ Policy General Plan amendment, a Foundation Amendment, and to establish consistency with the Eastern Coachella Valley Area Plan of the Riverside County General Plan.

In order for the County to approve the proposed project, the following findings are required to be made as part of the adoption of an Entitlement/Policy General Plan amendment:

A. The proposed changes do not involve a change in or conflict with:

1. The Riverside County Vision;
2. Any General Plan Principle; or
3. Any Foundation Component designation in the General Plan except as otherwise expressly allowed.

B. The proposed amendment would either contribute to the achievement of the purposes of the General Plan or, at a minimum, would not be detrimental to them.

Additionally, one or more of the following findings would also need to be made:

C. Special circumstances or conditions have emerged that were unanticipated in preparing the General Plan.

D. A change in policy is required to conform to changes in state or federal law or applicable findings of a court of law.

E. An amendment is required to comply with an update of the Housing Element or change in State Housing Element law.

F. An amendment is required to expand basic job opportunities (permanent jobs, exclusive of any jobs created by construction of the project itself), that contribute directly to Riverside County's economic base and that would improve the ratio of jobs-to-workers in the County of Riverside.

G. An amendment is required to address changes in public ownership of land or land not under Board of Supervisors' land use authority.

Further, adoption of the project would also require a Foundation Amendment. The premise for a Foundation Amendment is that the General Plan will only be amended in any fundamental way for significant cause. The intent with Foundation Amendment Findings is to consider them comprehensively in the context of the entire General Plan and their overall impacts on the Riverside County Vision and its implementation. Adoption of a Foundation Amendment requires that the following findings be made:

A. That new conditions or circumstances disclosed during the review process justify modifying the General Plan,

B. That the modifications do not conflict with the overall Riverside County Vision,

C. That they would not create an internal inconsistency among the elements of the General Plan.

The project site is located within the Eastern Coachella Valley Area Plan (ECVAP). Policy 2.3 of this Area Plan includes specific provisions that need to be made for development that is proposed within the Shavers Valley Area. The General Plan Vision and Principles recognize that the new towns and planned self-sustaining communities will play a role in the growth and development of Riverside County. These development proposals will require vigorous reviews to ensure compatibility with surroundings, consistency with environmental policies, a full range of public services, and fiscal stability.

Lands adjacent to Interstate 10, from the easterly edge of the Coachella Valley to the Chiriaco Summit, also known as the Shavers Valley, offer unique opportunities for self-sustaining development provided that such development is limited and can provide for a full complement of infrastructure and services. Clearly the availability and assurance of a long term and reliable water supply will be the pivotal issue for development in this area. Proposed planned communities in this area are not subject to the eight-year limit and other procedural requirements applicable to Foundation Component amendments as provided above, provided that:

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.

F. The proposed community must be consistent with, and advance the goals of, the Riverside 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 Multiple Species Habitat Conservation Plan, as determined by the County of Riverside in consultation with the Coachella Valley Association of Governments, the California Department of Fish and Wildlife, and the United States Fish and Wildlife Service.

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.

County staff has reviewed the findings that are necessary to be made in order to approve the project, and is not able to recommend that the project can meet all of the findings required in order to adopt an Entitlement/Policy General Plan Amendment, a Foundation Amendment, and to establish consistency with the Eastern Coachella Valley Area Plan at this time. This is based on the totality of all of the documents prepared; comments submitted; public testimony received during the course of 4 Planning Commission Hearings; questions raised by staff, the Planning Commissioners, and the public; answers provided by the applicant to those questions; and follow-up meetings with the applicant and other involved agencies to clarify issues, including subsequent correspondence, particularly when viewed through the lens that "these development proposals will require vigorous reviews to ensure compatibility with surroundings, consistency with environmental policies, a full range of public services, and fiscal stability", as required by Eastern Coachella Valley Area Plan Policy 2.3 for development that is proposed within the Shavers Valley Area.

The major remaining issues of concern that need to be addressed before staff would be in position to recommend approval are detailed in the next section.

MAJOR REMAINING ISSUES OF CONCERN

1. CVMHSCP Consistency in Consultation with CVCC and the Wildlife Agencies

As set forth above, a required finding for general plan consistency under ECVAP Policy 2.3 is that "the proposed community must be compatible with the achievement of the goals of the Coachella Valley Multiple Species Habitat Conservation Plan, as determined by the County of Riverside in consultation with the Coachella Valley Association of Governments, the California Department of Fish and Wildlife, and the United States Fish and Wildlife Service." ECVAP Policy 2.3.h.

The project is located within the boundaries of the CVMSHCP, in particular within the Desert Tortoise and Linkage Conservation Area of the CVMSHCP. Due to this, the Specific Plan and development pursuant to the Specific Plan is required to set aside areas to be dedicated for conservation in exchange for the ability to develop within this conservation area.

Discussions have been ongoing between the CVCC, the California Department of Fish and Wildlife, and the United States Fish and Wildlife Service (together referred to as the Wildlife Agencies), County staff and the applicant, regarding the need to conduct a Joint Project Review (JPR) for consistency with the CVMSHCP prior to County approval of the Programmatic EIR and the project. This has been one of the primary issues of contention and disagreement between the applicant on the one hand, and CVCC and the wildlife agencies and environmental advocacy groups on the other hand.

There are two sections of the CVMSHCP documents that focus on the timing of the JPR, as shown below:

Section 6.6.1.1. in the CVMSHCP, as amended through the Final Major Amendment to the CVMSHCP – August 2016, states:

> "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 7.5 of the Implementing Agreement covers how review of development proposals will occur in conservation areas:

> "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."

The Specific Plan was submitted to the Coachella Valley Conservation Commission (CVCC) for Joint Project Review (JPR) in 2010 to review initial concepts and subsequently a formal application in 2011 and based on comments received from CVCC, U.S. Fish & Wildlife Service, and California Department of Fish & Wildlife, and following further revisions to the proposed Specific Plan was again submitted for JPR in April 2012. The submittal of the Specific Plan to CVCC at these times was presented as a project level approval.

The CVCC issued a comment letter July 6, 2012, which states "the JPR process requires specific information on the proposed project that does not allow for a programmatic level analysis." and "...we have determined that not enough specific information is available to complete a JPR analysis of future phases of the project beyond Phase I. Therefore, we have not completed a JPR consistency determination for the Specific Plan." The information that CVCC was requesting was the precise location of the mitigation land that would be placed into conservation to meet the CVMSHCP required 8% allocation of take per Riverside County Board of Supervisors Policy A-61, which translates to a ratio of 11.5:1 of conservation area acreage to disturbance acreage. CVCC did distinguish in its findings that although it would not determine that the overall Specific Plan is consistent with the MSHCP due to information not being provided regarding specific location of all required mitigation land, adequate mitigation/conservation land has been identified to support development of Phase I as identified in the Specific Plan.

On September 5, 2012, County staff issued a letter to CVCC thanking them for participating in a JPR meeting held on September 4, 2012, and stating that the meeting "signals conclusion under the JPR process".

On September 19, 2012, CVCC responded to the County letter of September 19, 2012 that "as noted in our letter of July 6, 2012, we determined that not enough information was provided to complete the JPR for a programmatic level review of the entire Specific Plan."

There have been several subsequent meetings and communications involving the applicant, CVCC, CDFW, and USFWS since the project was circulated for public review, including a memorandum from CVCC dated May 9, 2019, a joint letter from CDFW and USFWS dated June 4, 2019, and responses from the applicant dated July 19, 2019.

In order to fully build-out the entire Specific Plan consistent with the CVMSHCP, a Like Exchange would have to be approved by CVCC and concurred in by the wildlife agencies to compensate for the loss of conservation lands within the Desert Tortoise and Linkage Conservation Area. Under Section 6.12.2 of

the CVMSHCP, this would involve, ultimately, the identification and acquisition of land outside of this conservation area. Without the ability to ultimately successfully process a Like Exchange, there are significant portions of the Specific Plan which would not be able to build, and therefore potentially not achieve a self-sustaining development as called for in the Eastern Coachella Valley Area Plan.

Much of the discussion has centered on when the CVMSHCP requires that JPR be conducted, in terms that "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...," and whether approval of a Programmatic EIR and Specific Plan constitutes an action that "would result in disturbance", or whether that occurs at such future time as implementing projects would be considered and approved, involving further CEQA analysis. The CVCC as well the Wildlife Agencies continue to contend that the applicant must complete the JPR process for the project in its entirety. The applicant, and County staff in the past, have taken the position that the JPR process should be completed when implementing projects that directly result in land disturbance (such as tract maps, plot plans, etc.) are considered for approval and undergo further CEQA analysis. It should be noted that, from County staff's perspective, one of the major concerns with requiring that a JPR be conducted now was the premise that the applicant would need to acquire or demonstrate control over the mitigation lands being proposed for a Like Exchange in advance of even a Programmatic level approval, which would commit the applicant to the acquisition of thousands of acres without any indication that ultimately they would be successful in obtaining even a Programmatic level approval. County staff has been of the opinion that this is an exceedingly high bar, and not a reasonable interpretation of the plan.

The issue of when the mitigation lands need to be acquired or controlled by the applicant has therefore been the subject of much recent discussion between County staff, the applicant, CVCC, and the Wildlife Agencies. The CVCC, in their May 9, 2019 Memorandum, and the Wildlife Agencies in the June 4, 2019 letter have identified an approach whereby the applicant could address the Like Exchange through a conceptual proposal process, under a meet and confer process. This would involve several steps, including a desk-top exercise which would largely be based on information that is readily available. As stated, "If the Wildlife Agencies can determine that the proposed conservation lands have the potential to support equivalent or superior functions and values, and the land could be acquired for conservation purposes (e.g. it is privately owned), conceptual concurrence for further assessment of these lands could be granted and the Applicant and Permittee would move forward and complete more in-depth on-site studies and analysis to support a final equivalency analysis".

If the meet-and-confer process and the conceptual concurrence review determines that lands required to successfully complete a Like Exchange cannot be located and ultimately obtained, the project (as it is currently proposed) would fail to accomplish many of the project's goals and objectives. This would put the feasibility of the entire project in question, particularly since the project is intended to be a self-sustaining development, which requires that it be completely built-out to complete that objective. If the project is unable to achieve build-out, as proposed in the Specific Plan, it brings into question the validity of the assumptions used to develop analyses of the Specific Plan, including traffic and fiscal impacts and achieving the goals of applicable General Plan Policies.

With regards to the assumptions used to develop the traffic analysis of the Specific Plan, the traffic studies project that, given the self-sustaining nature of the project, 64% of the daily trips will remain internal to the project, and only 36% would be external and leave the project site. If the project is unable to achieve project build-out because a Like Exchange is found to be infeasible, the assumptions used in the traffic analysis based on build-out of the mix of land uses to achieve this high level of internal traffic capture, thereby reducing impacts outside of the project area, cannot be relied upon. This then would also affect

other technical studies, such as noise and air quality, which rely upon the traffic study projections as part of their analysis methodology.

Likewise, the fiscal impact assessment and feasibility were determined based on a total build-out scenario of the project. Staff and the applicant had previously discussed preparing an alternative fiscal impact analysis that would assume that build-out is not achieved, involving various scenarios, including one in which the project area which relies on the successful completion of a Like Exchange process would be removed. From that analysis, staff and the decision makers would be able to better understand the overall fiscal viability of this project to pay for the services needed to serve this new community. To date, the applicant has not provided such an analysis, nor have they indicated they are in the process of preparing such an analysis.

The applicant has stated, in their response to the June 4, 2019 letter submitted by the Wildlife Agencies, that there is "the potential that the project could be developed within a development footprint no greater than 1,370 acres which could be mitigated entirely with Conservation Lands acquired from within the DTLCA, thus eliminating the need for a Like Exchange altogether." This reduced footprint has not been included in any prior analysis, nor has the applicant provided information to show that a self-sustaining community could be built within this reduced development footprint.

Given all of the above, staff is of the considered opinion that completion of the meet-and-confer process and a determination of a conceptual concurrence for a Like Exchange by the Wildlife Agencies would be of great policy value in assisting the decision makers (the Planning Commission and ultimately the Board of Supervisors) to make an informed decision as to the likely feasibility of build-out of the Specific Plan as a whole. This is particularly important given the proposed self-sustaining nature of the project which involves its full build-out, as analyzed in the technical studies. Further, the specific requirement in the ECVAP that "the proposed community must be compatible with the achievement of the goals of the Coachella Valley Multiple Species Habitat Conservation Plan, as determined by the County of Riverside in consultation with the Coachella Valley Association of Governments, the California Department of Fish and Wildlife, and the United States Fish and Wildlife Service," is of great weight to staff in making this determination since the principal stakeholders which the County is specifically required to consult with (CVCC and the Wildlife Agencies) have remained steadfast in their determination that consistency cannot be determined without conducting a JPR prior to the County's approval of a Programmatic EIR, and have further worked to identify a meet-and-confer and conceptual concurrence process for a Like Exchange which would provide the County with a much higher level of assurance that it would be feasible to achieve build-out of the Specific Plan as a whole, as needed to achieve a self-sustaining community.

Staff, therefore, is of the opinion that the test as to the level of detail required to approve the Programmatic EIR is not met if the analysis does not provide enough information to provide the decision makers with sufficient analysis to reasonably consider the project's merit and consequences. Although there is a potential path for consistency with the CVMSHCP as has been discussed previously, there is still a significant level of uncertainty that the project can achieve all of the conservation area necessary to build-out the entire Specific Plan as it is proposed. Staff therefore is unable, at this time, to recommend that the General Plan be amended, as the first step in potentially removing close to 2,000 acres from conservation, without sufficient information with regards to IF lands actually exist outside of the project boundary that are biologically equivalent or superior to those to be exchanged from inside the boundary, even on a conceptual level. Should the project be able to successfully complete the meet-and-confer process and obtain conceptual concurrence for the Like Exchange, thereby allowing it to complete the JPR now as requested by CVCC and the Wildlife Agencies, it would provide a stronger basis for the adoption of a Programmatic EIR, and the Like Exchange process could be finaled and completed prior to approval of any subsequent implementing project. Should the project not be successful in obtaining conceptual concurrence for the Like Exchange, it would strongly point to the need to modify and re-design

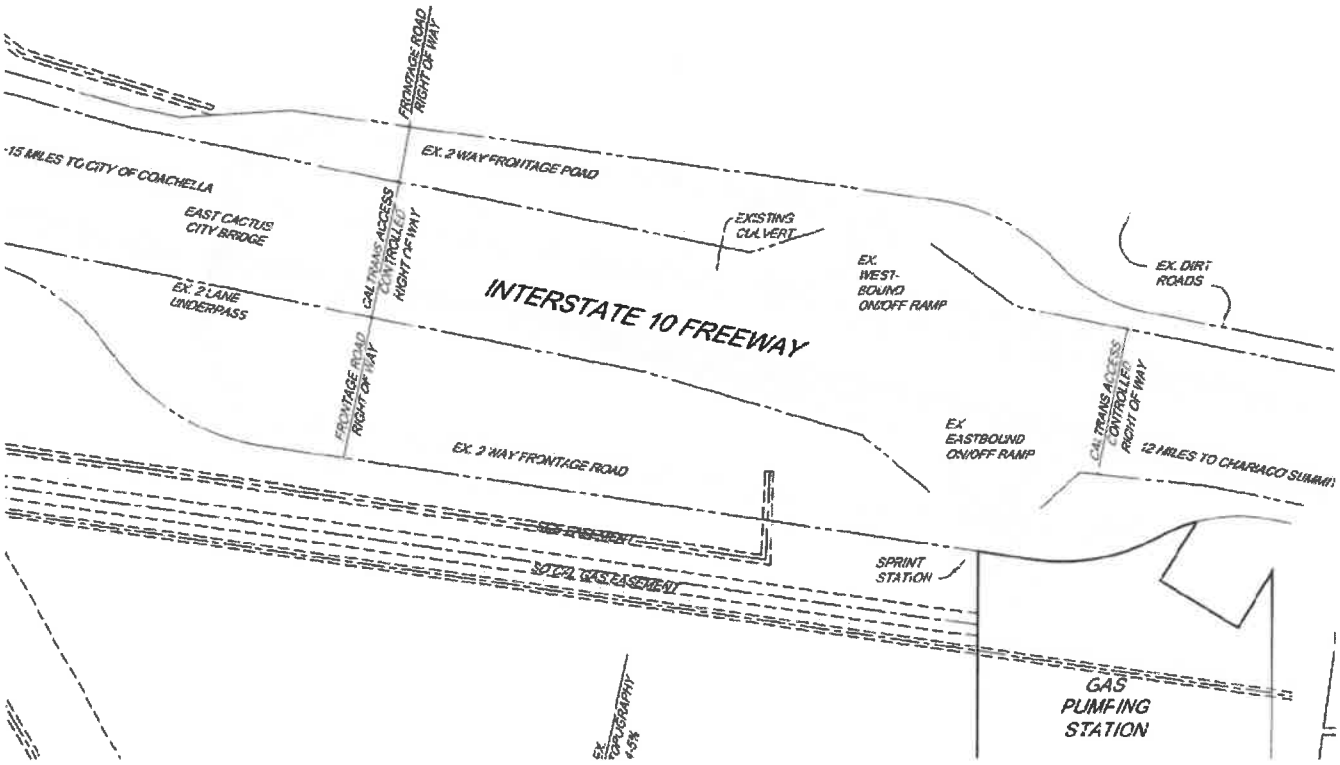
the project, so that it can provide for a self-sustaining community, in a phased and balanced way, within a reduced project footprint that does not trigger the need for a Like Exchange.

2. **The Project does not provide an appropriate number of ingress/egress access points to provide for adequate Emergency Access/Egress**

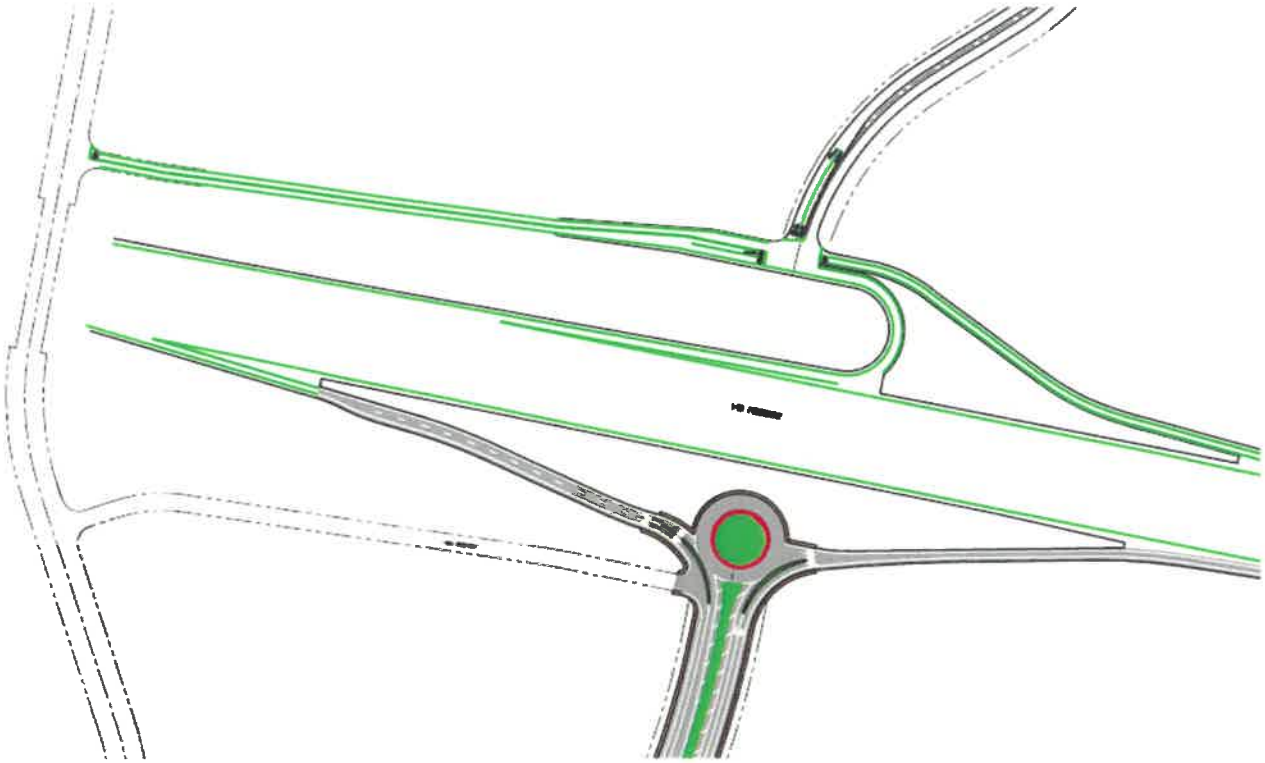
The project, as proposed, provides for one point of access to Interstate 10 and no other means of ingress or egress to the site. This is an isolated large new community that, upon buildout, could house an estimated 15,000 residents, as well as thousands of square-feet of commercial/industrial uses. Staff, including top management from TLMA and County Fire, are of the professional opinion that one point of access for a project of this size and population is wholly inadequate, and that additional means of ingress/egress are required to serve emergency access needs and provide a safer and more sustainable community.

The configuration of the existing interchange is shown below. The project proposes an interim and an ultimate improvement as also shown below. The interim interchange would provide for greater capacity at the ramps, but still relies on the existing underpass on I-10 as the one road that allows access to the Westbound Ramps. The ultimate would include a new underpass with a new bridge for I-10 and the existing underpass would remain as a second means of crossing I-10 between the north and south sides of the project.

Existing Interchange and Underpass



Interim Interchange Configuration



Ultimate Interchange Configuration

Staff contends that accessing the Interstate from a single interchange, with ramps going in the eastbound and westbound direction separated by a few hundred feet, does not fully provide a secondary means of access, given that both ramps in close proximity to each other could be compromised by certain emergency events. Even if the single evacuation route does not become blocked in an emergency, the project could have thousands of vehicles on the single access road during an evacuation, causing gridlock and taking hours to complete a community-wide evacuation. Again, the self-sustaining nature of the project anticipates that the majority of the residents will be present within the project limits at any one time, even during the typical workday.

It should also be pointed out that there is a high-pressure natural gas line and compressor station located just south of the one interchange, and that the project is about 6 miles east of the San Andreas Fault, adding to the potential risk that the one interchange could be compromised by an emergency event. Further, Cal Trans, in a letter dated, May 22, 2018, also requested that the project construct a second interchange to access Interstate 10.

The vital importance of having multiple points of access to provide for adequate and multiple evacuation routes has come to the forefront given the tragic events of November 2018, when there was a vast loss of lives in the town of Paradise in Butte County, CA as a result of the Camp Fire. The inability to evacuate the 23,000 +/- residents of Paradise during the Camp Fire, even with four access points in and out of town, highlights the need to have multiple routes when serving an entire new community such as that being proposed for this project.

Staff contends that because the project design does not allow for alternate methods to access or evacuate this isolated site, the project lacks the ability to realize the intended vision for a 'self-sustaining development' and lacks the provision for a "full complement of infrastructure and services", as imagined for Shavers Valley. It is staff's opinion that, especially in light of recent events and California's history with natural disasters, the project requires that an additional, second interchange be provided to access I-10, spaced sufficiently apart from the first interchange to address Caltrans and County spacing concerns and provide for two independent emergency access points, and that preferably a third route be provided as well. Said third route could potentially be a southerly connection south to Box Canyon Road, or a frontage road that parallels the freeway until it connects with another independent point of access.

Since the June 5, 2019 Planning Commission hearing, as a response to site access concerns from staff and the Planning Commission, the applicant completed and submitted a planning and modeling study for 'Risk Assessment and Mobile Emergency Evacuation' for the project. The report was reviewed by Planning, Transportation and Fire Staff.

The Risk Assessment analyzed the proposed project as it relates to the adequacy of the project's access, including access under an emergency or evacuation condition. The assessment did not study 'worst case scenarios' but analyzed hazards that have a reasonable probability of occurrence and those that would have a potential to require evacuation.

The assessment reviewed eight hazards that they deemed relevant to the project:

- Chemical Release
- Earthquake
- Flood
- Ground Subsidence
- Pipeline Incident
- Terrorist Event
- Volcano
- Wildfire

Hazards were analyzed for impacts to the access and operations of Interstate 10. The assessment concluded that the probability of a disaster occurring that would cause a partial or full evacuation of the entire Paradise Valley Community at buildout and simultaneously impacting, either partially or entirely, the operations Interstate 10, are extremely low, thereby concluding that the risk to the project residents, businesses and visitors, as it relates to the eight listed hazardous events – where the ability to access I-10 is compromised - is extremely low.

The assessment goes on to state that "The impacts of hazardous events can be lessened through the implementation of pre-event mitigation and post-event emergency response measures" and "In our considered opinion, the Paradise Valley project, as proposed, provides for adequate emergency access and would not expose residents and visitors to a significant risk of loss or injury."

Staff is not in agreement with the conclusions presented in the Risk Assessment, and asserts that 'significant risk of loss or injury' should not be the bar that good planning and site design for an entirely new, isolated, sustainable, and resilient community should strive for. The Risk Assessment relies upon mitigation measures, such as a plan to have the Master Homeowners Association advise residents to shelter-in-place, that only offer the illusion of safety and control during future disasters, but do not tangibly increase safety or reduce risk.

3. **A stronger case needs to be made that the Project Benefits outweigh the Project Impacts in order for the County to adopt a Statement of Overriding Considerations**

Due to the potentially significant impacts of the project that remain, even after proposed mitigation measures are considered, if the County is to approve the project it will be required to adopt Findings with a Statement of Overriding Considerations. The Statement of Overriding Considerations would acknowledge that the Board of Supervisors has balanced the economic, legal, social, technological, and other benefits of the project against the unavoidable adverse environmental effects identified in EIR, and has determined that the benefits and considerations outweigh and render acceptable those adverse environmental effects of the Project.

The EIR has determined that the following project and cumulative impacts were found to be unavoidable:

Aesthetics – Scenic Vistas and Visual Character

The Specific Plan incorporates through its conceptual grading, landscape, and architectural design elements that will minimize the impacts of the project. However, since the project would develop an area that is primarily undeveloped and would convert the view from surrounding areas of open desert to urban development that fundamentally changes the views of the area, impacts to scenic vistas as viewed from I-10 and Box Canyon Road, Orocopia Mountains, and nearby trails and change in visual character would be significant and unavoidable. Impacts to views from Joshua Tree National Park were determined to be less than significant, primarily due to intervening topography blocking views.

Aesthetics – Light and Glare

The Specific Plan includes lighting guidelines that would minimize direct impacts from light and glare to less than significant levels. However, with the introduction of lighting in an area where lighting is currently extremely limited, the project would have incremental impacts to night time sky glow. Since there is no quantitative threshold for significance for skyglow and considering the project's location near Joshua Tree National Park, impacts were conservatively assumed to be potentially significant.

Air Quality - AQMP Consistency and Regional Emissions

The Specific Plan would have the potential to result in or cause National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) violations due to the Specific Plan's exceedance of regional construction and operational emission thresholds for VOC, NOx, PM10, and PM2.5. The Specific Plan includes a number of design features and all feasible mitigation measures that would reduce emissions; however, emissions remain potentially significant. Therefore, the project would have a significant and unavoidable cumulative effect on regional air pollution and impacts related to AQMP consistency, Non-Attainment Pollutants, and Cumulative Air Quality would remain significant and unavoidable.

Greenhouse Gas Emissions

The Specific Plan includes a number of design features and mitigation measures related to sustainability and other elements that are intended to reduce greenhouse gas emissions as detailed in the Specific Plan's Climate Action Plan. Although with these measures it is anticipated that the Specific Plan would meet applicable greenhouse gas reduction goals, since the projected rates of electric vehicle ownership and usage cannot be guaranteed at this time, the EIR conservatively determined that impacts to greenhouse gas emissions may be potentially significant.

Noise – Operational Off-site and Ambient

Project-related operational impacts would result in less-than-significant impacts to on-site and most off-site locations. However, the project's generation of vehicle traffic on I-10 has the potential to significantly impact two residences off-site where noise barriers or other noise attenuation features do not exist. Mitigation is included for implementing projects to analyze further and to work with the affected residences to install adequate noise barriers or other features. However, since this cannot be guaranteed at this time, the EIR conservatively determined that impacts to these residences are significant and unavoidable. Additionally, since the project is developing urban uses with associated noise production in what is primarily an undeveloped location with few noise sources, impacts to ambient noise levels on the project site and immediate vicinity is significant and unavoidable.

Public Services – Construction of Fire, Sheriff, School, Libraries, Medical, Parks and Recreation Facilities

Since the Specific Plan includes the construction of fire, sheriff, school, libraries, and medical facilities and the Specific Plan as a whole has potentially significant impacts, the impacts from these public services included within the Specific Plan (although a small portion of the overall proposed development) would also present cumulatively potentially significant impacts to the environment related to the other topics noted here. These potentially significant impacts are not related to whether adequate public services would be provided for the Specific Plan.

Transportation and Traffic - Conflict with Plan, Ordinance or Policy Establishing Standards for Circulation System and Conflict with an Applicable Congestion Management Plan

The Specific Plan would generate traffic that would exceed the significance thresholds based on level of service for 7 intersections, 1 freeway segment, and 1 freeway ramp merge/diverge zone based on existing conditions. Three of these intersections as well as the freeway segment and freeway ramp merge/diverge zone currently operate at an adverse level of service. Based on a projection of 2035 conditions, the Specific Plan would create significant impacts at 4 intersections, 8 freeway segments, and 7 freeway ramp merge/diverge zones beyond what is anticipated to be operating at and adverse level of service without the project in 2035. Based on a projection of 2040 conditions, the Specific Plan would create significant

impacts at 7 intersections beyond what is anticipated to be operating at and adverse level of service without the project in 2040.

Mitigation measures are included to conduct further traffic analysis for implementing projects to determine more accurately impacts to traffic closer to development and determine what improvements may be necessary to address direct impacts. Additionally, the project will pay TUMF and DIF and provide payment of impacts to facilities not included in TUMF and DIF (including funding to cities through the County) to address the Specific Plan's cumulative impacts. However, since these facilities cannot be assured to be constructed at time of project operation, impacts remain significant and unavoidable.

Utility and Service Systems – Construction of Water and Sewer Facilities

Similar to Public Services, since the Specific Plan includes the construction of water and sewer facilities and the Specific Plan as a whole has potential significant impacts, the impacts from these utilities included within the Specific Plan (although a small portion of the overall proposed development) would also present potential cumulatively significant impacts to the environment related to the other topics noted here. These potentially significant impacts are not related to whether adequate utility services would be provided for the Specific Plan.

Mandatory Findings of Significance

Impacts on Human Beings (i.e. all of the project's significant impacts could affect human beings)

Although a specific Statement of Overriding Considerations has not been prepared at this time, the following benefits have been identified by the project to date:

- Establish a new town that provides for needed growth and development in the Eastern Coachella Valley as contemplated in EVAP Policy 2.3.

- Up to 8,490 dwelling units within a variety of housing types at different densities and affordability ranges to assist in satisfying the County Regional Housing Needs Assessment (RHNA) requirements.

- Employment opportunities to assist in meeting Riverside County's adopted job growth projections and goals for a healthy economy.

- Five percent of total project housing to be affordable to lower and moderate income households (i.e., a total of 425 units). Within the rental unit component of the project, 10 percent will be affordable to lower and moderate income households. The proposed project's affordable housing would add to the inventory not known at the time the RHNA was prepared.

- A land use plan that locates active mixed use environments, public services, appropriate densities and community-serving elements within the Town Center and other Village core areas.

- New development that meets or exceeds requirements for energy efficiency including, on-site renewable energy resources (PV solar), buildings that exceed Title 24 standards for energy efficiency, high efficiency lighting, high efficiency appliances, increased electric vehicle use (by including vehicle chargers), traffic calming measures, Neighborhood Electric Vehicles (NEVs), a trip reduction program, encouragement of telecommuting and alternative work schedules, preferred parking for employee vanpool/shuttles, and shuttle services to the SunLine Transit hub in Indio.

- Development that incorporates water conservation, including the use of recycled water from the on-site wastewater treatment plant.

- Development that encourages walkability and pedestrian access through the arrangement of travel destinations (i.e., work, retail) within walking or bicycling distance of residences and through a mix of alternative transportation mode options, including bicycles and NEVs.

- New development that will enhance property values and increase tax revenue to Riverside County.

- Development with a high ratio of jobs for working residents, which has shown to not generate urban decay issues.

On balance, it is staff's opinion that more needs to be done by the project by way of benefits that not only accrue to residents of the project itself, as many of the above-listed benefits do, but to help offset impacts that the project is creating outside of the project footprint. This could, as an example, include additional funding contributions to improvements in impacted areas along I-10, which carries all of the project's external traffic.

4. The Project should provide a higher proportion of affordable housing

The need to enhance housing affordability has come to the forefront State-wide. The Governor and Legislature have identified the need to provide for increased housing affordability as one of the key issues facing the State.

The Specific Plan includes requirements that 5% of the total dwelling unit count, which equates to a maximum of 425 units, are to be provided to households between Moderate and Very Low income households. Moderate income households are defined as households that have income between 80-120% of the Area Median Income (AMI) and Very Low Income households are defined as households that have income between 0-50% of the AMI. Of the 425 total units, 382 will be made available through multi-family and/or small lot single family for sale developments within the Specific Plan to Moderate Income households. The remaining 43 units will be made available through rental housing development within the Specific Plan to Very Low Income households. These affordable housing units are also required to be phased in as the Specific Plan develops.

Although the Project does propose a certain amount of units to be affordable to lower- and moderate-income households, the amount proposed relative to the overall Project total dwelling units does not keep pace with the housing needs for Riverside County as outlined in the Housing Element. In the last cycle of the Regional Housing Needs Assessment (RHNA), SCAG allocated to the County over 30,000 units to be built as our housing target, of which over 17,000 are designated as non-market rate housing (moderate, low, and very low income). SCAG is currently in the next round (6th cycle) of the RHNA update, and will look to allocate additional target units to the County as a result.

To more confidently determine that the Project advances the goals of the Housing Element (which is a requirement in ECVAP Policy 2.3), the Project, given its large size, should increase its commitment to providing housing between the Moderate and Very Low income levels. Staff recommends that setting a target of 10%-20% between those income levels would be more appropriate for this project. As a basis of comparison, the Villages of Lakeview project, approved in 2017 in the Lakeview/Nuevo area with a similar overall total unit count, included a requirement that 10% of all units would be built at densities of HHDR (Highest Density Residential) of 20 units per acre or higher, to provide for affordability at densities consistent with the Housing Element affordability targets. As another example we can point to the

Travertine Point Specific Plan which 10% overall to be affordable and a min of 1% of the total to be affordable to very low.

4. **Further refinement and specificity should be provided as to the source of electrical power**

The EIR identifies several options for providing power to the project, including an off-site transmission route, partly through BLM land, and intertie with the existing SCE transmission lines that run through the property, and providing its own on-site power generation through a natural gas-powered plant or other means.

The approach taken in the EIR has been to identify these alternatives in the Programmatic EIR stage, and then tier from that when more–site specific data is available, and study that further as part of the consideration and CEQA approval of any implementing projects. Comments have been received taking the opposing view, that it is not appropriate to approve an entirely new community without more specifics identifying its source of electrical power. In contrast, the project has much more clearly identified its sources of water to provide a fuller picture of how it will be served for those purposes.

Given the very fundamental need for electrical power as one of the core building blocks of a new community, and the vastly different array of potential options to be studied in more detail, it is staff's opinion that this key area should be more closely analyzed, even at this Programmatic EIR stage, to give the decision makers additional information as they consider this project.

PUBLIC HEARING NOTIFICATION AND COMMUNITY OUTREACH

This project was advertised in the Press Enterprise Newspaper and Desert Sun Newspaper. Additionally, public hearing notices were mailed to property owners within 2,400 feet of the project site and any other parties or individuals that specifically requested to be noticed regarding the project or that commented on the Draft EIR. As of the writing of this report, Planning Staff has received comments through the course of processing the project as well as comments received on the EIR Notice of Preparation and Draft EIR. The comments received through the course of processing have been attached to previous staff reports, provided via memo, and comments since the prior Planning Commission are attached to this staff report. The comments received on the EIR Notice of Preparation and Draft EIR are included within the Final EIR documents.

DEPARTMENT OF TRANSPORTATION
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Making Conservation a California Way of Life.

March 22, 2018

Mr. Russell Brady
Riverside County
Attn: Planning Department
4080 Lemon Street, 12 Floor
Riverside, CA 92501

Dear Mr. Brady:

Draft Environmental Impact Report (DEIR) Paradise Valley Specific Plan No. 339, General Plan Amendment No. 686, Change of Zone No. 6915, EIR No. 506, SCH#2015101031
08-RIV 10, PM R-74.752-75.3
GTS 08-RIV-2018-00158

The California Department of Transportation (Caltrans) reviewed the Draft Environmental Impact Report (DEIR) for Paradise Valley Specific Plan. This proposed project is located in the western portion of Shavers Valley in unincorporated Riverside County. It encompasses 5,000 acres, of which 1,800 acres will consist of: 8,490 residential units, 1.38 million square feet of commercial office, retail, hotels, light industrial, public facilities, 110 acres of recreational trails and parks, and 3,000 acres of natural open space. It will be located approximately eight miles east of Coachella City limits and will use exit #162 (Frontage Rd IC), and adjoins Interstate 10 (I-10) north and south.

The Specific Plan defines this as a new town in Shaver's Valley. The project will be constructed in phases with the Town Center village constructed first. The development timeframe is projected to be buildout in 2035. However, no infrastructure is in place, it abuts north and south of I-10 right-of-way, and we believe this development will severely impact growth in vehicle miles traveled and greenhouse gas production due to the site location. At buildout, we estimate approximately, 25,000 people will live in this development. For emergency access reasons we feel there is a need for two full interchanges to serve this development. This doesn't appear to be shown currently in the Specific Plan. The I-10 undercrossing and new interchange as shown may not meet minimum full interchange spacing standards. 1

Due to the scope of this proposed project and because it will impact highway operations we have the following comments:

Multimodal Accessibility

Caltrans views all land use and transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation system. Furthermore, Caltrans is committed to ensuring that a multimodal transportation system serves the local development project. We take into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, goods movement, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. The following are our comments concerning multimodal accessibility: 2

Transit 3

- We recommend provision of bus turnouts on the entire proposed internal shuttle network.
- We suggest the plan provide bus benches, bus shelter as well as bicycle parking facilities near each shuttle stop.

Bicycle 4

- On all proposed urban arterials, major arterials. divided collectors and local collectors, we recommend modifications to the proposed street cross sections from Class II bicycle/NEV lanes to fully separated Class IV lanes.
- To ensure that bicyclists can easily cross an intersection using any travel lane, we suggest the incorporation of either bicycle crossing push-button actuators, in-ground loop detectors and/or the calibration of optical vehicle detection (OVD) cameras.

Pedestrian 5

- We recommend the provision of through block pedestrian connections from subdivisions in the MDR and MHDR land use areas to the backbone street network to encourage walking.

Smart Mobility Framework 6

Caltrans supports infill and smart growth development. Based on it place-type, design characteristics, potential impacts, and proposed mitigations, this project could potentially reflect smart growth principles with positive land-use changes and multi-modal transportation planning and funding. For further details regard the Smart Mobility Framework, please visit the following websites:

http://www.dot.ca.gov/transplanning/ocp/sm-framework.html

http://www.dot.ca.gov/hq/tpp/californiatransportationplan2040/Final%20CTP/FINALCTP2040-Report-WebReady.pdf

The following are our comments as they relate to Smart Growth and the Smart Mobility Framework:

- We recommend the County consider modifying the plan to put more high-density residential areas in close proximity of the mixed-use areas to permit walking, bicycling or transit trips for both future employees and shoppers. By increasing housing density, the project will reduce Vehicle Miles Travelled (VMT) per capita, provide affordable housing, save space and improve transit use.

- We recommend the county consider amending this proposed Specific Plan to allow more employment acreage, such as Business Parks and Medium Industrial, and office buildings to offset the need to commute long distances for employment and reduce vehicle mile traveled by future residents.

- We suggest each use in this project be developed with net zero energy use goals by including things like using solar panels on every residence, office, service, retail, medical, school building etc.

7

System Planning and Forecasting

- Figure 2-4: Intersection #3 and #4 show proposed roundabouts, however all future proposed interchange projects need to be included in the Southern California Association of Governments Regional Transportation Plan. In addition, the interchange configuration needs to be coordinated with Caltrans. Any proposed roundabouts will need an intersection Control Evaluation (ICE).

- General: Please use 14% for Truck and Buses (P_T) per Caltrans' Traffic Census data in regard to your HCS calculation for freeway segment, merge, diverge, and weaving analysis.

8

- General: Please provide approved city/county scoping agreement.

Traffic Operations has reviewed the January 25, 2017 TIA prepared by Linscott Law & Greenspan Engineers and has the following comments:

9

- Please provide layout for modifications of interchange including roundabout intersections #3 and #4.

- The proposal of a modification in access should comply with safety and operational design standards.

- Caltrans Design and FHWA review is required for modification of the interchange configuration. 9

- Please provide the queue length along the new street (Paradise Valley) between intersections #3 and #4 and off-ramps.

Hydrology

Hydraulics has reviewed the July 2015 Hydrologic and Hydraulic Analysis Report prepared by West Consultants Inc. and concurs with respect to floodplain issues. At such time of permit application Hydraulics requests the final drainage report for review. 10

Encroachment Permits Requirements

When development occurs, encroachment permits will be necessary for any work performed within the State right-of-way (R/W). Furthermore, the applicant's environmental documentation must include such work in their project description and indicate that an encroachment permit will be needed. As part of the encroachment permit process, the developer must provide appropriate environmental approval for potential environmental impacts to State Highway R/W. In addition, all work undertaken within I-10 R/W shall be in compliance to current design standards, applicable policies, and construction practices. Detailed information regarding permit application and submittal requirements is available at:

Office of Encroachment Permits
California Department of Transportation
464 West Fourth Street, 6th Floor, MS 619
San Bernardino, CA 92401-1400
(909) 383-4526 11

Where work in the State Highway Right-of-Way will exceed $1 million in value a Streamlined Oversight Process review is required. Please contact our Streamlined Oversight Engineer Mr. Bahar Bakhtar at (909) 383-4276. Where work in the State Highway Right-of-Way is estimated to be over $3 million, development of a Project Initiation Document and other project development steps will be required. Please contact Ms. Catherine Barron at (909) 383-6050 in our Pre-Programming/ Engineering Studies (PID) Unit.

Prior to approval of each Phase of the project site-specific studies may be required to determine if any additional impacts need to be mitigated. These comments are based upon a review of the

materials provided for our evaluation. Additional comments may be provided with the progression of the proposed project. If you have any question please contact Rebecca Forbes 909) 388-7139 or myself at (909) 383-4557.

11

Sincerely,

MARK ROBERTS
Office Chief, ACIP
IGR/Community & Regional Planning

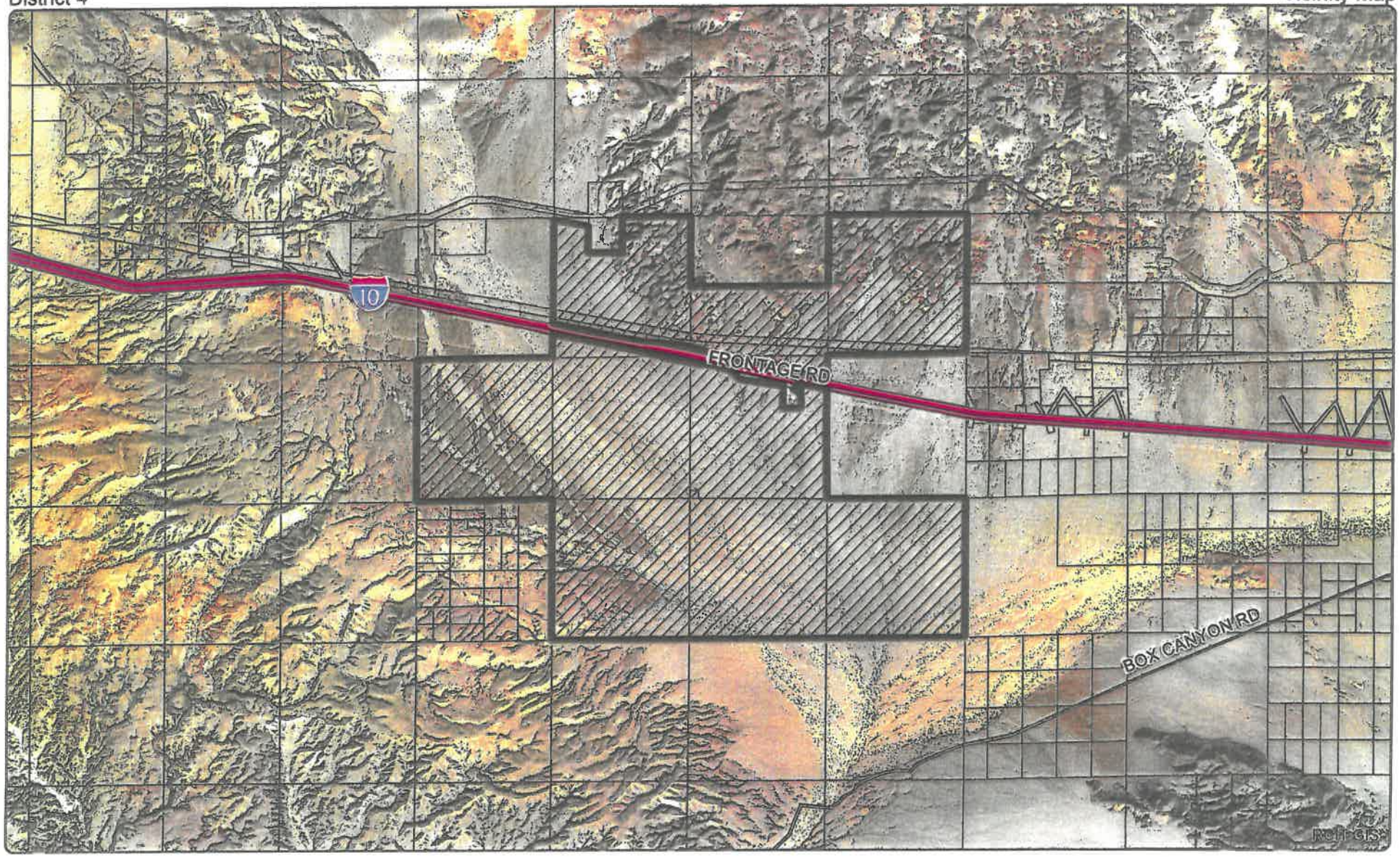
RIVERSIDE COUNTY PLANNING DEPARTMENT

CZ06915 GPA00686 SP00339

VICINITY/POLICY AREAS

Supervisor: Perez
District 4

Date Drawn: 11/20/2018
Vicinity Map



Zoning Area: Chuckawalla

Author: Vinnie Nguyen

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0 0.5 1 2
Miles

DISCLAIMER: On October 7, 2003, the County of Riverside adopted a new General Plan providing new land use designations for unincorporated Riverside County parcels. The new General Plan may contain different type of land use than is provided for under existing zoning. For further information, please contact the Riverside County Planning Department offices in Riverside at (951)955-3200 (Western County) or in Palm Desert at (760)863-8277 (Eastern County) or Website http://planning.rctlma.org

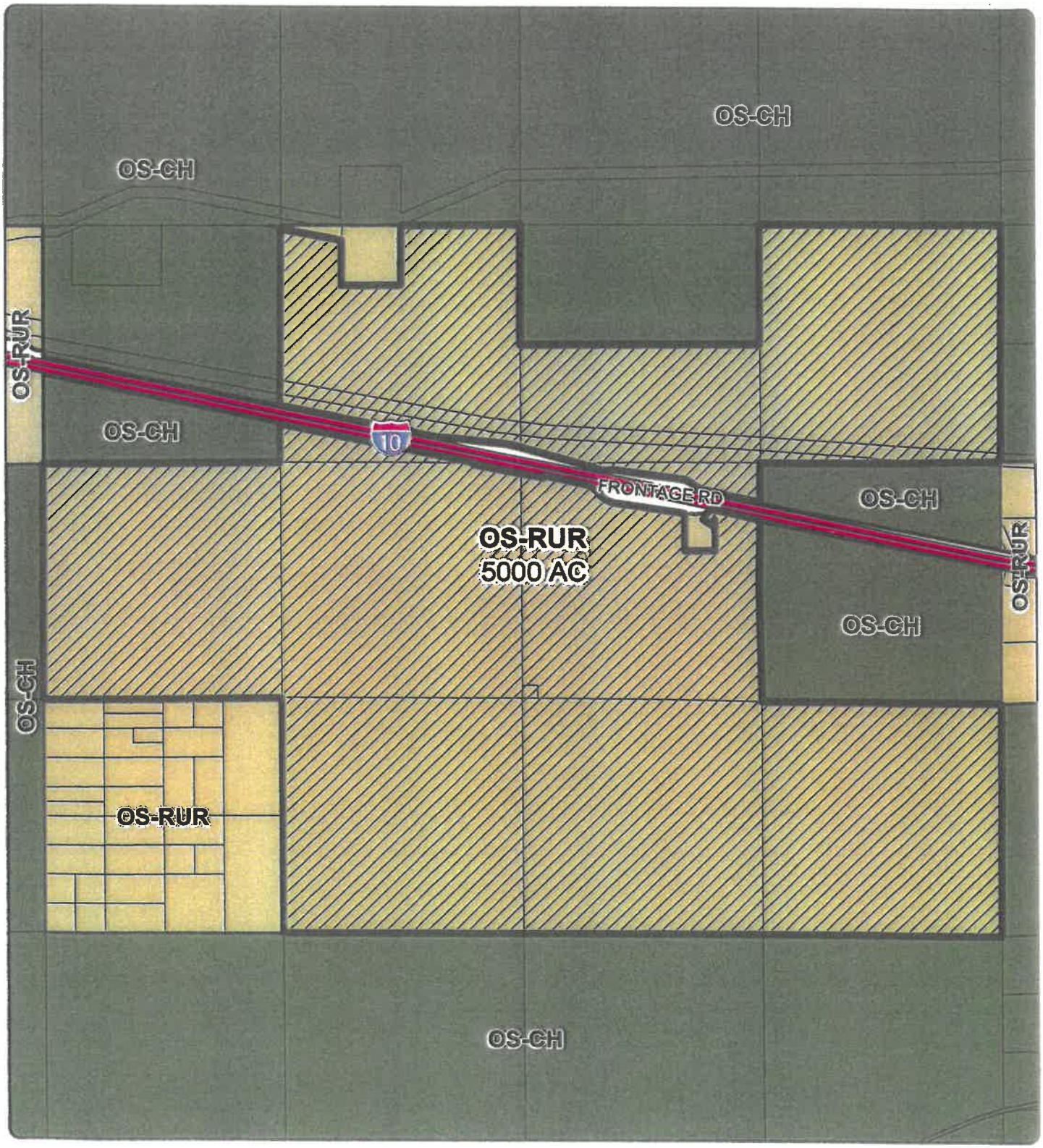
RIVERSIDE COUNTY PLANNING DEPARTMENT

CZ06915 GPA00686 SP00339

EXISTING GENERAL PLAN

Supervisor: Perez
District 4

Date Drawn: 11/20/2018
Exhibit 5



Zoning Area: Chuckawalla

Author: Vinnie Nguyen

N

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Feet

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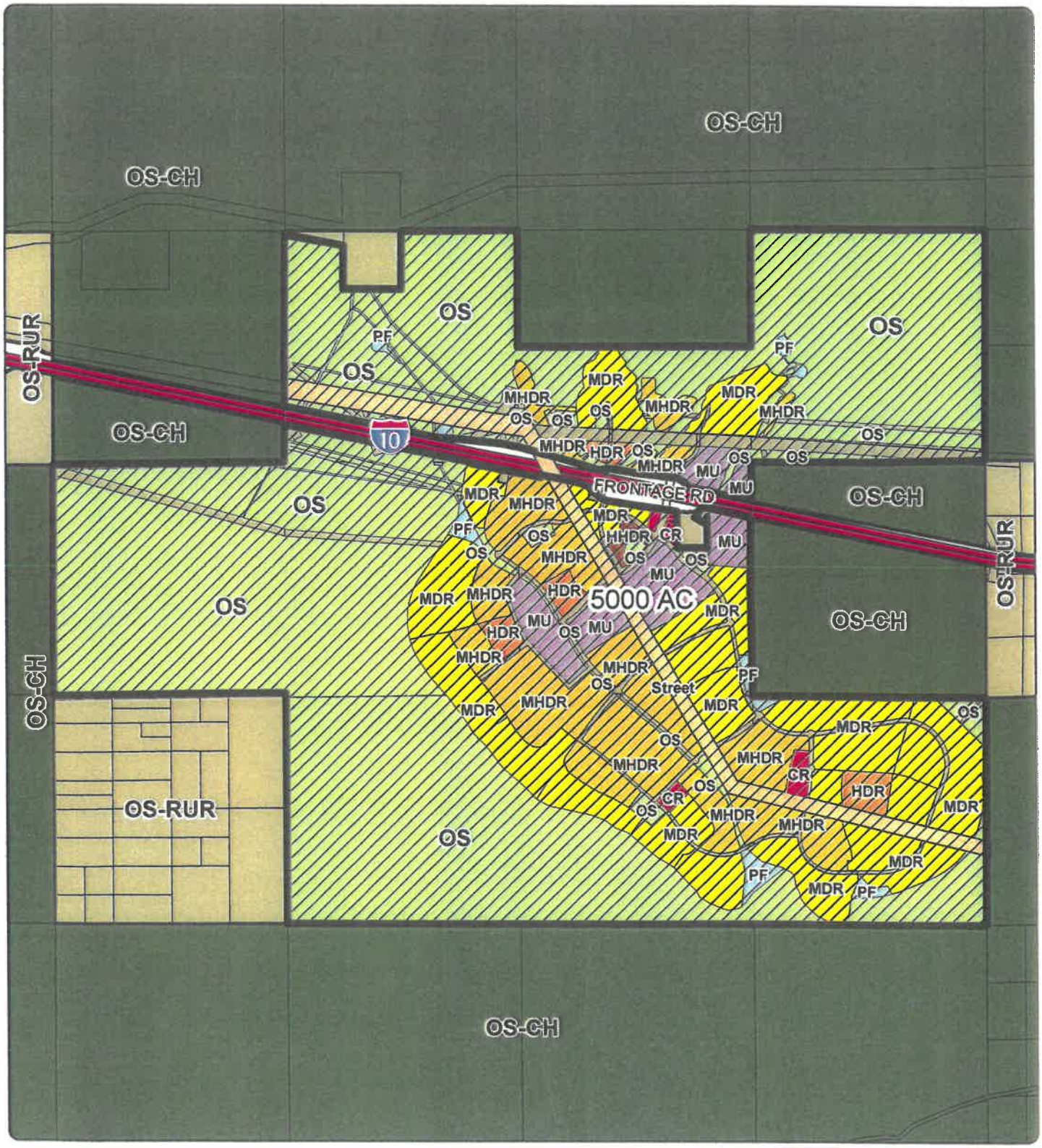
RIVERSIDE COUNTY PLANNING DEPARTMENT

CZ06915 GPA00686 SP00339

Supervisor: Perez
District 4

PROPOSED PLANNING AREA GENERAL PLAN

Date Drawn: 11/20/2018
Exhibit 6



Zoning Area: Chuckawalla

Author: Vinnie Nguyen

N

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Feet

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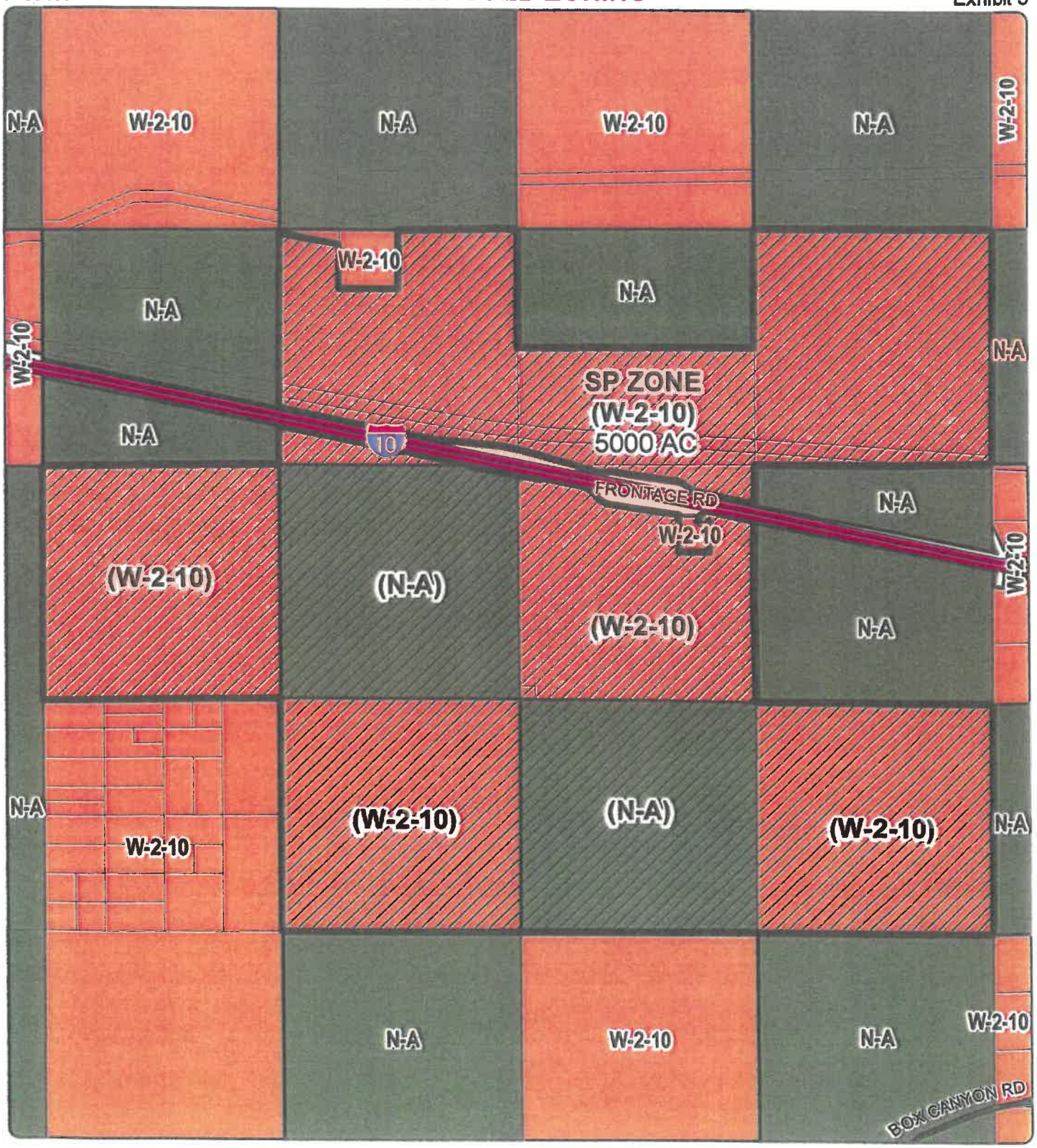
RIVERSIDE COUNTY PLANNING DEPARTMENT

CZ06915 GPA00686 SP00339

PROPOSED ZONING

Supervisor: Perez
District 4

Date Drawn: 11/20/2018
Exhibit 3



Zoning Area: Chuckawalla

Author: Vinnie Nguyen

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Feet

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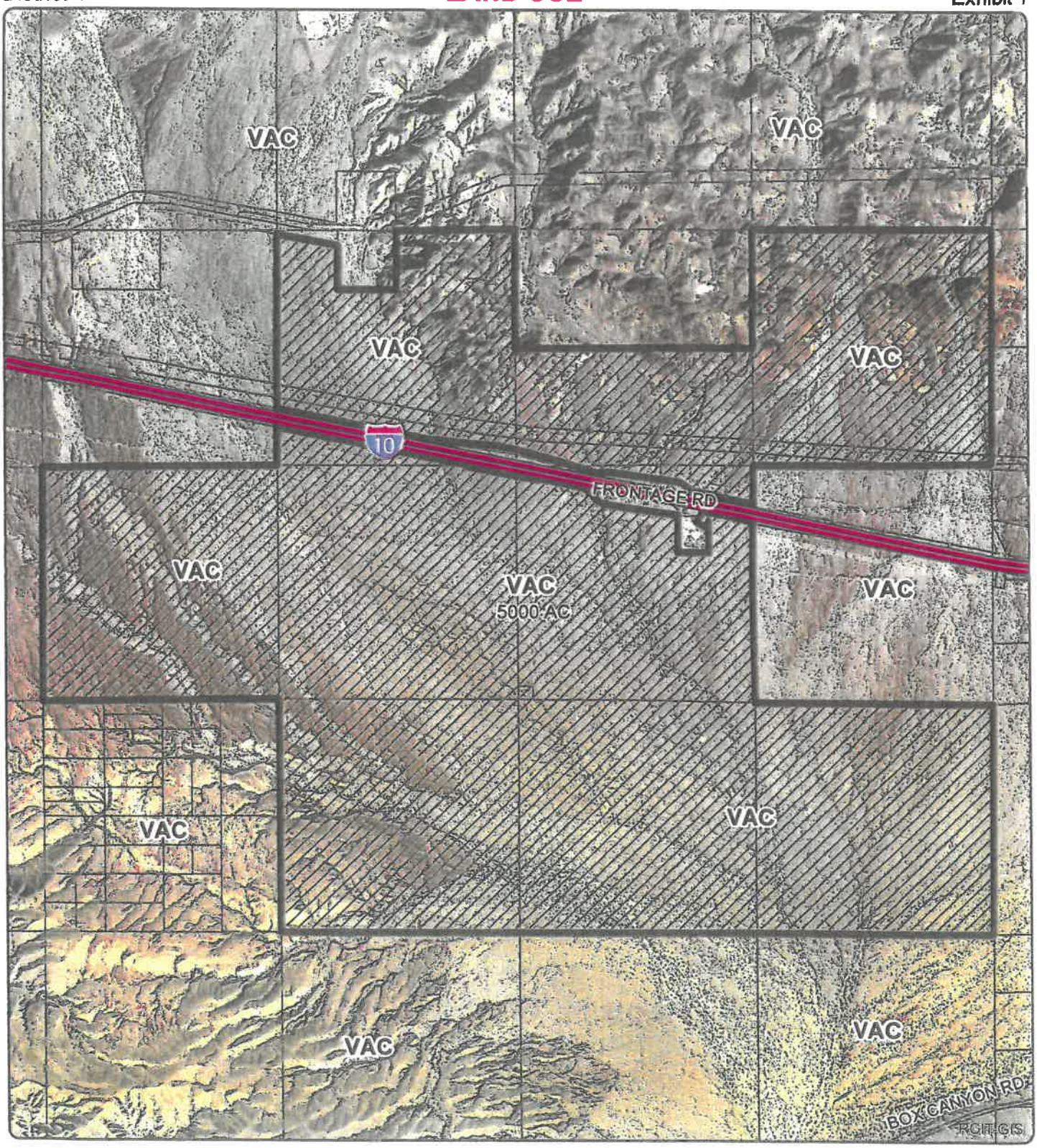
RIVERSIDE COUNTY PLANNING DEPARTMENT

CZ06915 GPA00686 SP00339

LAND USE

Supervisor: Perez
District 4

Date Drawn: 11/20/2018
Exhibit 1



Zoning Area: Chuckawalla

Author: Vinnie Nguyen

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Feet

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CAL FIRE – RIVERSIDE UNIT
RIVERSIDE COUNTY FIRE DEPARTMENT

SHAWN C. NEWMAN - FIRE CHIEF
Office of the Fire Marshal (West)
2300 Market Street, Ste 150, Riverside, CA 92501
Bus: (951) 955-4777 ~ Fax: (951) 955-4886 ~ www.rvcfire.org

PROUDLY SERVING THE UNINCORPORATED AREAS OF RIVERSIDE COUNTY AND THE CITIES OF:

BANNING
BEAUMONT
CANYON LAKE
COACHELLA
DESERT HOT SPRINGS
EASTVALE
INDIAN WELLS
INDIO
JURUPA VALLEY
LAKE ELSINORE
LA QUINTA
MENIFEE
MORENO VALLEY
NORCO
PALM DESERT
PERRIS
RANCHO MIRAGE
RUBIDOUX CSD
SAN JACINTO
TEMECULA
WILDOMAR

BOARD OF SUPERVISORS:

KEVIN JEFFRIES
DISTRICT 1

KAREN SPEIGEL
DISTRICT 2

CHARLES WASHINGTON
DISTRICT 3

V. MANUEL PEREZ
DISTRICT 4

JEFF HEWITT
DISTRICT 5

August 13, 2019

County of Riverside
Transportation Land Management Agency (TLMA)
Planning Department

Project Name: Paradise Valley Specific Plan
Reference: Risk Assessment and Mobile Emergency Evacuation Planning & Modeling Study
Administrative Draft: June 27, 2019
Prepared by Stantec

County of Riverside TLMA Planning Department:

The 2016 California Fire Code (CFC) Section 503.1.2 Additional access states:

"The fire code official is authorized to require more than one fire apparatus access road based on the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions or other factors that could limit access."

County of Riverside Ordinance 460 Section 3.2 (I) states:

"In order to assure adequate evacuation times, whenever lots of a proposed land division are located more than 1,320, or 660 feet in a high fire hazard area, from a publicly maintained circulatory road, alternate or secondary access shall be provided."

As requested by the County of Riverside TLMA Planning Department, staff from the Riverside County Fire Department have reviewed the "Risk Assessment and Mobile Emergency Evacuation Planning & Modeling Study, Administrative Draft: June 27, 2019" for the Paradise Valley Specific Plan.

We have significant concerns regarding the proposed design of the secondary access/egress for this development. As a result, we are asking for additional access/egress to be provided in accordance with CFC Section 503.1.2 and County of Riverside Ordinance 460 Section 3.2 (I).

Should you have any questions, or would like to discuss this project further, please feel free to contact Deputy Fire Marshal Adria Reinertson at (951) 955-4777.

Sincerely,

Shawn C. Newman
Fire Chief

Memorandum

To: Juan Perez, Director, Riverside County TLMA
Charissa Leach, Assistant Director, Riverside County TLMA
Russell Brady, Project Planner, Riverside County Planning Department.
Ken Baez, Riverside County TLMA

From: Tom Kirk, Executive Director, Coachella Valley Conservation Commission

Cc: Paul Lin, Harvey Niskala, Frans Bigelow, Travis Cullen, Mark Jones, Carolyn Syms Luna, Glorious Land Company
Ken Corey and Jenness McBride, U.S. Fish and Wildlife Service (USFWS)
Heather Pert, Joanna Gibson, and Scott Wilson, California Department of Fish and Wildlife (CDFW)

Re: Joint Project Review Process: Paradise Valley

Date: May 9, 2019

QUESTIONS RAISED MOST RECENTLY AT TUESDAY, APRIL 9, 2019 MEETING

On April 9, 2019 Riverside County planning staff (Russell Brady and Ken Baez) and representatives of the Glorious Land Company (Paul Lin, Harvey Niskala, Frans Bigelow, Travis Cullen, Mark Jones, and Carolyn Syms Luna) met with me and Coachella Valley Conservation Commission staff (Jim Sullivan and Katie Barrows) at CVAG's offices to discuss the Coachella Valley Multiple Species Plan (CVMSHCP) Joint Project Review (JPR) Process associated with the Paradise Valley Specific Plan. I committed to the County staff and Glorious Land Company representatives that I would further research some of the issues they raised concerning the JPR process, namely:

1. Should a JPR of the entire Paradise Valley Specific Plan be undertaken at this "programmatic" stage, as has been suggested by CVCC, the wildlife agencies and others?
2. If a JPR of the entire project was undertaken today and, as concluded in 2011, the project was determined to be inconsistent and a Like Exchange was proposed by the Glorious Land Company/County to address the inconsistency, when would this Like Exchange process be triggered? And, would Glorious Land Company need to demonstrate agreements or control over mitigation property being offered under the Like Exchange equivalency analysis?

As you are aware, the Western Riverside County Multiple Species Plan and the Coachella Valley Multiple Species Plan share some program elements, but the underlying premise behind the two plans' reserve systems is different. The CVMSHP is a "hard line" plan while the Western Riverside Plan is more fluid and subject to project by project negotiation, with much greater flexibility on lands to be conserved. In the Coachella Valley, our "hard line" plan makes it substantially easier than it was pre-plan for public agencies to approve and build infrastructure and to allow private development OUTSIDE of conservation areas through payment of fees, financial commitments and other identified obligations. For example, the CVMSHCP has greatly facilitated the

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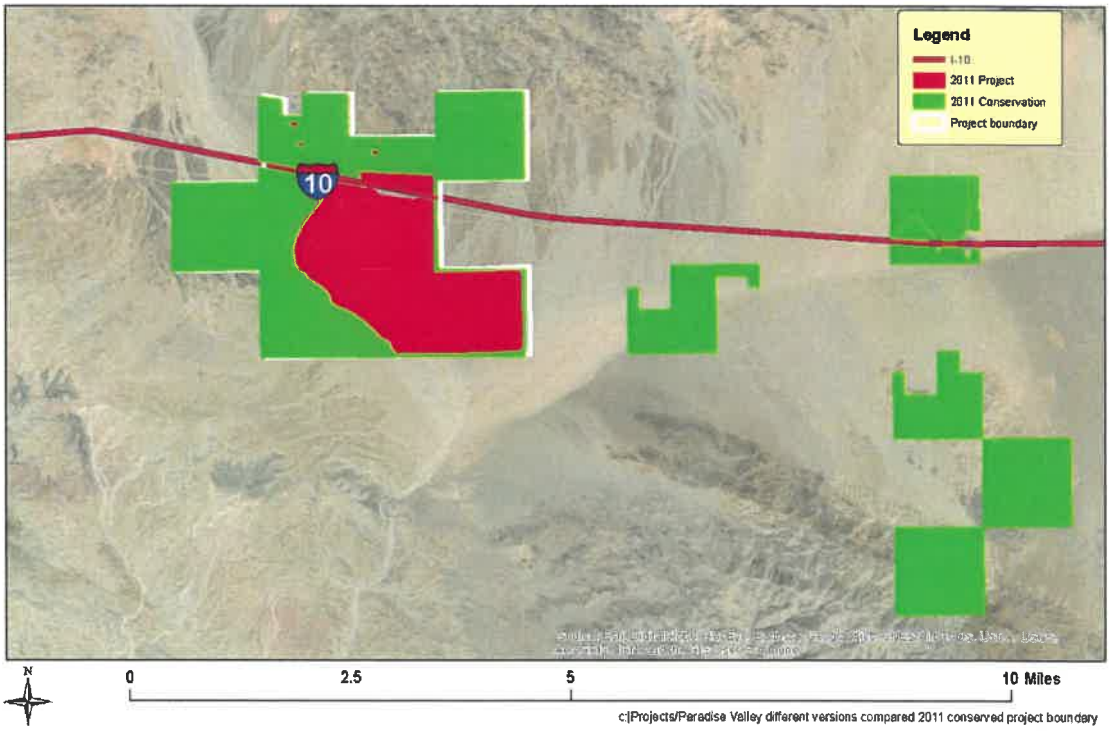
construction of freeway overpasses along Interstate 10. INSIDE conservation areas – such as the Desert Tortoise and Linkage Conservation Area where the Paradise Valley Specific Plan is located – development is limited and subject to processes like Joint Project Review, Like Exchange, and others. This is the "bargain" that was reached when the CVMSHCP was approved by all participants in 2007. 1

In order to provide more guidance to the County and Glorious Land Company on these topics, we have consulted with the wildlife agencies and offer our answers to the two questions posed.

SHOULD A JPR BE UNDERTAKEN OF THE WHOLE "PROGRAMMATIC" SPECIFIC PLAN?
Yes. Glorious Land Company has provided a summary entitled "2 ½ years of JPR Process (2010 – 2012)" (See Attachment A). While Glorious Land Company and the County may have met often and prepared multiple JPR drafts, CVCC undertakes the JPR once the County deems a JPR application is complete and submits a wet-signature application to the CVCC. Our records indicate this occurred twice, not three times as GLC's summary suggests, as no signed JPR application from GLC was received by CVCC in 2010. In each case, CVCC responded within about 30 calendar days of the submittal as required. On July 14, 2011, GLC submitted a JPR application to Riverside County. It is CVCC's understanding that August 2, 2011 is the first time the County deemed any JPR application from GLC as complete, triggering the JPR process. CVCC issued a JPR process comment letter on September 12, 2011 (see Attachment B). 2

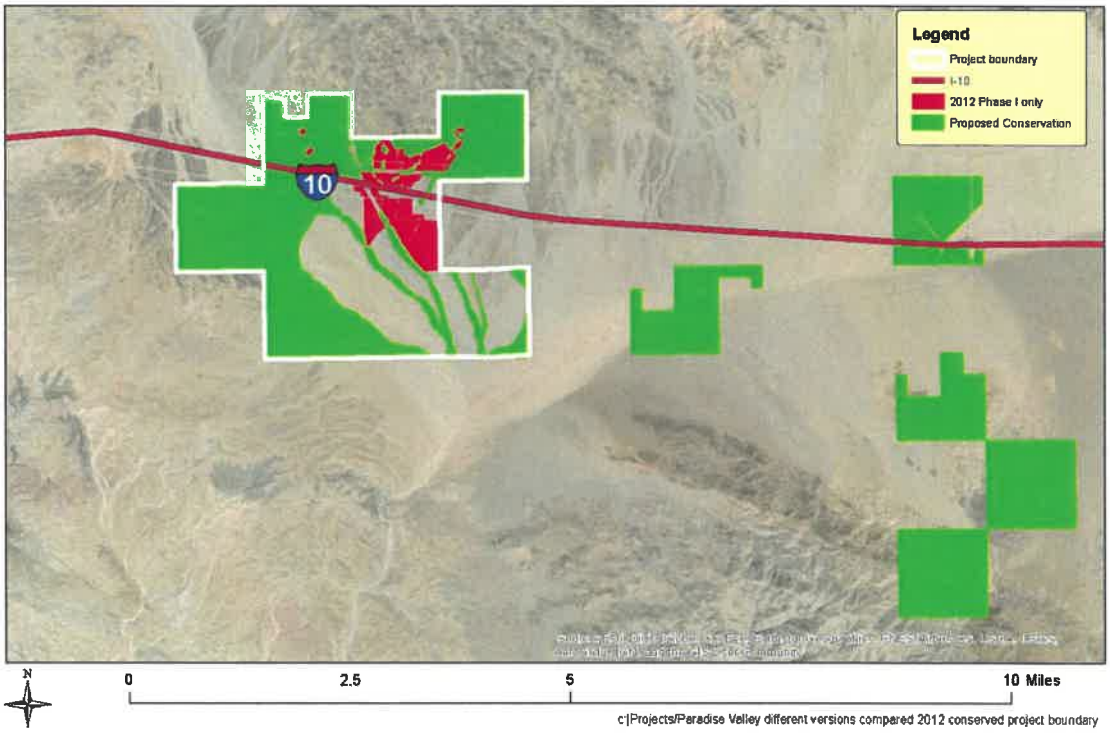
Notably, this 2011 JPR application was similar in scope, if not detail, to the one CVCC and others have determined is necessary at this stage of a project's entitlement process. As shown in Figure 1, the 2011 JPR covered the whole project, including the 1919.50 acres of proposed disturbance. 3

Figure 1. Area of proposed disturbance for the Paradise Valley project, from the June 2011 Joint Project Review submitted by GLC.



In the September 12, 2011 letter, CVCC found the "whole" project, as submitted, to be inconsistent, quantitatively and qualitatively, with the CVMSHCP. To remedy an inconsistent project, the Applicant has several options: 1) modify the project, reducing the amount and/or location of disturbance; 2) seek a transfer of conservation objectives (see CVMSHCP Section 6.12.3); or 3) seek a Like Exchange (see CVMSHCP Section 6.12.2). The latter two remedies require wildlife agencies concurrence. In the case of a Like Exchange, the CVMSHCP states, "if the Wildlife Agencies do not concur the action shall require an Amendment to the MSHCP." It is our understanding that none of these options were pursued or completed.
In April 2012, Glorious Land Company presented another application for a JPR that distinguished a Phase 1 for the project and requested that it be subject to a project level JPR. This Phase 1 of the project consists of 382 acres of proposed new disturbance.

Figure 2. Area of proposed disturbance for Phase 1 of the Paradise Valley project, from the April 2012 Joint Project Review submitted by GLC.



The second JPR process was started on May 9, 2012 and CVCC provided a comment letter on July 6, 2012 and follow up letters on August 16, 2012 and September 19, 2012. (see Attachment C- JPR Comment letters). Phase 1 of the project was determined to be quantitatively consistent with the CVMSHCP, but more information was needed to determine if it was qualitatively consistent. 4

In most, if not all, of our correspondence, CVCC has repeated that more information is necessary to complete the JPR process. The issues identified in the September 2011 letter are the same issues discussed in 2012, and indeed since the project was first discussed with CVCC and County staff prior to CVMSHCP approval. CVCC has had very little contact with the County or Glorious Land Company about this project since the late 2012 JPR, until the notice of release of the Draft EIR. The information in the Specific Plan and EIR demonstrate that much information has been gathered about the project and its impacts. This represents a substantial amount of effort and

analysis. That said, it is CVCC's opinion that the disturbed acreage of the project, from a total number of acres and location of disturbance basis, remains little changed from 2011 when CVCC determined that the project was quantitatively and qualitatively inconsistent with the CVMSHCP. It is CVCC's opinion, in consultation with the wildlife agencies, that the entire Specific Plan area must undergo a JPR. On April 23, 2019, Glorious Land Company provided CVCC two flow charts described as "Programmatic Entitlement Process" and "Project Level Entitlement Process" which represent the company's interpretation of this project's entitlement processes (see Attachment D). The Programmatic Entitlement Process flowchart depicts in green a step called, "County CVMSHCP Consistency Analysis per IA Section 7.5 and CEQA Appendix G." While the CEQA document is required to analyze consistency with the CVMSHCP, this analysis is not the same as, nor a substitute for, a JPR. escribed above, this "green" step specifically refers to Section 7.5 of the IA (CVMSHCP Implementation Agreement), which is provided in its entirety here:

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> 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 as set forth in 6.6.1.1 of the MSHCP [**emphasis added**]**.

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This flowchart identifies where the applicant provided their interpretation of the requirements of the CVMSHCP. In discussions with GLC at the April 9 meeting, it was suggested that the additional information not available in the 2012 JPR was included in the Draft EIR as part of the "consistency analysis." However, the Joint Project Review process is to be completed by the CVCC, not the applicant nor the County, upon receipt of a signed application. The "consistency analysis" in the project EIR may have been prepared as a requirement of CEQA but does not satisfy the requirements of the CVMSHCP. Indeed, the JPR serves as the consistency analysis required under the CVMSHCP. For this reason, the flowchart should indicate at the "green" step that the JPR/consistency analysis on the whole project should be completed prior to the step labeled "County Deems Application Complete." As a Local Permittee, the County follows the obligations of the CVMSHCP described in Section 6.6.1. In Section 6.6.1.1 ("Joint Project Review Process in Conservation Areas") it states, "CVCC staff shall participate in the Joint Project Review Process to ensure consistent Plan implementation and oversight. CVCC shall have neither jurisdiction over land use decisions by Permittees nor the authority to prevent a Permittee from approving a project. The application will not be deemed complete by the Permittee prior to completion of the Joint Project Review Process."

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It is our opinion that a JPR should and can be undertaken of the entire Paradise Valley project/Specific Plan. As the Glorious Land Company representatives are well aware, the sum total of disturbance envisioned in the Specific Plan is not consistent with the CVMSHCP. Of course, as we have previously indicated, the applicant can consider project modifications and/or a transfer of conservation objectives or Like Exchange, subject to wildlife agencies' approval. Glorious Land Company has raised questions about the Like Exchange process.

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LIKE EXCHANGE

Like Exchanges and other plan modifications were "not anticipated on a regular basis" (see CVMSHCP Section 6.12.) Note that in the 10 years of full plan implementation, and existence of the CVCC, we have had no project as large and impactful as the Paradise Valley Specific Plan proposed in a conservation area. And we have only one or two examples of applicants considering small Like Exchanges, only one of which was completed. Therefore, it is

understandable that there are some questions about the Like Exchange process associated with this large project.

At the meeting on April 9, 2019, Glorious Land Company (GLC) representatives indicated that it would be difficult or impossible to meet the Like Exchange requirements at this stage of the entitlement process. A central concern expressed by GLC representatives is that this Like Exchange will require thousands of acres and that, under the CVMSHCP, the "applicant must demonstrate agreements or control over mitigation property being offered under the equivalency analysis." I expressed some sympathy with the representative's concern and indicated I would research the matter further. This memo summarizes the results of that review, as well as discussions with the wildlife agencies, regarding the process for a Like Exchange.

In reviewing the CVMSHCP, it is apparent that when CVCC undertakes a JPR that finds a project inconsistent with the CVMSHCP, the two options to resolve this without downsizing/changing the project, transfer of conservation objectives and a Like Exchange, should occur before a local Permittee approves a project (see page 6-51), even a programmatic specific plan. These are separate processes from the JPR that are described in separate sections of the CVMSHCP and involve different criteria. Although a Like Exchange is to be submitted to the CVCC, the review process and approval are completely within the jurisdiction of the wildlife agencies, not CVCC. 12

From the CVMSHCP, Section 6.12.2, Like Exchanges to Conservation Areas:

> "Like Exchanges are changes proposed by a Permittee to modify the boundary of one or more Conservation Areas in exchange for reducing or modifying the boundary of a Conservation Area. A Like Exchange must result in equal or greater benefits to Covered Species and conserved natural communities as compared to those benefits analyzed in the Plan. In addition, the level of Take of Covered Species must be no greater than that analyzed in the Plan.
>
> When a Like Exchange is proposed, the applicable Permittee(s) shall meet and confer with the Wildlife Agencies prior to submittal of Like Exchange analysis to the CVCC. The Permittee will prepare an equivalency analysis. Upon submittal of a completed equivalency analysis, the Wildlife Agencies shall respond in writing within 60 days (of acknowledged receipt) as to their concurrence with the Like Exchange. If the Wildlife Agencies do not concur the action shall require an Amendment to the MSHCP. Like Exchanges must also be submitted to applicable Permittees for approval."

To submit a Like Exchange, a project like Paradise Valley that proposes substantial disturbance within the Conservation Area must be able to demonstrate that the lands outside the conservation area are biologically equivalent to those to be exchanged from inside the conservation area. The applicant should carefully follow the requirements in section 6.12.2 of the CVMSHCP. It is a substantial requirement, but such a high bar is exactly what was envisioned when the plan was formulated, especially in cases where changes to conservation area boundaries are proposed. After all, as a hard-line plan, it was assumed that nearly everything within conservation areas would be conserved and nearly everything outside of conservation areas wouldn't be. 13

To address the concerns from GLC about how to meet Like Exchange requirements at this point, the wildlife agencies have indicated that the meet and confer process is the appropriate forum to review conceptual draft components for a Like Exchange analysis. If requested by the County and the applicant, the wildlife agencies confirmed their willingness to participate in a meet and confer process as described in the CVMSHCP Like Exchange requirements in Section 6.12.2. Essentially, the applicant would need to prepare a "draft" Like Exchange analysis. Thus, the meet and confer process provides an opportunity for discussion of the level of information 14 15

needed in the Like Exchange analysis to demonstrate that the proposed exchange provides biologically equivalent or superior values.

During the initial stage of the meet and confer, use of Google Earth or a similar approach to review the potential suitability of proposed replacement properties would be acceptable and a review of proposed acquisition properties and the feasibility of acquisition would be sufficient. The meet and confer consultation will provide the opportunity for a discussion of what is needed in the proposed Like Exchange to quantify and characterize the effects and benefits of the exchange to demonstrate equal or greater benefits to Covered Species and natural communities. | 16

In the meet and confer draft Like Exchange analysis the applicant should not only identify equivalent lands outside of conservation areas, it must also demonstrate that it is at least feasible to secure or acquire these lands (e.g. privately owned). The applicant should describe why they think they can secure the proposed exchange property. This represents an approach to the Like Exchange which allows for a "draft" review of the analysis by the wildlife agencies, prior to the final step of demonstrating control of the property.

The wildlife agencies have indicated their position that, consistent with the CVMSHCP, a complete Like Exchange analysis would require site access and control of proposed exchange properties. They have suggested that the conceptual review process and timing could be discussed as part of the meet and confer discussion. This would include a discussion with the County and the applicant how #9 of the Like Exchange analysis ("Applicant must demonstrate agreements or control over mitigation property being offered under the equivalency analysis") can be achieved. | 17

This approach of allowing the applicant to present their proposal for a Like Exchange in draft form through the meet and confer process addresses the concerns expressed by GLC, while maintaining the requirements of the CVMSHCP.

NEXT STEPS

CVCC stands ready to perform a JPR for the whole project. The project footprint for the whole project, which is available, is the basis for evaluating quantitative consistency. CVCC staff will provide the applicant with the information necessary to evaluate the qualitative requirements of the CVMSHCP. It is reasonable to expect that our conclusions would be similar to those reached in 2011 and 2012: While Phase 1 is quantitatively consistent with the CVMSHCP, it may not be qualitatively consistent AND the whole of the specific plan is quantitively and qualitatively inconsistent with the CVMSHCP. If the project is not changed/downsized, this inconsistency is resolved through the County presenting a transfer of conservation objectives and/or Like Exchange to the wildlife agencies. | 18

GLC ENTERPRISES, LLC'S ("GLC'S") RESPONSE TO COMMENTS IN MEMO DATED MAY 9, 2019 SUBMITTED TO THE COUNTY OF RIVERSIDE BY THE COACHELLA VALLEY CONSERVATION COMMISSION CONCERNING THE PARADISE VALLEY PROJECT

GLC provides the following responses to comments contained in CVCC's May 9, 2019 Memo submitted to the County of Riverside concerning the Paradise Valley project. These responses correspond to the comment numbers marked for reference on CVCC's May 9, 2019 Memo.

Comment 1.

CVCC refers to the CVMSHCP as a "hard line plan" and states that this plan is the "bargain" that was reached when the CVMSHCP was approved by all participants in 2007.

Response to Comment 1.

The plan that was approved is a Habitat Conservation Plan created in accordance with the Natural Community Conservation Planning Act ("NCCPA"), the California Endangered Species Act ("CESA") and the federal Endangered Species Act ("ESA"). As is the case with all habitat conservation plans, the purpose of the CVMSHCP is to satisfy the legal requirements for the issuance of permits that will allow the incidental take ("Take") of species covered by the plan in the course of otherwise lawful activities (see, e.g., CVMSHCP Executive Summary at Page ES-1; Final Major Amendment to CVMSHCP dated August 2016, Section 1.2 at Page 1-2). The CVMSHCP is governed by the Implementing Agreement for the CVMSHCP (the "IA"), and the Final Recirculated CVMSHCP dated September 2007 (the "MSHCP"). The MSHCP contains specific terms and conditions. As discussed in the following responses, many of the positions expressed in CVCC's May 9, 2019 Memo and as stated in the May 9, 2019 meeting with CVCC staff are not supported by the plain and specific language of the CVMSHCP. The CVMSHCP must not be interpreted to include new requirements that are nowhere specified in the CVMSHCP or even supported by its express provisions.

GLC incorporates by reference in these responses to CVCC's comments the entire text of the CVMSHCP, including the IA and the MSHCP, which can be accessed at the following link: http://www.cvmshcp.org/Plan_Documents_old.htm

Comment 2.

In this comment CVCC purports to characterize the Joint Project Review ("JPR") process which was undertaken by GLC for an earlier version of the Paradise Valley project.

Response to Comment 2.

GLC initiated a pre-application review with CVCC and the Wildlife Agencies, followed by two JPR applications. GLC spent over two and a half years (from February 2010 to September 2012)

in continuous efforts to meet, confer and process JPR applications for an earlier version of the project.

The earlier version of the project included, (1) project level entitlements, with a proposed vesting tentative map, grading plan, and a request for Take Authorization over a portion of the project site, and (2) the balance of the site with programmatic level entitlements.

Because the earlier version of the project included project level entitlements which would have permitted ground disturbance and required issuance of Take Authorization, a JPR application was processed for those project level entitlements. During that processing, GLC also attempted to process a JPR for the programmatic entitlements.

Comment 3.

CVCC states that the 2011 JPR application was similar in scope, if not detail, to the one CVCC and the Wildlife Agencies believe is necessary at this stage of the current PVSP entitlement process.

Response to Comment 3.

This is incorrect. As discussed above the earlier version of the project included applications for project level approvals which would have permitted disturbance and required Take Authorization.

Comment 4.

CVCC states that Phase 1 of the earlier version of the project was determined to be quantitatively consistent with the CVMSHCP, but that more information was needed to determine if it was qualitatively consistent.

Response to Comment 4.

This is an incomplete and inaccurate characterization of CVCC's findings which are set forth in CVCC's September 19, 2012 letter. In that letter CVCC stated, (1) "CVCC finds the Phase 1 submission is consistent with the CVMSHCP with the caveat that the project has outstanding issues that will be resolved through the project approval process," and (2) "As noted in our letter of July 6, 2012, we determined that not enough information was provided to complete the JPR for a programmatic level review of the entire specific plan." Notably, the language that CVCC refers to from its July 6, 2012 letter states that "***The JPR process requires specific information on the proposed project that does not allow for a programmatic level analysis***." In other words, in the July 6, 2012 letter, CVCC acknowledged that the JPR process is not appropriate for programmatic level review, such as that which is associated with a Specific Plan (or, e.g., a General Plan).

Comment 5.

CVCC states its opinion that the disturbed acreage of the current project, from a total number of acres and location of disturbance basis remains little changed from 2011.

Response to Comment 5.

It is unclear why CVCC refers to the 2011 version of the project since that version was superseded by the 2012 version of the project. CVCC determined that Phase 1 of the 2012 version of the Paradise Valley project was consistent with the CVMSHCP subject to outstanding issues to be resolved through the project approval process and that the JPR process does not allow for programmatic level analysis. This same reasoning should apply to the current proposal.

Comment 6.

CVCC states that while the CEQA document is required to analyze consistency with the CVMSHCP, this analysis is not the same as, nor a substitute for, a JPR.

Response to Comment 6.

GLC agrees with this statement. The consistency analysis, included in the project EIR and required by Section 7.5, applies to all Discretionary Projects and is separate and distinct from a JPR analysis which only applies to projects which will result in disturbance.

Comment 7.

CVCC cites and emphasizes language from Section 7.5 of the IA which states that "Additionally, the Permittees will participate in the Joint Project Review Process as [*sic*] set forth in [Section] 6.6.1.1 of the MSHCP".

Response to Comment 7.

CVCC has omitted reference to key language in IA Section 7.5. IA Section 7.5 provides in the entirety as follows:

> "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."

The above language of IA Section 7.5 clearly states that all Discretionary Projects are required to assess the project's ability to meet the Conservation Objectives in the Conservation Area. This assessment was completed in the PVSP EIR (over 40 pages of consistency analysis was included in the EIR and the EIR concluded that the PVSP project was consistent with the CVMSHCP; see Draft EIR at pages 4.4-29 through 4.4-37 and 4.4-40 through 4.4-71).

IA Section 7.5 goes on to state that **Additionally**, the Permittees will participate in the JPR process ***set forth in Section 6.6.1.1 of the MSHCP***. [Emphasis added.] The word "Additionally" demonstrates that the JPR process is separate and distinct from the consistency assessment referenced in the preceding sentence. Also, this language simply refers to Section 6.6.1.1 of the MSHCP for the details as to how, when and where the JPR process is to occur.

See also response to Comment 8 below.

Comment 8.

CVCC states that the JPR process is to be completed by the CVCC, not by the applicant or the County.

Response to Comment 8.

GLC agrees with this statement as it pertains to the JPR process, and not the consistency assessment. Here it is important to note that IA Section 7.5, is unambiguously directed at the Permittees, and not at CVCC. This is because Discretionary Projects such as general plans, specific plans, etc. are matters within the sole discretion of the County and Cities (see IA Section 20.2, IA Section 11.2.2.A, and MSHCP Section 6.6.1.1). This fact is also supported by the language of IA Section 7.5 where it states that, "***Discretionary Projects*** 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."). [Emphasis added.]

The distinction between the consistency assessment, which is to be completed by the County as a Permittee under the CVMSHCP, and a JPR which is to be conducted by CVCC and participated in by the County as a Permittee, is further clarified by Section 6.6.1 of the MSHCP entitled "**Obligations of the Local Permittees**". Section 6.6.1 of the MSHCP states in pertinent part as follows:

"The Local Permittees must also comply with all other terms and conditions of the MSHCP and IA..., including but not limited to:

***

--***Participate in the Joint Project Review Process*** for projects within Conservation Areas ***as described in Section 6.6.1.1*** and implement the Land Use Adjacency Guidelines described in Section 4.5.

--Upon request from the Wildlife Agencies, ***the Local Permittees shall provide (a) an analysis and determination of consistency with the Plan at the time of, and along with, certification of applicable CEQA documents for approval of Development projects within Conservation Areas*** and (b) a copy of the final project approval documents within 30 days." [Emphasis added.]

Therefore, the IA and MSHCP are quite clear that the consistency analysis which is required for all Discretionary Projects must necessarily be completed by the County along with its CEQA document, as has been done in the PVSP EIR. This consistency analysis is a County process, not a CVCC process, and is to be provided at the time of and along with certification of the EIR. Additionally, the County is required under Section 7.5 to ***participate*** with CVCC in the JPR process to the extent a JPR process is required under Section 6.6.1.1.

CVCC will have the opportunity to complete a JPR process and consistency analysis when project level entitlements are proposed within the Specific Plan that would result in ground disturbance. To ensure that the JPR process is completed prior to deeming the application complete for projects within the Specific Plan that would result in ground disturbance, the County has proposed Mitigation Measure BIO-1, and GLC has agreed to incorporate that Mitigation Measure in a Mitigation Monitoring Plan and Condition of Approval for the proposed project.

Comment 9.

CVCC states that the JPR serves as the consistency analysis required under the CVMSHCP.

Response to Comment 9.

This is an incorrect statement for the reasons stated in GLC's response to comment 8 above. The consistency analysis and the JPR process are separate and distinct. The consistency analysis is conducted by the County in the course of its processing of the Discretionary Project. Such a consistency analysis coincides with the County's obligation under CEQA to evaluate whether the project would conflict with the provisions of an adopted Habitat Conservation Plan. (See CEQA Guidelines Appendix G at Section IV(f).) The JPR process, on the other hand, is conducted by CVCC and the County is required under IA Section 7.5 to participate in that process if and to the extent a JPR is required under MSHCP Section 6.6.1.1.

CVCC's assertion that the "JPR/consistency analysis on the whole project should be completed prior to the step labeled 'County Deems Application Complete'" is not supported by the specific language of the CVMSHCP or IA. CVCC's comment is only accurate for project level entitlements that propose ground disturbance. As stated above, the consistency analysis required under Section 7.5 of the IA and the consistency analysis to be completed in the JPR process pursuant to Section 6.6.1.1 are separate and distinct. In the course of processing project level entitlements that would result in ground disturbance, these separate and distinct processes could be completed at the same time. Only in the case of requested programmatic entitlements that will not result in ground disturbance does the separate nature of these requirements and the timing of the JPR process versus the County's requirements under Section 7.5 of the IA become apparent.

Comment 10.

CVCC quotes the part of MSHCP Section 6.6.1.1 which states "CVCC staff shall participate in the Joint Project Review Process to ensure consistent plan implementation and oversight."

Response to Comment 10.

To the extent CVCC is claiming that the language of this sentence supports its position that the consistency analysis and the JPR process which are referenced in IA Section 7.5 are one and the same, CVCC is mistaken. The fact that the language "Joint Project Review Process" and "consistent" appear in the same sentence does not mean they refer to the same process. Rather, the language quoted by CVCC merely clarifies CVCC's role in the JPR process.

That the consistency process and JPR are separate processes is made clear by the express language of Section 6.6.1.1, which CVCC has neglected to cite. In particular, Section 6.6.1.1 clearly states when and under what circumstances a JPR process is required. MSHCP Section 6.6.1.1 states in pertinent part as follows:

> "...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***. ..." [Emphasis added.]

In other words, a JPR process is only required for projects that would result in disturbance. CVCC has not reconciled and cannot reconcile this clear and unequivocal language with its position that the JPR process and consistency process are one and the same.

Moreover, CVCC's position ignores the fact that the purpose of the CVMSHCP is to satisfy the legal requirements for the issuance of Take permits (referred to in the CVMSHCP as "Take Authorization"). Under the ESA, "Take" is defined as: "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or to attempt to engage in any such conduct (see, 16 U.S.C. 1542(b)). Similarly, CESA defines "take" as to "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." The MSHCP refers to these definitions in its definition of the term "Take" (see MSHCP, "Definitions" at page xxxvii). Accordingly, by definition, "Take"

requires physical conduct or changes to the physical environment that could harm protected species. Planning actions, such as the County's approval of the PVSP, which neither permit disturbance nor grant Take Authorization do not constitute, nor will such actions permit, "Take" to occur.

It is well established that specific plans are legislative-level approvals that do not directly authorize land disturbance. (See, e.g., Cal. Gov. Code, § 65450 et seq.; and *Yost v. Thomas* (1984) 36 Cal.3d 561, 570-571.) Here, moreover, the GLC and Riverside County have committed to additional site-specific environmental documents for subsequent project level approvals consistent with the approved PVSP that would directly authorize actual physical development (or at least function as the County's last discretionary approvals prior to granting ministerial approvals allowing direct disturbance). There is no danger, then, that the County's approval of the proposed PVSP, absent a JPR, would authorize physical environmental changes that could result in the "Take" of any endangered or threatened species.

Further, MSHCP Section 6.6.1.1, as written (not as mistakenly interpreted by CVCC), is consistent with the U.S. Fish & Wildlife Service's (USFWS') official position as to when an incidental take permit is required. In its "Guidance on Trigger for an Incidental Take Permit Under Section 10(a)(1)(B) of the Endangered Species Act…" dated April 26, 2018, the Principal Deputy Director of the USFWS states that "*Simply put, … 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."* The Guidance document goes on to state that Chapter 3 of the USFWS' Habitat Conservation Plan Handbook clarifies "*that the standard for determining if activities are likely to result in incidental take is whether that take is 'reasonably certain to occur'."*

Finally, Section 17.2 of the IA states in pertinent part that "*Authorization of Take for Third Parties shall occur upon issuance of a grading permit…*". As discussed below, no grading permit will be issued by the County, and Take is not reasonably certain to occur by the programmatic approvals being sought by GLC. Rather, with adoption of Mitigation Measure MM BIO-1, it is in fact certain that Take will not occur until later implementing projects are evaluated under CEQA, a JPR process has been completed for those implementing projects, and Take Authorization has been issued by the County. It is anomalous that the CVCC is interpreting Section 6.6.1.1. in a manner wholly at odds not only with the ESA concept of "Take" but also long-standing understandings of how land use planning works in practice, as landowners first obtain legislative-level approvals and then build upon them by seeking later, site-specific approvals.

Comment 11.

CVCC states that in CVCC's opinion a JPR should and can be undertaken of the entire Paradise Valley project Specific Plan, and that the sum of total disturbance envisioned in the PVSP is not consistent with the CVMSHCP.

Response to Comment 11.

A. As discussed above, a JPR process is not required at this stage of the PVSP. The project which is being processed with the County only seeks the approval of a specific plan which

establishes the land use and zoning for the property. These programmatic entitlements do not allow for ground disturbance of any type. The PVSP does not involve issuance or approval of grading permits, building permits, subdivision maps or any other land use entitlement that would authorize disturbance. A consistency analysis has been completed by the County and is included in the project EIR. The project EIR concludes that the proposed project is consistent with the CVMSHCP. The EIR includes proposed Mitigation Measure MM BIO-1 which requires that a JPR process be completed in accordance with the CVMSHCP at the implementing project stage prior to any disturbance and prior to the County's issuance of take authorization. Mitigation Measure MM BIO-1 provides as follows:

> "**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 CVMSHCP 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 and Linkage Conservation Area (DTLCA) and Mecca Hills/Orocopia Mountains Conservation Area (MHOMCA) Conservation Objectives, Required Measures, and Land Use Adjacency Guidelines."

Mitigation Measure MM BIO-1, and Condition of Approval No. 015-Planning-EPD, make it clear that a JPR process must be completed in accordance with the requirements of MSHCP Section 6.6.1.1 prior to the County deeming an application complete for any implementing project within the PVSP that will result in disturbance of any type, and Take Authorization must be issued by the County prior to any such disturbance.

B. The position advanced by CVCC in its May 9, 2019 Memo and as expressed in the May 9, 2019 meeting with County staff presents threshold and watershed issues for the County. CVCC stated in the May 9, 2019 meeting attended by CVCC, Wildlife Agency representatives, County staff and representatives of the project applicant, that under CVCC's interpretation of the CVMSHCP as set forth in its Memo, ***the County would be required to complete a JPR process prior to adopting County initiated general plan amendments or updates including County initiated zone changes***, to the extent such a general plan amendment, update or zone change affects lands within or partially within a CVMSHCP Conservation Area. This is a substantial overreach and is inconsistent with the express terms, conditions and requirements of the adopted CVMSHCP. To our knowledge, the County to date has never been required by the CVCC to comply with a JPR process in connection with County initiated actions that will not result in ground disturbance. GLC submits that from a planning perspective, the County should be most concerned by this assertion on the part of CVCC.

C. Because the proposed project seeks only a programmatic approval for the Specific Plan and zoning of the project, and does not include any application for issuance of permits which would result in disturbance, a JPR process is premature at this programmatic stage of the proposed project.

The proposed project is a phased project which will be developed in phases. Project level entitlement applications, including Village Refinement Plans, Vesting Tentative Tract Maps and grading permits will be processed for each phase when actual development is proposed. When the actual areas to be developed and the corresponding lands which will be used for conservation to offset that development are identified during these project level applications, a JPR will be completed for each phase of development at that time. This will be ensured by implementation of Mitigation Measure MM BIO-1 identified in the EIR for the proposed project.

As part of the JPR process, GLC and the County will be required to demonstrate how the proposed project would affect the maintenance of Rough Step in the DTLCA. This will require that GLC and the County provide CVCC a map indicating the location of the proposed project, including the location of the areas to be disturbed by development and the lands to be used for conservation. This information will be needed in order to demonstrate how the project would affect the maintenance of Rough Step in the DTLCA as required by Steps 1 and 2 of MSHCP Section 6.6.1.1.

Given the fact that the County has not yet approved a programmatic Specific Plan and zoning for the proposed project, GLC does not yet own all of the conservation lands which will be needed to satisfy the Conservation Objectives required by the CVMSHCP, and cannot demonstrate how the project would affect maintenance of Rough Step in the DTLCA for the entire 1,800 acre Specific Plan area. As discussed above, a consistency assessment was included in the project EIR which established that there are sufficient privately held lands both inside and outside of the DTLCA which could be acquired for use as conservation lands to offset the disturbance of the entire 1,800 acre project footprint. However, until these lands have been purchased by GLC and the locations thereof provided to CVCC as required by Section 6.6.1.1 of the MSHCP, a JPR process cannot be completed. It would be unreasonable to expect GLC, or any project proponent to purchase over 20,000 acres of conservation lands in order to pre-mitigate the impacts associated with actual land disturbance for a project that has not yet been approved. Therefore, a JPR process is premature at this programmatic stage of the proposed project.

Comment 12.

CVCC states its position that when CVCC undertakes a JPR that finds a project inconsistent with the CVMSHCP, there are two options to resolve the inconsistency without downsizing or changing the project: transfer of conservations objectives or a Like Exchange. CVCC states that these options should be undertaken before a local Permittee (such as the County) approves a project, even a programmatic specific plan.

Response to Comment 12.

This comment illustrates a substantial problem with CVCC's interpretation of the CVMSHCP. When a programmatic project is proposed, particularly on a large project such as Paradise Valley, or perhaps a County initiated general plan amendment or update, the project applicant will not have yet acquired the conservation land which will be required in order to satisfy all of the Conservation Objectives of the CVMSHCP. In the case of the PVSP, it would be wholly unreasonable to expect GLC to purchase over 20,000 acres of conservation land prior to having received even a programmatic approval of its Specific Plan. Likewise, it would be wholly unreasonable to expect the County to acquire the conservation lands needed to satisfy Conservation Objectives over the areas covered by a County initiated general plan amendment or update affecting lands within the CVMSHCP Conservation Areas. For this reason, a JPR process is premature and unnecessary, until such time as the project applicant seeks project level entitlements which will authorize disturbance, and for which the County will be issuing Take Authorization. For the reasons discussed in Response to Comment 14 below, neither a Like Exchange nor a transfer can be evaluated until the project applicant secures the necessary conservation lands. Please see Response to Comment 14.

Comment 13.

CVCC states that in order to submit a Like Exchange, a project such as Paradise Valley that proposes substantial disturbance within the Conservation Area must be able to demonstrate that the lands outside the Conservation Area are biologically equivalent to those to be exchanged from inside the Conservation Area.

Response to Comment 13.

GLC agrees with this statement. This again, illustrates a problem with CVCC's interpretation of the CVMSHCP's requirements. In the May 9, 2019 meeting with CVCC and the Wildlife Agencies, CVCC and the Wildlife Agencies acknowledged that an evaluation of conservation lands could not be completed without gaining access to the proposed conservation lands in order to conduct a biological assessment.

Common sense dictates that it would be rare indeed to find a landowner who would allow access to the landowner's property for such a biological assessment prior to GLC first securing the right to access and purchase the property (i.e., GLC to landowner: "Would you mind if we come onto your property and look around for some endangered species?")

Comment 14.

CVCC proposes a "meet and confer process" as a proposed forum to review "conceptual draft components for a Like Exchange analysis."

Response to Comment 14.

GLC interprets the meet and confer process proposed by CVCC to be the process which is referenced in MSHCP Section 6.12.2. Under that Section, a Like Exchange process commences "***when a Like Exchange is proposed***". Section 6.12.2 goes on to provide that once a Like Exchange has been proposed by a Permittee, a preliminary step in the Like Exchange process is for the Permittee to meet and confer with the Wildlife Agencies. However, in this case, neither the County nor GLC is proposing a Like Exchange at this programmatic stage of the project, as to do so would be premature.

Nevertheless, even though the meet and confer process contemplated in MSHCP Section 6.12.2 is premature for the proposed project, GLC does remain open to further meeting and conferring with CVCC and with the Wildlife Agencies. GLC feels that the focus of such a meet and confer efforts should be on what processes are required under the express terms and conditions of the CVMSHCP for a programmatic project such as Paradise Valley. GLC suggests that such a meet and confer process should include an objective review of the CVMSHCP and its requirements by legal counsel representing CVCC and the Wildlife Agencies, which we do not believe has occurred to date. GLC would welcome the opportunity to have these discussions with CVCC and the Wildlife Agencies and their respective legal counsel.

There are a number of reasons why a Like Exchange cannot and should not be processed at this programmatic stage of the project. The clear and express language of MSHCP Section 6.12.2, which governs "Like Exchanges to Conservation Areas," requires the Permittee to provide the Wildlife Agencies and other Permittees a Like Exchange analysis which includes "***maps clearly and precisely delineating the proposed Boundary Adjustment, showing land to removed from the Conservation Area…and land to be added to…***" the Conservation Area, together with a host of other information. [Emphasis added.] (See MSHCP Section 6.12.2, items 1 through 6 at Page 6-50.) Further, the express language of MSHCP Section 6.12.2 states that in the Like Exchange equivalency analysis the "***Applicant must demonstrate agreements or control over mitigation property being offered under the equivalency analysis***". [Emphasis added.] (See MSHCP Section 6.12.2, item 9 at Page 6-51.) As stated in GLC's responses above, GLC does not own or control the lands located outside of the DTLCA or MHOMCA which would be used to complete a Like Exchange. So, under the express provisions of MSHCP Section 6.12.2, absent GLC's purchase or control of over 20,000 acres of Conservation Lands, a Like Exchange analysis cannot be completed for the proposed project. GLC believes that the Wildlife Agencies would concur with this statement.

Further, the land use element of the Paradise Valley Specific Plan has been designed based on existing market conditions. As stated above, the proposed project is being evaluated at a programmatic level, and additional CEQA review and JPRs will be required for future project level implementing projects within the Specific Plan area. As is stated in the project EIR, actual development of the project is scheduled to commence in approximately 2023 and be completed in 2035. As market conditions evolve to higher density development as has been the case in recent trends, it is possible that all of the residential and nonresidential uses which are proposed in the Specific Plan could be developed within a development footprint of less than 1,800 acres as currently anticipated. Thus, there is the potential that the proposed project could be developed

within a development footprint no greater than 1,370 acres which could be mitigated entirely with Conservation Lands acquired from within the DTLCA. This would eliminate the need for a Like Exchange altogether. These details are not known at this programmatic stage of the project, and will be addressed in future project level implementing projects which will involve additional CEQA review, JPRs and Like Exchange processes, if, as and when needed.

Also, even if a Like Exchange is ultimately required for the development of the later phases of the proposed project, it is unknown at this time which portions of the PVSP Area, if any, will not be able to be mitigated with Conservation Lands acquired from within the DTLCA, much less the quantity and quality of the habitat which would need to be replaced through a Like Exchange process. The development footprint of the proposed project includes varying types and qualities of habitat, the Take of which would be mitigated by conservation easements granted to CVCC in accordance with the requirements of the CVMSHCP. It is likely that higher quality habitat within the development footprint of the project may be replaced by conservation lands acquired from within the DTLCA, leaving lower quality habitat to be replaced through a Like Exchange process. As stated above, a Like Exchange analysis requires an identification of the lands and habitat which would be removed from, and those which would be added to, the Conservation Area. Because these details are not known at this programmatic stage of the project, a Like Exchange process at this stage of the project is premature and cannot be completed in accordance with the requirements of MSHCP Section 6.12.2.

For these reasons, a "conceptual draft Like Exchange analysis" such as that proposed by CVCC would be at best a hypothetical and speculative exercise involving lands which are currently owned by unrelated third parties and not controlled by GLC, which GLC might someday acquire to offset the impacts of disturbance which might or might not occur when future phases of the project are developed over ten years from now. There is nothing in the MSHCP which provides for such a conceptual, speculative and hypothetical exercise. Conducting such an exercise would not satisfy the requirements of MSHCP Section 6.12.2, and if undertaken in an attempt to satisfy the requirements of the MSHCP would be challengeable by non-governmental organizations such as Sierra Club, Center for Biological Diversity, Defenders of Wildlife, etc.

Comment 15.

CVCC proposes that GLC prepare a "draft" Like Exchange analysis as a part of its suggested meet and confer process.

Response to Comment 15.

Please see response to Comment 14 above.

As stated above, a Like Exchange analysis will not be required until GLC seeks project level entitlements which would permit disturbance and require Take Authorization, has completed a JPR for those project level entitlements and has proposed a Like Exchange to CVCC, the Wildlife Agencies and other Permittees.

Comment 16.

Continuing in its discussion about its proposed meet and confer process, CVCC states that during the "initial stage" of the meet and confer process the use of Google Earth or a similar approach to review the potential suitability of proposed replacement properties would be acceptable.

Response to Comment 16.

Again, CVCC and the Wildlife Agencies have expressly acknowledged that a Google Earth or similar approach would only be an initial step, and that in order to complete a Like Exchange analysis, GLC would have to either own or control the land in order to allow for in-depth biological assessment and ground truthing.

Comment 17.

CVCC states that the Wildlife Agencies have indicated their position that a complete Like Exchange analysis would require site access and control of proposed exchange properties, and refers to Item 9 of MSHCP Section 6.12.2 which requires that an applicant for a like exchange "... must demonstrate agreements or control over mitigation property being offered under the equivalency analysis."

Response to Comment 17.

In the May 9, 2019 meeting, the Wildlife Agencies unequivocally stated that in order to complete a like exchange analysis GLC would be required to secure site access and control of the proposed exchange properties in order to permit an in-depth biological assessment and ground truthing. CVCC's Comment 17 confirms the conclusions reached in GLC's Responses to Comments 13 through 16 above.

Comment 18.

In its closing paragraph, CVCC reiterates the positions stated in its comments above and concludes that CVCC stands ready to perform a JPR for the entire PVSP. Further, CVCC states that "while Phase 1 is quantitatively consistent with the CVMSHCP, it may not be qualitatively consistent AND the whole of the specific plan is quantitatively and qualitatively inconsistent with the CVMSHCP."

Response to Comment 18.

With respect to the first part of CVCC's Comment 18, for the reasons stated in GLC's responses above, a JPR is not required unless and until GLC pursues project level entitlements which will permit disturbance and require the issuance of Take Authorization. The programmatic entitlements currently sought by GLC for the PVSP do not permit disturbance or request Take Authorization.

Mitigation Measure MM BIO—1 ensures that a JPR process is completed prior to the County's approval of any implementing project within the PVSP that would result in disturbance of any type.

With respect to the second part of CVCC's Comment 18, the statements made by CVCC there are neither correct nor accurate. First, there is no Phase 1 which is currently being processed as part of the PVSP. The reference to "Phase 1" is a reference to an earlier version of the project for which GLC was then proposing project level entitlements. Further, in 2012 CVCC concluded that the Phase 1 submission for the earlier version of the project was "consistent with the CVMSHCP with the caveat that the project ha[d] outstanding issues that would be resolved through the project approval process". As for the balance of the project, the CVCC concluded that the "JPR process requires specific information on the proposed project that does not allow for a programmatic level analysis."

Further, as stated above, the project EIR included a detailed consistency assessment which concluded that the proposed project is consistent with the CVMSHCP.

General Response.

GLC submits that CVCC's assertion that a JPR and conceptual Like Exchange process should be undertaken at this programmatic stage of the proposed project is unreasonable and impractical for the reasons stated above, several of which are summarized below.

- CVCC's assertion is contrary to the clear and express requirements of the CVMSHCP.
- If the County were to accede to CVCC's proposal to depart from the express requirements of the CVMSHCP, both the County and GLC would be subjected to potential legal challenge.
- Over 40 pages of the County's EIR for the proposed project were devoted to a consistency assessment which concluded that the proposed project is consistent with the CVMSHCP.
- The CVMSHCP requires a JPR only for projects that would result in disturbance.
- The project EIR included proposed Mitigation Measure MM BIO-1 which will require that JPRs be completed, for each implementing project within the proposed Specific Plan area which will result in disturbance.
- If the proposed project is approved by the County, no disturbance will occur until a JPR has been completed and sufficient mitigation lands have been provided.
- Neither a JPR process nor a Like Exchange analysis could be conducted for the entire 1,800 acre project area unless and until GLC first purchases or controls over 20,000 acres of Conservation Lands.
- It is unreasonable to expect GLC to purchase over 20,000 acres of Conservation Lands for a proposed project which has not yet been approved by the County even at a programmatic level.
- Neither a JPR process nor a Like Exchange process can be completed at this programmatic stage of the proposed project.

- Under CVCC's interpretation of the CVMSHCP the County would be required to complete a JPR process prior to adopting County initiated general plan amendments or updates, including County initiated zone changes.
- A JPR and/or a Like Exchange process if conducted at this programmatic stage of the proposed project would be a hypothetical exercise only, which would not satisfy the requirements of the CVMSHCP.
- The clear language of the CVMSHCP provides for a reasonable and practical approach: (1) the County conducts a consistency analysis as a part of its CEQA documents for all discretionary projects, and (2) a JPR is required only for projects which will result in disturbance.

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In Reply Refer To:
FWS/CDFW-IMP-12B0294-19TA1053

June 4, 2019
Sent by email

Mr. Juan Perez
Director
Transportation and Land Management Agency
County of Riverside
4080 Lemon Street, 14th Floor
P.O. Box 1605
Riverside, California 92502-1605

Subject: Like Exchanges to Conservation Areas within the Coachella Valley Multiple Species Habitat Conservation Plan

Dear Mr. Perez:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (CDFW), hereafter referred to jointly as the Wildlife Agencies, are submitting this letter for your information in advance of the Riverside County Planning Commission meeting scheduled for June 5, 2019. This letter was prepared to address questions posed by the County of Riverside during a meeting held on May 9, 2019, and at the request of the Coachella Valley Conservation Commission, to convey to the County of Riverside an approach and concurrence process, at a conceptual level, acceptable to the Wildlife Agencies, to determine whether equivalency is achievable for a proposed Like Exchange to the Desert Tortoise and Linkage Conservation Area within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) for the Paradise Valley Specific Plan. This letter was also prepared to alleviate concerns expressed by the County of Riverside related to the demonstration of agreements or control over mitigation properties early in the Like Exchange to Conservation Areas process. 1 2

As described in Like Exchanges to Conservation Areas (Section 6.12.2 of the CVMSHCP):

> Like Exchanges are changes proposed by a Permittee to modify the boundary of one or more Conservation Areas in exchange for reducing or modifying the boundary of a Conservation Area. A Like Exchange must result in equal or greater benefits to Covered Species and conserved natural communities as compared to those benefits analyzed in the Plan. In addition, the level of Take of Covered Species must be no greater than that analyzed in the Plan. 3

The information and analysis requirements, and the equivalency analysis required to complete a Like Exchange, are described in detail in Section 6.12.2 of the CVMSHCP. However, what is not fully identified in the CVMSHCP is a strategy and conceptual concurrence procedure, acceptable to the Wildlife Agencies, to complete during a meet and confer process that would determine, at a conceptual level, whether equivalency is achievable for a proposed Like Exchange. 4 5

The Wildlife Agencies have discussed that a meet and confer process that includes the steps identified below would determine, at a conceptual level, whether equivalency is achievable for a proposed Like Exchange. Further, though the Like Exchange equivalency analysis requires that an Applicant demonstrate agreements or control over mitigation property being offered under the equivalency analysis, the Wildlife Agencies propose an initial Like Exchange conceptual proposal process under this proposed meet and confer process, prior to an Applicant moving forward with the Like Exchange equivalency analysis (and ultimately pursuing agreements or control over mitigation property). 6

The Wildlife Agencies are in agreement that the following steps should be completed prior to commencement of a Like Exchange equivalency analysis, as described in Section 6.12.2 of the CVMSHCP, and that concurrence of a conceptual equivalency strategy may be granted by the Wildlife Agencies prior to completion of the equivalency analysis (as described in Section 6.12.2):

1. Permittee requests a meeting/series of meetings with the Wildlife Agencies to initiate the meet and confer process to discuss a proposed Like Exchange.

2. Permittee provides sufficient information to determine the scope and impacts associated with the project. This information will include an assessment of existing functions and values (i.e., baseline condition of the Applicant's proposed project area) and how the project will impact these functions and values. Permittee will identify impacts to the following: the Conservation Area, Covered Species, Core Habitat, natural communities, Biological Corridors and Linkages, Essential Ecological Processes, and Conservation Area reserve design and manageability. 7

3. Based on a desktop exercise, Permittee shall spatially and numerically identify locations elsewhere in the CVMSHCP area that support equivalent or superior functions and values compared to those proposed to be impacted and that may be available for conservation purposes. This desktop exercise should also garner any additional information that may be readily available, for example vegetation types/broad habitat categories, potential for species occurrence (based on online-mapping databases), streambed mapping, and land ownership information. During the meet and confer process, the Wildlife Agencies will provide technical assistance to the Permittee and Applicant regarding additional biological criteria we will use to evaluate a final equivalency analysis (e.g., contiguity of Like Exchange locations with similar habitat, degree of fragmentation, connectivity habitat for desert tortoise, etc.)

4. The Wildlife Agencies will assess the scope and impacts of the project to the Conservation Area, Covered Species, Core Habitat, natural communities, Biological Corridors and Linkages, Essential Ecological Processes, and Conservation Area reserve design and manageability, and review the locations deemed by the Applicant and Permittee to support equivalent or superior functions and values. If the Wildlife Agencies can determine that the proposed conservation lands have the potential to 8

support equivalent or superior functions and values, and the land could be acquired for conservation purposes (e.g., it is privately owned), conceptual concurrence for further assessment of these lands could be granted and the Applicant and Permittee would move forward and complete more in-depth on-site studies and analyses to support a final equivalency analysis.

8

We appreciate the opportunity to provide this information in advance of the Riverside County Planning Commission meeting, scheduled for June 5, 2019, and look forward to continuing work with you. If you have any questions or comments regarding this letter, please contact Jenness McBride of the Service at jenness_mcbride@fws.gov or 760-322-2070, Ext 403; or Heather Pert of the CDFW at heather.pert@wildlife.ca.gov; by telephone at 909-466-6626.

9

Sincerely,

Heather A. Pert

For
Kennon A. Corey
Assistant Field Supervisor
U.S. Fish and Wildlife Service

for
Scott Wilson
Environmental Program Manager
California Department of Fish and Wildlife

cc:
Russell Brady, RCPD
Tom Kirk, CVCC

GLC ENTERPRISES, LLC'S ("GLC'S") RESPONSE TO COMMENTS IN LETTER DATED JUNE 4, 2019 SUBMITTED TO THE COUNTY OF RIVERSIDE JOINTLY BY THE U.S. FISH AND WILDLIFE SERVICE AND CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE CONCERNING THE PARADISE VALLEY PROJECT

GLC provides the following responses to comments contained in USFWS' and CDFW's June 4, 2019 Letter submitted to the County of Riverside concerning the Paradise Valley project. These responses correspond to the comment numbers marked for reference on the USFWS / CDFW June 4, 2019 Comment Letter.

Comment 1.

Comment 1 states that the USFWS/CDFW Letter was prepared to address questions posed by the County during a May 9, 2019 meeting, and at the request of CVCC, to convey an approach and concurrence process, at a conceptual level, acceptable to the Wildlife Agencies to determine whether equivalency is achievable for a proposed Like Exchange to the Desert Tortoise and Linkage Conservation Area ("DTLCA").

Response to Comment 1.

Comment noted. GLC refers to and incorporates by reference its responses to the comments submitted by CVCC in its Memo dated May 9, 2019 submitted to the County concerning the Paradise Valley project as those responses are equally applicable to the issues raised in the June 4, 2019 letter submitted by the Wildlife Agencies. In addition, GLC notes that the processes and procedures for Like Exchanges to Conservation Areas are set forth in detail in Section 6.12.2 of the MSHCP. GLC respectfully submits that to the extent the Wildlife Agencies are proposing processes and procedures which are either in excess of or less comprehensive than those specified in MSHCP Section 6.12.2, such processes and procedures are inconsistent with the express provisions of the adopted CVMSHCP.

Comment 2.

Comment 2 states that the Wildlife Agencies' Letter was also prepared "to alleviate concerns expressed by the County of Riverside related to the demonstration of agreements or control over mitigation properties early in the Like Exchange to Conservation Areas process."

Response to Comment 2.

Comment noted. GLC agrees that the County of Riverside has expressed concern over CVCC's and the Wildlife Agencies' assertions that GLC should be required to purchase or control over 20,000 acres of Conservation Land in order to complete a JPR and possible Like Exchange prior to having received even an approval of its programmatic level entitlements. To the extent the Wildlife Agencies' letter infers that a Like Exchange process could be conducted for the proposed

project without GLC having demonstrated agreements or control over the mitigation property being offered under the equivalency analysis of the Like Exchange, this assertion would be inconsistent with the express requirements set forth in the CVMSHCP. In this regard, Section 6.12.2, Item 9 on Page 6-51 of the MSHCP expressly states that the "Applicant must demonstrate agreements or control over mitigation property being offered under the equivalency analysis." In any event, as discussed in GLC's responses below, the concluding statements in the Wildlife Agencies' Comment Letter make it clear that GLC would in fact be required to own or control the mitigation property in order to complete a Like Exchange process. Therefore, GLC respectfully submits that the County's expressed concerns have been neither addressed nor alleviated by the approach proposed in the Wildlife Agencies' June 4, 2019 Comment Letter.

Comment 3.

In Comment 3 the Wildlife Agencies quote language from MSHCP Section 6.12.2 which explains that Like Exchanges are changes proposed by a Permittee to modify the boundary of one or more Conservation Areas in exchange for reducing or modifying the boundary of a Conservation Area and that this must result in equal or greater benefits to Covered Species and conserved natural communities than those benefits analyzed in the Plan, and that the level of Take of Covered Species must be no greater than that analyzed in the Plan.

Response to Comment 3.

Comment noted. Here the Wildlife Agencies have accurately quoted one paragraph of the three pages of text which is included in MSHCP Section 6.12.2.

Comment 4.

In Comment 4 the Wildlife Agencies state that the information and analysis requirements, and the equivalency analysis required to complete a Like Exchange, are described in detail in Section 6.12.2 of the CVMSHCP.

Response to Comment 4.

Comment noted. GLC concurs that this is an accurate statement by the Wildlife Agencies.

Comment 5.

In Comment 5, the Wildlife Agencies state that what is not identified in the CVMSHCP is a strategy and conceptual concurrence procedure, acceptable to the Wildlife Agencies, to complete during a meet and confer process that would determine at a conceptual level, whether equivalency is achievable for a proposed Like Exchange.

Response to Comment 5.

Comment noted. While GLC appreciates the Wildlife Agencies' willingness to further meet and confer, it is unlikely that such a meet-and-confer process would be fruitful. At this programmatic stage of the planning process, GLC does not own or control the lands located outside of the DTLCA or Mecca Hills/Orocopia Mountains Conservation Area (MHOMCA), which could be used to complete a Like Exchange. Therefore, the analysis which would be needed to fully evaluate the biological equivalency of the lands to be exchanged cannot be completed. Furthermore, the informal "conceptual" process proposed by the Agencies is not authorized by the CVMSHCP, a fact that reinforces GLC's view that Like Exchanges should not occur as early in the local planning process as the time of adoption of a specific plan based on a programmatic EIR to be followed by later site-specific environmental documents.

MSHCP Section 6.12.2 states that "***When a Like Exchange is proposed***, the applicable Permittee(s) shall meet and confer with the Wildlife Agencies prior to submittal of Like Exchange analysis to the CVCC." [Emphasis added.] MSHCP Section 6.12.2 further states that the Permittee is to prepare an equivalency analysis, and submit it to the Wildlife Agencies who are to respond in writing as to their concurrence with the Like Exchange. If the Wildlife Agencies do not concur, the action will require an amendment to the MSHCP, and Like Exchanges must also be submitted to applicable Permittees for approval. Section 6.12.2 goes on to provide a detailed listing of the necessary project information and equivalency analysis which is required for completion of the Like Exchange process. Notably, a Like Exchange is not being proposed by GLC or the County in connection with the programmatic entitlements which are being sought by the proposed project. The proposed project will not result in ground disturbance, and no Take Authorization will be issued by the County upon approval of the proposed project.

Further, for the reasons more fully explained in GLC's Response to Comment Number 14 of CVCC's May 9, 2019 Memo, there is insufficient information at this programmatic stage of the proposed project in order to complete a Like Exchange analysis as required by MSHCP Section 6.12.2. For example, it is unknown at this point which portions of the Specific Plan area, if any, will not be able to be mitigated with Conservation Lands acquired from within the DTLCA, much less the quantity and quality of the habitat which will need to be replaced. Further, there is the potential that the proposed project could be developed within a development footprint no greater than 1,370 acres which could be mitigated entirely with Conservation Lands acquired from within the DTLCA, thus eliminating the need for a Like Exchange altogether. In short, a Like Exchange process is premature and unable to be completed at this time.

Comment 6.

In Comment 6 the Wildlife Agencies state that even though the Like Exchange equivalency analysis requires that an applicant demonstrate agreements or control over mitigation property being offered under the equivalency analysis, they are proposing an initial Like Exchange conceptual proposal process prior to an applicant moving forward with the Like Exchange equivalency analysis and ultimately pursuing agreements or control over mitigation property.

Response to Comment 6.

Comment noted. GLC agrees that the Like Exchange equivalency analysis set forth in MSHCP Section 6.12.2 expressly requires that an applicant demonstrate agreements or control over mitigation property. MSHCP Section 6.12.2 sets forth the process for Like Exchanges. This process does not include a "conceptual" Like Exchange analysis.

Please see also Response to Comment No. 5 above.

Comment 7.

In Comment 7 the Wildlife Agencies outline four steps which they propose in order to conduct a "conceptual" Like Exchange analysis: (1) the Permittee requests meetings with the Wildlife Agencies to meet and confer to discuss a proposed Like Exchange, (2) the Permittee provides sufficient information to determine the scope and impacts associated with the project, (3) based on a "desktop exercise," the Permittee is to identify locations that support equivalent or superior functions and values compared to those proposed to be impacted and that may be available for conservation purposes, and (4) the Wildlife Agencies are to assess the scope and impacts of the project, presumably from the "desktop exercise," to determine whether the proposed Conservation Lands have the potential to support equivalent or superior functions and values.

Response to Comment 7.

Please see Response to Comment No. 5 above.

Further, it is highly unlikely that the Wildlife Agencies would, or even could, determine that any proposed Conservation Lands identified at this time would have the potential to support equivalent or superior functions and values than those existing at the project site, from a "desktop exercise" without biological surveys which could only be conducted by accessing the mitigation lands. Therefore, the Wildlife Agencies' proposed added step in the Like Exchange process (the "conceptual" Like Exchange analysis) would inevitably result in the Agencies' determination that any proposed Conservation Lands are inadequate.

In other words, the process suggested by the Wildlife Agencies would require the Agencies to make an initial determination based on less than all of the information which is required by MSHCP Section 6.12.2, and only if the Wildlife Agencies could determine from this "desktop exercise" that the hypothetically proposed Conservation Lands are adequate would the County and GLC then be permitted to proceed with the actual Like Exchange analysis which is set forth in Section 6.12.2 of the MSHCP.

GLC submits that the appropriate process is to proceed in accordance with the express terms and conditions which are in fact set forth in the CVMSHCP, as follows: (1) the County includes a consistency assessment in its EIR for the programmatic level project in order to determine whether the proposed project is consistent with the CVMSHCP, as required by IA Section 7.5 and MSHCP Section 6.6.1 (such a consistency assessment was included in the project EIR), (2) the County and

GLC participate in a JPR process conducted by CVCC for all project level implementing projects within the adopted Specific Plan that would result in disturbance, as required by IA Section 7.5, MSHCP Section 6.6.1 and MSHCP Section 6.6.1.1, and (3) if and when a Like Exchange is proposed by the County and GLC, then CVCC and the Wildlife Agencies would process such a Like Exchange in accordance with the provisions set forth in MSHCP Section 6.12.2.

Comment 8.

In Comment 8 the Wildlife Agencies conclude by stating that if they can determine through their proposed "conceptual" Like Exchange analysis that the proposed Conservation Lands support equivalent or superior functions and values, then conceptual concurrence for further assessment of these lands could be granted and the Applicant and Permittee would move forward and complete more in-depth on-site studies and analyses to support a final equivalency analysis.

Response to Comment 8.

Please see Response to Comment 7 above.

Further, this comment confirms that it is the Wildlife Agencies' intent that the conceptual Like Exchange analysis would be an additional, interim step in the Like Exchange process, because following the completion of the "conceptual" Like Exchange analysis the County and GLC would then still be required to move forward with in-depth on-site studies and analysis, requiring GLC to demonstrate agreements or control over Conservation Lands offered under a final equivalency analysis. Therefore, the County's expressed concerns "related to the demonstration of agreements or control over mitigation properties early in the Like Exchange ... process" have not been alleviated by the Wildlife Agencies' proposal.

Comment 9.

In Comment 9, the Wildlife Agencies conclude by stating their appreciation for the opportunity to provide the information in their Comment Letter.

Response to Comment 9.

Comment noted. GLC likewise appreciates the Wildlife Agencies' comments, and thanks the County for providing GLC with the opportunity to respond to these comments.

Brady, Russell

From: Cathy Armstrong <mscjarmstrong@gmail.com>
Sent: Tuesday, May 14, 2019 3:28 PM
To: Brady, Russell
Subject: Paradise Valley

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

I am writing to urge Riverside County to reject the Paradise Valley project. The principal objections:

1. It is not appropriate to create a city of 20,000 or more people on the doorstep of a national park, for many reasons. It is unnecessary urban sprawl and shows significant lack of environmental respect or even awareness. Attendant problems for the park include noise and air pollution, vandalism and a potential loss or degradation of native springs.

2. The project would have serious consequences on Interstate 10. The two-lane eastbound side already is dangerous because of the trucks that pass each other at 30 mph on the long grade east of Indio. Traffic moving at 70 mph often has to slow suddenly as one slow truck pulls into the fast lane to pass another. Adding a city's worth of traffic to that route would seriously worsen a potentially deadly situation. I don't believe the EIR adequately recognizes that danger.

3. Air pollution. Putting a city so far from existing urban areas would increase air pollution in a region already out of compliance with air quality standards. Air quality in Joshua Tree National Park already is degraded; this would make it worse. In addition, people living in Paradise Valley would be exposed to high levels of diesel soot and other particulates generated by Interstate 10 traffic. Building homes next to a freeway always is a bad idea.

4. Water. The project would depend on existing native groundwater, to be replenished by the Colorado River Aqueduct. Lowering the water level in the existing, untapped groundwater basin could affect springs in Joshua Tree National Park and other nearby areas, creating obvious trouble for wildlife. Even if the water were replenished, it would be with degraded water that is laden with salt and carries pollutants such as perchlorate. On top of that, it is clear that in a prolonged drought, Colorado River authorities may not be able to meet all their water delivery obligations.

When a developer has a choice of where to build Paradise, why do it in a place that will harm a true paradise? There are far more appropriate locations for this project.

Respectfully,

Cathleen Armstrong
Pioneertown, California

Virus-free. www.avast.com

Brady, Russell

From: AP Storrs <apstorrs@gmail.com>
Sent: Tuesday, May 14, 2019 12:03 PM
To: Brady, Russell
Subject: PLEASE NO PARADISE VALLEY DEVELOPMENT....

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DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Good Day Sir,
Im taking the time today to please urge you to reconsider the proposed "Paradise Valley" Development on the southern edge of Joshua Tree National Park. A very precious natural area that needs to be preserved for future generations. The harm this will have on the park & the wildlife there is simply terrible. lets learn from past mistakes of overdevelopment & limit our rapid growth that is speeding the decline of all life on planet earth.

Please re-consider this project & do not allow it to go any further.
I beg of you on behalf of myself, the plants & animals of this region & many of my friends & neighbors.

Andrew Storrs
Yucca Valley, CA

Brady, Russell

From: jen schichi <jenshakti@yahoo.com>
Sent: Tuesday, May 14, 2019 11:45 AM
To: Brady, Russell
Subject: "No" to development in Paradise Valley

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Hello, my name is Jennifer Schichi and I am an advocate for preservation of the Mojave Desert. While I'm not able to attend the Riverside planning commission meeting in person on May 15, I want to share my voice and concern.
I agree with and support the points that Mojave Desert Land Trust has cited.
The Mojave is a precious and delicate ecosystem, once you " sell the farm" that land will never recover its untouched beauty.
Developers choose to ignore the wisdom of preservation for the "next seven generations". It is no secret that a developer's position is "for profit" veiled behind self-serving research about " the housing shortage" There are just as many articles to the contrary.
For-profit new construction is overwhelmingly geared toward the luxury market. But it's lower-income households who face the most severe affordable housing shortfalls.
Secondly, new construction takes decades to depreciate down to rents and mortgages that are actually affordable to most people. Studies show construction actually fuels displacement in the short term. It's not like already existing housing is knocked down.
I suggest that Riverside, San Bernardino and Imperial counties create incentives for people to reclaim and restore desert properties that range from depressed (foreclosures) to delapidated.
There are plenty! This is one solution with the smallest ecological footprint.
Revisions to strict permitting, codes and laws that prevent access to these types of projects for reasons usually veiled in "public safety". With ingenuity and discussion most problems are solvable.
In closing, The beautiful vistas of the Mojave desert, is its greatest natural resource to Californians who receive solace and rejuvenation from the density and toxicity of urban density.
Development in Paradise valley creates urban density where it doesn't belong. I do not believe 8,500 homes is needed for the unrevocable cost to the environment.
Thank you for reading this. I'll be following the story as it unfolds.
Jennifer Schichi

Brady, Russell

From: Gail Wadsworth <gwadsworth@cirsinc.org>
Sent: Tuesday, May 14, 2019 10:24 AM
To: Sarabia, Elizabeth; Victorian-White, Rosalee; Flores, Robert; Brady, Russell
Subject: Paradise Valley Development -- Comment Letter for May 15
Attachments: Paradise Valley and Gentrification letter (1).pdf

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Brady,
Attached is a comment letter regarding the Paradise Valley proposed development in the Coachella Valley. Please enter it into the record and keep on file.

CIRS is opposed to this development. Not only is the development proposed in an area covered by the MSHCP, it will likely encourage sprawl development, divert needed resources from the communities in the Eastern Coachella Valley where a large proportion of residents live in substandard housing, it will also strain existing resources. It is exactly the opposite of the kind of development Riverside County should be pursuing.
Kind regards,
Gail Wadsworth

--
Executive Director
California Institute for Rural Studies
P.O. Box 1047
Davis, CA 95617
www.cirsinc.org
Tel: 530.756.6555 x17
Cell: 925.817.7565
"There are dark shadows on the earth, but its lights are stronger in the contrast." Charles Dickens

"Hope is being able to see that there is light despite all of the darkness." Desmond Tutu

CALIFORNIA INSTITUTE FOR RURAL STUDIES PO BOX 1047, DAVIS, CA 95617 • WWW.CIRSINC.ORG

May 15, 2019

Riverside County Planning Commission
4080 Lemon Street 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409

Dear Riverside County Planning Commission:

California Institute for Rural Studies has been conducting public interest research which inspires action for social change to benefit rural communities for over forty years. We believe that rural Californians need to be seen, heard and understood by their fellow Californians, the media and politicians, and that these groups and individuals will work with rural residents to create healthier, more equitable, stronger communities. This is not what we see happening with regard to the proposed Paradise Valley development. Paradise Valley does not take into account the needs of existing community members and the substantial impacts those communities will suffer if it is approved. We respectfully ask you to deny this development.

The Case against Paradise Valley Gentrification

Paradise Valley has defined itself as "a compact, fiscally self-sustaining and environmentally sensitive "New Town" in Shavers Valley, an unincorporated area of central Riverside County located approximately eight miles east of the City of Coachella."

Planning, Development Patterns, and Rural Gentrification

There is a pattern to the choices made by planning agencies in Riverside County that has not benefitted residents currently living in the Eastern Coachella Valley -- that perpetuates a social and physical divide between the "haves" and the "have-nots." Approval of development choices such as the Paradise Valley proposed development, focus on upscale transformation of the desert and can result in gentrification. Cloke and Little (1990) discuss "'class-dictated population movements' into accessible rural areas through 'an immigration of middle-class residents at the expense of the lower classes'." [i] They refer to this movement as colonization.

Through settlement patterns and urban development in California, we have created sparsely populated ghettos[1] of poor people of color in rural regions of the state that

[1] We use this word in the Webster's Dictionary meaning: "a quarter of a city in which members of a minority group live especially because of social, legal, or economic pressure." In this case, we refer to rural regions of the state rather than quarters of cities.

lack cohesive regional plans for development. With low populations and poverty, these regions have little power in county planning agencies. And yet, these agencies are the ones that provide resources and make decisions for them.

As we consider the impacts of climate change and state mandates for development, we cannot ignore the communities in California who will be most affected by the expected changes to our climate. The priorities of the state for building affordable and sustainable communities that can both mitigate and adapt to climate change are not reflected in the plans for Paradise Valley. These same plans do not address the region's most marginalized and vulnerable residents living nearby. This plan is not transit oriented, it is not urban infill—it is more of the same sprawl development that has forced California to address climate solutions through thoughtful planning.

Coachella Valley

The Coachella Valley is clearly divided into two halves by all measures of social wellbeing. The northwestern portion of the valley consists of well-maintained golf courses and wealthy, primarily white, residents who live in the area for the amenities and benefits of having a year-round warm climate and a clean and well-maintained environment. The Western Coachella Valley is comprised of cities such as Palm Springs, La Quinta, Rancho Mirage and Indian Wells.

The Eastern Coachella Valley located to the southeast of Indio-- home to the famous Coachella Music Festival-- is made up of one small city and four unincorporated rural communities that could not be more different from their western neighbors. These communities house low-wage workers, many in agriculture and tourism, who are primarily Latino.

They live in towns and settlements with tainted water wells, unpaved streets, failing septic systems, and legal as well as illegal waste dumps. The Eastern Coachella Valley, includes the city of Coachella, and the communities of Thermal, Oasis, Mecca, and North Shore along with many small scattered mobile home settlements.

The concentrated poverty of the Eastern Coachella Valley contrasts with the substantial contribution made by the hard working residents of the Eastern Coachella Valley to the region's vital economic engines: agriculture, tourism, and goods movement industries. The Eastern Coachella Valley is a major hub for agricultural production in Riverside County, producing more than half of the gross agricultural value of the county at nearly $600 million annually. While most of the valley's tourist attractions are located in the Western Coachella Valley, many of the workers who power the tourism economy live in the East.

Rural Housing Conundrum

Housing in California is in short supply and unaffordable for those living in poverty. When available, affordable rental housing is frequently substandard.[ii] Substandard housing presents its own environmental and health risks. But there is also a segment of the population living in "informal" housing in rural regions that is completely lacking infrastructure, with unsafe electrical connections and a lack of potable water and safe sewage systems. Poor people and people of color reside in substandard housing at a disproportionate rate. When discussing especially marginalized groups, such as farm laborers, the picture is even more extreme.

With a steady decline in employer supplied workforce housing, farm workers in California are competing in the limited private marketplace for housing and are increasingly living in urban centers located in rural regions close to their work places. There is very little information on housing location or housing quality for California farm workers. There has never been a statewide survey or assessment of farm labor housing nor any determination of quality or compliance with housing codes from a representative sample of residences.

> Affordable, safe, and sanitary housing is virtually nonexistent for the vast majority of California's farmworkers. When a migrant farmworker arrives in a rural agricultural town, he/she has few options: most of the existing housing is occupied; available units often consist of the most dilapidated units in the community; rents are high; and per-person charges are used to capitalize on 'doubling up'.[iii]

The Coachella Valley is a microcosm of the extreme inequities existing in California. Rural residents within the larger metropolitan region of the Coachella Valley are at risk for health disparities due to environmental degradation and lack of community planning and investment.

The Coachella Valley offers an opportunity to develop innovative approaches to sustainable development and smart growth in an equitable manner.

To refocus our ideas and create a vision for affordable housing, rural transit, access to resources and clean communities, general plans and new developments need to consider all sectors of rural society. Transportation needs to be redefined as the infrastructure network that connects communities to work, resources and each other. Communities in rural regions need to be planned holistically, **extending resources** of all kinds to low population density, low income regions. Food, potable water, waste water systems, paved roads, parks, sidewalks and street lights should not be considered luxuries.

These issues and others related to environmental justice are often not addressed in rural regions because populations are dispersed and may be transient, are marginalized both geographically and economically, and are disempowered as a result of these factors. **These residents are placed in jeopardy simply because of where they work and live, their ethnicity and their lack of information and familiarity with laws and organizations.**

Paradise Valley, in addition to its negative environmental impacts, does not meet the needs of those in the Coachella Valley who lack housing: those who fuel the financial engines of the region and who survive on low wages. Many of these residents live in crowded and substandard conditions, others live in "informal" housing units. All deserve to be housed in a dignified manner.

Paradise Valley does not address the lack of affordable housing in the Coachella Valley. In fact, it represents a form of modern day colonization. It is not environmentally sound nor environmentally just.

Sincerely,

Gail Wadsworth, Executive Director

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[i] Cloke, Paul & Little, J. 1990. The rural state? Limits to planning in rural society. Clarendon Press.

[ii] Joint Center for Housing Studies (JCHS) 2004

[iii] California. Assembly, 'Farmworker Housing,' 2000. cf. http://www.assembly.ca.gov/acs/committee/c12/publications/2000report/farmworkerhousing.htm

Brady, Russell

From: Leslie Gebhart <leslieg@childvoice.com>
Sent: Tuesday, May 14, 2019 7:52 AM
To: Brady, Russell
Subject: what's a voter to do?

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Thank you for your leadership!

Want to be sure to weigh in on the IMPORTANCE OF PROTECTING the natural acreage with respect to Nature—sorta a Mother's JOB to protect.

Having lived long enough to watch our human species concrete over the land without regard to Nature's systems. Please say NO—we do NOT NEED MORE HOUSES….Palm Springs is full of empty spaces and concrete waste and it is our duty to protect our wildlife habitat by the park's south entrance and the Shavers Valley

registered voter here since 1974, Leslie Gebhart

~~~~~~~~~~~~~~~~~~~~~

Keeping focus on what is possible
holding the vision for peaceful outcomes
& the UU Peace Labyrinth Oasis where you are welcomed
for respite & contemplation.
Your donations are graciously accepted to this 501 (c) 3 option
when planning your philanthropic actions.
With gratitude, Leslie G
760.218.8865
~~~~~~~~~~~~~~~~~~~~~

Brady, Russell

From: tanya petrovna <tanya.petrovna@gmail.com>
Sent: Tuesday, May 14, 2019 7:36 AM
To: Brady, Russell
Subject: Paradise

CAUTION: This email originated externally from the **Riverside County** email system.
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Concerning the proposed development. It is hideous and bad. That kind of development is too big too fast.

Are there wildlife corridors planned? Is desert landscaping to be save? Will the wildlife be relocated, and if so how will that impact the areas they plan to relocate them?

You have many local people in the area that are trying to preserve open space to preserve the flora and fauna and open space that we have left as so much has been obliterated.

New industries and businesses that are sustainable are emerging that subsist on nature being undeveloped. It is important for mental health as well. I think the Riverside County Planning Commission has a duty to represent nature and the human inhabitants that rely on the open space.

Keep open space open! Do not change the zoning for greedy developments.

--
Tanya Petrovna
Chef and Founder
www.cheftanyaskitchen.com
@cheftanyaskitchen
Life is short, do it (t)all!

Brady, Russell

From: dbdeen <dbdeen@verizon.net>
Sent: Tuesday, May 14, 2019 6:32 AM
To: District 4 Supervisor V. Manuel Perez; Brady, Russell
Subject: District4

CAUTION: This email originated externally from the **Riverside County** email system.
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My name is Dana Burkert. I am emailing you as I am opposed to the Paradise Valley project. There are several reasons I am opposed, but mainly, the area chosen for this project should be protected by the county, state, and surrounding cities, for its native plants, animals and their habitats, and the untouched desert.

Nature has taken a back seat to humanity for far too long. We have this beautiful desert land that will be destroyed. The animals will be destroyed. There is already a huge issue with not enough water. Joshua Park is neighboring the area this project will take over. The project will ruin the night skies, and the noise will increase.

We have been visiting the park for nearly 50 years. We have seen many changes on the road from L.A. to Joshua Tree over the years, but as we go up the hill, we find only blue skies and fresh air as we approach the park. For many years, while inside the park you barely passed another person on a hike. People have increased bringing the noise level a little crazy during the day, but it seems everyone respects the dark night skies and star gazing. This project would bring much noise and artificial light , taking away the full experience a park visitor would have.

I know that I am just one voice, but for every single voice, there are at least 100 more who don't take the time to contact you.

Please consider the opposition of the Paradise Valley. Our beautiful desert needs protection. I am hoping the folks in the 4th district and surrounding counties will help to save Mother Earth.

Thank you for your time,
Dana Burkert

Sent from my Verizon, Samsung Galaxy smartphone

Brady, Russell

From: Daniel Brenner <danielbrenner04@hotmail.com>
Sent: Monday, May 13, 2019 8:43 PM
To: Brady, Russell
Subject: Paradise Valley housing development

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Hi Russell,

I am writing to express my opposition to planned development in Paradise Valley.

While I support development in general (people need to live somewhere), the impact that housing development on Paradise Valley will have on the natural surroundings will be severe. Not only is nature impacted, you've also got light pollution. As you may know, Joshua Tree National Park is designated as a dark sky location. There's not many places in the world where one can see the stars free from light pollution. This planned development won't improve the situation.

I ask that you do everything within your power to stop the development in Paradise Valley. The long term impact is way too great.

Thank you,

Daniel Brenner

Brady, Russell

From: gail butensky <gbeesgardens@gmail.com>
Sent: Monday, May 13, 2019 4:58 PM
To: Brady, Russell
Subject: Don't pave paradise!!!!

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Please please do not put a city in the middle of the nature corridors.
Housing is needed, but urban sprawl really needs to be contained.
With one million species about to go extinct, losing habitat is not gonna help.
That is terrible place for an entire development, for so many reasons- night skies, habitat, noise, pollution, the critters…
Just say no.
Thanks .
gail butensky
gbeesgardens@gmail.com

Brady, Russell

From: Nick Jensen <njensen@cnps.org>
Sent: Monday, May 13, 2019 3:55 PM
To: Brady, Russell
Subject: Opposition to Paradise Valley Project

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Dear Russell,

I will be unable to attend the planning commission hearing on Wednesday (5/15) given that I threw my back out last week and am unable to travel.

On behalf of the California Native Plant Society, I would like to register our opposition to the Paradise Valley Specific Plan Project. We oppose the project for a variety of reasons including impacts to native plants and wildlife and habitat corridors, and its proximity to Joshua Tree NP and other conservation lands. We also strongly advocate that a Joint Project Review be completed prior to the Planning Commission's/Board of Supervisors' final decision. We have related these concerns, and others, in comment letters submitted on the Draft and Final EIRs.

Consequently, the Planning Commission should recommend that Paradise Valley be rejected by the Board of Supervisors.

Sincerely,
Nick Jensen

--
Nick Jensen, PhD
Southern California Conservation Analyst
California Native Plant Society
2707 K Street, Suite 1
Sacramento, CA 95816
njensen@cnps.org

Brady, Russell

From: Eric Merrell <eric@ericmerrell.com>
Sent: Monday, May 13, 2019 10:13 AM
To: Brady, Russell
Subject: No to Paradise Valley project

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

To Mr. Brady,

California's sublime deserts are unique and need to be protected from further development. Their flora and fauna are amazing, the vast open spaces and dark nights provide fantastic inspiration. We don't need another town in the middle of the desert; developing Paradise Valley into a housing tract will permanently ruin the beautiful open vistas and dark skies not only in Shaver Valley but also in Joshua Tree National Park, and will sizably add to congestion, energy, and water use. Houses and shopping malls will just make it look like any other place in Southern California, along with 24-hour convenience stores, motels, floodlights, and more trash to blow into the desert.

Like rooftop solar, housing development should be done in places that have already been disturbed, close to existing cities, not staking out new space in pristine desert. Please preserve this place and do not develop it.

--
Eric Merrell
www.ericmerrell.com

Brady, Russell

From: robert rupert <rupert5149@yahoo.com>
Sent: Monday, May 13, 2019 6:53 AM
To: District 4 Supervisor V. Manuel Perez
Cc: Brady, Russell
Subject: Paradise Valley

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Perez,

I am writing to ask you to reconsider plans for development of a portion of Joshua Tree National Park.

We retired to the southern California area in 2014 and our first day trip was to Joshua Tree National Park. Such a beautiful, clean and pristine area of the country. In an era when we see more and more natural wonders disappearing, we feel it is important to preserve such a beautiful and unique desert. Our future generations should share the diversity of Joshua Tree's clean air, ecology, wildlife and the honor of being a "dark sky park". How many places in the world can boast all these assets.

We implore you -- please save our beautiful and important desert. Development would have such a devastating impact on the area and one that cannot be reversed.

Brady, Russell

From: Kate Oldroyd <kate-oldroyd@hotmail.com>
Sent: Monday, May 13, 2019 3:39 AM
To: Brady, Russell; District 4 Supervisor V. Manuel Perez
Subject: Proposed Paradise Valley Development - Objection

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Hi Russell and V. Manuel,

I am emailing you to object to the proposed new development called Paradise Valley near Joshua Tree National Park for the following reasons:

- A development on this scale in an undeveloped area would be out of character with the surrounding area, and developments should be situated within existing towns, cities and settlements, where existing infrastructure and zoning is already there.
- This development will seriously threaten the desert ecosystem, specifically that of desert tortoises and the habitat of the southern end of Joshua Tree National Park. We should be focusing on projecting this, rather than damaging it.
- This development will introduce light pollution to the Joshua Tree National Park area, which is a recognized dark sky area. This will also have a detrimental impact on tourism to the area as many people visit the park and the surrounding area for this reason. I know it is one of the many reasons that I continue to visit the area.
- The Joshua Tree National Park area is one of my favorite places to visit in the whole world, I regularly visit the area and I am a monthly donor to local conservation and preservation projects as I believe we should be protecting the desert ecosystem for not only current visitors and residents, but more importantly for future generations of visitors and desert inhabitants. It is paramount therefore, that any new development in the desert areas are focused to existing towns. cities and settlements, rather than creating brand new ones. The environmental impact is just too great to justify.

I urge you to reject the proposed development.

Kind regards,

Kate

Brady, Russell

From: Tori Downes <tori_downes@hotmail.com>
Sent: Sunday, May 12, 2019 1:32 PM
To: Brady, Russell
Subject: Oppose: Paradise Valley project

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

I am writing as a property owner in Joshua Tree to oppose the Paradise Valley housing development.

As a resident, I greatly value the Joshua Tree National Park's dark skies and clean air, and the pristine desert and wildlife habitat provided by the park's south entrance and the Shavers Valley.

If allowed, the Paradise Valley project will have major environmental impacts.

- Around 5,000 acres of prime desert tortoise habitat will be lost.
- Habitat on the park's southern boundary will be physically damaged.
- Ancient groundwater will be pumped from the Orocopia basin.
- Invasive plant and animal species will be introduced.
- Joshua Tree National Park's dark night skies will be affected by hundreds of thousands of new sources of artificial light.
- Biological connectivity between the park and other major conservation areas like the Mecca Hills Wilderness will be blocked.

I strongly urge you to reject this inappropriate development.

Yours, Tori Downes

Brady, Russell

From: Nancy Hulme <nancyhulme@yahoo.com>
Sent: Saturday, May 11, 2019 11:17 PM
To: District 4 Supervisor V. Manuel Perez; Brady, Russell
Subject: AGAINST Paradise Valley development

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DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Please accept my public comment AGAINST the proposed Paradise Valley development.
This proposed development is not aligned with the local Multiple Species Habitat Conservation Plan. The Shavers Valley is prime habitat for the threatened desert tortoise and LeConte's thrasher, and it is home to several other species and a network of wildlife corridors for migrating animals like the desert bighorn sheep. It would also interfere with the US Fish & Wildlife Service's plan to re-introduce the Sonoran pronghorn sheep to this area.

And in an era when housing affordability is at crisis levels, these expensive luxury homes will not address the need for housing that the average family can afford.

Thank you,

Nancy Hulme

Cathedral City, CA

Brady, Russell

From: scott connelly <scottdesert@gmail.com>
Sent: Saturday, May 11, 2019 10:15 PM
To: Brady, Russell
Subject: Paradise Valley project

CAUTION: This email originated externally from the **Riverside County** email system.
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I am unable to attend the public hearing on May 15. Please accept my comments in the email below explaining my opposition to this project. Comments also attached in pdf format.

May 11, 2019

To: Riverside County Planning Department

Re: Paradise Valley Specific Plan 339, Amendment No. 686
Draft Environmental Impact Report No.: 506 (Shaver Valley Development)

I submit the following comments regarding the above stated proposed project.

The Environmental Impact Report identifies negative impacts as significant and unavoidable in the following areas:

1. Long term water service program identified a pivotal issue for sustainability.
2. Environmental sustainability
3. Impacts of views of Orocopia Mountains and surrounding desert views
4. The location is surrounded by the Cottonwood Mountains, Joshua Tree National Park, Mecca Hills Wilderness and Orocopia Mountains which are unique valuable natural resources and encompasses a biological diverse ecosystem essential to the sustainability of multiple species including the endangered desert tortoise.
5. Alteration of visual character
6. Freeway views
7. Box Can Views
8. Trail Views
9. Orocopia Mountains views
10. Light Pollution
11. Cumulative aesthetics impacts
12. Biological resources
13. Air Quality
14. Soil erosion
15. Geology and Soils
16. Significance of the San Andreas Fault is understated and does not include sufficient analysis. The San Andreas Fault runs through the Mecca Hills, Orocopia Mountains and crosses the I-10 freeway where the Coachella Canal is located and then bends and turns north west. This is where geologist state that the fault is stuck at the bend and is building up pressure for a significant break/rupture of a 7.8 or 8 magnitude which is 300 years overdue.
17. Greenhouse Gasses
18. Groundwater Management Plan
19. Noise impacts
20. Congestion management

21. Utility and Services systems
22. Impacts on human beings.

All the above have been identified as Significant and Unavoidable Impacts. There are many other significant impacts that have been identified that require mitigation.

This proposal is essentially a creation of a new town and the impacts projected would create long term significant changes that would negatively impact and alter the existing quality of life of the surrounding communities. The long term sustainability of this project has not been establish.
I urge you to consider these impacts and deny the project as it appears the negative impacts outnumber the positive impacts.

Thank you for your consideration.
Scott Connelly
2071 Marguerite St
Palm Springs CA 92264

Brady, Russell

From: Jane Garrison <jane.garrison66@gmail.com>
Sent: Saturday, May 11, 2019 5:10 PM
To: Brady, Russell
Subject: Paradise valley

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To whom it may concern,

As you may have read, a study is being presented to the United Nations this year. This study was just completed after using 15,000 scientific sources, 450 scientists and a host of other information. It was concluded that our planet is in a dire situation. One of the biggest threats to the health of our planet is the overdevelopment of land. Why is a new city being considered right outside Joshua tree national Park? We as a species need to be conserving land, not developing more land. I am adamantly opposed to this development. I ask that you please keep me informed on any hearings, meetings, or actions that are taking place regarding this proposed hideous development. Thank you.
Jane Garrison
1323 South Driftwood drive Palm Springs California

Brady, Russell

From: Pam Nelson <pamela05n@yahoo.com>
Sent: Saturday, May 11, 2019 3:40 PM
To: Brady, Russell
Subject: Paradise Valley specific plan

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Dear County Planner, Russell Brady,

Please record my opposition to the Paradise Valley Specific Plan. There are many reasons for my opposition, but I will list a few below:
1) the Coachella Valley Multispecies Habitat Plan, which is a superior model of an HCP and carefully crafted for 12 years is not being followed. The JPR has not determined if the project is consistent with the MSHCP. This must be done.
2) Wildlife connectivity is in great jeopardy already and this would sever the connection with Joshua Tree NP and the Mecca Hills wilderness.
3) This new town is almost 18 miles from any existing shopping center. This is bad planning making air quality and ignoring climate change effects.
4) "Where's the water" ? Depending on ground-water and trying to obtain water rights is risky. The State just decided to hold back more water from this region due to the recent drought years.
5) This is undisturbed desert habitat. We are losing swaths of important desert habitat to off-roading, warehouses, roads, and energy production. This development is not needed and not sustainable.

These are my own opinions, but many of the members of our Group have expressed similar concerns.

Sincerely,
Pam Nelson
chair
Santa Margarita Group/Sierra Club

Brady, Russell

From: Jenny <jensoasis@aol.com>
Sent: Saturday, May 11, 2019 1:51 PM
To: District 4 Supervisor V. Manuel Perez; Brady, Russell
Subject: Paradixe Valley Housing Development

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

I am writing in opposition to the proposed development called Paradise Valley near Joshua Tree National Park.
This valley is know by the name Shavers Valley and has incredible views, wildlife and plant diversity. It is also know for its dark skies as is Joshua Tree National Park.

This is a sprawl development which will not add anything to the quality of life in the region. In addition, the region is over built with luxury homes when affordable homes closer to town are what is needed most.

Such a project will have devastating impacts to the Joshua Tree National Park and bordering Wilderness Areas.
The site includes several washes and these would have to be paved, creating runoff. It also means it is in a flood prone area! Why would a new city be proposed in a flood-prone area? The washes are full of wildlife which use the them as corridors, including desert bighorn sheep. It is also prime habitat for the threatened desert tortoise and LeConte's Thrasher.

Where is the water coming from during construction and for so many houses. How will the pumping of groundwater affect the wildlife in the area and is it sustainable?

I am opposed to this project and ask that instead you keep Shaver Valley in a pristine state to compliment the dark skies and clean air of the Joshua Tree National Park.

Jenny Wilder,
Apple Valley, CA

"People working together in a strong community with a shared goal and a common purpose can make the impossible possible." - Tom Vilsack

Brady, Russell

From: Sandra Zelasko <slzphoto@sbcglobal.net>
Sent: Saturday, May 11, 2019 11:21 AM
Subject: NO on the Paradise Valley Project

CAUTION: This email originated externally from the **Riverside County** email system.
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You can't be serious with this destructive project? Please consider the following issues.

This project would interfere and greatly effect Joshua Tree National Park's dark skies, clean air and pristine desert and wildlife habitat at the parks south entrance. Have you ever seen the Milky Way? Try it sometime and you will see why this project is damaging and irreversible.

5,000 acres of prime desert tortoise habitat would be lost forever, physically damaged beyond its natural state. Groundwater will compromise the Oraocopia basin and invasive plant and animal species will be introduced to an otherwise pristine ecosystem.

The biological connectivity, wildlife corridor, between the park and other major conservation areas like the Mecca Hills Wilderness will be blocked by development. WHEN WILL OUR WILDLIFE WIN? The Mecca Hills abound with wildlife who have carved out their own niche in the desert environment over centuries.

KEEP SHAVERS VALLEY the pristine desert landscape that it is TODAY!

Sandy Zelasko
Valley Center, CA 92082

Brady, Russell

From: John Trammell <jwtrammell87@gmail.com>
Sent: Saturday, May 11, 2019 9:18 AM
To: Brady, Russell; District 4 Supervisor V. Manuel Perez
Subject: Paradise Valley Housing Development | A Disappointing Proposal

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Dear Russell Bradly and V. Manuel Perez:

Please do not support the proposed Paradise Valley Housing Development in Shavers Valley.

Development in Shavers Valley will jeopardize the health of the California desert ecosystems and post as a public safety threat as the valley is known to experience flash floods during rain events.

The Mojave Desert Tortoise, listed as threatened by federal and state governments, will lose over 5,000 acres of vital habitat. This habitat is important in the survival of this species.

A new develop puts a high risk of the introduction to invasive plant and animal species, which can out compete native vegetation. Take a look at the damages being doing to our desert ecosystems from the Saharan Mustard.

Many animal species rely on Shavers Valley as a connecting corridor to move from the Mecca Mountains into the Cottonwood Mountains in Joshua Tree National Park. These species includes Desert Bighorn Sheep, Coyote, and Mountain Lions.

Groundwater supply needed for this development will be depleted quickly as recharge takes hundreds of years. Any nearby freshwater springs that are vital for migratory birds and mammals will dry causing more harm to our ecosystems.

Shavers Valley is a large flood plain. When rain comes to the desert, a good amount of water discharge from the Cottonwood and Mecca Mountains will rush into the valley causing major flash floods. This will post a great public safety issue to those who live and/or work in the proposed Paradise Valley.

Lastly, this development will take away from the pristine beauty and solitude of our deserts. People from all across the globe travel to our California deserts to be inspired, experience peace, beauty, and some of the darkest skies that can be found in our wonderful state. This development puts all of this at risk.

I understand we are in a housing crisis, but we need to think more smartly on how we build new housing. Urban Sprawl is not the answer. We need to consider building up instead of out.

Thank you for your time and consideration to not support the proposed Paradise Valley Housing Development.

--

John W. Trammell

Southern Area Director
California 4-H Management Board

Project Manager
The Wildlands Conservancy

Brady, Russell

From: Myrna Gomez <myrnagomez89@gmail.com>
Sent: Saturday, May 11, 2019 8:47 AM
To: Brady, Russell
Subject: Concerning the Paradise Valley Project

CAUTION: This email originated externally from the Riverside County email system. DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Brady,

Joshua Tree National Park is such a beautiful place that my family and I have the pleasure of visiting time and time again. There are huge repercussions of this project that will be damaging to the wild life and just as importantly as the beautiful dark night skies for star gazing. Please reconsider this project for it will be destructive all around. Lets protect such beautiful sacred land instead of finding ways to destroy it. Thank you for taking the time to read this.

Sincerely,
Myrna Bogner

Brady, Russell

From: danilarrea@aol.com
Sent: Friday, May 10, 2019 11:00 PM
To: District 4 Supervisor V. Manuel Perez; Brady, Russell
Subject: Paradise Valley Project

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Threats posed by the Paradise Valley project:

- Around 5,000 acres of prime desert tortoise habitat will be lost.
- Habitat on the park's southern boundary will be physically damaged.
- Ancient groundwater will be pumped from the Orocopia basin.
- Invasive plant and animal species will be introduced.
- Joshua Tree National Park's dark night skies will be affected by hundreds of thousands of new sources of artificial light.
- Biological connectivity between the park and other major conservation areas like the Mecca Hills Wilderness will be blocked.

Brady, Russell

From: Kathleen S <ksoler@gmail.com>
Sent: Friday, May 10, 2019 9:18 PM
To: Brady, Russell
Subject: Joshua Tree

CAUTION: This email originated externally from the **Riverside County** email system.
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One million of the world's species are near extinction thanks to human activity. If you build in this wildlife corridor you will be a part of that. Nature can never recover from sudden human development at the scale of paradise valley. Do not build it here. For it is America and it will not grow back.

Brady, Russell

From: Donna Thomas <thomasruby2@verizon.net>
Sent: Friday, May 10, 2019 6:22 PM
To: Brady, Russell
Subject: No to Paradise Valley Project

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Russell Brady,

As someone who lives near Joshua Tree National Park and who values the irreplaceable desert flora and fauna community in and around JTNP, I am greatly concerned by the proposal to pursue the Paradise Valley Project, an ill-conceived project that would have numerous unacceptable consequences:

1. Biological connectivity between the park and other major conservation areas like the Mecca Hills Wilderness will be blocked. It is essential for the continuation of life on earth as we know it that biological connectivity be maintained on planet Earth. The human species cannot continue without the vast biological support system of the Earth's flora and fauna, and by cutting off biological connectivity in the case of the Paradise Valley Project, we would be moving one step closer to destroying the web of life that sustains human life on our planet.

2. Joshua Tree National Park's dark night skies will be affected by hundreds of thousands of new sources of artificial light. Dark night skies are a legacy we owe to future generations, and we should not obliterate dark night skies with artificial light sources. Also, artificial lights disrupt the natural patterns within which our wildlife have evolved and which they depend on for maintaining their lives.

3. Around 5,000 acres of prime desert tortoise habitat will be lost.

4. Habitat on the park's southern boundary will be physically damaged.

5. Ancient groundwater will be pumped from the Orocopia basin.

6. Invasive plant and animal species will be introduced. Invasive plants are a huge issue. They take over native species and thus deprive pollinators and other fauna of the specific plant species they require to sustain their life. For example, many native bee species, of which there are 400 to 500 individual species in JTNP, have evolved to be dependent only one particular plant species, and when that plant species disappears, the native bee is also lost.

The Paradise Valley Project would pave over Paradise only to provide homes for a subset of wealthy individuals. It must never be approved or built.

Sincerely,
Donna Thomas

Brady, Russell

From: Browne, Janna <jsbrowne@student.cmccd.edu>
Sent: Friday, May 10, 2019 5:50 PM
To: Brady, Russell
Subject: New development near joshua tree national park

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Please don't build in this area. It makes no sense. This area is a conservation area. Please you can not move forward with this. This area is crucial for wildlife.

This development would cause devastating impacts to Joshua Tree National Park and to the wilderness areas bordering the development site. The site sits next to Joshua Tree's Cottonwood Mountains, which provide some of the best stargazing in all of California. The park was designated as a Dark Sky Park by the International Dark Sky Association—and because the park's south entrance is so remote and undeveloped, it is the best spot in the park for stargazing.

To the south, the Mecca Hills Wilderness area, Painted Hills, and Orocopia Mountains would also be impacted by the urbanization.

This proposed development is also not aligned with the local Multiple Species Habitat Conservation Plan. The Shavers Valley is prime habitat for the threatened desert tortoise and LeConte's thrasher, and it is home to several other species and a network of wildlife corridors for migrating animals like the desert bighorn sheep. It would also interfere with the US Fish & Wildlife Service's plan to re-introduce the Sonoran pronghorn sheep to this area.

And in an era when housing affordability is at crisis levels, these expensive luxury homes will not address the need for housing that the average family can afford.

Get Outlook for Android

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Brady, Russell

From: J <jonathonal@rocketmail.com>
Sent: Friday, May 10, 2019 5:35 PM
To: Brady, Russell
Subject: 'New City'

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No one is in approval for this idea especially since it is in a natural wildlife corridor. I believe we should stand to protect the area and the natural life that's already there. By not building on this land, it could have a positive impact on the environment.

Brady, Russell

From: Stef Brower <Stefanie.brower@gmail.com>
Sent: Friday, May 10, 2019 5:09 PM
To: Brady, Russell; District 4 Supervisor V. Manuel Perez
Subject: Please consider the last of our natural habitats & wildlife, please.

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DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Brady and Mr. Perez,

I am reaching out to plead that you reconsider approving the Paradise Valley Development Project. Joshua Tree National Park, and the precious wildlife and habitat surrounding it, especially the Pinkham Canyon Wash. Additionally Joshua Tree National Park would lose its status as International Dark Sky accreditation - something that is a very rare achievement. There are only 60 parks certified in the US.

Joshua Tree National Park area would be forever changed, and today it serves such a special and spiritual place for many.

Lastly, the wildlife impacted would be detrimental. I'm sure you've seen the recent UN report that outlines the alarming rate at which species are becoming extinct. This would not help the efforts that humankind must take to stop this from happening.

I urge you to consider doing what is best for the future of the planet and future generations - instead of what is in the best interest of businesses, and excessive greed.

Thanks you,
Stef

Brady, Russell

From: Sarabia, Elizabeth
Sent: Tuesday, August 13, 2019 8:25 AM
To: Brady, Russell
Subject: FW: attn: Commissioner Sanchez re:Paradise Valley
Attachments: JTNPA Letter to Riverside County - Paradise Valley FINAL.docx

Good morning Russell,

Attached for your review is a letter regarding Paradise Valley.

Thank you,
Elizabeth

From: Jacqueline Guevara [mailto:jacqueline@joshuatree.org]
Sent: Monday, August 12, 2019 10:04 AM
To: Sarabia, Elizabeth <ESarabia@RIVCO.ORG>
Subject: attn: Commissioner Sanchez re:Paradise Valley

Dear Ms. Sarabia,

Attached please find our letter, addressed to Mr. Russell Brady, in opposition of the proposed Paradise Valley development on the southern border of Joshua Tree National Park.

We hope that Mr. Brady, as well as Commissioner Sanchez, will take this letter and the points therein into consideration. We will be in attendance at the August 21, 2019 Planning Commission meeting, and are looking forward to further developments on this issue.

Sincerely,

Jacqueline Guevara
Executive Director
she/her/hers
Joshua Tree National Park Association
74485 National Park Drive
Twentynine Palms, CA 92277
Phone 760-367-5530
Cell 760-361-9359
FAX 760-367-5583
www.joshuatree.org

Mr. Russell Brady
Project Planner
Riverside County Planning Department
4080 Lemon St., 12th Floor
Riverside, CA 92501

Re: Paradise Valley, County EA No. 39364; EIR No. 506, County of Riverside Specific Plan No. 0033

Dear Mr. Brady:

On behalf of the Board members of the Joshua Tree National Park Association (JTNPA), I am writing to express to the Riverside County Planning Commission and the Riverside County Board of Supervisors our serious concerns regarding the proposed Paradise Valley project and its adverse effects upon Joshua Tree National Park and the ecosystem surrounding the southern boundary of the Park. We believe there are many conditions that merit rejection of the permits and approvals for the Project.

JTNPA is a California nonprofit association incorporated in 1962, and is the primary nonprofit partner for Joshua Tree National Park. Within the structure of a Cooperating Association Agreement with the National Park Service, our mission is to support the Park in its education, interpretation, scientific, and historic research and activities. A key component of our education activity is the Desert Institute, a highly-regarded program providing day-long and weekend courses to educators and the general public. We own and operate the Joshua Tree Visitor Center for the Park Service, and also operate and assist with staffing three other Visitor Centers located in Park facilities, including the visitor center located on Cottonwood Springs Road, the southern entrance to the Park.

We believe that development of the proposed Paradise Valley project, located at the Park boundary and near the Park's southern entrance - and referred to from time to time in this correspondence as "Shavers Valley", the historical name association with the site - would have negative and long-lasting effects on the condition of the Park and the experience of its visitors. Knowing that the Coachella Valley Multiple Species Habitat Conservation Plan (the "Conservation Plan") is in place, we ask that the Planning Commission and Supervisors apply the Conservation Plan's intended process and strictures thoroughly when considering the Paradise Valley Project. Additionally, all the public lands in the proposed project area have been designated by the Bureau of Land Management as California Desert National Conservation Lands and an Area of Critical Environmental Concern, and determined to be critical habitat for the desert tortoise by the California Department of Fish and Wildlife.

We note especially the following issues affecting the environmental and ecosystem health of Joshua Tree National Park:

- The site is situated within the Desert Tortoise and Linkage Conservation Area of the Conservation Plan, which affords protection to the desert tortoise, the LeConte's thrasher, and plants such as the Mecca aster and the Orocopia sage. They comprise a dry wash woodland habitat, or microphyll ecosystem, supporting these and other

species of wildlife and plants. The site is currently undisturbed, with few non-native plants observed. According to the California Native Plant Society, the footprint of the project would destroy more than 1,100 acres of microphyll woodland.

- The project will disrupt the migration of wildlife, particularly desert bighorn sheep, that migrate along their familiar corridors between Joshua Tree National Park and the wilderness areas to the south of the proposed project, including the Mecca Hills Wilderness Area and the Orocopia Mountains Wilderness, both under BLM management.

- Construction damage to the proposed project acreage will occur immediately and over time as land is graded. Grading will destroy critical habitat, damage wildlife and plants, and introduce invasive species. Grading will also produce excess runoff and erosion in a flood-prone area and above the ancient Orocopia groundwater basin.

- Such a large development would contribute greatly to light pollution, a wholly insupportable situation next to a designated Dark Sky Park. In 2017, Joshua Tree National Park was officially designated a Dark Sky Park by the International Dark Sky Association. The southeastern area of the Park is exactly where the darkest skies are found, and this urban invasion will severely affect the experience of the thousands of visitors to the Park who come specifically to enjoy a "dark sky" experience, as evidenced by the overflow attendance at the last several Joshua Tree National Park Dark Sky Festivals.

- Park wildlife such as bobcats, kit foxes, and coyotes, will encounter domestic pets and be likely to contract diseases such as distemper and toxoplasmosis, reducing the numbers of healthy wildlife populations.

- Households and businesses in the development using chemicals such as herbicides and pesticides and rat poison would also harm the ecosystem's wildlife and plant life.

- Ancient groundwater in the Orocopia basin is threatened. Disruption and depletion of this source of water would adversely affect wildlife that live within or migrate to and from the southern portion of the Park. Groundwater is not replenished in current climate conditions and climate change will exacerbate that. The research of Dr. Cameron Barrows has shown that the inevitable warming temperatures in the Park due to climate change will reduce populations of the iconic Joshua tree itself.

- The Pinkham Canyon Wash is considered vital to maintaining diversity among species, yet it appears to constitute one of the boundaries of the proposed footprint of the development. The Wash broadens and braids as it travels south of Interstate-10 beneath several large under crossings that are heavily used as migration corridors by a variety of wildlife, including bighorn sheep.

- The Wash is also subject to periodic severe flooding, all of which drains to Box Canyon Road, which is frequently impassable. Box Canyon Road was closed for

several months commencing in October 2018 as a consequence of substantial damage to the road resulting from severe flooding in the area. The road was finally reopened, following repairs at a reported cost of approximately $3 million, during May 2019. While the number of visitors entering the Park at the Cottonwood Springs Road entrance has risen dramatically over the past several years, we also suspect that an increasing number of visitors are using the Box Canyon Road to Cottonwood Springs Road as a "back door" entrance. Thus, any development in the area that may contribute to the flooding of or damage to Box Canyon Road could adversely affect the experience and possibly the welfare of visitors to Joshua Tree National Park who use these southern access routes.

Further, these are lands that have long been felt to have ecological and conservation significance. The desert area from Edom Palms near Mecca to 29 Palms was identified early on for protection as a potential state park by Frederick Law Olmstead, Jr. in the 1928 California State Parks Commission report. President Roosevelt included the Paradise Valley area in his 1933 executive withdrawal of 1,136,000 acres from public entry for the purpose of studying a new national monument as part of Minerva Hamilton Hoyt's effort to create Desert Plants National Monument. Minerva Hoyt's vision for the new NPS protected area included sizable components of both the Mojave and Colorado Deserts. She favored inclusion of much of the lands withdrawn for the study area including areas south of the present-day park boundary including Painted Canyon and Edom Palms Canyon near Mecca. This area included Shaver's Valley and the site of the Paradise Valley project. Her proposal had the support of many well-known scientists and conservationists of the time including desert botanist Philip Munz and ecologists Edmund Jaege and Forrest Shreve. She also had the support of Dr. Harold Bryant of the NPS Education Branch, who later became Superintendent of Grand Canyon NP. Dr. Bryant recognized the value of the Colorado Desert lands and the uniqueness of their plant communities within California.

Lastly, there is precedent for protecting the park from inappropriate development. A very similar project in the late 1990s for a Joshua Hills development along the park's southern boundary was defeated and the land placed under state protection. We ask that Riverside County acknowledge the tremendous growth in public recreation at Joshua Tree in recent years and that this has altered the balance for land use in favor of protecting these lands as open space.

We hope that you will consider our concerns as you analyze and evaluate the Paradise Valley Project proposal. It is the opinion of the Board of the Joshua Tree National Park Association that approving the Paradise Valley Project would bring many destructive outcomes to Joshua Tree National Park, therefore reducing the value of the public lands experience and the economic value to communities that serve as gateways to Joshua Tree National Park.

Please feel free to contact Jacqueline Guevara, Executive Director, at 760-567-5530 or jacqueline@joshuatree.org if you have any questions that we might be able to answer, or provide you with additional information.

Sincerely,

Brady, Russell

From: Jacqueline Guevara <jacqueline@joshuatree.org>
Sent: Monday, August 12, 2019 10:29 AM
To: Brady, Russell
Subject: Paradise Valley
Attachments: Paradise Valley letter final - letterhead.docx

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Brady,

Please find attached our letter in opposition to the Paradise Valley project, proposed for the southern border of Joshua Tree National Park. A hard copy has also been mailed to your office.

We at the Joshua Tree National Park Association sincerely hope that you will take the points enumerated in this letter into serious consideration. We will be in attendance at the Planning Commission meeting on August 21, and look forward to future developments on this issue.

Thank you for your time,

Sincerely,

Jacqueline Guevara
Executive Director
she/her/hers
Joshua Tree National Park Association
74485 National Park Drive
Twentynine Palms, CA 92277
Phone 760-367-5530
Cell 760-361-9359
FAX 760-367-5583
www.joshuatree.org

74485 National Park Drive, Twentynine Palms, CA 92277

www.joshuatree.org ▪ 760-367-5525 ▪ 760-367-5583 fax

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Joe Zarki

Mr. Russell Brady
Project Planner
Riverside County Planning Department
4080 Lemon St., 12th Floor
Riverside, CA 92501

August 9, 2019

Re: Paradise Valley, County EA No. 39364; EIR No. 506, County of Riverside Specific Plan No. 0033

Dear Mr. Brady:

On behalf of the Board members of the Joshua Tree National Park Association (JTNPA), I am writing to express to the Riverside County Planning Commission and the Riverside County Board of Supervisors our serious concerns regarding the proposed Paradise Valley project and its adverse effects upon Joshua Tree National Park and the ecosystem surrounding the southern boundary of the Park. We believe there are many conditions that merit rejection of the permits and approvals for the Project.

JTNPA is a California nonprofit association incorporated in 1962, and is the primary nonprofit partner for Joshua Tree National Park. Within the structure of a Cooperating Association Agreement with the National Park Service, our mission is to support the Park in its education, interpretation, scientific, and historic research and activities. A key component of our education activity is the Desert Institute, a highly-regarded program providing day-long and weekend courses to educators and the general public. We own and operate the Joshua Tree Visitor Center for the Park Service, and also operate and assist with staffing three other Visitor Centers located in Park facilities, including the visitor center located on Cottonwood Springs Road, the southern entrance to the Park.

We believe that development of the proposed Paradise Valley project, located at the Park boundary and near the Park's southern entrance - and referred to from time to time in this correspondence as "Shavers Valley", the historical name association with the site - would have negative and long-lasting effects

on the condition of the Park and the experience of its visitors. Knowing that the Coachella Valley Multiple Species Habitat Conservation Plan (the "Conservation Plan" is in place, we ask that the Planning Commission and Supervisors apply the Conservation Plan's intended process and strictures thoroughly when considering the Paradise Valley Project. Additionally, all the public lands in the proposed project area have been designated by the Bureau of Land Management as California Desert National Conservation Lands and an Area of Critical Environmental Concern, and determined to be critical habitat for the desert tortoise by the California Department of Fish and Wildlife.

We note especially the following issues affecting the environmental and ecosystem health of Joshua Tree National Park:

- The site is situated within the Desert Tortoise and Linkage Conservation Area of the Conservation Plan, which affords protection to the desert tortoise, the LeConte's thrasher, and plants such as the Mecca aster and the Orocopia sage. They comprise a dry wash woodland habitat, or microphyll ecosystem, supporting these and other species of wildlife and plants. The site is currently undisturbed, with few non-native plants observed. According to the California Native Plant Society, the footprint of the project would destroy more than 1,100 acres of microphyll woodland.

- The project will disrupt the migration of wildlife, particularly desert bighorn sheep, that migrate along their familiar corridors between Joshua Tree National Park and the wilderness areas to the south of the proposed project, including the Mecca Hills Wilderness Area and the Orocopia Mountains Wilderness, both under BLM management.

- Construction damage to the proposed project acreage will occur immediately and over time as land is graded. Grading will destroy critical habitat, damage wildlife and plants, and introduce invasive species. Grading will also produce excess runoff and erosion in a flood-prone area and above the ancient Orocopia groundwater basin.

- Such a large development would contribute greatly to light pollution, a wholly insupportable situation next to a designated Dark Sky Park. In 2017, Joshua Tree National Park was officially designated a Dark Sky Park by the International Dark Sky Association. The southeastern area of the Park is exactly where the darkest skies are found, and this urban invasion will severely affect the experience of the thousands of visitors to the Park who come specifically to enjoy a "dark sky" experience, as evidenced by the overflow attendance at the last several Joshua Tree National Park Dark Sky Festivals.

- Park wildlife such as bobcats, kit foxes, and coyotes, will encounter domestic pets and be likely to contract diseases such as distemper and toxoplasmosis, reducing the numbers of healthy wildlife populations.

- Households and businesses in the development using chemicals such as herbicides and pesticides and rat poison would also harm the ecosystem's wildlife and plant life.

- Ancient groundwater in the Orocopia basin is threatened. Disruption and depletion of this source of water would adversely affect wildlife that live within or migrate to and from the southern portion of the Park. Groundwater is not replenished in current climate conditions and climate change will exacerbate that. The research of Dr. Cameron Barrows has shown that the inevitable warming temperatures in the Park due to climate change will reduce populations of the iconic Joshua tree itself.

- The Pinkham Canyon Wash is considered vital to maintaining diversity among species, yet it appears to constitute one of the boundaries of the proposed footprint of the development. The Wash broadens and braids as it travels south of Interstate-10 beneath several large under crossings that are heavily used as migration corridors by a variety of wildlife, including bighorn sheep.

- The Wash is also subject to periodic severe flooding, all of which drains to Box Canyon Road, which is frequently impassable. Box Canyon Road was closed for several months commencing in October 2018 as a consequence of substantial damage to the road resulting from severe flooding in the area. The road was finally reopened, following repairs at a reported cost of approximately $3 million, during May 2019. While the number of visitors entering the Park at the Cottonwood Springs Road entrance has risen dramatically over the past several years, we also suspect that an increasing number of visitors are using the Box Canyon Road to Cottonwood Springs Road as a "back door" entrance. Thus, any development in the area that may contribute to the flooding of or damage to Box Canyon Road could adversely affect the experience and possibly the welfare of visitors to Joshua Tree National Park who use these southern access routes.

Further, these are lands that have long been felt to have ecological and conservation significance. The desert area from Edom Palms near Mecca to 29 Palms was identified early on for protection as a potential state park by Frederick Law Olmstead, Jr. in the 1928 California State Parks Commission report. President Roosevelt included the Paradise Valley area in his 1933 executive withdrawal of 1,136,000 acres from public entry for the purpose of studying a new national monument as part of Minerva Hamilton Hoyt's effort to create Desert Plants National Monument. Minerva Hoyt's vision for the new NPS protected area included sizable components of both the Mojave and Colorado Deserts. She favored inclusion of much of the lands withdrawn for the study area including areas south of the present-day park boundary including Painted Canyon and Edom Palms Canyon near Mecca. This area included Shaver's Valley and the site of the Paradise Valley project. Her proposal had the support of many well-known scientists and conservationists of the time including desert botanist Philip Munz and ecologists Edmund Jaege and Forrest Shreve. She also had the support of Dr. Harold Bryant of the NPS Education Branch, who later became Superintendent of Grand Canyon NP. Dr. Bryant recognized the value of the Colorado Desert lands and the uniqueness of their plant communities within California.

Lastly, there is precedent for protecting the park from inappropriate development. A very similar project in the late 1990s for a Joshua Hills development along the park's southern boundary was defeated and the land placed under state protection. We ask that Riverside County acknowledge the

tremendous growth in public recreation at Joshua Tree in recent years and that this has altered the balance for land use in favor of protecting these lands as open space.

We hope that you will consider our concerns as you analyze and evaluate the Paradise Valley Project proposal. It is the opinion of the Board of the Joshua Tree National Park Association that approving the Paradise Valley Project would bring many destructive outcomes to Joshua Tree National Park, therefore reducing the value of the public lands experience and the economic value to communities that serve as gateways to Joshua Tree National Park.

Please feel free to contact Jacqueline Guevara, Executive Director, at 760-567-5530 or jacqueline@joshuatree.org if you have any questions that we might be able to answer, or provide you with additional information.

Sincerely,

Jacqueline Guevara
Executive Director
Joshua Tree National Park Association
74485 National Park Drive
Twentynine Palms, CA 92277
www.joshuatree.org

Brady, Russell

From: Richard Greenwood <richardgreenwood2@gmail.com>
Sent: Wednesday, August 07, 2019 11:18 AM
To: Brady, Russell
Subject: "Paradise Valley" ???

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Hi -- I am a resident of Idyllwild and almost lifetime resident of Riverside County. I am also an enthusiastic proponent of our wonderful desert environment , at least in the winter months, and I just heard of some disturbing news about one of my favorite areas of the desert.

The "Paradise Valley" project has come to my attention, and it seems to me to be one of those billion dollar schemes to make a lot of money for a few people and make it seem to a lot of other people that they can own a piece of "paradise" . With that said, it seems that with climate change, dwindling resources and water, the several thousand foot elevation difference between the project and the nearest civilization, and the ruination of de facto wilderness. A much better plan would be to leave the area as it is in order to mitigate damage on many fronts as much as possible.

Anyone who buys into this scheme is only going to have to commute a long distance for work for many years and will be using a lot of resources from a long way off. The fuel needed just to bring food to that kind of a project will be an enormous jump. And the water? I guess it will come directly from the Colorado Aquaduct. It seems that a better plan would be to expand the Coachella Valley infrastructure for a while and use some of that land for other less damaging projects like solar farms near the freeway and the transmission lines that might help us mitigate some of our climate problems rather than exacerbate them.

Anyway, it is not my job to do your job -- I just wanted to register my and my wife's VERY strong objections to what we would consider a very bad idea in light of what is happening in terms of climate change, which our children and their children for a thousand years are going to be suffering with because we were too timid to accept reality and do the right thing.

Thank you for listening Richard Greenwood 951-961-6956

PS -- we are going to be talking to a lot of other people in town in our discussion groups about this bad idea. You may be hearing from more Idyllwilders soon.

Brady, Russell

From: Sandra Plummer <sandyplum@icloud.com>
Sent: Friday, August 02, 2019 6:03 AM
To: Brady, Russell
Subject: Oppose paradise valley

CAUTION: This email originated externally from the **Riverside County** email system.
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Planning Commission
Attn: Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501

RE: Paradise Valley SP EIR 506

Dear Riverside County Planning Commissioners:
I am strongly opposed to the proposed Paradise Valley project that intends to destroy thousands of acres of precious desert habitat. This project, while falling under the Coachella Valley Multi-Species Habitat Plan, is trying to circumvent the hard-won environmental and conservation protections that the CVMSHCP outlined.

As a Riverside County resident, I am asking the commissioners to strongly adhere to the CVMSHCP and its requirements. I understand that one of those important requirements is the Joint Project Review, which the applicant of the Paradise Valley project is trying to thwart. The JPR was agreed upon as a condition, long ago, for any applicant to adhere to in a Conservation Area. Please enforce that requirement. No applicant or developer should be given special treatment.

This enormous developmental sprawl is bypassing East Coachella Valley communities in dire need of growth, clean water, clean air and other infrastructure. This new city threatens the most remote and pristine part of adjacent Joshua Tree National Park, its dark skies and its life-giving springs.

Finally, "Paradise Valley" would undermine the very Habitat Plan that currently protects the entire southern flank of Joshua Tree and ensures that responsible development can happen quickly and easily where it ought to—next to existing urban, NOT next to this pristine National Park.

Thank you for your time and consideration in this matter. Please disseminate to all Planning Commissioners.

Passionately opposed

Sandra Plummer

92879

Sent from my iPhone

Brady, Russell

From: Eric Hamburg <ehamburg@gmail.com>
Sent: Thursday, August 01, 2019 12:57 PM
To: Brady, Russell
Subject: Opposition to Paradise Valley project

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Planning Commission
Attn: Russell Brady
Riverside County Planning
4080 Lemon Street 12th Floor
Riverside, CA 92501

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Thank you for your time and consideration in this matter. Please disseminate to all Planning Commissioners.

Sincerely,

Eric Hamburg

78858 Garden Road

Twentynine Palms, CA 92277

Mailing address: PO Box 1722, 29 Palms 92277

Brady, Russell

From: Fire <rsmsfire@yahoo.com>
Sent: Thursday, July 11, 2019 2:33 AM
To: Brady, Russell
Subject: : Paradise Valley SP EIR 506

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Planning Commission

Attn: Russell Brady

Dear Riverside County Planning Commissioners:

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Finally, "Paradise Valley" would undermine the very Habitat Plan that currently protects the entire southern flank of Joshua Tree and ensures that responsible development can happen quickly and easily where it ought to—next to existing urban, NOT next to this pristine National Park.

Thank you for your time and consideration in this matter. Please disseminate to all Planning Commissioners.
Ruth Sinfuego
760-534-4581

Brady, Russell

From: Joe Wallace <Joe.Wallace@cvep.com>
Sent: Thursday, June 20, 2019 1:39 PM
To: Brady, Russell
Cc: Lesa Bodnar
Subject: Project Support

CAUTION: This email originated externally from the **Riverside County** email system.
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Mr. Brady,

My name is Joe Wallace and I serve as the CEO and Chief Innovation Officer of the Coachella Valley Economic Partnership. The purpose of this email is to express CVEP's support for the Paradise Valley project that is under consideration at this time. The developer, GLC Enterprises has been very diligent in designing a community that is environmentally optimized while adding 8,500 home in a region that is perpetually suffering from a shortage of housing. Paradise Valley will be an economic stimulus not only during the construction phase but also on a continual basis after it is completed. The jobs created in the proposed commercial areas expected to be capable of paying sufficiently for those who live in Paradise Valley to buy a home in Paradise Valley, minimizing the traffic based emissions associated with bedroom developments alone. CVEP's mission is to inspire and advocate for projects that elevate the economy of the greater Coachella Valley region and this project meets all of the criteria that we use for metrics. If you have any questions or would like to speak with me directly please feel free to do so at your convenience.

Best Regards,

Joe Wallace, CEO and Chief Innovation Officer
Coachella Valley Economic Partnership
(760) 340-1575

Brady, Russell

From: Sue Shigenaga <sshigenaga@gmail.com>
Sent: Tuesday, May 28, 2019 7:39 PM
To: Brady, Russell
Subject: Letter - Paradise development
Attachments: Paradise Development Letter - Brady 5-2019.docx

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DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Brady,
Please find attached my letter regarding the proposed Paradise Development.

Thank you for the opportunity to share my opinion.

Sincerely,

Sue Shigenaga

--
Sue Shigenaga
760.668.3936 Cell
sshigenaga@gmail.com

May 28, 2019

Mr. Russell Brady
Project Planner
County of Riverside

Dear Mr. Brady,

I am writing to express my opposition to the Paradise Development in the Eastern Area of Riverside County, near Cottonwood Springs Road. For a number of reasons, I believe that this development should not be allowed to move forward in this area.

Previous County zoning and environmental agreements have placed this land's status in a non-residential and non-commercial category. I believe this is the way it should remain.

There are a number of reasons to keep the land the way is, including:

- Corridor access for wildlife traveling to and from Joshua Tree National Park.
- Current pristine status of this corridor for those people traveling to and from Joshua Tree National Park, for their unfettered enjoyment of nature.
- Light pollution of the night sky, harming the current night sky status.
- Environmental harm due to increased travel from residents of the Paradise community to the greater Coachella Valley.

I would ask for your leadership and stewardship in maintaining the natural areas of the County, in particular this parcel of land. Joshua Tree National Park brings visitors from around the world. Keeping the perimeter of this park pristine is possible and it should be vigorously protected.

Thank you for allowing me to share my opinions.

Sincerely,

Sue Shigenaga
76145 Via Fiore
Indian Wells, CA
92210
sshigenaga@gmail.com

Brady, Russell

From: Rena Nayyar <renanayyar@hotmail.com>
Sent: Tuesday, May 28, 2019 7:17 PM
To: Brady, Russell
Subject: reject Paradise Valley

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Please Please prevent the Paradise Valley development on the border of Joshua Tree National Park from moving forward. I have been going to the park often since I had the privilege of doing an internship on bobcats there as a college student. It is a unique and magical place that needs to be protected. Such a large development nearby will do permanent damage to the park as well as of course the actual land developed which has habitat for desert tortoise and is a buffer to protect the park's dark skies for stargazing, and the amazing plants found there. Places like this are rare -this is no place for a new city.
Thank you,
Rena Nayyar

Brady, Russell

From: Leslie Gebhart <leslieg@childvoice.com>
Sent: Wednesday, May 15, 2019 4:27 PM
To: Brady, Russell
Cc: District 4 Supervisor V. Manuel Perez
Subject: Follow upFwd: what's a voter to do?

CAUTION: This email originated externally from the **Riverside County** email system.
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I am Grateful for the opportunity to speak today at the lengthly hearing.
Although representing merely the voice of an aged population, I do also represent those of us alive before the environmental advocacy reached us with their education about this VERY FRAGILE and irreplaceable desert landscape. We can do better now that we know better and I learned a LOT today at the meeting from the Sierra Club and staff and others willing to speak.

The applicant is well staffed, well protected, well armed.
BUT
mistakenly viewing this Paradise Valley acreage as ready for the sort of development proposed.
Resounding, "NO" was offered by the majority of speakers and those speaking for others not present.
Please please resist the urge to go along with this proposed plan while ignoring the species already adapted to the delicate balance of those precious few remaining, undeveloped spaces we can leave to our children if we are courageous enough to be a voice of reason for the planet….we do not need more concrete nor the resulting negative environmental impact.

There are MANY areas in your district that could use an influx of plans and energy this team proposes….which would BOTH support low income residents already in place ANMD without destroying virgin land.

Thank you for your service and for paying attention to those of us now willing to stand up and be counted and protest this illogical Paradise Valley which may have sounded good all those years ago, but now out-dated and inappropriate.

Respectfully,
Registered voter, since 1974
Leslie A. Gebhart

~~~~~~~~~~~~~~~~~~~~~~
Keeping focus on what is possible
holding the vision for peaceful outcomes
& the UU Peace Labyrinth Oasis where you are welcomed
for respite & contemplation.
Your donations are graciously accepted to this 501 (c) 3 option
when planning your philanthropic actions.
With gratitude, Leslie G
760.218.8865
~~~~~~~~~~~~~~~~~~~~~~

Begin forwarded message:

From: Leslie Gebhart <leslieg@childvoice.com>
Subject: what's a voter to do?
Date: May 14, 2019 at 7:51:49 AM PDT
To: rbrady@rivco.org

Thank you for your leadership!

Want to be sure to weigh in on the IMPORTANCE OF PROTECTING the natural acreage with respect to Nature—sorta a Mother's JOB to protect.

Having lived long enough to watch our human species concrete over the land without regard to Nature's systems. Please say NO—we do NOT NEED MORE HOUSES….Palm Springs is full of empty spaces and concrete waste and it is our duty to protect our
wildlife habitat by the park's south entrance and the Shavers Valley
registered voter here since 1974, Leslie Gebhart

~~~~~~~~~~~~~~~~~~~~~~

Keeping focus on what is possible
holding the vision for peaceful outcomes
& the UU Peace Labyrinth Oasis where you are welcomed
for respite & contemplation.
Your donations are graciously accepted to this 501 (c) 3 option
when planning your philanthropic actions.
With gratitude, Leslie G
760.218.8865
~~~~~~~~~~~~~~~~~~~~~~

Brady, Russell

From: Raven Stone <xravenstonex@gmail.com>
Sent: Wednesday, May 15, 2019 1:44 PM
To: Brady, Russell
Subject: Fwd: Land development in Joshua Tree National Park

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

---------- Forwarded message ---------
From: **Raven Stone** <xravenstonex@gmail.com>
Date: Wed, May 15, 2019 at 3:41 PM
Subject: Land development in Joshua Tree National Park
To: <brady@rivco.org>, <district4@rivco.org>

White man's greed has already rest me of the place where I was married and spent my honeymoon, Bonnie Springs Ranch, where my wife used to live. There are already enough houses in the United States to house every single homeless person in this county. https://www.mintpressnews.com/empty-homes-outnumber-the-homeless-6-to-1-so-why-not-give-them-homes/207194/

https://blog.amnestyusa.org/us/housing-its-a-wonderful-right/

Destroying what little sacred, natural land we have, taking away habitat from already endangered plants and animals including the endangered Desert Tortoise is the last thing this world needs.
https://www.nps.gov/jotr/learn/nature/tortoise.htm

Why not instead take another approach to the housing problem in the United States? https://www.coalitionforthehomeless.org/ending-homelessness/proven-solutions/

Why not focus on finding solutions and alternative to climate change?
https://www.nationalparks.org/our-work/programs/programs-protect

Why take away land that is valued for its natural beauty for white greed?

Thank you for your time, and I hope that you will consider the futures of the many animal species that live in the park, and the people that will never get to see them if you build more houses for the white upper class when you vote.

Raven Stone
Legal Secretary
Social Activist
Interfaith Clergy Counselor

Brady, Russell

From: Maria jose Rodriguez <yosoymaria00@gmail.com>
Sent: Wednesday, May 15, 2019 10:35 AM
To: Brady, Russell
Subject: Paradise valley project opposition
Attachments: Paradise Valley Comment Letter May152019_MariaJose.pdf

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Mr. Russel Brady, I hope you take this letter into consideration.

Best regards,
María José Rodríguez
--
Sent from Gmail Mobile

May 15, 2019

Riverside County Planning Commission
Russell Brady, Project Planner
Riverside County Planning Department
4080 Lemon St., 12th Floor
Riverside, CA 92501

Re: Paradise Valley Specific Plan Public Comment

Dear Commissioners and Mr. Russell Brady:

Thank you for the opportunity to submit comments regarding the Paradise Valley Specific Plan. My name is María José Rodríguez, I am a resident of the Eastern Coachella Valley and I would like to voice my opposition to this project being built. Not only is the Paradise Valley project a threat to low income residents in the east of the valley, it would also be detrimental to the local environment.

I would like to discuss the likely impacts that Paradise Valley would have on the Eastern Coachella Valley. I have recently started engaging and working with environmental justice organizations like Leadership Counsel for Justice and Accountability to further learn about the different planning processes that take place and often disregard the needs of environmental justice communities and the environment. We hope that our engagement and collaborative efforts will ensure that programs and policies do not disadvantage but rather benefit and advance the priorities of low income communities and communities of color.

With increasing greenhouse emissions, this project would have a negative impact on our already struggling community, in terms of clean air. The proposed time for this project to be finished in 15 years...the earth doesn't have that much time before it starts seeing major natural disasters, this project certainly wouldn't help. There is a community, full of life that desperately needs resources so why not invest in us? There's a homelessness crisis that is not being addressed directly. Moving homeless people from one homeless camp to the other is not going to get rid of homelessness. The U.S prides itself from being a first world country and yet my community is being affected by poor air quality, outdated sewer systems, bad infrastructure, lack in clean water, homelessness and little to nothing is being done about it. It's problematic, to say the least, that outsiders are coming to this valley, especially the east side, to want to start projects that the residents didn't ask for. How is this project going to cater to the low income community it wants to be built on? Eastern Coachellanos deserve better.

With the following additional reasons listed below we urge the Riverside County Planning Commission to oppose the approval of the Paradise Valley Specific Plan:

1. **Investing in existing communities** such as Thermal, Oasis, Mecca, North Shore and the City of Coachella. Whereas the disadvantaged unincorporated communities have yet to see large investments of affordable housing, water and wastewater infrastructure, active transportation and other foundational infrastructure needs. Developing projects like Paradise Valley perpetuate urban sprawl, leapfrog development, continue the marginalization of affordable housing supply.
2. **Air quality is a critical environmental justice concern** in the Eastern Coachella Valley impacted by various mobile and stationary sources including pesticides and the Salton Sea. Paradise Valley would only exacerbate those existing issues in the community by creating a new town of more than 25,000 new residents. Greenhouse gas emissions will rise and bring more impacts to the community.
3. **Housing affordability concerns** play a huge role in the opposition to this project because more than ⅓ will be vacation homes and a small number of rental units would be low to moderate income. In a time where California has a housing crisis, this development project would never meet the need for housing for individuals who need it most.
4. **Respecting the Multiple Species Habitat Conservation Plan** means respecting Joshua Tree National Park, more specifically, its southern border where this development project will threaten and damage the habitat and species that reside there.

I urge you to take into consideration our concerns and needs.

Thank you for the opportunity to comment.

Sincerely,
María José Rodríguez

Brady, Russell

From: Maria jose Rodriguez <yosoymaria00@gmail.com>
Sent: Wednesday, May 15, 2019 10:33 AM
To: Brady, Russell
Subject: Paradise valley project opposition
Attachments: Paradise Valley Comment Letter May152019_MariaJose.pdf

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Mr. Russel Brady, I hope you take this letter into consideration.

Best regards,
María José Rodríguez
--
Sent from Gmail Mobile

May 15, 2019

Riverside County Planning Commission
Russell Brady, Project Planner
Riverside County Planning Department
4080 Lemon St., 12th Floor
Riverside, CA 92501

Re: Paradise Valley Specific Plan Public Comment

Dear Commissioners and Mr. Russell Brady:

Thank you for the opportunity to submit comments regarding the Paradise Valley Specific Plan. My name is María José Rodríguez, I am a resident of the Eastern Coachella Valley and I would like to voice my opposition to this project being built. Not only is the Paradise Valley project a threat to low income residents in the east of the valley, it would also be detrimental to the local environment.

I would like to discuss the likely impacts that Paradise Valley would have on the Eastern Coachella Valley. I have recently started engaging and working with environmental justice organizations like Leadership Counsel for Justice and Accountability to further learn about the different planning processes that take place and often disregard the needs of environmental justice communities and the environment. We hope that our engagement and collaborative efforts will ensure that programs and policies do not disadvantage but rather benefit and advance the priorities of low income communities and communities of color.

With increasing greenhouse emissions, this project would have a negative impact on our already struggling community, in terms of clean air. The proposed time for this project to be finished in 15 years...the earth doesn't have that much time before it starts seeing major natural disasters, this project certainly wouldn't help. There is a community, full of life that desperately needs resources so why not invest in us? There's a homelessness crisis that is not being addressed directly. Moving homeless people from one homeless camp to the other is not going to get rid of homelessness. The U.S prides itself from being a first world country and yet my community is being affected by poor air quality, outdated sewer systems, bad infrastructure, lack in clean water, homelessness and little to nothing is being done about it. It's problematic, to say the least, that outsiders are coming to this valley, especially the east side, to want to start projects that the residents didn't ask for. How is this project going to cater to the low income community it wants to be built on? Eastern Coachellanos deserve better.

With the following additional reasons listed below we urge the Riverside County Planning Commission to oppose the approval of the Paradise Valley Specific Plan:

1. **Investing in existing communities** such as Thermal, Oasis, Mecca, North Shore and the City of Coachella. Whereas the disadvantaged unincorporated communities have yet to see large investments of affordable housing, water and wastewater infrastructure, active transportation and other foundational infrastructure needs. Developing projects like Paradise Valley perpetuate urban sprawl, leapfrog development, continue the marginalization of affordable housing supply.
2. **Air quality is a critical environmental justice concern** in the Eastern Coachella Valley impacted by various mobile and stationary sources including pesticides and the Salton Sea. Paradise Valley would only exacerbate those existing issues in the community by creating a new town of more than 25,000 new residents. Greenhouse gas emissions will rise and bring more impacts to the community.
3. **Housing affordability concerns** play a huge role in the opposition to this project because more than ⅓ will be vacation homes and a small number of rental units would be low to moderate income. In a time where California has a housing crisis, this development project would never meet the need for housing for individuals who need it most.
4. **Respecting the Multiple Species Habitat Conservation Plan** means respecting Joshua Tree National Park, more specifically, its southern border where this development project will threaten and damage the habitat and species that reside there.

I urge you to take into consideration our concerns and needs.

Thank you for the opportunity to comment.

Sincerely,
María José Rodríguez

Brady, Russell

From: Sarah SU Forman <sarah.unterseher@gmail.com>
Sent: Wednesday, May 15, 2019 8:42 AM
To: Brady, Russell
Subject: Paradise Valley Project

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As a California resident and homeowner, I'm disturbed by the possibility of Riverside County approving this project. The proposed Paradise Valley project is anything but paradise for this valley. It would affect Joshua Tree National Park's International Dark Night Sky accreditation. And it would destroy the Pinkham Canyon Wash and the ecosystem it supports. Please do not support developers' greed in doing irreversible damage to this beautiful land and its ecosystem.

Thank you for your consideration.
Sarah Forman

Brady, Russell

From: Miriam Roe <miriam.roe@gmail.com>
Sent: Wednesday, May 15, 2019 12:55 AM
To: Brady, Russell
Subject: New city development in Paradise Valley/Joshua Tree

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Dear Russell,

I won't be able to attend the public hearing on May 15th about your idea of a new city development in Paradise Valley/Joshua Tree, but wanted to express my feelings, thoughts, and beliefs about your new development at least in an email.

Please re-think your plan of developing a new city in Paradise Valley/Joshua Tree. Peace, quiet, and sights of this beautiful park would be destroyed. Already in the Mojave desert, e.g. during night light pollution from Las Vegas and during the day mirror solar towers ruin the park's atmosphere, and pose a very bad example of how our protected environment can be destroyed, and further not to forget the noise level from planes and freeways.

Your new Paradise Valley development would pose threats to the following:

- Around 5,000 acres of prime desert tortoise habitat will be lost.
- Habitat on the park's southern boundary will be physically damaged.
- Ancient groundwater will be pumped from the Orocopia basin.
- Invasive plant and animal species will be introduced.
- Joshua Tree National Park's dark night skies will be affected by hundreds of thousands of new sources of artificial light.
- Biological connectivity between the park and other major conservation areas like the Mecca Hills Wilderness will be blocked.

Important and famous parks, especially such as Joshua Tree have to stay protected for the public and future generations to come and to preserve species of animals, insects, and plants that only live in our deserts.

Overpopulation is not far, but we are also not far from building future alternative housing, e.g. earthships, which make their own power, and water, and even grow food in an integrated green house. I'm building my own earthship in Taos, New Mexico at this moment. These alternative housing examples don't need infrastructure, use water 4 times, and don't harm or cause a threat to our environment, e.g. as leech fields could create.

We need to re think our building policies and can't go on sucking aquifers empty that would ruin all live in the surrounding deserts, just because it is cheap land to develop on. One day a development like this can't support itself anymore. We can't go on and have to re-think building permits for alternative housing that would be in the long run so much more valuable and cheaper for developers, consumers, and our environment.

I would like to speak more about this with you, but please from the bottom of my heart don't build a city on protected land and help to preserve our beautiful desert environments and a beautiful unique park that would be otherwise ruined.

Thank you very much for reading and considering.

Sincerely,
Miriam Roe
Santa Cruz, CA

Brady, Russell

From: L. Bartlett <morongomom21@gmail.com>
Sent: Tuesday, May 14, 2019 11:56 PM
To: Brady, Russell; District 4 Supervisor V. Manuel Perez
Subject: Opposition to PARADISE VALLEY PROJECT

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I have lived in this desert for nearly 20 years. I have seen the growth and changes in the high desert as well as in the low desert. It's not all good.

Our desert isn't sustainable. It's fragile. This project will endanger, threaten , and kill indigenous plant species and indigenous animal habitats.

There isn't enough water for a hosted project. And why on Earth is this proposed project in the middle of pristine desert?

Please do not let the project proceed. For my children. For your children. For their childrens children.

Loisa Bartlett
Simple desert homeowner
An advocate for our desert environment

Brady, Russell

From: Becky Kyles <beckykyles@gmail.com>
Sent: Tuesday, May 14, 2019 8:44 PM
To: Brady, Russell
Subject: Paradise Valley Project

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DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Brady,

I am writing in concern regarding the proposed Paradise Valley Project. I am unable to attend the hearing but wanted to express dissent to this project, as it would negatively impact the wildlife of the area.

Thank you for taking the time to read my message.

Sincerely,

Becky Kyles

Brady, Russell

From: brosie96@yahoo.com
Sent: Tuesday, May 14, 2019 7:45 PM
To: District 4 Supervisor V. Manuel Perez; Brady, Russell
Subject: No on specific plan 339

CAUTION: This email originated externally from the **Riverside County** email system.
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Please don't approve Specific Plan 339-Paradise Valley development. This plan will seriously endanger desert tortoise and Bighorn sheep habitat and their migratory paths. It also will severely impact Mecca Hills wilderness and Shaver Valley, two stunningly beautiful and important areas for wildlife, hiking, and outdoor recreational activities. Please don't allow such a terrible disruption and devastation to this community. Thank you.

Betti Rosmar,
Palm Desert

Brady, Russell

From: Jim Leupold <desertleup@gmail.com>
Sent: Tuesday, May 14, 2019 7:28 PM
To: Brady, Russell
Subject: Proposed new city near Joshua Tree

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Dear Mr. Brady,

Please listen to those of us who do NOT want anything else built in or near Joshua Tree National Park. We're having enough problems with climate change, government shutdowns, etc.

There are still vast areas in our desert for developers to build. Let's not ruin a pristine, unique, star-gazing wonder that we have right in our back yard. Please!!!

Sent from my iPhone
Jim Leupold
PBI Director of Tennis
JW Marriott Desert Springs Resort & Spa
Jim.leupold@pbitennis.com
760 341-1894
41775 Lima Hall Road
Bermuda Dunes CA

Brady, Russell

From: Duane Young <duane@wdyoung.com>
Sent: Tuesday, May 14, 2019 5:59 PM
To: Brady, Russell
Subject: Paradise Valley
Attachments: Paradise Valley Support Letter 2019.pdf

CAUTION: This email originated externally from the **Riverside County** email system.
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Dear Sir,

Please see my letter of support for PVSP ...

Many Thanks

Duane Young

Wm. Dale Young & Sons & Grandsons

PH (760) 347-7906
FX (760) 342-6188
81-910 Arus Ave
Indio, CA. 92201

HOME OF THE "CLASSIC CUT"

From the desk of Duane Young, Email – Duane@wdyoung.com, Cell – (760) 250-2103

Riverside County Planning Commission
c/o Russell Brady, Riverside County Planning Department
4080 Lemon St., 12th Floor
Riverside, CA 92501
VIA EMAIL: RBrady@rivco.org

Re: Paradise Valley SP – Final EIR No. 506

Dear Commissioners,

I am writing to express our support for the Paradise Valley Specific Plan in East Coachella Valley. With our several companies here in the Desert we employ over 500 full time employees. Our family first came to the Valley in 1950 and at that time started "Young's Nursery" out on old Hwy 86. We are now in our fifth generation of being full time resident business owners in the Coachella Valley. We have been watching the progress of the Paradise Valley project for the better part of 20 years now and have been strong supporters of the project from its get-go. It is a project that makes good sense environmentally and strategically. It will require almost no additional highway infrastructure and have very little impact on the crowding Valley floor other than shopping dollars and sales tax revenue. It is by micro-climate a few degrees cooler requiring less additional power than developments slated for the Valley floor. It is a project that to all of us "just makes good sense and cents" . We strongly support the project as companies that are major employers of the Valley.
We believe The PVSP is an example of smart planning that balances the interests and needs of our growing region with protection and preservation of our valued natural habitat and species. For these reasons and more, "WE" urge the Planning Commission to recommend approval of the PVSP and certification of the programmatic Environmental Impact Report.

Very Sincerely

Duane Lee Young, President or Vice President of and representing .....
"William Dale Young & Sons Inc"
"Cocopah Nurseries Inc"
"The Jewel Date Company"
"Vintage Associates and Nursery"

Brady, Russell

From: Diana Reza <d.oreza14@gmail.com>
Sent: Tuesday, May 14, 2019 4:59 PM
To: Brady, Russell
Subject: Paradise Valley Comment Letter May2019
Attachments: DR Paradise Valley Letter May 2019.pdf

CAUTION: This email originated externally from the **Riverside County** email system.
DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Mr. Brady,

I hope this email reaches you well. My name is Diana Reza and I have attached below a comment letter for the upcoming meeting surrounding the Paradise Valley specific plan.

Best

Diana Reza

May 15, 2019

Riverside County Planning Commission
Russell Brady, Project Planner
Riverside County Planning Department
4080 Lemon St., 12th Floor
Riverside, CA 92501

Re: Paradise Valley Specific Plan Public Comment

Dear Commissioners and Mr. Russell Brady:

Thank you for the opportunity to submit comments regarding the Paradise Valley Specific Plan. My name is Diana Reza and I am a community member from the city of Coachella. I was born and raised in the east valley, continually exposed to the disparities faced by our communities, but much of my processing of this occurred attending university. Having been able to become educated is a great privilege not many here can attain. I found it necessary to come back and help where I am most needed listening to the community itself, and I ask you for the same courtesy.

I would like to discuss the likely impacts that Paradise Valley would have on the Eastern Coachella Valley. I have recently started engaging and working with environmental justice organizations like Leadership Counsel for Justice and Accountability to further learn about the different planning processes that take place and often disregard the needs of environmental justice communities and the environment. We hope that our engagement and collaborative efforts will ensure that programs and policies do not disadvantage but rather benefit and advance the priorities of low income communities and communities of color.

This letter focuses on urging the Riverside County Planning Commission to oppose the approval of the Paradise Valley Specific Plan for the following reasons:

1. **Investing in existing communities** such as Thermal, Oasis, Mecca, North Shore and the City of Coachella. Whereas the disadvantaged unincorporated communities have yet to see large investments of affordable housing, water and wastewater infrastructure, active transportation and other foundational infrastructural needs. Developing projects like Paradise Valley perpetuate urban sprawl, leapfrog development, and continue the marginalization of affordable housing supply.
2. **Air quality is a critical environmental justice concern** in the Eastern Coachella Valley impacted by various mobile and stationary sources including pesticides and the Salton Sea. Paradise Valley would only exacerbate those existing issues in the community by creating a new town of more than 25,000 new residents. Greenhouse gas emissions will rise and bring more impacts to the community.

3. **Housing affordability concerns** play a huge role in the opposition to this project because more than ⅓ will be vacation homes and a small number of rental units would be low to moderate income. In a time where California has a housing crisis, this development project would never meet the need for housing for individuals who need it most.
4. **Respecting the Multiple Species Habitat Conservation Plan** means respecting Joshua Tree National Park, more specifically, its southern border where this development project will threaten and damage the habitat and species that reside there. The land is critical for the migration of desert tortoises and
5. **Inadequate accessibility to emergency and transportation vehicles** motivates further opposition to this project as the proposed development area is not included within the Sunline transit system. Its maintenance of one entrance/exit through the I-10 freeway will create issue for emergency vehicles as well as increase traffic and gas emissions to the surrounding communities.

Thank you for the opportunity to comment. Having the ability to come back to my hometown and work with environmental justice groups has helped me further understand the inequity continually faced by the Eastern Coachella Valley. Having been involved in public health throughout my education in high school and college I know that there is greater causes that need to be dealt with in terms of air quality, water contamination, and physician shortages, all greatly decreasing the quality of life of your constituents. I urge you to instead consider where development and infrastructure is most needed for the existing communities whom you represent and to oppose the Paradise Valley Specific Plan.

Sincerely,

Diana Reza

June 1, 2019

Riverside County Planning Commission

P. O. Box 1409

Riverside, CA 92502-1409

RE: Paradise Valley Project

Dear Members of the Riverside County Planning Commission:

The Paradise Valley project would be detrimental to Joshua Tree National Park and to the Coachella Valley. The Desert Sun newspaper published an editorial on May 25, 2019, declaring that this project threatens the multi-species habitat plan. There were various important issues highlighted in the editorial including that the Joint Project Review must be completed before any further official action by the Planning Commission. Furthermore, that the Coachella Valley Multiple Species Habitat Conservation Plan must be respected and followed.

Not to be forgotten, a member of the Cahuilla Native American tribe attended the May 15th meeting and reminded all those in attendance of the significance of this fragile desert land which is sacred and valued by the tribe. Generations of Native Americans have been an integral part of this area. Their voice must be respected and heard.

Please consider all those who reside in our valley and those who travel from other parts of Riverside County, who are concerned about this proposed project.

Thank you for consideration.

Gloria Kelly

Gloria Kelly

48850 Paisano Road (P O Box 3033)

{Palm Desert, CA 92261

Sarabia, Elizabeth

From: George Cerny <gcerny40@gmail.com>
Sent: Friday, June 14, 2019 6:10 PM
To: Sarabia, Elizabeth
Subject: Paradise Valley project

Dear planning commissioners:
I am vehemently against the PV project adjacent to Joshua Tree National Park BECAUSE it is next to Joshua Tree National Park and in a Conservation Area. I am totally against anything in this beautiful area. Thank you for your considerartion in this important matter.
George Cerny 81901 Avenida Alcalde, Indio, CA 92203. SUNCITY SHADOW HILLLS

Sarabia, Elizabeth

From: Nancy <NancyK500@charter.net>
Sent: Tuesday, June 18, 2019 12:27 PM
To: Sarabia, Elizabeth
Subject: Paradise Valley Proposed Development

I wish to express my disapproval of the large-scale development planned for the Coachella Valley, known as Paradise Valley. I grew up in Palm Springs in the 1950's and am a frequent visitor to the desert as I value its distinctive and fragile environment. I have witnessed many changes to that environment over the past 60-some years, but have been pleased to see most development as an outgrowth from existing neighborhoods.
The Paradise Valley proposal appears to be an isolated and invasive project which will have negative impacts on the heretofore open and protected zones around Joshua Tree National Park. Please consider my strong opposition to this project at the upcoming August 21st meeting of your Planning Commission. Thank you. Nancy Klotzsche

Sarabia, Elizabeth

From: Stephen Anderson <sca1baa@earthlink.net>
Sent: Saturday, June 22, 2019 10:30 PM
To: Sarabia, Elizabeth
Subject: Atrocious Housing Project

June 24, 2019
11378 Pena Way
Jurupa Valley, California 91752-1620

Dear Riverside County Supervisors:

I am writing to express my opposition to the Paradise Valley Project as being proposed by the "Glorious Land Co." It violates the Multiple Species Habitat Conservation Plan, which took 12 years to prepare and get approved. This plan has served its purpose for this area since 2008. To approve the purposed development is to abolish a plan that is meant to preserve this area for existing and endangered desert habitat. This area is recognized as a wild life corridor that allows animals and reptiles, specifically Tortoises, to move between Joshua Tree National Park and Mecca Hills Wilderness areas. This is one of the worst locations for desert species preservation that a housing project might select.

Additionally, this is a poor location for infrastructure. It will create pollution and unnecessary expense since it is "twenty-six miles from no-where". Rather than building on existing infrastructure such as roads, sewage, water, shopping, employment, schools, etc., this project leaps to destroy sensitive Desert habitat planning and designation for profit. Unfortunately once Desert habitat is destroyed it is gone.

I hope you will join with me in an effort to protect land of true value for the preservation of habitat for future generations to enjoy. Please recognize that Desert development needs to protect the Desert and its habitat rather than destroy it.

Stephen C. Anderson

Sarabia, Elizabeth

From: Wendy Wright <wendywright1113@gmail.com>
Sent: Monday, June 24, 2019 8:58 PM
To: Sarabia, Elizabeth
Subject: Don't Pave Paradise

Dear Planning Commissioners,

I'm strongly opposed to the Paradise Valley project that threatens thousands of aces next to Joshua Tree National Park Wilderness, affecting wildlife, air, water the the night sky. The city of 25,000 people just doesn't belong in that location.

This project, located 17 miles from the closest urban area is a very bad idea. It would create a huge demand for infrastructure, bypassing east Coachella Valley communities in much greater need f clean drinking water, good roads, sewage treatment and other county services. An international developer who has no understanding of the desert is trying to place these homes in the middle of a designated conservation area. Riverside County has agreed to protect the wildlife and the flora in this area.

For the above stated reasons, please join me in opposing the development of anything on the conserved land adjacent Joshua Tree National Park.

Thank you considering my opposition to the Paradise Valley project..

Gwendolyn "Wendy" Wright
Palm Desert, CA 92260

--
Wendy Wright
626-372-0540

Sarabia, Elizabeth

From: Ben Holstrom <bholstrom@gmail.com>
Sent: Thursday, July 11, 2019 9:20 AM
To: Sarabia, Elizabeth

Commissioners, Riverside County Planning Commission

I respectfully urge planning commissioners to reject the Paradise Valley Project. Massive urbanization along the our JTNP border is tantamount to degradation of America. It's an insult to pass on to future generations such an horrible plan. Please don't do this.

Ben Holstrom
Twentynine Palms, CA
bholstrom@gmail.com
760.362.4215

Sarabia, Elizabeth

From: Cindy Zacks <mamalorax@gmail.com>
Sent: Saturday, July 13, 2019 5:45 PM
To: Sarabia, Elizabeth
Subject: Paradise Valley bordering JTNP

Hello,

I write to implore you to deny any permits to move ahead with this ill-conceived and incredibly damaging project on the border of one of our most imperiled national parks. The flora and fauna of Joshua Tree National Park already deal with daily onslaught of pollution and damage. The negative impacts must be reduced, not increased astronomically.

This project lies within a designated conservation zone, a buffer made to protect the park's fragile resources.

I represent three registered voters who live on the border of the national park in Joshua Tree. I've taught ecology and environmental science for over 25 years at Yucca Valley High School. I am also the 2017 JTNP Minerva Hoyt recipient. I know what I'm talking about, being a trained ecologist.

Please put a stop to this project, and support our natural world, which, of course, supports us as well.

Thank you,

Cindy Zacks

Sarabia, Elizabeth

From: Melba <melenore@aol.com>
Sent: Wednesday, July 17, 2019 4:09 PM
To: Sarabia, Elizabeth

Dear Riverside Co. Planning Commission (c/o E. Sarabia)

I am writing in strong OPPOSITION to the planned community of Paradise Valley (or any other development for that matter!). From what I have read and understand, it's proximity to Joshua Tree National Park would be a very bad thing, for the Park and the wildlife - especially the desert tortoise - not to mention the natural resources. I strongly urge you to abandon your support and consideration for moving forward with it. So many other projects and uses for existing communities would benefit from your attention.
Thank you very much!

Melba Brown
Chino Hills, CA 91709

Melba "Keep your head to the Sky..."

Sarabia, Elizabeth

From: Carolyn Zarro <carolynzarro@gmail.com>
Sent: Sunday, July 21, 2019 11:42 AM
To: Sarabia, Elizabeth
Cc: jtdotell@gmail.com
Subject: Paradise Valley Development

I cannot imagine allowing this land to be developed. More cars, more emissions from homes and businesses, more pollution of all orders. And what did it take to have this land appear as it does today absolutely nothing created by a human, and what will it take to make it another ticky tacky tract home abomination that destroys the sanctity of desert life, greed.
Carolyn Zarro

Sarabia, Elizabeth

From: MARK JUNGE <jungeart@msn.com>
Sent: Monday, July 22, 2019 9:49 PM
To: Sarabia, Elizabeth
Subject: Opposed to Paradise Valley Development

I must strongly protest the proposed develop "Paradise Valley."

It is right next to the southern boundary of Joshua Tree National Park. Even if the development is outside the park, what happens outside JTNP affects what's inside the Park as well. And where is the water coming from, and is there going to be a sewage treatment plasnt and garbage dump there. too?

I see the developers claim the project won't affect wildlife, but how can it not do that? Habitat is going to be destroyed. There is no way life will continue for the plants and animals in this semi-wilderness area.

The developers aren't proposing this for the good of the Coachella Valley or to provide more affordable housing. It's all about filling their pockets with cash. It's all about the money, and we all know that.

Please see to it that this idea dies like the desert wildflowers that wither and blow away in the winds.

Mark Junge
https://nam01.safelinks.protection.outlook.com/?url=www.SouthwestSpaces.com&data=02%7C01%7Cesarabia%40rivco.org%7Cf8c7dd8e5c9a46010f3908d70f291cf3%7Cd7f03410e0a84159b30054980ef605d0%7C1%7C0%7C636994541563886093&sdata=0XoNzfrsVgber3Wb46vRM%2FTiQvn2M6L8RqQlhMuEEXk%3D&reserved=0
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Sarabia, Elizabeth

From: pelehootch@gmail.com
Sent: Tuesday, July 23, 2019 9:21 PM
To: Sarabia, Elizabeth
Subject: Paradise Valley

I am a local since 1977 and love the wilderness. Joshua Tree National Park will be even more impacted with the Paradise Valley Project.

Air quality, wildlife and vegetation are just a small part of this new development that will erode if it comes to pass. Do not allow this project to proceed.
Respectively, Elaine Bernal

Please forward if I have the wrong e mail.

Via email

360 Lupine Drive
Sequim, WA 98382
August 1, 2019

Planning Commission
County of Riverside
4080 Lemon Street
Riverside, CA 92501

Re: Paradise Valley Specific Plan SCH #2015101031; SP 339; GPA 686; CZ 6195; EIR 506 and Final Environmental Impact Report (FEIR)

Dear Commissioners:

Having been the lead author of the MSHCP in my capacity as Executive Director of the Coachella Valley Mountains Conservancy, the agency with which CVAG contracted for development of the MSHCP, I can speak with some certainty and authority as to the meaning and intent of the MSHCP. The purpose of this letter is to clearly set forth the requirements of the MSHCP regarding the Joint Project Review process and CVCC determination of whether a project proposal is consistent with the MSHCP Conservation Goals and Objectives. This letter is in three parts and responds to the misinterpretations, distortions, and misrepresentations being promulgated by GLC in its May 15 PowerPoint presentation and the memo titled GLC ENTERPRISES, LLC'S ("GLC'S") RESPONSE TO COMMENTS IN MEMO DATED MAY 9, 2019 SUBMITTED TO THE COUNTY OF RIVERSIDE BY THE COACHELLA VALLEY CONSERVATION COMMISSION CONCERNING THE PARADISE VALLEY PROJECT. The conclusion, as you will see, is clear: a JPR on the complete project is required before the County can consider the project any further. An Addendum is also attached addressing Like Exchange assertions made by GLC in case the Commissioners are also interested in that issue.

Part I

Before responding to specific distortions and misleading or erroneous statements by GLC, it is important to emphasize that:

1. The turning point for this project came in 2011-12 when GLC and the County submitted the original Specific Plan to CVCC for review. GLC's submittal, titled 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, dated June 17, 2011, stated on page 1: *"Pursuant to the requirements for implementation of the CVMSHCP, projects under the Local Permittees' jurisdiction (in this case the County of Riverside) that would result in disturbance to habitat, natural communities, Biological Corridors, or Essential Ecological Processes shall enter into a Joint Project Review ("JPR") process with the Coachella Valley Conservation Commission ("CVCC")."* Thus, GLC clearly acknowledged that its Specific Plan would result in disturbance and therefore required a JPR. CVCC conducted the JPR and stated in its response letter dated September 12, 2011 that *"CVCC has performed a GIS analysis of the areas of proposed development and conservation submitted by the applicant and has enclosed the results of the analysis. Attached please find Table a: Conservation Objectives Analysis and a map showing the area analyzed. The project as proposed would be inconsistent with CVMSHCP as the Total Acres of Proposed Disturbance exceeds the total amount of Acres of Disturbance Authorized for desert dry wash woodland in the Desert Tortoise and Linkage Conservation Area. The proposed project would also exceed available*

Rough Step which requires a balance between conservation and development, for Desert Tortoise, Le Conte's thrasher, Desert Dry Wash Woodland and Biological Corridors." The CVCC letter also advised GLC and the County that if GLC intended a Like Exchange as one means to attempt to meet Conservation Objectives, Like Exchange is a separate process from the JPR and requires Wildlife Agency concurrence. It was immediately after this determination by CVCC that the project was inconsistent with the MSHCP Conservation Objectives that GLC and County staff developed the alternative notion that no JPR was required prior to County approval because the Specific Plan was somehow "programmatic" and did not per se involve "Take". GLC then suggested that because it was seeking only a "programmatic" Specific Plan approval rather than project level entitlements which would have permitted ground disturbance, no "Take Authorization" was needed and, hence, no JPR was required. This fabrication and deliberate reinterpretation of the MSHCP has been promulgated by GLC and County staff ever since 2012, though it is no more correct today than it was then. It simply doesn't matter how GLC labels the entitlements it seeks. The MSHCP is clear that a JPR is required for the Specific Plan before the application is deemed complete and before an EIR is prepared.

2. GLC is not empowered to interpret the MSHCP to accommodate the problems arising from the inconsistency of its proposed Specific Plan with the MSHCP Conservation Goals and Objectives. CVCC is charged with implementing the MSHCP in accordance with the Plan document and the Implementing Agreement, and it has been doing so successfully for over 10 years. The Wildlife Agencies, as the issuers of the "Take" Permits, have a critical oversight responsibility and they concur that CVCC is correct: the MSHCP requires a JPR prior to the application's being deemed complete and prior to the preparation of the EIR. Period. See Section 6.6.1.1 of the MSHCP in Part II below of this letter.

3. It is illogical and just bad planning for any jurisdiction to spend months – or in this case years – processing and, potentially, approving a project that has not demonstrated consistency with the MSHCP Conservation Goals and Objectives. It is a waste of the County's time, the public's time, the CVCC's time, the Wildlife Agencies' time, and the applicant's time.

4. Approving the proposed project prior to a JPR's determination that the project is consistent with the MSHCP's Conservation Goals and Objectives would place the County squarely in violation of the MSHCP, subjecting the County to litigation and potential Permit suspension or revocation.

Part II

The clearest understanding of the MSHCP's requirements can be obtained from reading Section 6.6.1.1 in its entirety. Accordingly, it is provided here with highlighting to emphasize the key language.

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. O&M of Covered Activities is not subject to the Joint Project Review Process. This process shall in no way limit the Local Permittees' land use authority. The purpose of the Joint Project Review Process is to allow CVCC to facilitate and monitor implementation of the MSHCP. To assist the Local Permittees in meeting the Conservation Goals and Objectives and implementing the Required Measures of the Plan, Local Permittees' Covered Activities identified in Tables 7-1 through 7-12 as having the potential to affect connectivity of habitat within the

Conservation Areas shall consult with CVCC at the pre-design stage regarding the size, location, and configuration of wildlife undercrossings. Consultation with CVCC is needed at this early stage to ensure that alternatives are fully evaluated to achieve Conservation Area Conservation Objectives prior to public release of environmental documents prepared pursuant to CEQA.

CVCC staff shall participate in the Joint Project Review Process to ensure consistent Plan implementation and oversight. CVCC shall have neither jurisdiction over land use decisions by Permittees nor the authority to prevent a Permittee from approving a project. The application will not be deemed complete by the Permittee prior to completion of the Joint Project Review Process. The review process is as follows:

Step 1. Within thirty (30) calendar days of receipt of an application for a project in a Conservation Area, the Local Permittee shall provide CVCC with a copy of the project application. Alternatively, a potential project applicant may request a pre-application review directly with CVCC, who shall provide notice to the applicable Local Permittee. A project application or a request for a pre-application review shall include, at a minimum, a project description; a map in either electronic format compatible with CVCC's GIS or a map on a USGS 7.5 minute topographic map, indicating the location of the proposed project, including section, township, and range; and Assessors Parcel Number(s).

Step 2. Upon receipt of the project information, CVCC staff shall use a spatial data base such as GIS coverages of species habitat distribution models, Essential Ecological Process areas, and Biological Corridors and Linkages, to provide the Local Permittee an analysis of how the proposed project would impact the Conservation Area Conservation Objectives and Required Measures delineated in Section 4.3 for each Conservation Area and in Section 9 for each proposed Covered Species' Goals and Objectives, and how the project would affect the maintenance of Rough Step in the affected Conservation Area. At the discretion of the Local Permittee after submittal of an application, an initial project review meeting may be held with CVCC staff and the project applicant. Any initial project review meeting shall be scheduled by CVCC to occur within thirty (30) calendar days of the transmittal of the project information to CVCC. Within thirty (30) calendar days of receipt of the project information, or within fourteen (14) calendar days after an initial project review meeting if one is held, CVCC staff shall prepare and distribute comments that address the proposed project's consistency with the Conservation Area Conservation Objectives and Required Measures and delineate the status of Rough Step in the affected Conservation Area. The comments shall be sent to the appropriate Local Permittee, the project applicant, and the Wildlife Agencies. CVCC shall also send the Wildlife Agencies a copy of the project application. The Implementation Manual should be consulted to determine the specifics of calculating impacts of new or repowered wind energy facilities.

Step 3. The Wildlife Agencies' comments, if any, shall be sent to CVCC and the appropriate Local Permittee within thirty (30) calendar days of receipt of CVCC's comments.

Step 4. Based on CVCC's analysis and any Wildlife Agencies' comments, if CVCC finds that the proposed project is consistent with the Conservation Area's Conservation Objectives and Required Measures as defined in Section 4.3 and Goals and Objectives for each proposed Covered Species as defined in Section 9, the Local Permittee shall be so notified with copies to the Wildlife Agencies.

Step 5. Based on CVCC's analysis and any Wildlife Agencies' comments, in the event CVCC identifies inconsistencies between the Conservation Area Conservation Objectives and the proposed project, and/or failure to incorporate applicable Required Measures, CVCC staff and appropriate Local

Permittee and project applicant representatives shall meet and confer to identify requirements necessary to achieve compliance. Alternatively, CVCC may propose acquisition of the property if the owner is a willing Seller. Section 4.2.2.2.2 describes the acquisition program. The initial meeting to resolve inconsistencies shall be held within thirty (30) calendar days following the CVCC deadline for receipt of Wildlife Agencies' comments. Additional meetings may be held as necessary. If the inconsistencies are resolved, CVCC will notify the Local Permittee and Wildlife Agencies of the resolution within fourteen (14) calendar days of the meeting. If the inconsistencies cannot be resolved, CVCC will provide written notice to the Local Permittee and the Wildlife Agencies of the Conservation Objectives and Required Measures with which the Development proposal is inconsistent within fourteen (14) calendar days of the meeting. See Sections 13.0 of the IA for the Local Permittees' obligations under the Plan and see Section 23.0 of the IA for potential remedies for failure to comply with the obligations.

What is clear from this language is that there is no "exemption" for "programmatic" projects and, as clearly stated in Step 2 above, it is CVCC, utilizing the JPR process, that determines consistency (or lack thereof) with the MSHCP: "CVCC staff shall prepare and distribute comments that address the proposed project's consistency with the Conservation Area Conservation Objectives." It is quite clearly not the County's purview to determine consistency.

Part III

GLC's attempts to re-interpret the MSHCP and IA are self-serving erroneous misinterpretations and distortions of these documents. GLC's attempts to re-make the MSHCP are extensive and have evolved over the years, generally seeming intended to obfuscate and misdirect, and it would require many pages to list and respond to every argument that GLC has advanced. If the Planning Commission desired that, I would be happy to provide such an exhaustive point-by-point refutation, but I don't believe it's necessary in light of Parts I and II of this letter, which set forth the relevant facts and the actuality of the MSHCP's requirements regarding the JPR and the determination of whether or not a project is consistent with the MSHCP's Conservation Goals and Objectives. To touch briefly on and exemplify GLC's efforts to redefine and re-interpret the MSHCP, they can be summarized and refuted as follows:

A. GLC selects various words and phrases in the documents and interprets them in self-serving ways, contradicting the CVCC's and Wildlife Agencies' established understanding of the MSHCP and IA as they have been implemented without challenge for more than 10 years. For example, GLC cites the following sentence as support for its contention that the County can make its own consistency determinations without completing the JPR process.

> *"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."*

First, this sentence (found in Section 7.5 of the IA) does not confer consistency determination authority on the County. It does not refer to the County at all. Rather, it is clear that the sentence cited by GLC is a general expression of the requirement to assess a project's ability to meet Conservation Objectives and nothing more. However, Section 7.5 does make clear that any consideration of consistency includes participation in the JPR process for which CVCC is responsible. Section 7.5 in its entirety reads as follows:

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 a 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 merely obligates the County (as a Permittee) to participate in the JPR process described in 6.6.1.1 of the MSHCP. Section 6.6.1.1 provides that CVCC – not the County - is the entity that determines a project's consistency with the MSHCP as part of the JPR process. GLC argues that because the last sentence in Section 7.5 starts with the word "additionally", it means that what follows that word is different from and contrasted with what is before it. This is a meaningless distinction because, as described above, the sentence "before" is not a delegation of authority that allows a Permittee to conduct its own consistency analysis and defer the JPR process. While the County may ultimately address the question of consistency for purposes of complying with CEQA, that analysis cannot be used as a substitute for the consistency determinations required as part of the JPR process. GLC's attempt to argue otherwise seeks to turn the process on its head by allowing the environmental review process to be completed before a JPR has been completed; but the JPR process outlined in Section 6.6.1.1 of the MSHCP is required to be completed by CVCC "prior to public release of environmental documents prepared pursuant to CEQA." In other words, the JPR process is intended to precede and guide – not follow - the environmental review process. It is also notable – although GLC overlooks this - that the very sentences quoted by GLC clearly state that all discretionary projects – which the Specific Plan manifestly is – require a JPR.

B. GLC creates and defines concepts and distinctions that do not exist in the MSHCP and IA. For example, GLC asserts that "programmatic" projects do not immediately result in "Take" and, therefore are not subject to the JPR requirement. There are several problems with this contention:

- One, the trigger for a JPR is not "Take". Rather it is consideration of a project that "would result in disturbance" (whether to Habitat, a natural community, a Biological Corridor, or an Essential Ecological Process) and the MSHCP makes no distinction between projects that will immediately result in Disturbance and those that would ultimately result in Disturbance. Every discretionary project must undergo a JPR pursuant to Section 7.5 of the IA and Section 6.6.1.1 makes it clear that any project that would result in Disturbance (at whatever point in time) must undergo a JPR before the application is deemed complete and before preparation of any CEQA document, including an EIR. The reason the trigger is Disturbance and not Take (as defined in the Endangered Species Act) is that the MSHCP is a comprehensive and proactive conservation plan that addresses not only currently listed species that are subject to Take, but also species that could be listed in the future absent a proactive conservation plan that ensures their persistence in perpetuity and hence eliminates the need for the species to be listed. Thus, the ESA meaning of "Take" does not apply to many of the species in the MSHCP and similarly has no relevance for natural communities, Biological Corridors, and Essential Ecological Processes. It is the eventuality of Disturbance that matters and which triggers the requirement for the JPR at the outset.
- Two, the very fact that the Specific Plan is the subject of an EIR that identifies project impacts to Biological Resources clearly demonstrates that the Specific Plan would result in Disturbance. If it will

not, why prepare an EIR that identifies and analyzes the impacts? If one accepted GLC's "logic", the only project that would require a JPR is a grading permit because only that leads immediately to Disturbance. It is absurd to contemplate that a Specific Plan and Tract Maps could be approved by the County because they don't *per se* create Disturbance and only the actual grading permit would require a JPR. That is simply foolish. As required by the MSHCP, projects that will ultimately and inevitably result in Disturbance must have a JPR conducted by CVCC before the application is even deemed complete and before an EIR is prepared to determine if the project is consistent with the Conservation Objectives. This is the only reasonable and logical approach. It is what is written into the MSHCP and what CVCC has been doing successfully since 2008.

- Three, had the MSHCP intended to make a distinction between projects and "programmatic" plans, it would have so stated that. It does not. There is no exemption in the MSHCP for "programmatic" plans; no provision for deferring a JPR to a future "implementing" project. Moreover, for a large project such as this which is obligated to be a self-sustaining community, it is especially important to determine consistency with the MSHCP at the outset. That is the only way it can be assured that all the phases can be completed in their entirety to achieve the "self-sustaining" goals of the project.
- Four, GLC quotes the July 12, 2012 CVCC letter, which states "The JPR process requires specific information on the proposed project that does not allow for a programmatic level analysis" as evidence that CVCC accepted the idea that the JPR process was not applicable to "programmatic" projects. In fact, however, the CVCC statement simply means exactly what it says; namely, that the application was incomplete in providing sufficient detail for the required JPR process to be completed. The County and GLC should have rectified this and completed the JPR process, not moved forward, attempting to defer the JPR until far into the future.

C. GLC misleads and misrepresents by citing only selected aspects of the MSHCP requirements and terms.

- Example one: in the May 15 PowerPoint presentation GLC states that "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." This statement implies that the only conservation objective is to conserve a total number of acres. That is simply not correct. The MSHCP specifies an array of very specific Conservation Objectives for each Covered Species, each natural community, each Biological Corridor, and each Essential Ecological Process. Dedicating a bulk number of acres does not accomplish all these Conservation Objectives. Moreover, the only scenario under which GLC would be dedicating anywhere close to 21,000 acres is if it pursues a Like Exchange. That is a process that requires Wildlife Agency approval of a biological equivalency analysis, which GLC has not prepared. Further, the Like Exchange is required to be undertaken and approved by the Wildlife Agencies prior to project approval. The MSHCP has been successfully acquiring and preserving land in Conservation Areas for over ten years. The MSHCP provides adequate funding sources and partnerships to achieve this; CVCC does not need to rely on dedications from a project that is not consistent with the Conservation Area Conservation Objectives.
- Example two: GLC quotes from IA Section 17.2 "***Timing of Take Authorization.*** *Authorization of Take for Third Parties shall occur upon issuance of a grading permit by a Local Permittee or issuance of a Certificate of Inclusion by the CVCC or other Local Permittee*" as "proof" that a JPR is not needed until the grading permit stage of a project. This section of the IA, however, addresses only the mechanics and <u>timing</u> of the issuance of the Take Authorization, which is entirely independent of the JPR requirement, which is detailed and specified in Section 6.6.1.1 of the MSHCP. Timing of issuance of Take Authorization is not to be confused with the required timing for CVCC's conduct of a JPR.

D. The GLC PowerPoint presentation from May 15 asserts that it is the County's role to assess project consistency with the Conservation Objectives and that it has done so in the EIR. Again, this is simply not true. As demonstrated in Part II of this letter, the MSHCP makes clear that it is CVCC's role to conduct a JPR specifically to determine if the proposed project is **consistent** with the Conservation Goals and Objectives. The MSHCP further sets forth a specific methodology for this analysis and sets forth specific procedures and criteria for a Like Exchange or a Transfer of Conservation Objectives if those are needed to achieve consistency. The EIR cannot substitute its own methodology and ignore the processes and criteria set forth in the MSHCP to assert alleged consistency. Again, the logical purpose and intent of the MSHCP is for the JPR process conducted by CVCC to determine whether or not the project is consistent with the Conservation Objectives and then to work with the Permittee and the applicant to modify the project or direct them to the Wildlife Agencies if they wish to pursue a Like Exchange or a Transfer of Conservation Objectives. Only then can an EIR be prepared that would be based on the JPR findings and follow-up project modifications and actions such as a Like Exchange. The conjecture and speculation in the existing EIR cannot substitute for the MSHCP required process and criteria, no matter how many pages the EIR devotes to theoretical and conjectural future actions that GLC contends could achieve consistency.

Had the proposed Paradise Valley Specific Plan proceeded as required under the MSHCP, GLC and the County would have responded to the 2011 JPR letter from CVCC by appropriately modifying the project to ensure consistency with the Conservation Objectives and/or by pursuing a Like Exchange through the Wildlife Agencies to ensure the project would be consistent. All this would have occurred before an EIR was prepared and before any hearings were conducted by the Planning Commission. GLC and County staff regrettably chose not to proceed as required under the MSHCP. Instead, since the project as proposed was clearly not consistent with the MSHCP, GLC sought to subvert and reinterpret the MSHCP in hopes of obtaining County approval for a project that is clearly inconsistent with the Conservation Area Conservation Objectives. The Planning Commission should reject this approach and direct that the project be submitted to CVCC for a JPR on the entire Specific Plan prior to any further consideration by the County and before preparation of a new EIR to reflect the changes that will result from the JPR process.

Sincerely,

Bill Havert

Cc: Tom Kirk, CVCC
Ken Corey, USFWS
Leslie MacNair, CDFW

Attachment 1 – Like Exchange

GLC asserts that it is infeasible and unnecessary to pursue a Like Exchange prior to project approval for an array of reasons. It also argues that it has effectively addressed the question of the potential for a Like Exchange in the EIR. Before setting forth what the MSHCP and IA actually require regarding the Like Exchange process, it is important to place the issue in a larger context: the MSHCP is a trade-off. A large area in the Coachella Valley is designated as a Take Authorization Area in which infrastructure and development projects rely on the MSHCP for compliance with state and federal Endangered Species Act laws and the state's Natural Community Conservation Plan Act, and need only pay a mitigation fee. The trade-off for this certainty accorded to development in the Take Authorization Area is that the MSHCP designates Conservation Areas in which the Covered Species and natural communities will be permanently protected. Large scale development was not anticipated in these Conservation Areas because of the impacts it would have on the Covered Species and natural communities; and, indeed, more than 90% of the Conservation Areas already had a General Plan designation of Open Space when the MSHCP was adopted in 2008.

To ensure that the Conservation Areas are protected, the MSHCP appropriately sets a very high bar for development in these areas, and sets forth strict procedures that must be complied with. This is not at all unreasonable to ensure that the MSHCP, with all its benefits, is implemented; what is unreasonable is for any project of the scale of Paradise Valley to assume that it ought to be able to develop in a Conservation Area and not comply strictly with the MSHCP process and the MSHCP requirements for demonstrating consistency with the Conservation Area Conservation Objectives.

When the County approved the MSHCP and signed the Implementing Agreement in 2008 and became a Permittee who has benefited greatly from the MSHCP, it also committed itself to adhere to the MSHCP requirements and ensure that it never approved a development in a Conservation Area that has not demonstrated conclusively that it is consistent with the Conservation Objectives. Approving the Paradise Valley Specific Plan as proposed would be a clear violation of the MSHCP and put at risk all the benefits of the MSHCP for the County and the Coachella Valley. Approval would be an act of bad faith with respect to the MSHCP trade-off between Permitted development in the Take Authorization Area and guaranteed protection of Habitat and Natural Communities in the Conservation Areas.

The EIR asserts that the project will ultimately be consistent with the Conservation Area Conservation Objectives through various assumed future mitigation actions, including Like Exchange. The EIR proposes that the project can be approved by the County in reliance on such assumed future Like Exchange. The MSHCP, however, is unequivocal in its language regarding Like Exchange. Section 6.12.2 of the MSHCP concludes the explanation of the Like Exchange process by stating, "Projects not determined to be biologically equivalent or superior shall be determined to be unacceptable deviations from the Conservation Area Conservation Objectives and **an amendment to the MSHCP would be required prior to approval of such projects**." (emphasis added.) The proposed Specific Plan is such a project, and characterizing it as only "programmatic" does not change the fact that it is a discretionary project for MSHCP (and CEQA) purposes. The EIR provides no biological equivalency analysis; and no biological equivalency analysis has been concurred with by the Wildlife Agencies. This triggers the need for an amendment to the MSHCP before the approval of the project. Absent an approved Like Exchange, the County will be in violation of the MSHCP if it approves the Specific Plan proposal.

The MSHCP further requires that "When a Like Exchange is proposed, the applicable Permittee(s) shall meet and confer with the Wildlife Agencies prior to submittal of Like Exchange analysis to the CVCC." Speculative discussion in an EIR of the theoretical possibility of a Like Exchange occurring does not and cannot substitute for or obviate the obligation to comply with the MSHCP requirement which clearly vests responsibility and control over the Like Exchange process with the Wildlife Agencies and CVCC, not with the County.

For your reference the complete section of the MSHCP detailing the Like Exchange process and requirements is appended below. Highlighting has been added to underscore the critical aspects.

6.12.2 Like Exchanges to Conservation Areas.

The design of the Conservation Areas focused on natural communities, Core Habitat for Covered Species, Essential Ecological Processes, Biological Corridors and Linkages. The natural communities and Covered Species also occur outside of the Conservation Areas. In some instances it may be possible to achieve the Plan's Conservation Goals while not increasing the level of Take analyzed in the Plan through a different configuration of one or more Conservation Areas.

Like Exchanges are changes proposed by a Permittee to modify the boundary of one or more Conservation Areas in exchange for reducing or modifying the boundary of a Conservation Area. A Like Exchange must result in equal or greater benefits to Covered Species and conserved natural communities as compared to those benefits analyzed in the Plan. In addition, the level of Take of Covered Species must be no greater than that analyzed in the Plan.

When a Like Exchange is proposed, the applicable Permittee(s) shall meet and confer with the Wildlife Agencies prior to submittal of Like Exchange analysis to the CVCC. The Permittee will prepare an equivalency analysis. Upon submittal of a completed equivalency analysis, the Wildlife Agencies shall respond in writing within 60 days (of acknowledged receipt) as to their concurrence with the Like Exchange. If the Wildlife Agencies do not concur the action shall require an Amendment to the MSHCP. Like Exchanges must also be submitted to applicable Permittees for approval.

The Like Exchange analysis shall include assembly of necessary project information and completion of an equivalency analysis as described below:

The following information shall be included in the analysis:

- **Like Exchange Information and Analysis Requirements**

1. Maps clearly and precisely delineating the proposed Boundary Adjustment, showing land to be removed from the Conservation Area in the context of the entire Conservation Area, and land to be added to this or another Conservation Area;
2. Narrative and graphic description of the proposed project;
3. Narrative and graphic description of biological information available for the Boundary Adjustment sites (land to be removed and land to be added) including current project-specific vegetation mapping, modeled habitat and appropriate species surveys, land identified as part of a Biological Corridor or Linkage, and land identified as part of an Essential Ecological Process area;
4. Narrative and graphic description of the project's efforts to be consistent with the Conservation Area Conservation Objectives and explanation of the rationale why consistency has been determined to be infeasible;
5. Quantification and characterization of effects/benefits of the proposed Boundary Adjustment on Habitats for Covered Species, natural communities, Biological Corridors and Linkages, Essential Ecological Processes, and Conservation Area reserve design and manageability; and
6. Any other information deemed necessary by the Permittee to make the appropriate findings.

- **Analysis**

Based on the assembled information, an equivalency analysis shall be provided by the applicable Permittee(s) to the CVCC and the Wildlife Agencies in narrative and graphic form comparing the effects/benefits of the proposed Like Exchange. The equivalency analysis shall address the following categories:

1. Effects on the level of Take of Covered Species;
2. Effects on Habitats of Covered Species, including Core Habitat; potential habitat fragmentation, reduction in size of Core Habitat patches, and increase in edge effects;
3. Effects on natural communities, including potential fragmentation, reduction in patch size, and increase in edge effects;
4. Effects on Biological Corridors and Linkages;
5. Effects on Essential Ecological Processes;
6. Effects on Conservation Area configuration and management (such as increases or decreases in edge);
7. Effects on ecotones (defined as areas of adjoining natural communities, generally characterized by greater biological diversity) and other conditions affecting species diversity (such as invasion by exotics);
8. Equivalent or greater acreage contributed to the Conservation Areas;
9. Applicant must demonstrate agreements or control over mitigation property being offered under the equivalency analysis.

The equivalency analysis shall draw conclusions regarding the degree to which the proposed project incorporating Boundary Adjustments is considered to be biologically equivalent or superior to a project on the same site not deviating from the Conservation Area Conservation Objectives. Projects determined to be biologically equivalent or superior shall be determined to be acceptable refinements to the MSHCP Conservation Area boundaries and amendment to the MSHCP shall not be required prior to approval of such projects. Projects not determined to be biologically equivalent or superior shall be determined to be unacceptable deviations from the Conservation Area Conservation Objectives and an amendment to the MSHCP would be required prior to approval of such projects.

It is apparent from the preceding that Like Exchange is intended for limited application under highly specialized circumstances. For example, a Like Exchange could address a situation where a small development on the edge of a Conservation Area could pursue a minor boundary adjustment through a Like Exchange. Such minor adjustments under exceptional circumstances are provided for through the Like Exchange process where the very rigorous methodology set forth in the MSHCP clearly demonstrates to USFWS and CDFW that the boundary adjustment would provide equal or better benefits to the Covered Species and natural communities. Several have occurred since 2008 and all have been minor adjustments as allowed under the MSHCP. Accommodating the severe impacts and deficiency in Allowable Disturbance arising from the Paradise Valley Specific Plan is the antithesis of such a minor adjustment. What is being impacted by Paradise Valley is the largest extant desert dry wash woodland (DDWW) natural community in the entire MSHCP area. There are approximately 2,626 acres of DDWW on the Paradise Valley site associated with the Pinkham Wash drainage. This acreage of DDWW is part of a larger DDWW complex that extends downstream from Paradise Valley into Box Canyon (into which Pinkham Wash flows) in the Mecca Hills and Orocopia Mountains Wilderness Areas. The hydrological and ecological

processes that sustain this DDWW complex extend northwards from the Paradise Valley site into Joshua Tree National Park (immediately abutting the project site) so that these processes are permanently protected. The Paradise Valley site sits in the critical center of this vast system, and its importance is commensurate to the size of this DDWW ecosystem. Thus, significant loss of the DDWW on the Paradise Valley site would be an enormous impact that is highly unlikely to be offset in a biologically equivalent way by conserving various disparate patches of DDWW in areas outside the current Conservation Areas that comprise the MSHCP Reserve System.

Given the implausibility of successfully using Like Exchange as a mitigation measure to offset the project's severe impacts, the burden of proof that it is feasible rests with the applicant and the County through the MSHCP required procedures of conferring with the Wildlife Agencies, conducting a biological equivalency analysis, and securing Wildlife Agencies' concurrence prior to approval of the Specific Pan.

It is notable that the MSHCP identified and selected the optimum Habitat in the MSHCP area to incorporate into the Conservation Areas to ensure survival of the species and natural communities. Specifically, with respect to the DDWW natural community, the MSHCP states "*The Planning Team attempted to include all large contiguous stands of desert dry wash woodland that remain in the Plan Area*" (MSHCP, 10.8.2.3). The significance of this is that those areas not included were generally omitted because they were small and dis-contiguous patches. Thus, it is highly implausible if not impossible that enough quality habitat could be found outside of designated Conservation Areas to "result in equal or greater benefits" to complete a Like Exchange of the magnitude needed for this project. The DEIR and FEIR merely assert that it is possible to use Like Exchange and Transfer of Conservation Objectives to meet the MCHCP Conservation Area Conservation Objectives. This is wholly speculative and conceptual and cannot constitute legitimate Mitigation measures for CEQA purposes; nor guarantee that the project impacts will be mitigated to below significance; nor establish that the project is consistent with the MSHCP's Conservation Area Conservation Objectives. The inability to actually demonstrate that any of these measures can actually be accomplished is no doubt the reason the County chose to create the fiction that a JPR for the entire project is not needed, and that all meaningful analysis and identification of specific achievable mitigation measures can be deferred far into the future at "implementing project" phases.

Action Alert
Tell Riverside County "Don't Pave Paradise"

We need to tell the County Planning Commission to oppose Paradise Valley, a proposed "new town" of 25,000 people on the south edge of Joshua Tree National Park, 17 miles east of the Coachella Valley. Paradise Valley is an atrocious project – it should have been a non-starter.

Please write to the Planning Commission at the address below. Personalize it: add your own words as to why you're opposed. The Planning Commission will consider the project at its August 21st meeting, so we want to get as many letters (or emails) as possible to them before that.

Via email to: esarabia@rivco.org

Or regular mail to:

Riverside County Planning Commission
County Administrative Center
4080 Lemon Street
Riverside, CA 92501

Please also send a separate email to: mountaintracker47@gmail.com to let us know you're opposed to Paradise Valley and would like to receive updates.

Thank you for helping!

SAMPLE LETTER

Dear Planning Commissioners,

I'm strongly opposed to the Paradise Valley project that threatens thousands of acres next to Joshua Tree National Park Wilderness, affecting, wildlife, air, water, and the night sky just to construct a new city of 25,000 people where it simply doesn't belong.

This project is sprawl on steroids, located 17 miles from the closest urban area. It would create a huge demand for infrastructure, bypassing east Coachella Valley communities in much greater need of clean drinking water, good roads, sewage treatment and other County services. An international developer who has no understanding of the desert is trying to develop this atrocity right in the middle of a designated Conservation Area for threatened desert tortoise and other wildlife that Riverside County and many cities have all agreed to protect.

Because of the sensitivity of this area, next to Joshua Tree National Park and in a Conservation Area, I oppose anything on this site.

Thank you for your consideration in this matter,

continue p0.2

Please write to the Planning Commission at the address below. Personalize it and your own words as to why you're opposed. The Planning Commission will consider the project at its August 21st meeting, so we want to get as many letters (or emails) as possible to them before that.

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SAMPLE LETTER

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This project is sprawl on steroids, located 17 miles from the closest urban area! It would create a huge demand for infrastructure, bypassing east Coachella Valley communities in much greater need of clean drinking water, good roads, sewage treatment and other County services. An international developer who has no understanding of the desert is trying to develop this atrocity right in the middle of a designated Conservation Area for threatened desert tortoise and other wildlife that Riverside County and many cities have all agreed to protect.

Because of the sensitivity of this area, next to Joshua Tree National Park and in a Conservation Area, I oppose anything on this site.

Thank you for your consideration in this matter,

P02

Doesn't Rio Co.'s current financial difficulties make approval of this project seem like a really bad idea?

Robert Schlag
26594 Meridian St
Hemet, CA 92544

Dear Planning Commissioners:

We as the community look to you to do the right thing. Please say no to the Paradise Valley project. I am strongly opposed to the Paradise Valley project. We have already spread enough out this way.

The Joshua Tree National Park is very sensitive area. What we do in one place reacts out to other places. This area needs us to help protect the already threatened desert tortoise and other wildlife.

I oppose any projects now or in the future on this site. Stop this and protect it from future attacks.

Thank you for your consideration in this matter

Deanna Doull

Riverside County 6-15-19

Dear Planning Commissioners,

I'm strongly opposed to the Paradise Valley project that threatens thousands of acres next to Joshua Tree National Park Wilderness, affecting, wildlife, air, water, and the night sky just to construct a new city of 25,000 people where it simply doesn't belong.

This project is sprawl on steroids, located 17 miles from the closest urban area! It would create a huge demand for infrastructure, bypassing east Coachella Valley communities in much greater need of clean drinking water, good roads, sewage treatment and other County services. An international developer who has no understanding of the desert is trying to develop this atrocity right in the middle of a designated Conservation Area for threatened desert tortoise and other wildlife that Riverside County and many cities have all agreed to protect.

Because of the sensitivity of this area, next to Joshua Tree National Park and in a Conservation Area, I oppose anything on this site.

Thank you for your consideration in this matter,

Wendy Martin

Dear Riverside County Planning Commission: 6-15-19

This is absurd. As if we don't have enough problems here, we are trying to hold onto our good quality of life + there are enough problems already!! without importing more!

Conservation Area should mean just what it says we revere Joshua Tree a wonderful place to go to view the night sky + all the rest.

Why must we live in a world where things are managed so poorly? — there aren't

enough words to describe my disgust that there aren't more controls in place to stop all manner of absurdities harming our environment & our quality of life

Instead help those communities already in place & help us all — especially us retireds who came here to the high desert to enjoy a quality of life we were never going to find down below.

Let us live out our lives in peace without having to

(3)

Worry about air quality, water quality & all the rest. Surely we have enough problems already without adding more. Paradise Valley is a mis-nomer, an oxymoran — for paradise will be destroyed if we need all the paradise we can get. Don't pave over paradise & instead you can name the project the Unparadise — that's it, I'm done, thanks for listening.

Wendy Martin
~~Apple~~ Valley, CA

Mr. Terence O'Malley
26647 6th St.
Highland, CA 92346-5667

17 JUNE 2019

DEAR SIRS:

I OPPOSE THE PARADISE VALLEY PROJECT.

BECAUSE OF THE SENSITIVITY OF THIS AREA, NEXT TO JOSHUA TREE NATIONAL PARK AND IN A CONSERVATION AREA, I OPPOSE ANYTHING ON THIS SITE

THANK YOU,

T O'Malley

The Riverside County Planning Commission

June 18, 2019

The County Administrative Center

4080 Lemon St.

Riverside, CA 92501

Dear Planning Commissioners:

I am firmly opposed to the proposed Paradise Valley project near Joshua Tree National Park. I've been informed that this project will be 17 miles from the nearest urban service areas and therefore will greatly increase vehicular traffic—just one of many problems with the project. I have camped many times in this area and know that the desert is, despite its foreboding nature, a fragile and delicate ecosystem easily disrupted by mankind's "developments."

For these and many other reasons, I am opposed to this "development," and thank you for your consideration of my concerns.

Phill Courtney

Phill Courtney

1311 College Ave.

Redlands, CA 92374-3808

pjcourtney@earthlink.net

Eunice Raymond
24971 Leicester St.
Menifee, CA 92584

June 18, 2019

Riverside County Planning Commission
County Administrative Center
4080 Lemon Street
Riverside, CA 92501

Dear Planning Commissioners,

I am strongly opposed to the Paradise Valley project that threatens thousands of acres next to Joshua Tree National Park Wilderness, affecting wildlife, air, water, + the night sky, just to construct a new city of 25,000 people where it does not belong.

This project is sprawl on steroids, located 17 miles from the nearest urban area! It would create a huge demand for infrastructure, bypassing east Coachella Valley communities in much greater need of clean drinking water, good roads, sewage treatment, + other County services. An international developer who has no understanding of the desert is trying to develop this atrocity right in the middle of a designated Conservation area for the threatened desert tortoise + other wildlife that Riverside County + many cities have all agreed to protect.

Because of the sensitivity of this area, next to Joshua Tree National Park + in a Conservation area, I oppose anything on this site.

Thank you for your consideration in this ~~matter~~ matter,

Eunice Raymond

June 19

Dear Planning Commissioners,

My husband and I live in San Bernardino County, but only an hours drive from Joshua Tree. The added traffic and pollution from such a project would be unbearable.

We are strongly opposed to the Paradise Valley Project. It threatens Coachella Valleys communities which are in greater need of clean drinking water, good roads, sewage treatment and other county services.

A developer who has no understanding of the desert is trying to develop this atrocity right in the middle of a Conservation area for the threatened Desert Tortoise and other wildlife that Riverside County has agreed to protect.

We oppose any building on this site.

Thank you for your consideration

Mr. & Mrs. Kurt Kleingeil
Forest Falls, CA

20 June 19

Dear Planning Commissioners.

I am opposed to the Paradise Valley project. I cannot think of anything more unneeded and wasteful to plunk down in the middle of a beautiful desert area. There are so many reasons it is wrong and harmful to that area. I'm sure other letters will enumerate them from the flora, fauna, water and people perspective. It is a lose, lose situation for all concerned - except the contractor investors.

Just because the feds are selling public lands disgracefully is no reason to hop that wagon. Be leaders and show all that our local dignitaries have vision & smarts. Patricia Evans

June 20, 2019
40791 Cecina
Bermuda Dunes, CA

Planning Commissioners
Riverside County
4080 Lemon St
Riverside, CA 92501

Dear Sirs/Madam:

RE: Paradise Valley Project

I have lived in the Coachella Valley since 1976 and have closely followed happenings regarding our environment.

This new proposal for a community to be built near or in the midst of a Conservation area is absolutely appalling to me. We have such serious issues with air quality, water availability, traffic, sewage disposal that it is unfathomable that elected representatives of the people would even tolerate the consideration of this plan put forward by someone who has no understanding of our valley.

I sincerely and strongly urge you to discontinue any consideration of a project such as this.

Thank you for your consideration.

Lesley Getz

6/22/2019

Dear Planning Commissioners:

"Paradise" Valley would be anything but. Please do not approve a foolish and unneeded development close to the Conservation Area for the desert tortoise and other wildlife in our precious, fragile desert.

The impacts on traffic, air quality, noise levels, wildlife, and the night sky would be terrible and lasting. Do not approve this.

I am a longtime visitor and part-time resident of the Coachella Valley. I can always spend my time and $ elsewhere, but I hope not to have to. — Janet Weil

Riverside County Planning Commission
County Administrative Center

June 23, 2019

Dear Planning Commissioners,

I oppose the Paradise Valley project because it threatens the economy, wildlife, water and air quality, and general quality of life of residents of Riverside County. This project will cause light and air pollution that will substantially reduce the number of visitors to Joshua Tree National Park. Nearly 3 million visitors per year pump millions of dollars into the local economy, and support thousands of jobs in the area.

In addition, the Paradise Valley project lies in a designated Conservation area. Any development in this area is inappropriate. The courts have ruled that communities have the right to preserve their way of life and to limit or prevent development that threatens quality of life.

Joshua Tree National Park is public land. It is your responsibility to protect the economy and residents of Riverside County from inappropriate, damaging development. Please vote no on this project. I vote! We need to protect this wilderness area for our children, grandchildren, and future generations!

Thank you.

Dr. Maurice Mangels

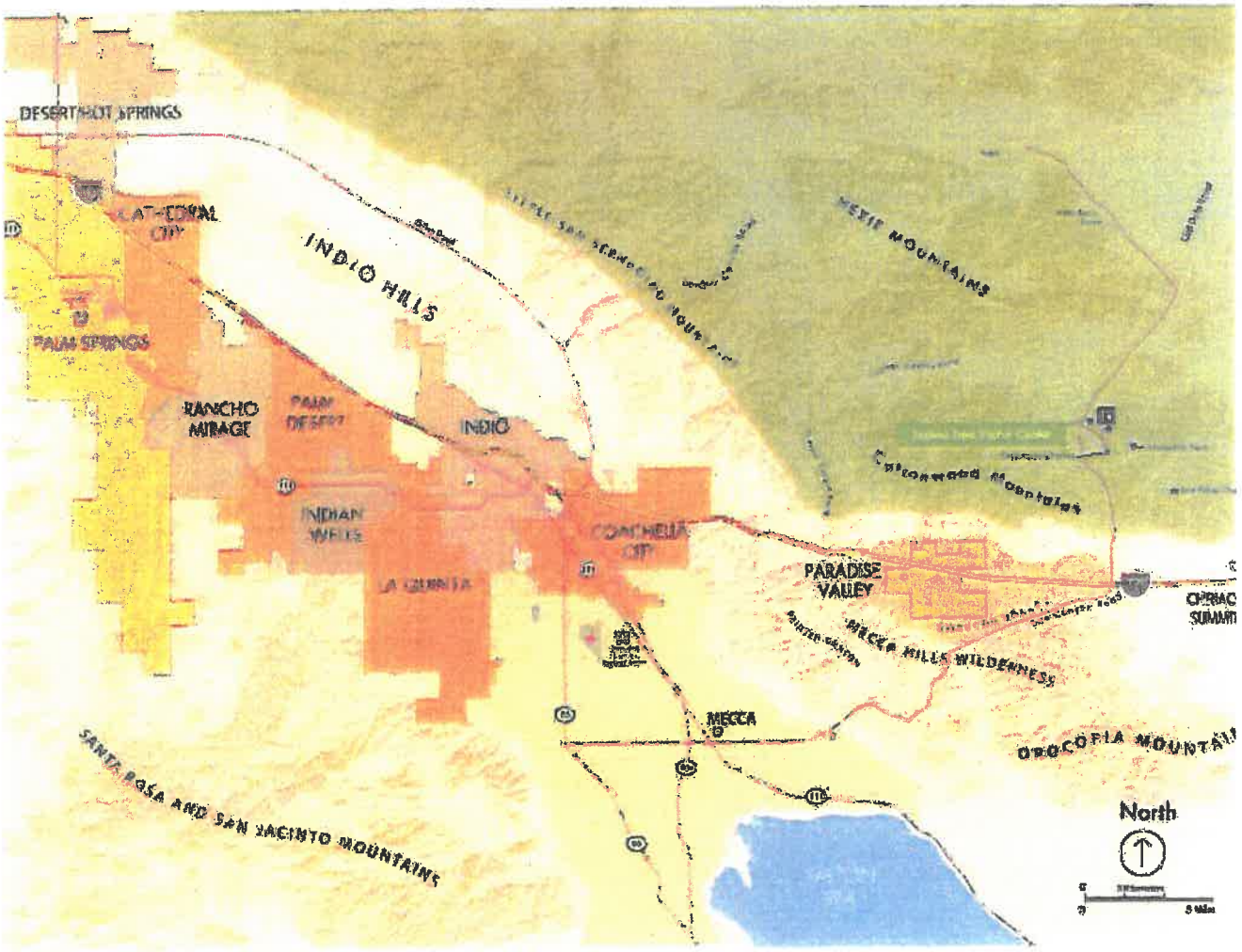


EXHIBIT 1-1 REGIONAL CONTEXT

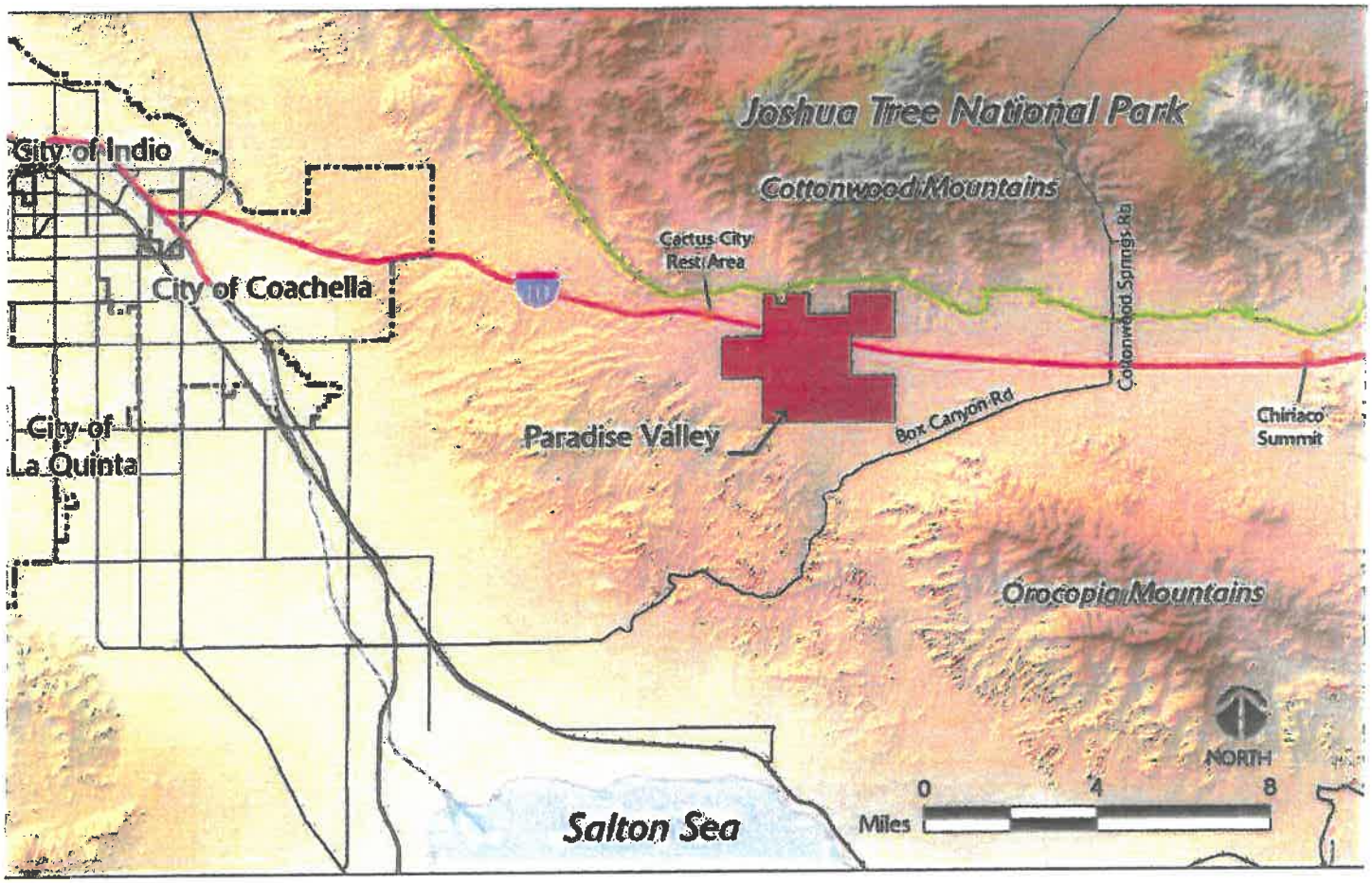


EXHIBIT 1-2 LOCAL CONTEXT

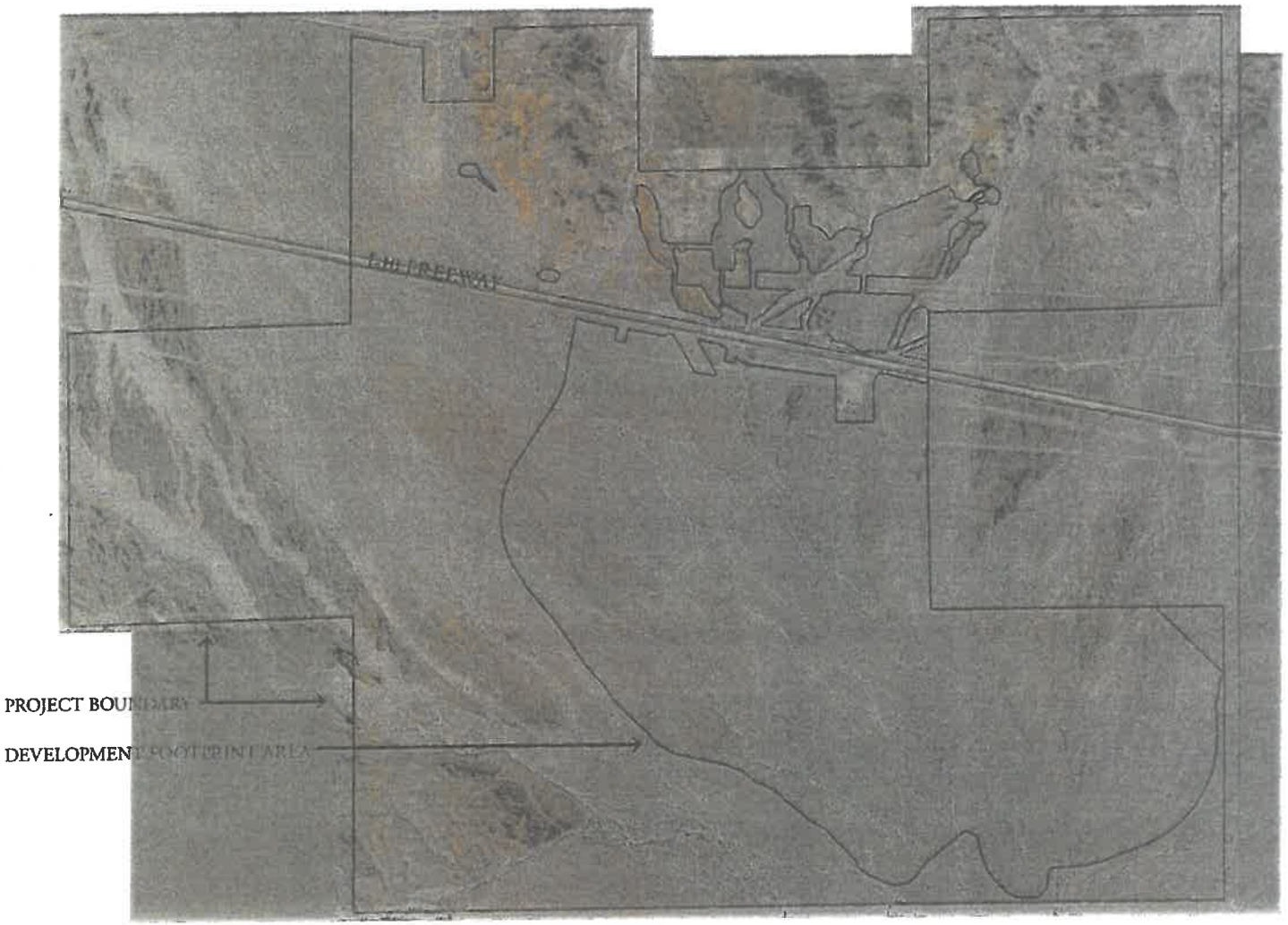


EXHIBIT 1-3 SITE AERIAL

TABLE 2-1 PROJECT SUMMARY

LAND USE	GROSS ACRES	% OF DEV. FOOT-PRINT	GROSS DENSITY (DU/AC)	TARGET DWELLING UNITS (DU)	MAXIMUM NON-RESIDENTIAL SQUARE FOOTAGE (SF)
RESIDENTIAL					
MEDIUM DENSITY RESIDENTIAL - MDR 2-5 DU/AC	820.5	44.4%	3.7	3,010	
MEDIUM HIGH DENSITY RESIDENTIAL - MHDR 5-8 DU/AC	539.1	29.2%	6.3	3,399	
HIGH DENSITY RESIDENTIAL - HDR 8-14 DU/AC	58.7	3.2%	9.1	535	
VERY HIGH DENSITY RESIDENTIAL - VHDR 14-20 DU/AC	-	-	-	-	
HIGHEST DENSITY RESIDENTIAL - HHDR 20+ DU/AC	10.5	0.5%	20.00	211	
TOTAL RESIDENTIAL	1,428.8	77.3%	5.0	7,155	
MIXED USE					
MIXED USE - MU	177.0	9.6%	7.5	1,335	1,182,040
TOTAL MIXED USE	177.0	9.6%	7.5	1,335	1,182,040
NON-RESIDENTIAL					
COMMERCIAL RETAIL - CR	23.4	1.3%			198,950
OPEN SPACE - RECREATION - OS -R*	54.9	3.0%			
PUBLIC FACILITIES - PF**	44.8	2.4%			
BACKBONE ROADS***	118.9	6.4%			
TOTAL NON-RESIDENTIAL	242.0	13.1			198,950
DEVELOPMENT FOOTPRINT TOTAL	**1,848**	**100%**	**4.6**	**8,490**	**1,380,990**
OPEN SPACE - CONSERVATION HABITAT - OS - CH	**3,100**				
PROJECT TOTAL	**4,948**				

NOTES:

* ADDITIONAL PARKS TOTALING APPROXIMATELY 55 ACRES ARE CONCEPTUALLY LOCATED THROUGHOUT THE PLAN FOR A TOTAL PARK AREA OF 109.9 ACRES.

**PUBLIC FACILITIES AND INFRASTRUCTURE SUCH AS SCHOOLS, WATER WELLS AND ELECTRICAL SUBSTATIONS ARE CONCEPTUALLY LOCATED THROUGHOUT THE PLAN.

***LOCAL ROADS, "TOWN CENTER BOULEVARD" AND "MAIN STREET" ARE NOT CALCULATED IN THE BACKBONE ROAD AREA.

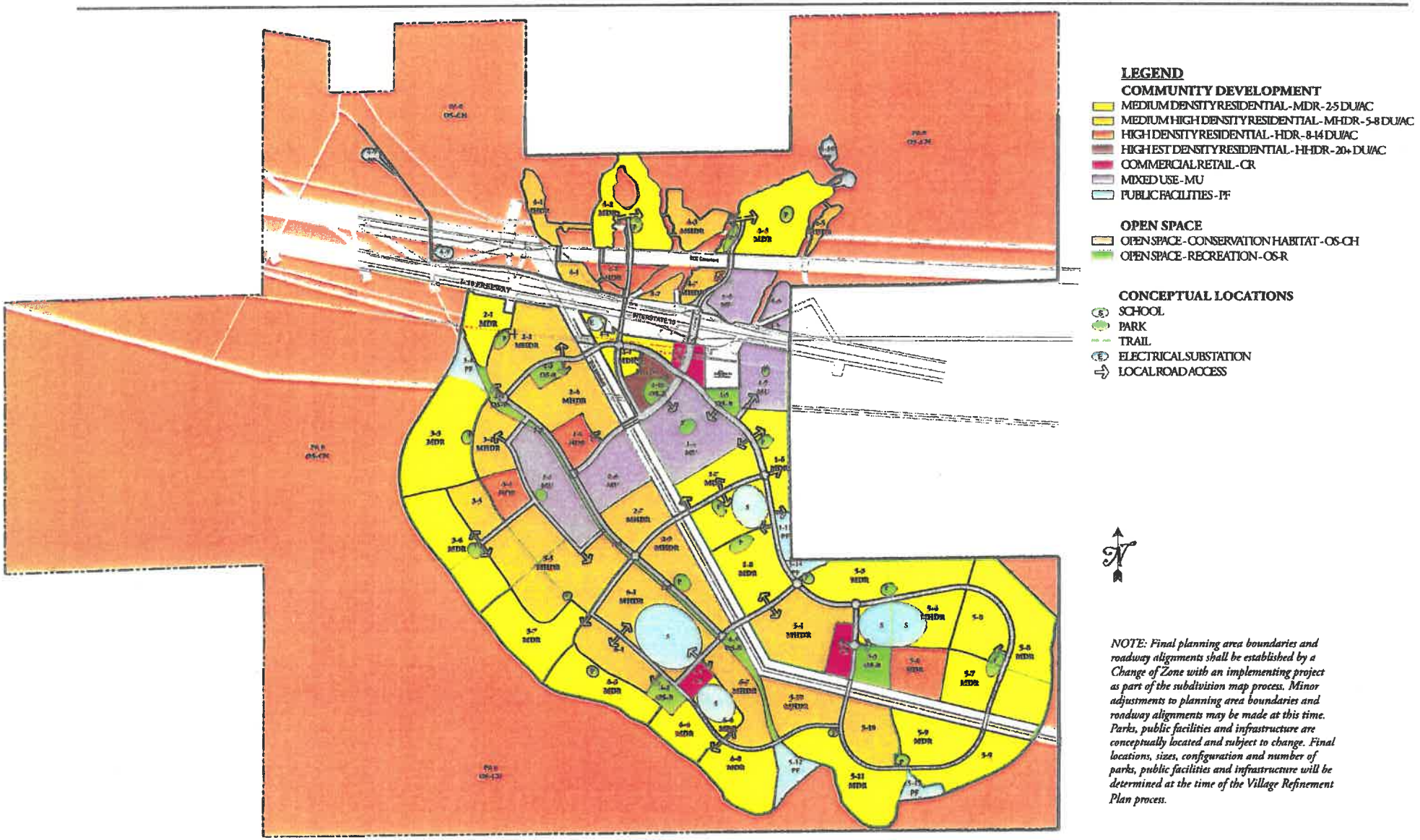


EXHIBIT 2-1 LAND USE PLAN - CONTIGUOUS SPECIFIC PLAN AREA

LEGEND

COMMUNITY DEVELOPMENT

- MEDIUM DENSITY RESIDENTIAL - MDR - 2-5 DU/AC
- MEDIUM HIGH DENSITY RESIDENTIAL - MHDR - 5-8 DU/AC
- HIGH DENSITY RESIDENTIAL - HDR - 8-14 DU/AC
- HIGHEST DENSITY RESIDENTIAL - HHDR - 20+ DU/AC
- COMMERCIAL RETAIL - CR
- MIXED USE - MU
- PUBLIC FACILITIES - PF

OPEN SPACE

- OPEN SPACE - RECREATION - OS-R

CONCEPTUAL LOCATIONS

- SCHOOL
- PARK
- TRAIL
- ELECTRICAL SUBSTATION
- LOCAL ROAD ACCESS

NOTE: Final planning area boundaries and roadway alignments shall be established by a Change of Zone with an implementing project as part of the subdivision map process. Minor adjustments to planning area boundaries and roadway alignments may be made at this time. Parks, public facilities and infrastructure are conceptually located and subject to change. Final locations, sizes, configuration and number of parks, public facilities and infrastructure will be determined at the time of the Village Refinement Plan process.

EXHIBIT 2-2 LAND USE PLAN - DEVELOPMENT FOOTPRINT AREA

2.3 Development Standards and Organization

2.3.1 Villages

The Paradise Valley Specific Plan is organized into six villages and a large natural open space conservation area. These villages will be differentiated by their distinct function in the community, lifestyle, location, physical setting, mix of uses and home types. These villages are structured around a highly integrated road and trails network linking Paradise Valley's various components to one another. A special project feature is an approximate 4.8 mile trail system located along the majority of the community perimeter, allowing both walking and exercise opportunities, as well as beautiful views to the outlying desert environs.

Set within each of these villages is a "core" intended to include a variety of uses and activities such as retail and service, health and wellness, education, cultural and civic uses, and may provide an array of functions and programs.

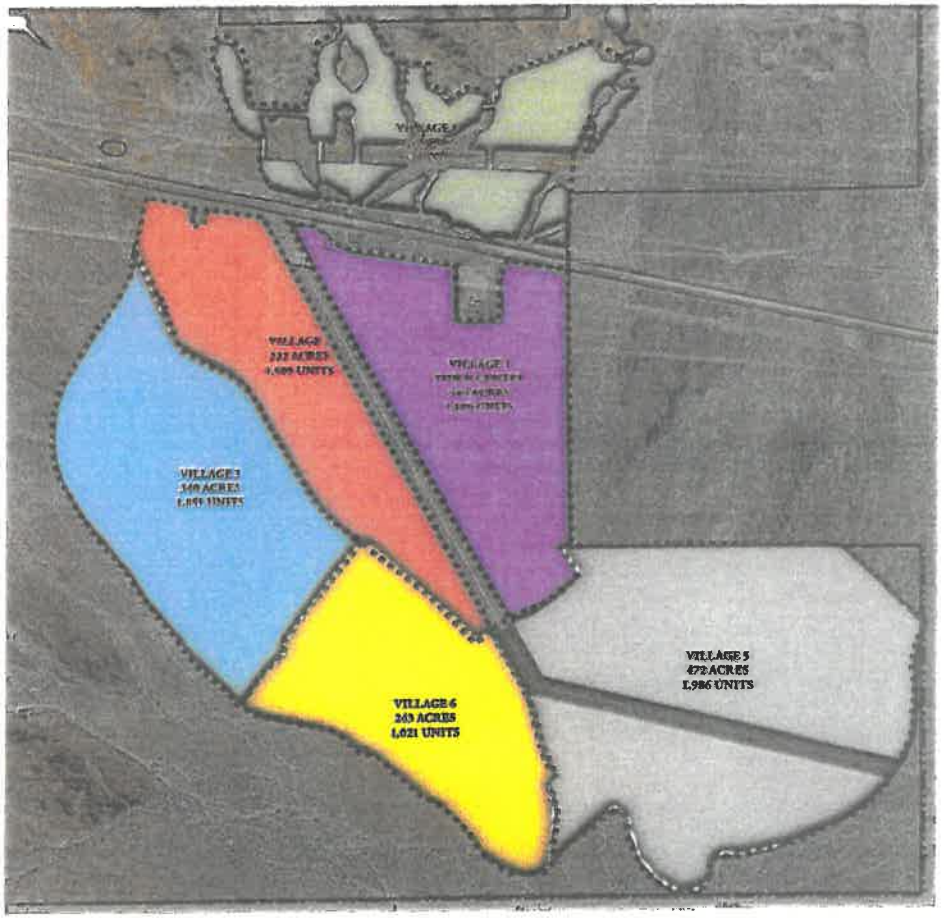
Each village will have its own identity, with unique signage and monumentation for neighborhood entries, parks, common areas and retail centers. At the same time, every village will be an integral part of the overall Paradise Valley community, with community monumentation, backbone road signage, landscape and lighting characterized by a cohesive theme. A set of complementary architectural styles has been identified to help set the tone for the entire community: Spanish Heritage, Desert Contemporary, Prairie, Monterey and Italianate. Together, these architectural styles, with their classic and elegant detail, will provide architectural diversity and beauty. More information regarding architectural styles can be found in Section 8, Community Design Guidelines.

The Villages are as follows:

Village 1 - Town Center
Village 2 - The Resort Area
Village 3 - The Age Qualified Community
Village 4 - The Hillside Area
Village 5 - The Family Village
Village 6 - The Family and Pre-retiree Village

In an effort to maintain flexibility, much of the detailed design aspects for development will be defined at a later date as part of a Village Refinement Plan. Each Village within Paradise Valley will require a unique Village Refinement Plan containing detailed information regarding site layout and design, lighting, themeing, monumentation and signage, infrastructure and other improvements. A Village Refinement Plan must be submitted to the Riverside County Transportation and Land Management Agency prior to the approval of any implementing plan. Please see the criteria set forth in Section 9, Implementation, Maintenance and Financing, for further information.

A description of each Village follows.



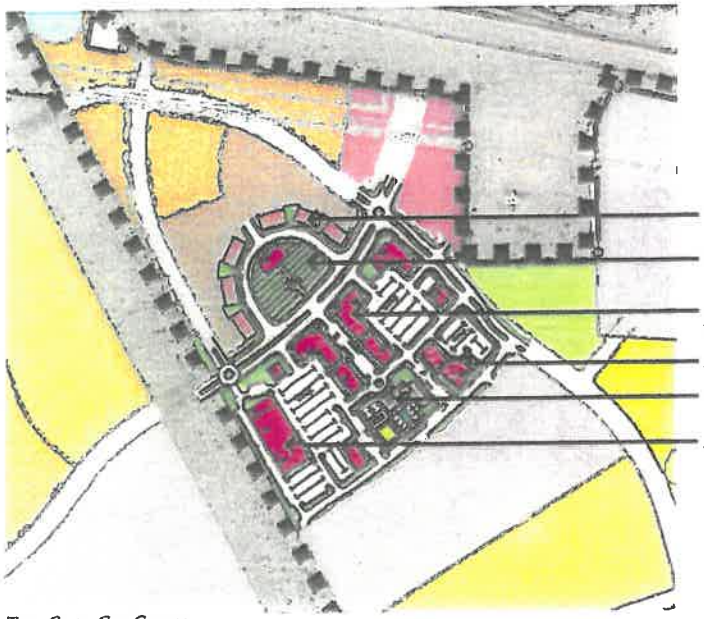
NOTE: The delineation of Villages is shown for illustrative purposes only. Final Village locations will be determined at the time of subdivision mapping.

EXHIBIT 2-3 VILLAGE ORGANIZATION

TABLE 2-2 VILLAGE 1 - TOWN CENTER - SUMMARY

Planning Area	Land Use	Gross Acreage	Target Dwelling Units	Maximum Dwelling Units	Gross Density	Maximum Square Footage
1-1	MDR	19.14	92	96	4.8	
1-6	MDR	26.86	114	134	4.2	
1-7	MDR	53.56	214	268	4.0	
1-8	MDR	37.34	136	187	3.6	
1-3	HHDR	10.55	211	422	20.0	
1-4	MU	51.85	413	413	8.0	315,500
1-9	MU	27.56				313,940
1-2	CR	7.50				78,800
1-5	OS-R	5.54				
1-10	OS-R	3.84				
1-11	PF	5.38				
	TOTAL	249.13	1,180	1,520		708,240

Note: All acreages are approximate



Town Center Core Concept
For illustrative purposes only

VILLAGE CORE AREA

CONCEPTUAL LOCATIONS
- SCHOOL
- PARK
- TRAIL
- ELECTRICAL SUBSTATION

NOTE: Final planning area boundaries and roadway alignments shall be established by a Change of Zone with an implementing project as part of the subdivision map process. Minor adjustments to planning area boundaries and roadway alignments may be made at this time. Parks, public facilities and infrastructure are conceptually located and subject to change. Final locations, sizes, configuration and number of parks, public facilities and infrastructure will be determined at the time of the Village Refinement Plan process.

EXHIBIT 2-4 VILLAGE 1 TOWN CENTER

TABLE 2-3 Village 2 - SUMMARY

Planning Area	Land Use	Gross Acreage	Target Dwelling Units	Maximum Dwelling Units	Gross Density	Maximum Square Footage
2-1	MDR	20.56	77	103	3.7	
2-2	MHDR	42.54	281	340	6.6	
2-4	MHDR	42.26	247	338	5.8	
2-7	MHDR	24.92	190	199	7.6	
2-9	MHDR	31.34	172	251	5.5	
2-5	HDR	13.07	122	183	9.3	
2-6	MU	29.03	420	420	14.5	287,600
2-3	OS-R	5.23				
2-8	OS-R	13.48				
	TOTAL	222.43	1,509	1,834		287,600

Note: All acreages are approximate

Village 2 Core Concept
For illustrative purposes only

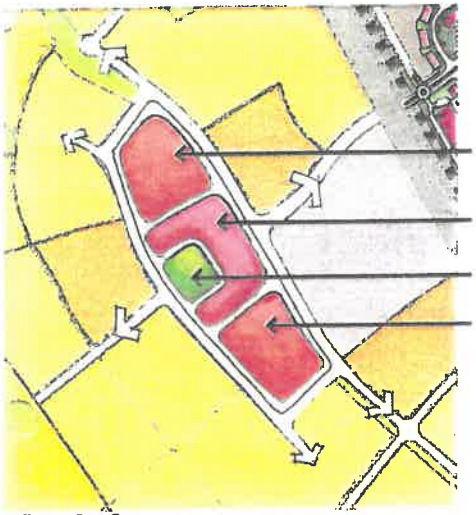
NOTE: Final planning area boundaries and roadway alignments shall be established by a Change of Zone with an implementing project as part of the subdivision map process. Minor adjustments to planning area boundaries and roadway alignments may be made at this time. Parks, public facilities and infrastructure are conceptually located and subject to change. Final locations, sizes, configuration and number of parks, public facilities and infrastructure will be determined at the time of the Village Refinement Plan process.

EXHIBIT 2-6 VILLAGE 2

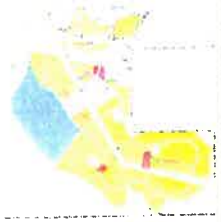
TABLE 2-4 VILLAGE 3 SUMMARY

Planning Area	Land Use	Gross Acreage	Target Dwelling Units	Maximum Dwelling Units	Gross Density	Maximum Square Footage
3-3	MDR	63.46	233	317	3.7	
3-6	MDR	50.54	151	253	3.0	
3-7	MDR	42.47	153	212	3.6	
3-2	MHDR	22.57	147	181	6.5	
3-5	MHDR	99.85	635	799	6.4	
3-4	HDR	13.77	114	193	8.3	
3-1	MU	39.54	418	418	10.6	125,000
3-8	PF	8.29				
	TOTAL	340.49	1,851	2,372		125,000

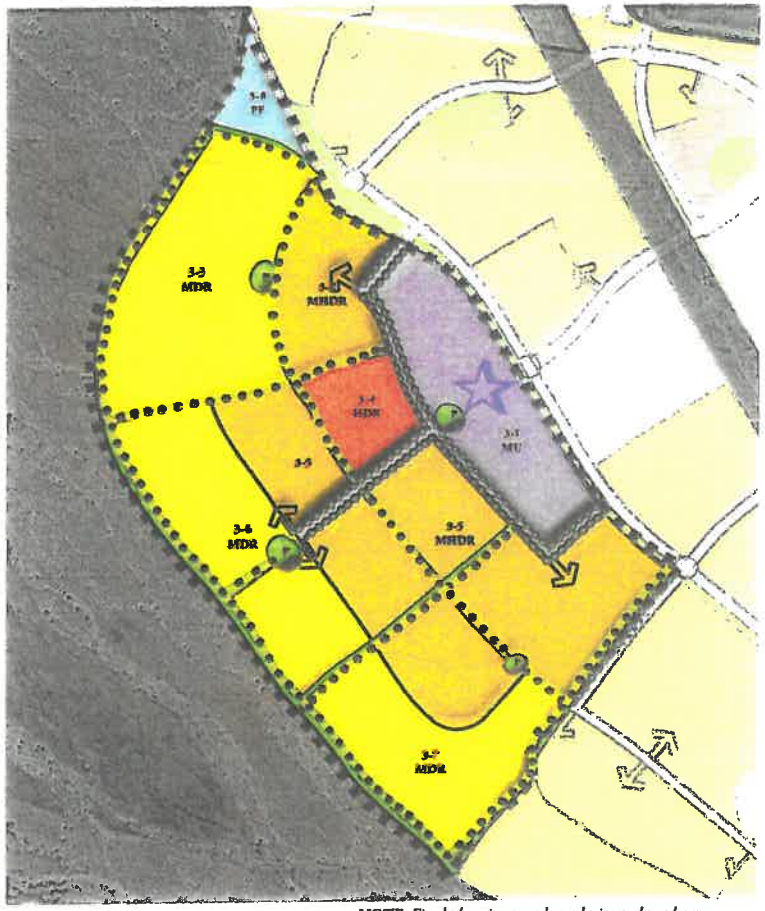
Note: All acreages are approximate



Village 3 Core Concept
For illustrative purposes only



KEY MAP



VILLAGE CORE AREA

CONCEPTUAL LOCATIONS
PARK
TRAIL

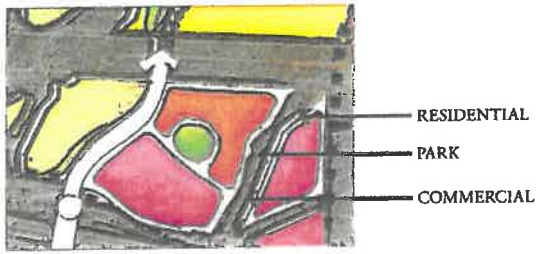
NOTE: Final planning area boundaries and roadway alignments shall be established by a Change of Zone with an implementing project as part of the subdivision map process. Minor adjustments to planning area boundaries and roadway alignments may be made at this time. Parks, public facilities and infrastructure are conceptually located and subject to change. Final locations, sizes, configuration and number of parks, public facilities and infrastructure will be determined at the time of the Village Refinement Plan process.

EXHIBIT 2-7 VILLAGE 3

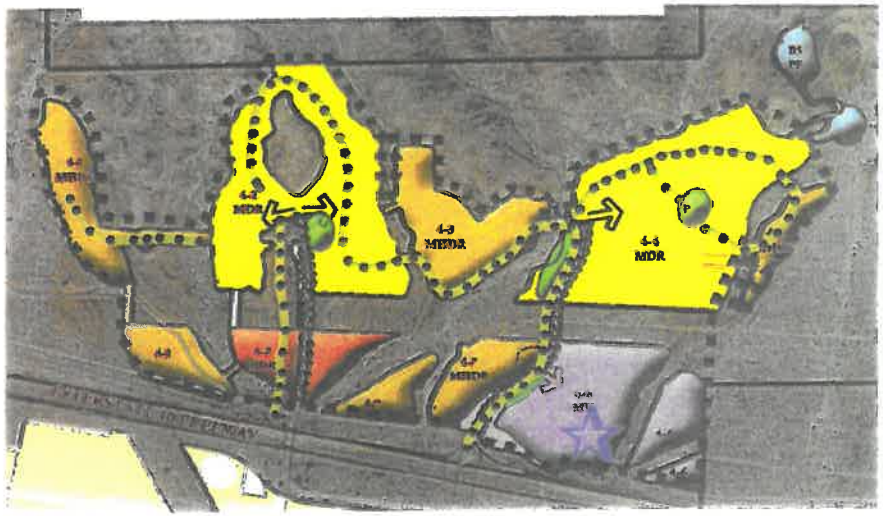
TABLE 2-5 VILLAGE 4 SUMMARY

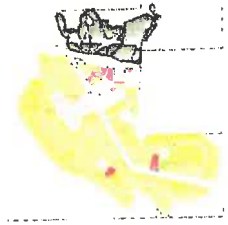
Planning Area	Land Use	Gross Acreage	Target Dwelling Units	Maximum Dwelling Units	Gross Density	Maximum Square Footage
4-2	MDR	39.5	192	198	4.9	
4-4	MDR	49.04	172	245	3.5	
4-1	MHDR	21.30	153	170	7.2	
4-3	MHDR	17.75	116	142	6.5	
4-5	MHDR	5.35	38	43	7.1	
4-7	MHDR	13.57	96	109	7.1	
4-8	HDR	9.61	92	135	9.6	
4-6	MU	29.05	84	84	2.9	140,000
4-9	PF	4.02				
4-10	PF	5.22				
	TOTAL	194.41	943	1,125		140,000

Note: All acreages are approximate



Village 4 Core Concept
For illustrative purposes only





KEY MAP

VILLAGE CORE AREA

CONCEPTUAL LOCATIONS
PARK
TRAIL

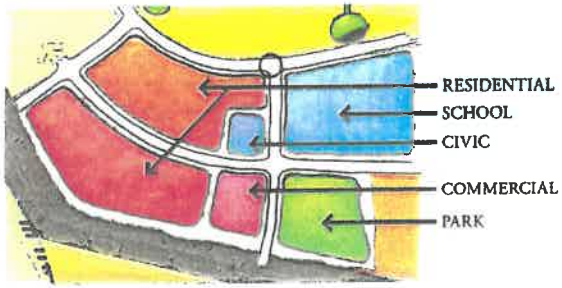
NOTE: Final planning area boundaries and roadway alignments shall be established by a Change of Zone with an implementing project as part of the subdivision map process. Minor adjustments to planning area boundaries and roadway alignments may be made at this time. Parks, public facilities and infrastructure are conceptually located and subject to change. Final locations, sizes, configuration and number of parks, public facilities and infrastructure will be determined at the time of the Village Refinement Plan process.

EXHIBIT 2-8 VILLAGE 4

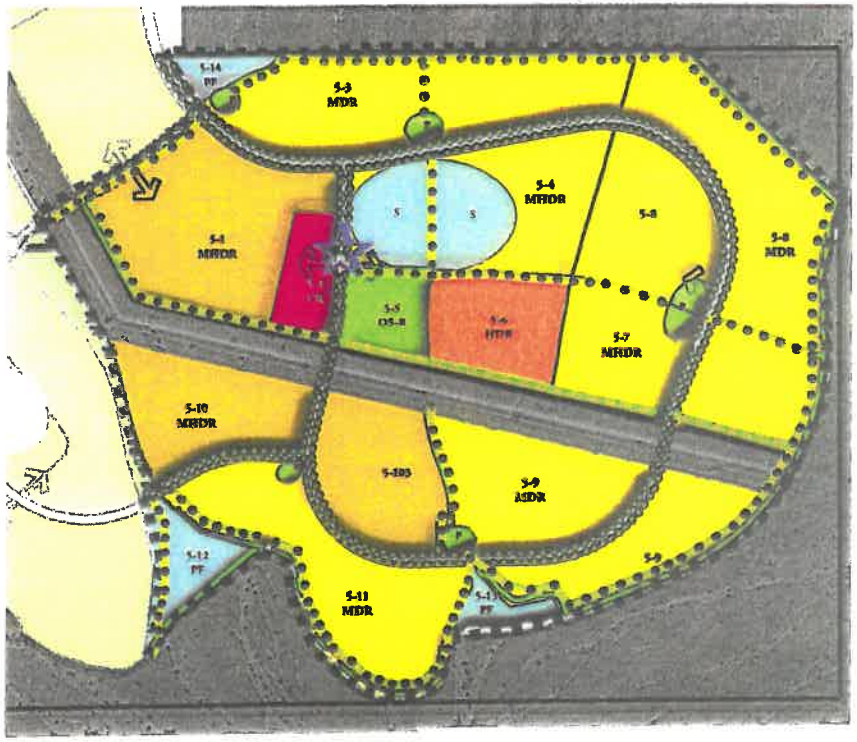
TABLE 2-6 VILLAGE 5 SUMMARY

Planning Area	Land Use	Gross Acreage	Target Dwelling Units	Maximum Dwelling Units	Gross Density	Maximum Square Footage
5-3	MDR	50.95	127	255	2.5	
5-4	MDR	43.68	172	218	3.9	
5-7	MDR	22.86	109	114	4.8	
5-8	MDR	91.58	381	458	4.2	
5-9	MDR	58.31	227	292	3.9	
5-11	MDR	45.89	156	229	3.4	
5-1	MHDR	45.88	325	367	7.1	
5-10	MHDR	53.93	282	431	5.2	
5-6	HDR	22.25	207	312	9.3	
5-2	CR	10.10				65,700
5-5	OS-R	12.08				
5-12	PF	12.24				
5-13	PF	5.61				
5-14	PF	4.01				
	TOTAL	472.3	1,986	2,676		65,700

Note: All acreages are approximate



Village 5 Core Concept
For illustrative purposes only



KEY MAP

VILLAGE CORE AREA

CONCEPTUAL LOCATIONS
SCHOOL
PARK
TRAIL

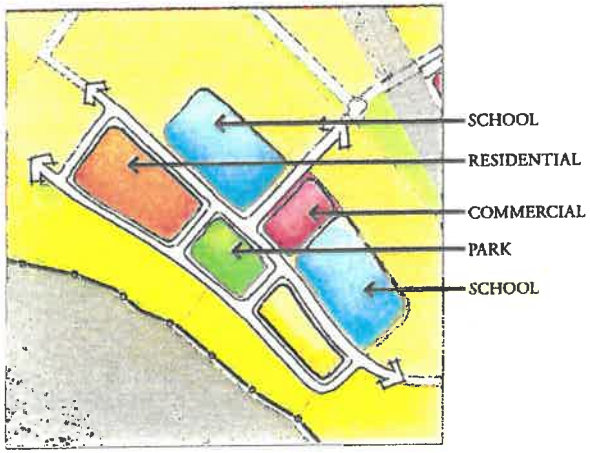
NOTE: Final planning area boundaries and roadway alignments shall be established by a Change of Zone with an implementing project as part of the subdivision map process. Minor adjustments to planning area boundaries and roadway alignments may be made at this time. Parks, public facilities and infrastructure are conceptually located and subject to change. Final locations, sizes, configuration and number of parks, public facilities and infrastructure will be determined at the time of the Village Refinement Plan process.

EXHIBIT 2-9 VILLAGE 5

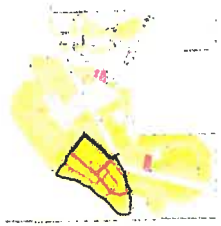
TABLE 2-7 VILLAGE 6 SUMMARY

Planning Area	Land Use	Gross Acreage	Target Dwelling Units	Maximum Dwelling Units	Gross Density	Maximum Square Footage
6-3	MDR	33.78	87	169	2.6	
6-4	MDR	21.38	66	107	3.1	
6-6	MDR	14.45	65	72	4.5	
6-8	MDR	35.17	86	176	2.4	
6-1	MHDR	88.87	530	444	6.0	
6-7	MHDR	28.94	187	145	6.5	
6-5	CR	5.78				54,450
6-2	OS-R	7.04				
6-9	OS-R	7.69				
	TOTAL	243.1	1,021	1,113		54,450

Note: All acreages are approximate



Village 6 Core Concept
For illustrative purposes only



KEY MAP

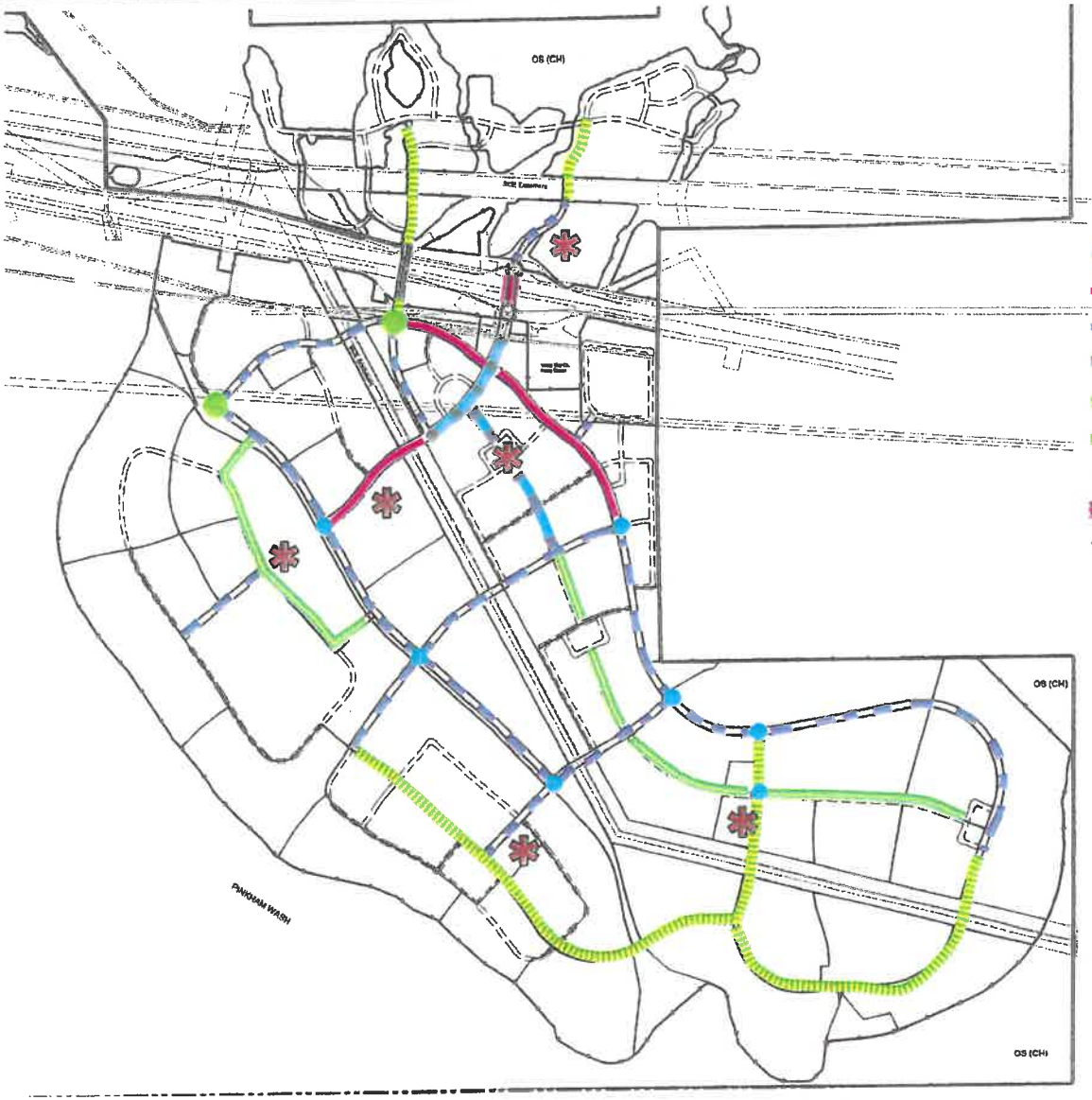
VILLAGE CORE AREA

CONCEPTUAL LOCATIONS

SCHOOL
PARK
TRAIL

NOTE: Final planning area boundaries and roadway alignments shall be established by a Change of Zone with an implementing project as part of the subdivision map process. Minor adjustments to planning area boundaries and roadway alignments may be made at this time. Parks, public facilities and infrastructure are conceptually located and subject to change. Final locations, sizes, configuration and number of parks, public facilities and infrastructure will be determined at the time of the Village Refinement Plan process.

EXHIBIT 2-10 VILLAGE 6

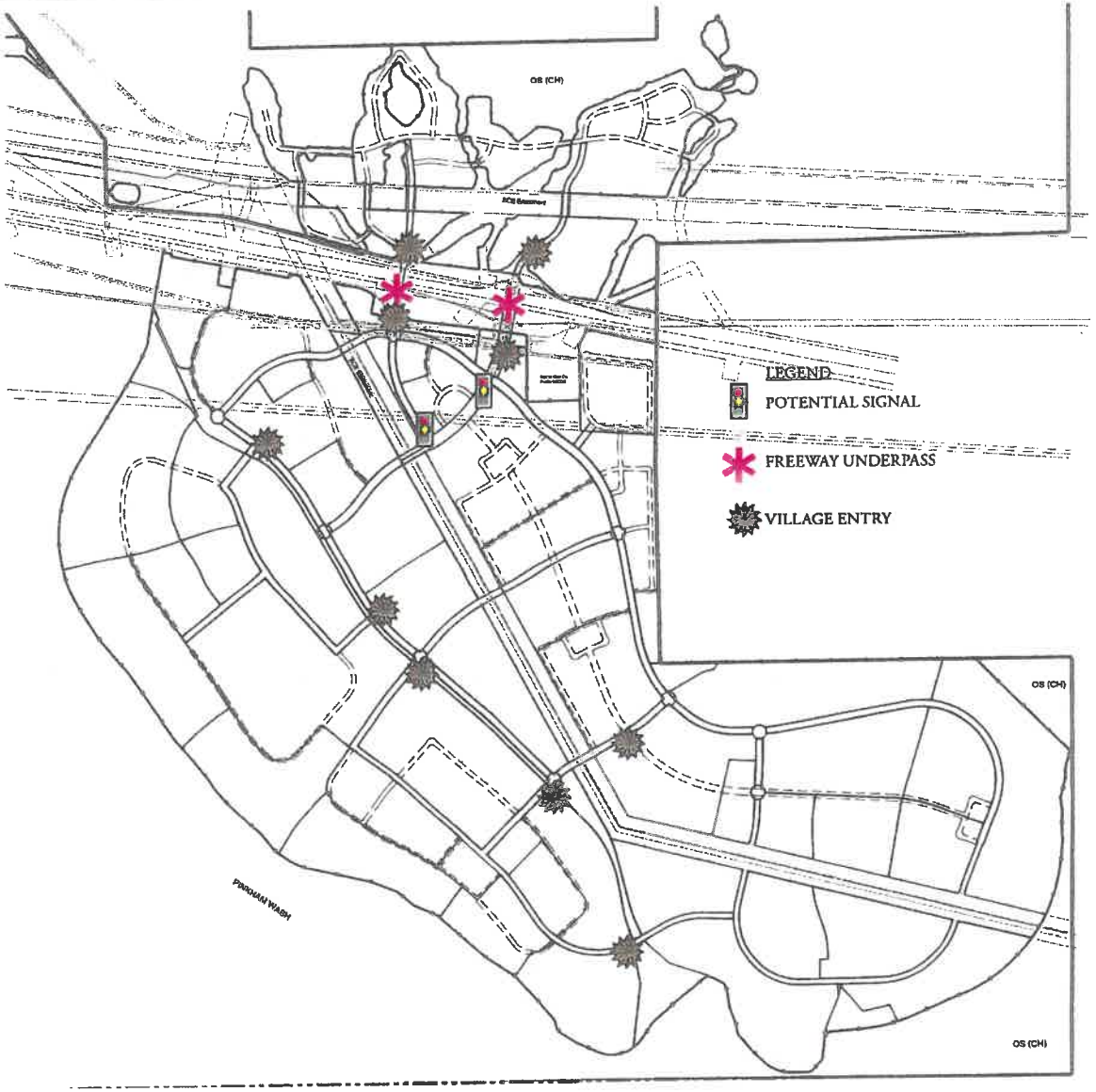


LEGEND

- 6-LANE URBAN ARTERIAL with MEDIAN - 152' ROW
- 4-LANE MAJOR ARTERIAL with MEDIAN -116' ROW
- 2-LANE DIVIDED COLLECTOR with MEDIAN - 90' ROW
- 2-LANE MAIN STREET - 90' ROW
- 2-LANE TOWN CENTER BOULEVARD - 84' ROW
- 2-LANE LOCAL COLLECTOR - 72' ROW
- 2-LANE LOCAL ROAD - 56' OR 60' ROW
- URBAN ARTERIAL UNDER I-10 FREEWAY - 78'
- COLLECTOR UNDER I-10 FREEWAY - 50'
- INTERSTATE 10 FREEWAY ROUNDABOUT
- ROUNDABOUT - LARGE
- ROUNDABOUT - SMALL
- SHUTTLE STOP CONCEPTUAL LOCATION

NOTE: The circulation pattern, roundabout locations and associated infrastructure shown are for illustrative purposes only. Final roundabout locations, road alignments and backbone infrastructure will be determined at the time of subdivision mapping.

EXHIBIT 4-1 CIRCULATION PLAN



NOTE: The circulation pattern and associated infrastructure shown are for illustrative purposes only. Final alignments and infrastructure will be determined at the time of subdivision mapping.

EXHIBIT 4-2 ENTRIES AND SIGNALIZATION

4.2.14 Interstate 10 Freeway Interchange

Access to the Paradise Valley Specific Plan site is provided by the existing Frontage Road on and off ramp located approximately 8 miles east of the City of Coachella and approximately three miles east of the Cactus City Rest Stop. The existing interchange allows traffic to exit the freeway traveling either east or west, pass under the freeway and re-enter in either direction. The existing underpass, also called the East Cactus City Bridge, allows traffic under Interstate 10 to access the east and west bound on ramps with approximately a minimum 15'2" clearance. See Existing Interchange Exhibit 4-16. Adjacent to the underpass roadway is an existing trapezoidal, open drainage channel traveling north-south, parallel to the existing 36' wide travel way. The channel provides drainage conveyance to upstream tributary areas within the Cottonwood Mountains as well as runoff trapped between the east and west bound lanes. A Sprint fiber optic cable aligned parallel with the freeway is located within the southerly Caltrans Frontage Road right-of-way. The south eastern end of the interchange provides access to the existing Southern California Gas Company compressor station as well as a Sprint fiber optic splice station, both south of the Frontage Road right-of-way.

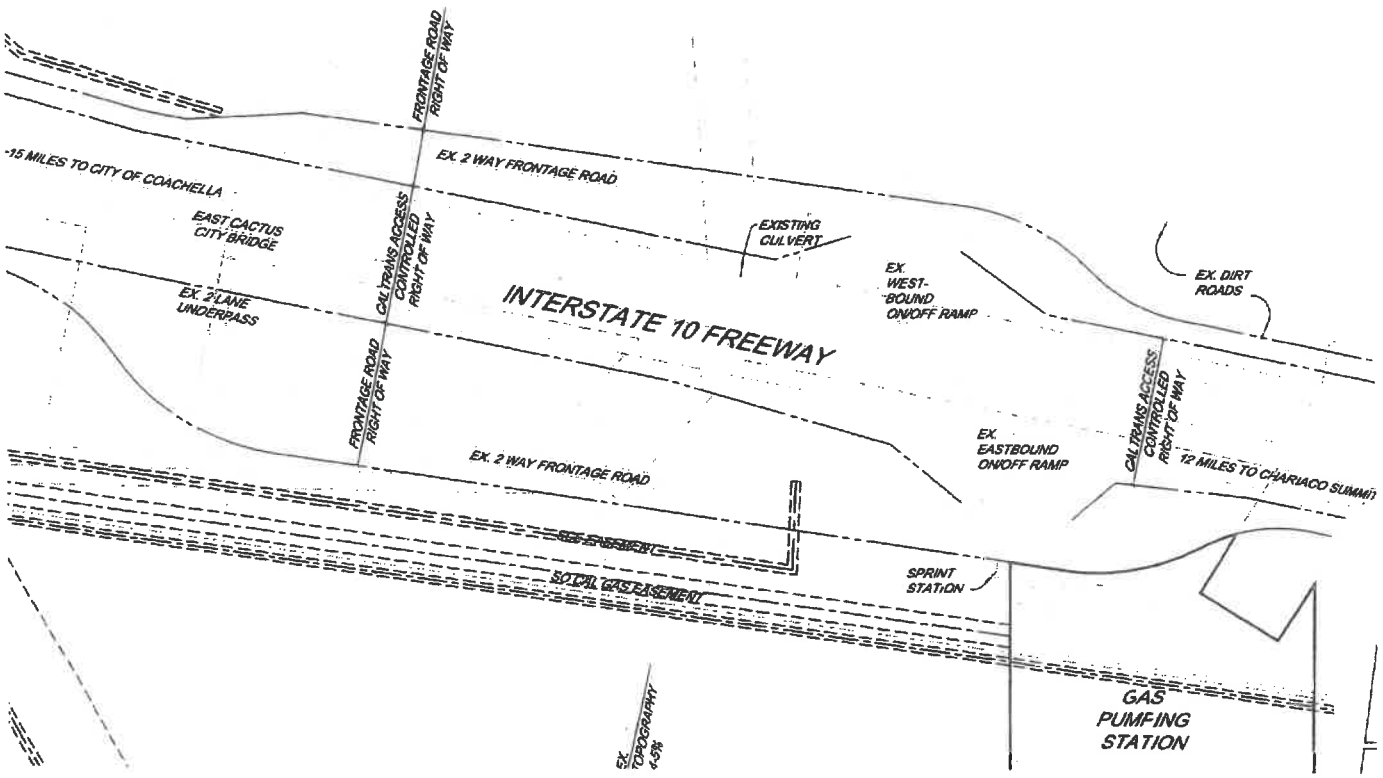
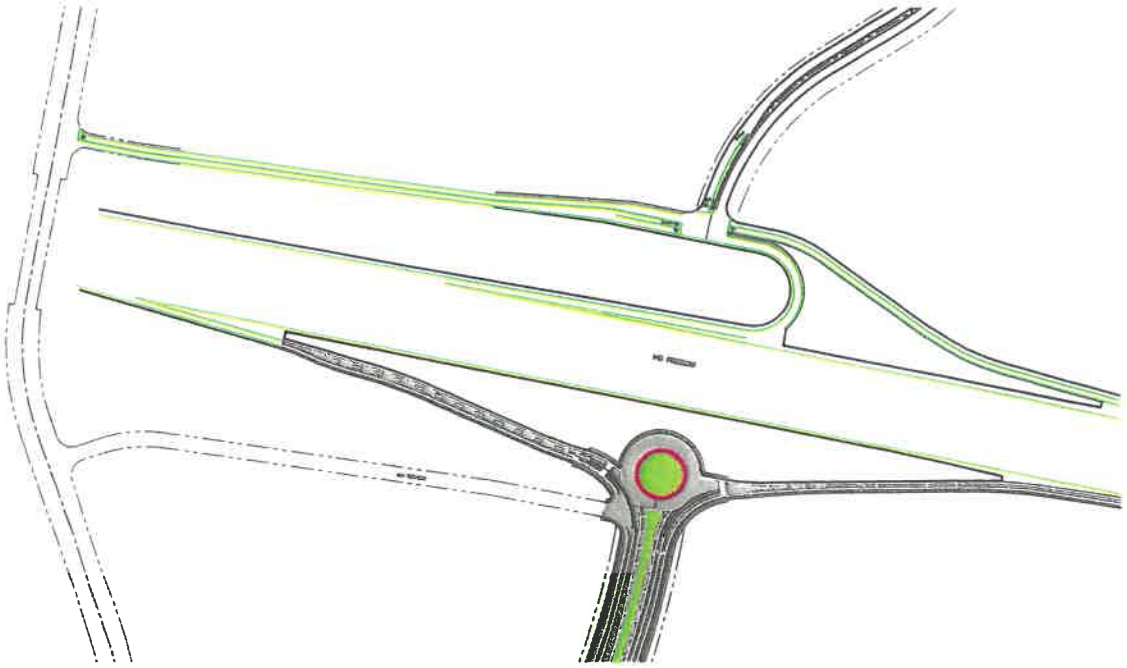


EXHIBIT 4-16 EXISTING INTERSTATE 10 INTERCHANGE

4.2.15 Interim Interstate 10 Interchange

The Frontage Road interchange will be phased with the project to meet the traffic demands of each development within the Paradise Valley Specific Plan. To the extent possible, the existing Frontage Road interchange will be utilized during the initial stages of the project. As the interchange is phased, there will be construction of new east and west bound on- and off-ramps to comply with current Caltrans, FHWA and AASHTO standards and regulations for the given traffic projections. See Interim Interchange Exhibit 4-17. The interim design proposes a west bound loop on-ramp and a standard diamond shape off-ramp. The northerly interchange intersection will service traffic from northern planning areas via the two-lane divided collector roadway. The existing Frontage Road will be utilized to direct traffic under the existing underpass to access the southern planning areas of the Paradise Valley Specific Plan and/or the eastbound on and off-ramps. The interim design also proposes a standard diamond shape eastbound on and off-ramps leading to a proposed ultimate roundabout traffic facility. The interim interchange facilities will be designed and constructed to allow a future underpass and two points of access to the northern and southern planning areas and villages.

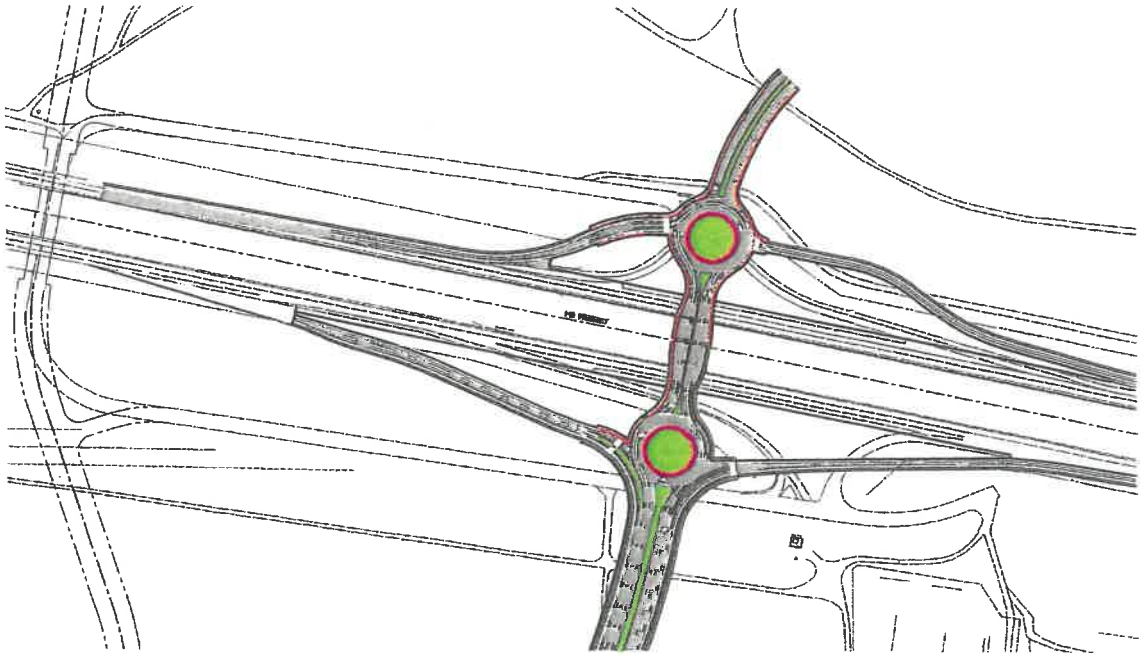


NOTE: The interim Interstate 10 Interchange and associated infrastructure shown is for illustrative purposes only. Final alignments, design and infrastructure will be determined at the time of subdivision mapping subject to planning, transportation, engineering and fire approval.

EXHIBIT 4-17 INTERIM INTERSTATE 10 INTERCHANGE

4.2.16 Ultimate Interstate 10 Interchange

The proposed ultimate interchange is conceptually designed as a diamond interchange with roundabouts directing traffic in and out of the community. The ultimate design also consists of a freeway underpass connecting the northern 2 lane divided collector to the southern 6 lane urban arterial roadway. The underpass will be designed in accordance with all state and federal standards and requirements. The ultimate design provides a two-lane eastbound off-ramp and a two-lane westbound on-ramp. The frontage roads on the north and south side of the freeway will be closed as traffic will be able to access the on and off-ramps via the new undercrossing as well as by the interior improved roadways. See Ultimate Interstate 10 Interchange Exhibit 4-18. The design and location of Monumentation, signage, walls, landscape and other community design features related to the Interstate 10 Freeway Interchange will be determined in the Village Refinement Plans.



NOTE: The ultimate Interstate 10 Interchange and associated infrastructure shown is for illustrative purposes only. Final alignments, design and infrastructure will be determined at the time of subdivision mapping subject to planning, transportation, engineering and fire approval.

EXHIBIT 4-18 ULTIMATE INTERSTATE 10 INTERCHANGE

4.2.17 Caltrans Frontage Road Right-of-Way

Caltrans has certain existing rights of way for frontage roads which traverse the project site on both the north and south sides of the I-10 freeway. Ingress and egress to and from the Project will require the construction of a freeway interchange, on and off ramps and access roads to and from the Project site, as more particularly described in the circulation section of this Specific Plan. The circulation plan for the Paradise Valley Project shall be designed and developed in such a manner as to preserve contiguity of the frontage road rights-of-way within the Project boundaries. Such contiguity may be provided by separated or at-grade intersections, the dedication of additional rights-of-way for continuation of potential frontage road segments within the interior public roadways of the Project, or in such other manner as shall be acceptable to CalTrans and the County.
Please see exhibit 4-19, Caltrans frontage road right-of-way, for a detail.

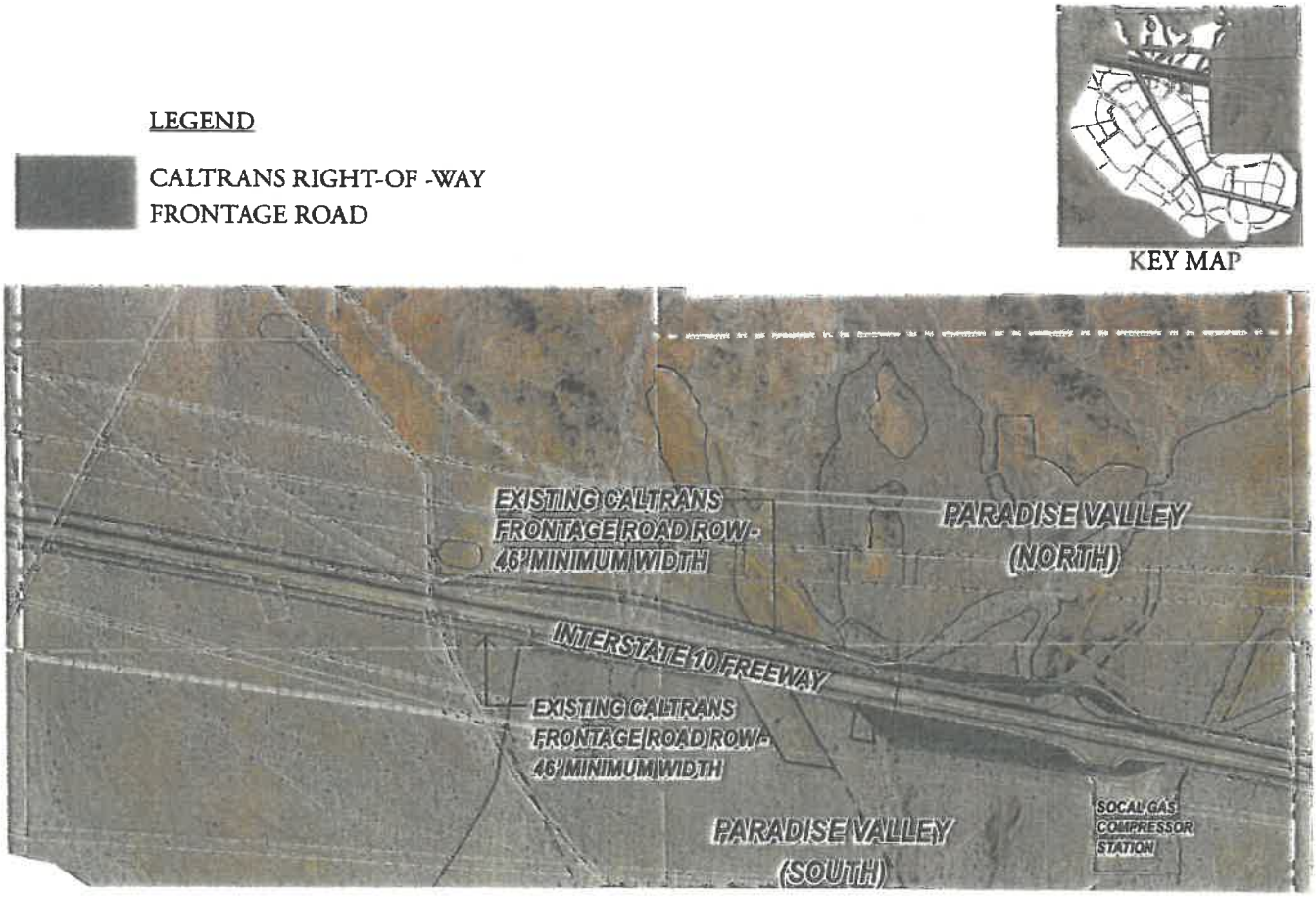


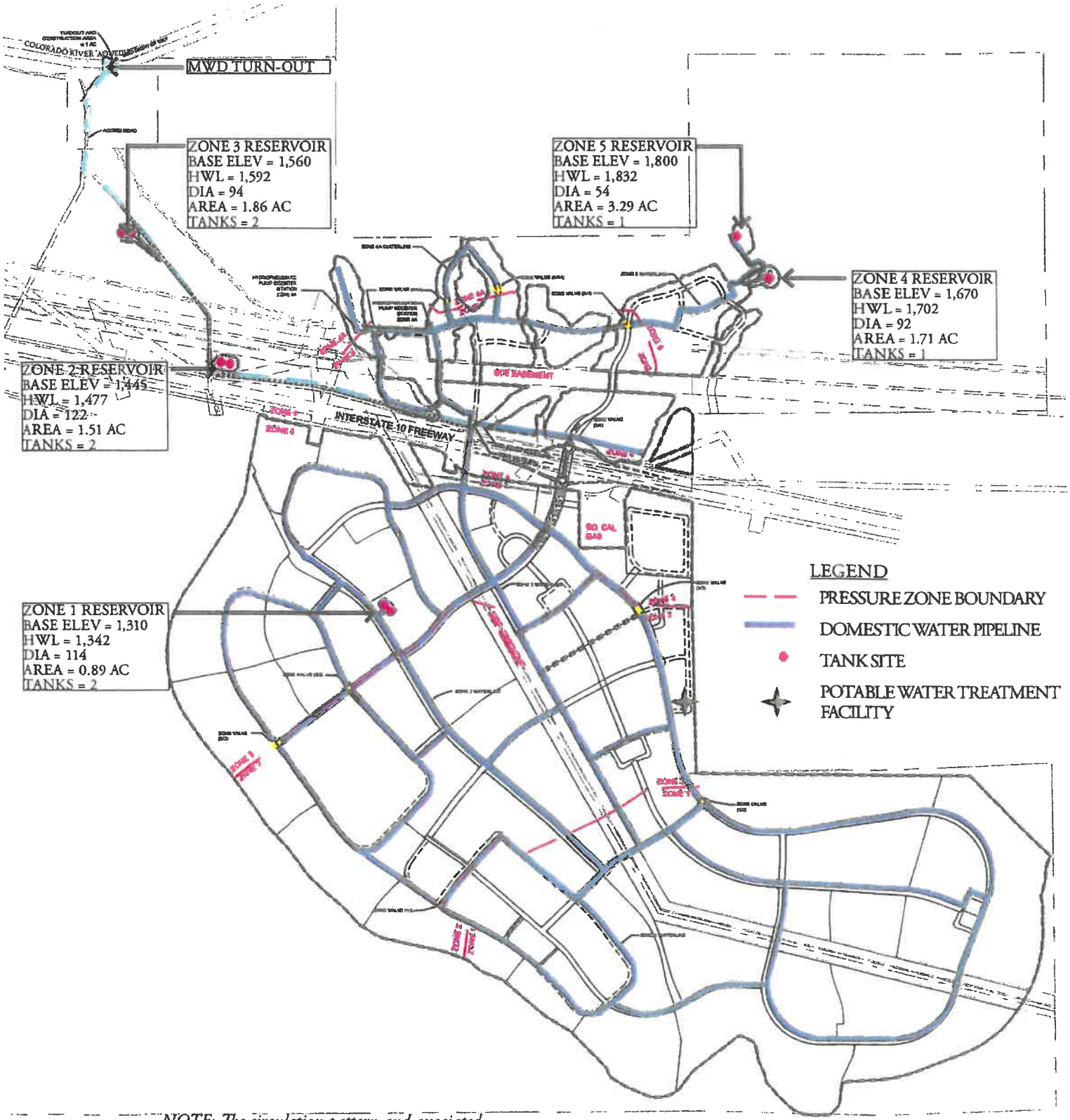
Exhibit 4-19 Caltrans frontage road right-of-way

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

EXHIBIT 4-20 TRAIL NETWORK

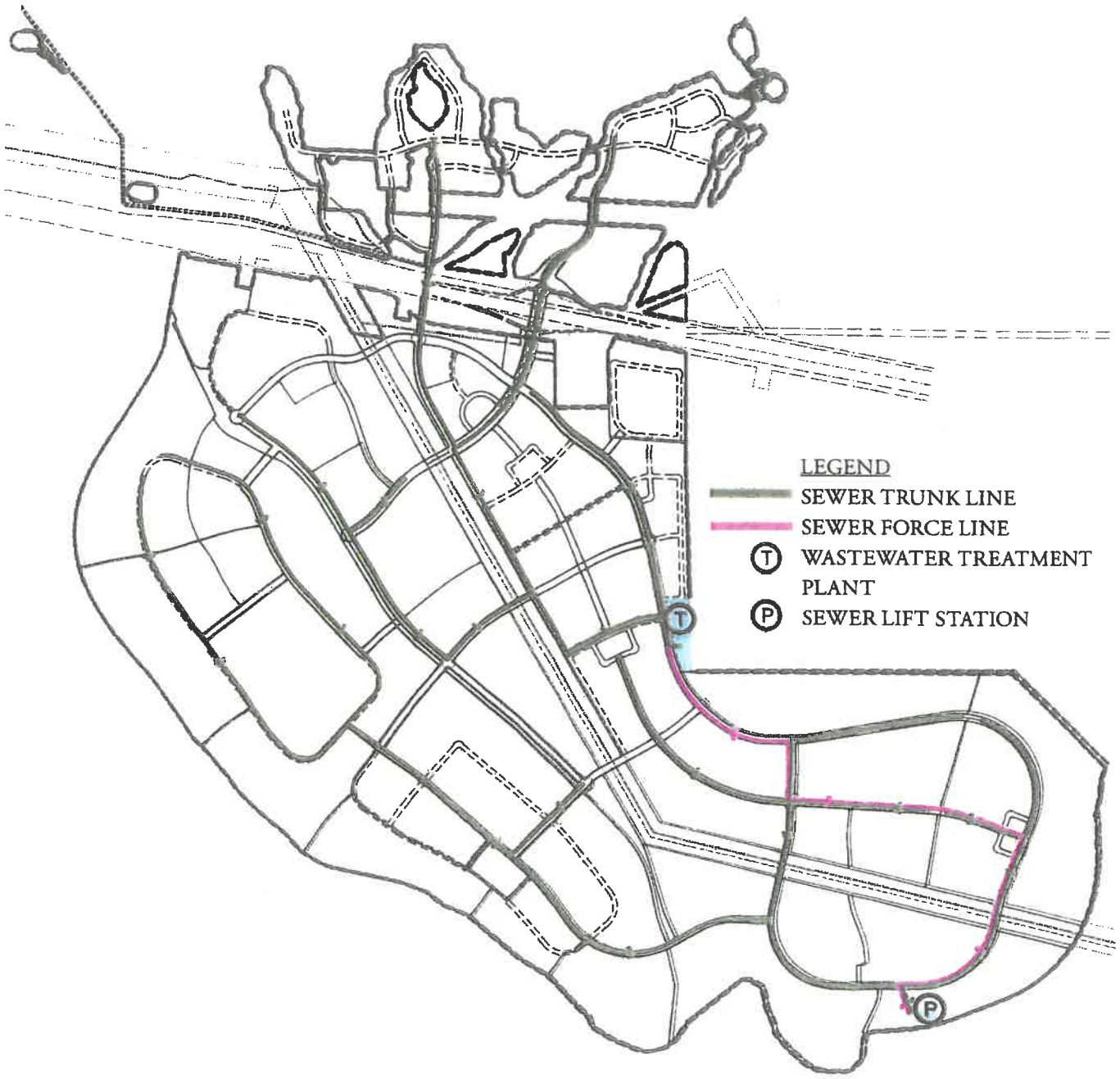
NOTE: The NEV path locations shown are for illustrative purposes only. Final locations will be determined at the time of subdivision mapping.

EXHIBIT 4-21 NEIGHBORHOOD ELECTRIC VEHICLE NETWORK



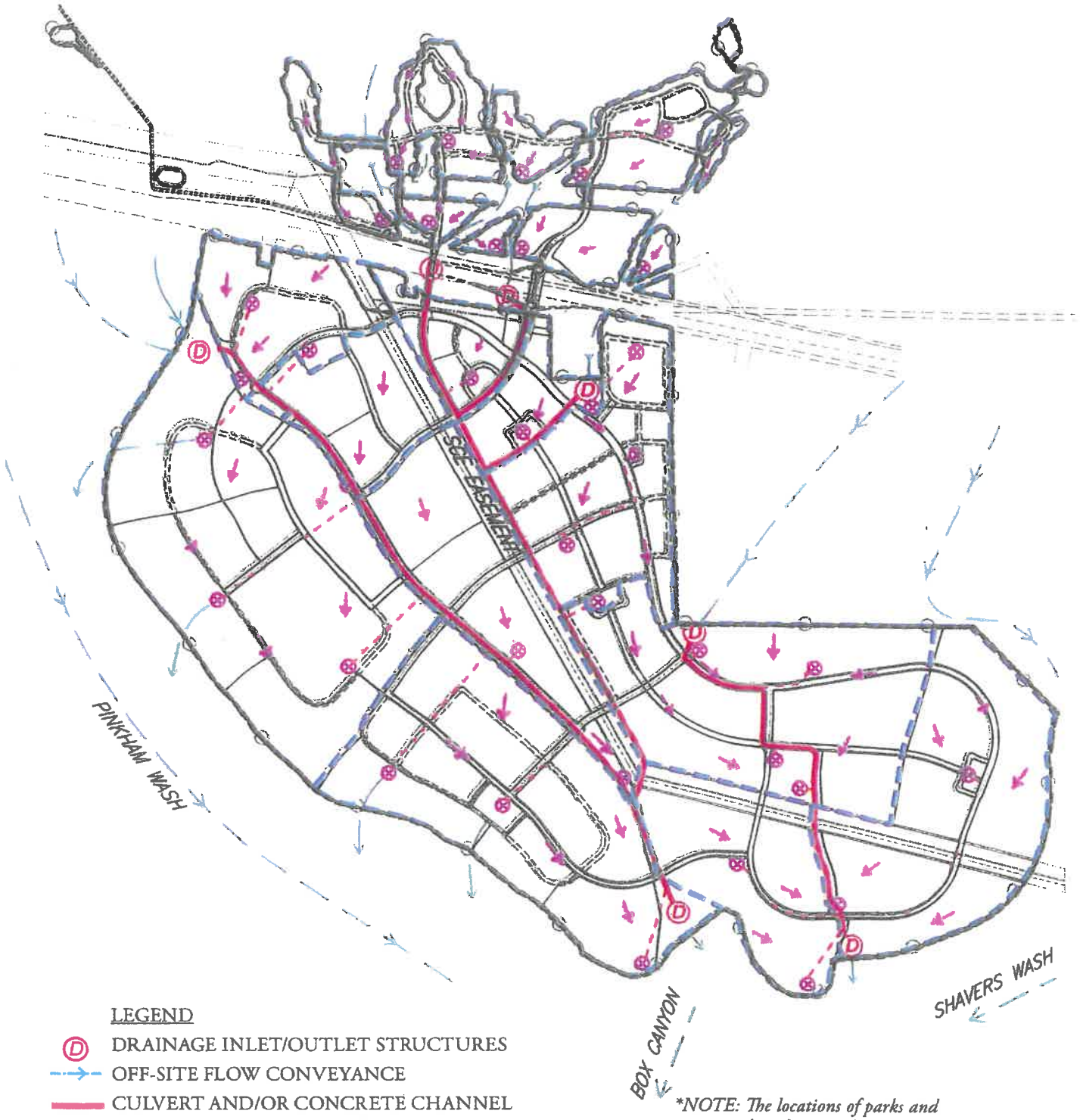
NOTE: The circulation pattern and associated infrastructure shown is for illustrative purposes only. Final alignments and infrastructure will be determined at the time of subdivision mapping.

EXHIBIT 5-1 WATER MASTER PLAN



NOTE: The circulation pattern and associated infrastructure shown is for illustrative purposes only. Final alignments and infrastructure will be determined at the time of subdivision mapping.

EXHIBIT 5-2 WASTEWATER PLAN

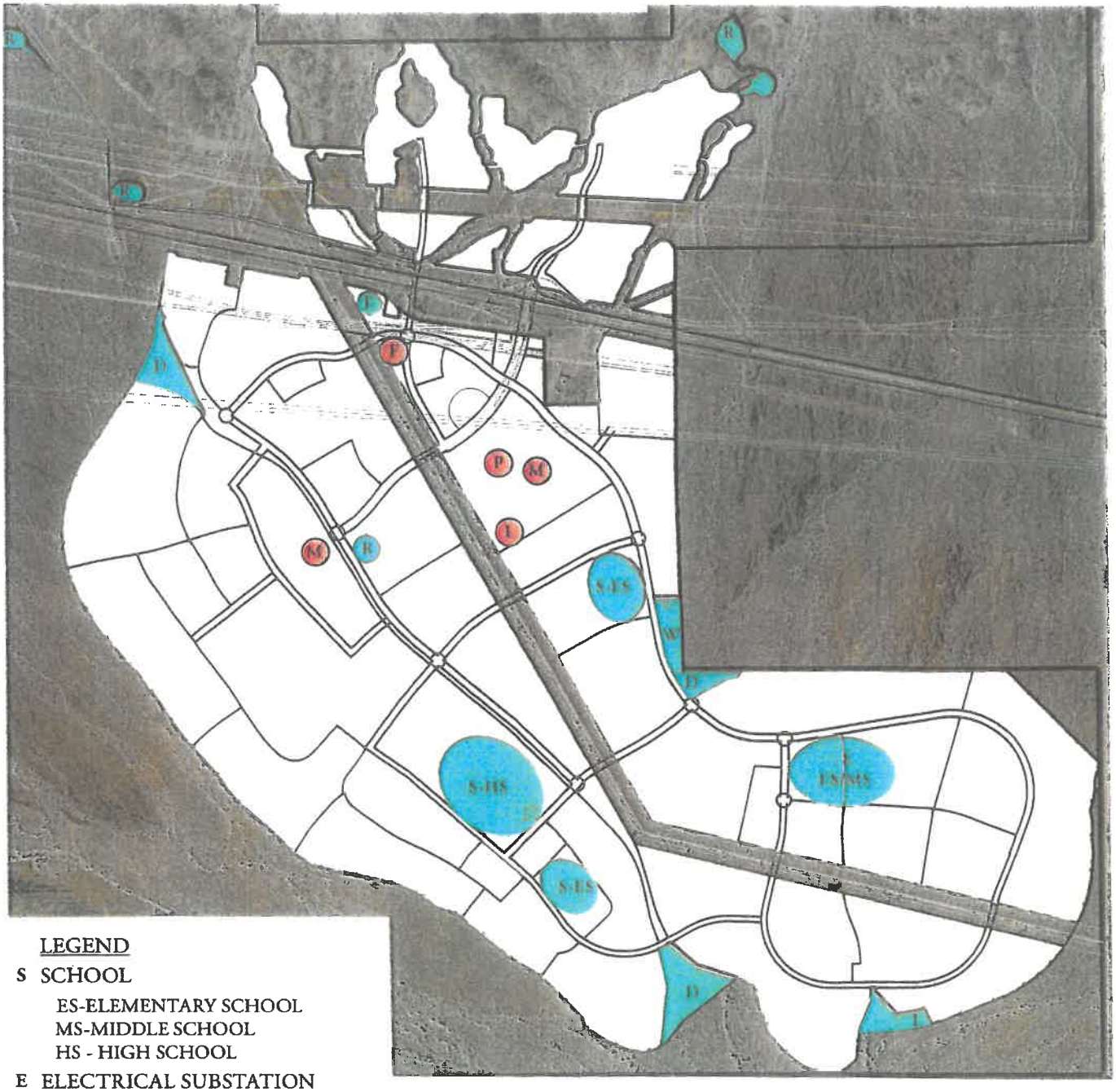


LEGEND

- DRAINAGE INLET/OUTLET STRUCTURES
- OFF-SITE FLOW CONVEYANCE
- CULVERT AND/OR CONCRETE CHANNEL
- ON-SITE STORM DRAIN CONVEYANCE
- DETENTION/STORM WATER TREATMENT BASIN*
- ON-SITE DIRECTION OF FLOW

**NOTE: The locations of parks and corresponding detention/treatment facilities are for illustrative purposes only. The circulation pattern and associated infrastructure shown is for illustrative purposes only. Final alignments and infrastructure will be determined at the time of subdivision mapping.*

EXHIBIT 5-3 DRAINAGE MASTER PLAN



LEGEND

S SCHOOL
- ES-ELEMENTARY SCHOOL
- MS-MIDDLE SCHOOL
- HS - HIGH SCHOOL

E ELECTRICAL SUBSTATION

D DRAINAGE STRUCTURE

W WASTEWATER TREATMENT FACILITY

L SEWER LIFT STATION

R RESERVOIR

P POLICE/SHERIFF SUBSTATION

F FIRE

L LIBRARY

M MEDICAL FACILITIES

NOTE: The circulation pattern and associated infrastructure shown is for illustrative purposes only. Final alignments and infrastructure will be determined at the time of subdivision mapping.

EXHIBIT 5-5 PUBLIC FACILITIES AND SERVICES PLAN

TABLE 6-2 OPEN SPACE - RECREATION SUMMARY

PLANNING AREA	OPEN SPACE TYPE	ACRES
VILLAGE 1 - TOWN CENTER		
1-5	NEIGHBORHOOD PARK	5.5
1-10	NEIGHBORHOOD PARK	3.8
	CONCEPTUALLY LOCATED PARKS	4.5
	CONCEPTUALLY LOCATED TRAILS	4.5
	TOTAL FOR VILLAGE 1	*18.4*
VILLAGE 2		
2-3	NEIGHBORHOOD PARK	5.2
2-8	LINEAR PARK	10.4
	CONCEPTUALLY LOCATED PARKS	2.5
	CONCEPTUALLY LOCATED TRAILS	2.5
	TOTAL FOR VILLAGE 2	*20.6*
VILLAGE 3		
	CONCEPTUALLY LOCATED PARKS	3.5
	CONCEPTUALLY LOCATED TRAILS	10.0
	TOTAL FOR VILLAGE 3	*13.5*
VILLAGE 4		
	CONCEPTUALLY LOCATED PARKS	4.0
	CONCEPTUALLY LOCATED TRAILS	2.0
	TOTAL FOR VILLAGE 4	*6.0*
VILLAGE 5		
5-5	NEIGHBORHOOD PARK	7.0
	CONCEPTUALLY LOCATED PARKS	2.7
	CONCEPTUALLY LOCATED TRAILS	9.0
	TOTAL FOR VILLAGE 5	*18.7*
VILLAGE 6		
6-2	NEIGHBORHOOD PARK	12.1
6-9	LINEAR PARK	10.5
	CONCEPTUALLY LOCATED PARKS	4.0
	CONCEPTUALLY LOCATED TRAILS	6.0
	TOTAL FOR VILLAGE 6	*32.6*
PROJECT TOTAL		**109.9**

Note: All areas are approximate. Numbers may not add precisely due to rounding.

LEGEND

- OS-CH — Natural Open Space (OS-CH)
- OS-R — Neighborhood "Anchor" Parks and Trails and (OS-R)
- P — Conceptually located Park
- Trails
- Quarter mile walking radius from park or trail

NOTE: The park and trail locations shown are for illustrative purposes only. Final locations will be determined as part of a Village Refinement Plan.

EXHIBIT 6-1 PARKS AND OPEN SPACE PLAN

TABLE 9-1 COMMUNITY FACILITIES: POTENTIAL CONSTRUCTION RESPONSIBILITY AND FUNDING SOURCES

FACILITY TYPE	POTENTIAL PARTY RESPONSIBLE FOR CONSTRUCTION	POTENTIAL FUNDING SOURCES
Backbone Roadways	• Developer	• CFD • Development Impact Fees
Community Buildings	• Developer	• CSA • Developer contributions
Drainage Facilities	• Developer • CVWD	• CSA or CFD • Development Impact Fees • Sewer and Water Connection Charges • Infrastructure Financing District
Fire Station	• Developer	• CSA • Developer contributions • Development Impact Fees
Irrigation and Fire Water Facilities	• Developer • CVWD	• CSA or CFD • Development Impact Fees
Library	• Developer	• CSA or CFD • Development Impact Fees • Developer contributions
Parks and Trails	• Developer	• CSA or CFD • Development Impact Fees • Developer contributions
Potable Water and Water Wells	• Developer • CVWD	• CFD • Development Impact Fees • Sewer and Water Connection Charges • Infrastructure Financing District
Sewer (including collection, treatment, and disposal facilities)	• CVWD	• CSA or CFD • Development Impact Fees • Sewer and Water Connection Charges • Infrastructure Financing District
Sheriff Substation	• Developer	• CSA • Developer contributions • Development Impact Fees
Schools	• Developer • CVUSD	• CVUSD School Fees • Developer contributions
Power/Electrical Electrical Substations	• Developer • IID	• Development Impact Fees • Developer contributions

TABLE 9-2 MAINTENANCE RESPONSIBILITY

FACILITY/PROGRAM TYPE	PROVIDER
Bus benches and shelters at transit stops	• CSA, CFD, HOA and/or other equivalent mechanism
Community Signage, Walls and Fences	• CSA, CFD, HOA and/or other equivalent mechanism
Drainage, Local	• CSA, CFD, HOA or other equivalent mechanism
Drainage, Regional	• Coachella Valley Water District
Electrical Facilities	• Imperial Irrigation District
Fire Stations	• CSA, CFD, or other equivalent mechanism
Library	• Riverside County Library System
Natural Gas Facilities	• Southern California Gas Company
Parks and Trails (including perimeter tortoise fences)	• CSA, CFD, HOA or other equivalent mechanism
Public Art	• CSA, CFD, HOA and/or other equivalent mechanism (maintenance of public art pieces following installation).
Public Schools (K–12)	• Coachella Valley Unified School District
Public Street Lighting (facility maintenance; utility payments to IID)	• CSA, CFD, HOA and/or other equivalent mechanism
Public Streets (including traffic signals and on-street bike and NEV lanes)	• CSA, CFD, HOA and/or other equivalent mechanism
Private Streets (serving individual Planning Areas)	• CSA, CFD, HOA and/or other equivalent mechanism
Recycled Water (including storage, transmission lines, and distribution lines up to and including service meters)	• Coachella Valley Water District
Sewer (including collection, treatment, and disposal facilities)	• Coachella Valley Water District
Sheriff Substation	• CSA, CFD, or other equivalent mechanism
Shuttle services, transit node and bus benches/ shelters	• CSA, CFD, HOA and/or other equivalent mechanism
Streetscapes (edge of pavement to edge of right-of-way) and other common community areas.	• CSA, CFD, HOA and/or other equivalent mechanism
Trash and recycling receptacles in Open Space Recreation Areas	• CSA, CFD, HOA and/or other equivalent mechanism

FACILITY/PROGRAM TYPE	PROVIDER
Water facilities (including storage, transmission, and distribution, including service meters)	• Coachella Valley Water District
Weed Management Plan	• Master HOA
WQMP Trench and Detention Basins	• CSA, CFD, HOA and/or other equivalent mechanism

County Service Area

A potential mechanism for facilities funding and maintenance is a County Service Area (CSA). The PVSP project will either annex into an existing CSA, or form a new CSA to provide and fund services within the project area. The CSA may provide funding and/or maintenances such as sheriff protection, fire protection, local park maintenance services, ambulance services, streetlight energy services, landscape services and street sweeping. The Riverside County Board of Supervisors will be the CSA governing body, which is established by law to administer the operation of county service areas per Government Code 25210.0.

Community Facilities District (CFD)

A Mello-Roos Community Facilities District (CFD) may also be established to finance improvements and services at Paradise Valley. The services and improvements that Mello-Roos CFDs can finance include streets, sewer systems and other basic infrastructure, police protection, fire protection, ambulance services, schools, parks, libraries, museums and other cultural facilities. A CFD would be a formed under the Mello-Roos Community Facilities Act of 1982, California Government Code Section 53311-53368.3.

Community Services District

A Community Services District (CSD), or similar entity, may also be established to provide and fund services within PVSP. The CSD, if formed, will be administered by a locally elected board of directors and will employ professional management, staff and outside assistance as required to offer the necessary range of services to the PVSP community. The CSD will be a multi-service special district that will be formed under the Community Services District Law, California Government Code Section 61000 et seq.

9.5.3 Mitigation Monitoring

A summary of conditions of project approval will be prepared to mitigate or avoid significant effects on the environment. An approved Mitigation Monitoring Program will be established so that the Paradise Valley Specific Plan complies with all applicable environmental mitigation and permit requirements. The final approved Mitigation Monitoring program shall be established upon EIR certification.

9.6 Environmental Review

Environmental assessments shall be required for applications for development projects within the Paradise Valley Specific Plan to the extent required under the California Environmental Quality Act. Residential projects undertaken pursuant to and in conformity to the Paradise Valley Specific Plan

may be exempt from further environmental review if such projects meet the requirements of California Government Code Section 65457 and CEQA Guidelines Section 15182.

9.7 Affordable Housing

The Paradise Valley Specific Plan will provide five (5) percent of the total dwelling units as affordable to lower and moderate income households, or a total of 425 units, assuming the project is built out to the maximum of 8,490 units, as outlined in Table 2. Specifically:

Moderate Income Units: Housing units affordable to moderate income households will be provided primarily in the multi-family and small-lot single-family for-sale components of the Specific Plan. A total of 382 for-sale units will be made available at prices affordable to moderate income households.

Very Low Income Units: Housing units affordable to very low income households will be provided in the rental housing component of the Specific Plan. A total of 43 units of the rental housing component will be made available at rents affordable to very low income households.

Target Households

The Paradise Valley Affordable Housing Program targets the following income groups, consistent with the State Housing Element law:

- "Very low income households" means households defined in Section 50105 of the Health and Safety Code, as may be amended.
- "Lower income households" means households defined in Section 50079.5 of the Health and Safety Code, as may be amended.
- "Moderate income households" means persons and families defined in Section 50093 of the Health and Safety Code, as may be amended.

TABLE 9-3 AFFORDABLE HOUSING

Income Group	Income Definition	Affordable Housing Costs			
		Ownership Housing		Rental Housing	
		% Income Spent on Housing	Income Limit	% Income Spent on Housing	Income Limit
Very Low	0-50% AMI	30%	50% of AMI	30%	50% of AMI
Low	51-80% AMI	30%	70% of AMI	30%	60% of AMI
Moderate	81-120% AMI	35%	110% of AMI	30%	110% of AMI

AMI = Area Median Income

Source: Section 50052.5, Health and Safety Code

Pursuant to State law, income eligibility will be determined as a percentage of the Area Median Income for the metropolitan area (Riverside County), as published by the State Department of Housing and Community Development (Health & Safety Code Section 50093(c)).

Affordable Housing Costs

Affordable housing costs are based on standards established in Sections 50052.5 and 50053 of the Health and Safety Code (Table 9-3). Affordable housing costs include reasonable allowance for utilities and based on underwriting standards of mortgage financing.

Affordable Units

The proposed affordable units will be made available based on a percentage of the estimated residential units for the proposed product types as allocated within the development phases.

It is the intent of the master developer to avoid concentration of affordable housing in any one location or development phase of Paradise Valley. Specific locations, types, and occupancy will be included in the Affordable Housing Implementation Program (AHIP) to be submitted to the County with the first increment of development and updated with subsequent development increments.

Phasing of Affordable Units

TABLE 9-4 PHASING OF AFFORDABLE UNITS

Number of Building Permits Issued	Number of Affordable Units in Each Phase	Cumulative Affordable Units Provided in Master Plan
No more than 2,500 Units	100 Units	100 Units
No more than 5,000 Units	150 Units	250 Units
No more than 7,500 Units	150 Units	400 Units
Buildout at 8,490 Units	25 Units	425 Units

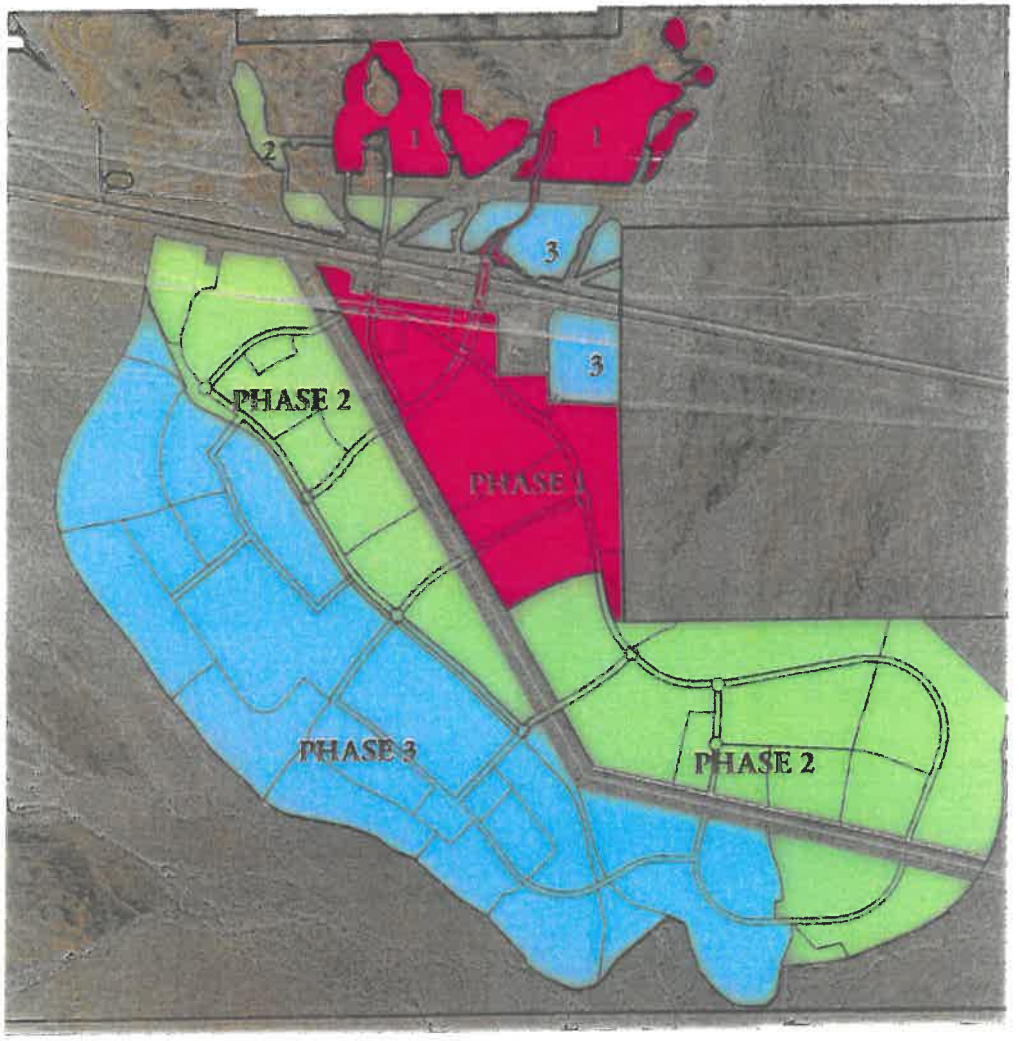
The different phases of the Specific Plan do not represent the exact sequence of developing the various subareas. It is the intent of the master developer to provide the affordable units concurrent with the overall development of the Specific Plan. To the extent feasible, the number of affordable units to be provided will adhere to the following schedule:

Alternatives to Providing Affordable Units

The affordable housing requirements may be satisfied with alternative mechanisms. These may include:

- Units off site
- Land donation to the County or a County-approved affordable housing development for the construction of affordable units
- Payment of in-lieu fees under a County approved in-lie fee program

The master developer will specify the method of satisfying the affordable housing requirements in the AHIP.



Note: All phases are market-driven, can be implemented over time and are subject to change. One or more phases, or portion thereof, may be developed concurrently. The phasing shown is intended for illustrative purposes only.

EXHIBIT 9-1 PHASING PLAN

DPFG
DEVELOPMENT PLANNING & FINANCING GROUP, INC.

DRAFT

Memorandum

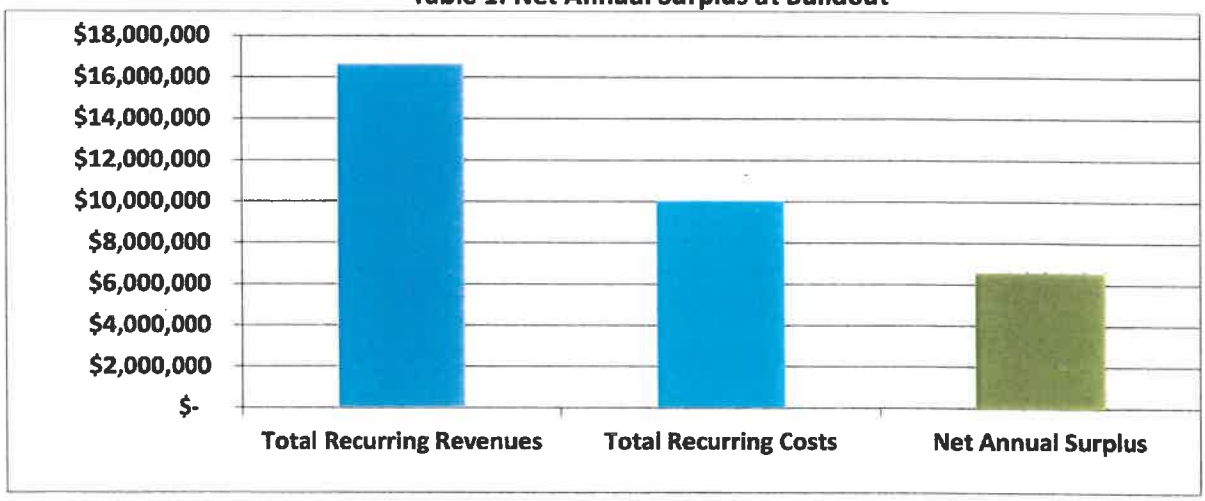
To:	Specific Plan No. 00339 (Paradise Valley) File
From:	DPFG
Date:	February 15, 2017 Discussion Draft
Subject:	February 2017 FIA

Introduction and Conclusions

The February 2017 FIA was prepared in accordance with the general methodologies outlined in the County FIA Guidelines to Preparing Fiscal Impact Reports ("County FIA Guidelines"), dated January 1995. The February 2017 FIA examines the financial impact the Project will have on the County's general fund ("General Fund"), fire fund ("Fire Fund"), library fund ("Library Fund"), and transportation fund ("Transportation Fund"). The Project will generate additional income for the General Fund primarily through increased property taxes, sales taxes, and transient occupancy taxes, while increasing the need for County services such as police, fire, and health and sanitation.

Based on the assumptions and calculations detailed in the attached February 2017 FIA, the Project is expected to yield a new net annual surplus at buildout of approximately $6.6 million (see Exhibit A, Table 1).

Table 1: Net Annual Surplus at Buildout



The Draft FIA is based on the following key assumptions:

- Per the County FIA Guidelines, the methodology used to determine the allocable revenue and cost impacts to County Funds as a result of the Project's development is a combination of case study methods and multiplier methods
- County Budget: Riverside County 2015-16 Recommended Budget
- Fire Phasing Analysis is based on draft fire conditions
- General Fund revenues are assumed to be transferred at various times to the Fire Fund and Transportation Fund

The FIA is organized as follows:

- Exhibit A – Fiscal Impact Analysis at buildout
- Exhibit B – Fire and Transportation Funds Phasing Analysis
- Exhibit C – Phasing Analysis

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Paradise Valley
February 15, 2017

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Exhibit A - Fiscal Impact Analysis
Table 1 - Riverside County Fiscal Impact Analysis Summary
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I. Fiscal Impact to General Fund	Table Ref.	Per Unit	Buildout	Percent of Total
A. Financing Sources				
Property Tax	4	$ 582	$ 4,937,557	43.1%
Property Tax In-Lieu of Sales-Tax	4	-	-	0.0%
Documentary Transfer Tax	4	63	533,863	4.7%
Property Tax In-Lieu of MVLF	5	367	3,112,791	27.2%
On-Site Retail Sales and Use Tax	5	128	1,085,275	9.5%
Off-Site Retail Sales and Use Tax	5	-	-	0.0%
Transient Occupancy Tax	5	159	1,352,644	11.8%
Interest Earnings	5	9	74,091	0.6%
Other Discretionary Revenue	6	42	355,711	3.1%
Total Financing Sources		$ 1,349	$ 11,451,931	100.0%
B. Financing Requirements				
General Financing Requirements	8	$ 64	$ 547,469	9.6%
Public Protection				
Judicial	8	27	226,507	4.0%
Police Protection	9	285	2,416,270	42.5%
Detention and Correction	8	61	519,304	9.1%
Fire Protection (Transfers to the Fire Fund)	10	72	609,039	10.7%
Protection/Inspection	8	0	2,731	0.0%
Other Protection	8	20	170,625	3.0%
Transfers to the Transportation Fund	12	59	503,275	8.8%
Public Ways & Facilities	8	-	-	0.0%
Health and Sanitation	8	77	652,211	11.5%
Public Assistance	8	4	36,769	0.6%
Education	8	0	4,183	0.1%
Recreation & Cultural Services	8	0	500	0.0%
Debt Service	8	-	-	0.0%
Total Financing Requirements		$ 670	$ 5,688,883	100.0%
Net Annual Surplus / (Deficit)		**$ 679**	**$ 5,763,048**	
II. Fiscal Impact to Fire Fund				
A. Financing Sources (a)	10	$ 412	$ 3,500,000	
B. Financing Requirements	10	412	3,500,000	
Net Annual Surplus / (Deficit)		**$ -**	**$ -**	
III. Fiscal Impact to Library Fund				
A. Financing Sources	11	$ 59	$ 502,177	
B. Financing Requirements	11	18	156,935	
Net Annual Surplus / (Deficit)		**$ 41**	**$ 345,242**	
IV. Fiscal Impact to Transportation Fund				
A. Financing Sources	12	$ 85	$ 721,834	
B. Financing Requirements	12	85	721,834	
Net Annual Surplus / (Deficit)		**$ -**	**$ -**	
V. Net Fiscal Impact of Project				
A. Financing Sources		$ 1,905	$ 16,175,942	
B. Financing Requirements		1,186	10,067,652	
Net Annual Surplus / (Deficit)		**$ 719**	**$ 6,108,291**	
VI. Net Fiscal Impact of Project with Measure A Sales Tax				
A. Financing Sources		$ 1,963	$ 16,667,017	
B. Financing Requirements		1,186	10,067,652	
Net Annual Surplus / (Deficit)		**$ 777**	**$ 6,599,366**	

Footnotes:

(a) Assumes additional financing sources generated from CSA/CFD.

Exhibit A - Fiscal Impact Analysis
Table 2 - Riverside County Post-ERAF Share of the Basic Tax Calculation
Paradise Valley
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Agency (b)	Tax Rate Area (a) 058-002	Tax Rate Area (a) 058-011	Weighted Average (c)
General	**14.0181%**	**14.3133%**	**14.0253%**
County Free Library	**1.4305%**	**1.4606%**	**1.4312%**
County Structure Fire Protection	**5.8484%**	**5.9716%**	**5.8514%**
Supervisorial Road District 4	1.0005%	1.0216%	1.0010%
Coachella Valley Unified School	46.4394%	47.4176%	46.4634%
Desert Community College	7.4951%	7.6530%	7.4990%
Riv. Co. Office Of Education	4.0777%	4.1636%	4.0798%
Riv Co Reg Park & Open Space	0.3460%	0.3533%	0.3462%
Coachella Valley Public Cemetery	0.2289%	0.2338%	0.2290%
Cv Mosq & Vector Control	0.9734%	0.9939%	0.9739%
Coachella Valley Rec & Park	1.1785%	0.0000%	1.1496%
Coachella Valley Resource Conserv	0.0349%	0.0357%	0.0350%
Educational Revenue Augmentation Fund	16.9285%	16.3820%	16.9151%
Total	**1.0000%**	**1.0000%**	**1.0000%**
Acres (d)	1,460.92	36.70	1,497.62
% of Total	97.55%	2.45%	100.00%

Footnotes:

Source: FY 2014-15 Property Tax Share per Riverside County Auditor-Controller's Office, Property Tax Division.

(a) In additional to other ad valorem charges imposed by various local agencies, land owners in California are required to pay annual property taxes of 1% on the assessed value of their property pursuant to Proposition 13. Each County in California is divided into tax rate areas ("TRA"). After the basic 1% property tax is collected by the county, the tax is allocated to various local agencies based on each agency's share of the basic tax within the property's applicable TRA. This exhibit shows the share of the basic tax applicable to both of the TRAs applicable to the Project.

(b) Shares of the basic tax that are received by the County for each tax rate area are highlighted in bold print.

(c) For purposes of the analysis, the weighted average tax rates were calculated based on the acreage of the TRAs within the Project.

(d) Acres based on total acreage of parcels that include a portion of the development planned for Phase I. Parcel acreage was not adjusted to remove parcel area that overlaps with undeveloped areas and subsequent phases of development.

Exhibit A - Fiscal Impact Analysis
Table 3 - Riverside County Land Use and Absorption Assumptions
Paradise Valley
February 15, 2017

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Description	PA	Base Price	Measure	Total Units/ Sq. Ft.	Absorption (Units/Sq. Ft) (a) Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12
(a)	(a)	(a)		(a)												
RESIDENTIAL LAND USE																
Village 1 (Town Center)																
TOWNS	1-1	$ 349,066	per Unit	92	50	42										
Stacked flats HHDR	1-3	271,999	per Unit	211	50	50	50	50	11							
Stacked flats	1-4	305,999	per Unit	413	50	50	50	50	50	50	50	50	13			
55'x100'	1-6	504,332	per Unit	114	50	50	14									
50'X70'	1-7	356,432	per Unit	88		50	38									
45'X80'	1-7	362,666	per Unit	67	50	17										
45'X80'	1-7	362,686	per Unit	59		33	26									
55'X100'	1-8	504,332	per Unit	66			36	30								
60'X100'	1-8	509,999	per Unit	70	50	20										
Village 2 (Town Center West)																
60'X100'	2-1	509,999	per Unit	77		30	47									
50x100	2-2	473,732	per Unit	92			50	42								
45x80	2-2	362,686	per Unit	100			24	50	26							
50'x100	2-2	473,732	per Unit	89					32	50	7					
50'x100	2-4	473,732	per Unit	118			50	50	18							
Duplex	2-4	344,532	per Unit	129			50	50	29							
40'X62'	2-5	314,499	per Unit	122			50	50	22							
Stacked flats	2-6	226,686	per Unit	420			50	50	50	50	50	50	50	50	20	
Triplex-adult	2-7	301,466	per Unit	60			50	10								
Triplex-adult	2-7	301,466	per Unit	130				40	50	40						
45X100	2-9	387,599	per Unit	172			50	50	50	22						
Village 3 (Casa Activie Adult)																
MIXED USE HHDR	3-1	271,999	per Unit	418							75	75	75	75	75	43
DUPLEX	3-2	275,399	per Unit	46							46					
DUPLEX	3-2	275,399	per Unit	101								50	51			
65x110	3-3	456,165	per Unit	86							50	36				
75x100	3-3	515,665	per Unit	74								50	24			
65x110	3-3	456,165	per Unit	73								23	50			
DUPLEX	3-4	275,399	per Unit	114										50	50	14
50x90	3-5	362,666	per Unit	90							50	40				
50x70	3-5	396,666	per Unit	97								50	47			
DUPLEX	3-5	275,399	per Unit	146										50	50	46
40X90	3-5	335,466	per Unit	92									42	50		
50x90	3-5	362,666	per Unit	94									50	44		
40x90	3-5	335,466	per Unit	116							50	50	16			
75x100	3-6	515,665	per Unit	100									26	24	50	
85x115	3-6	632,398	per Unit	51									30	21		
85x115	3-7	632,398	per Unit	51										11	40	
75x100	3-7	515,665	per Unit	102										26	40	36
Village 4 (North Village)																
Duplex-Adult	4-1	344,532	per Unit	97					50	47						
Duplex-Adult	4-1	344,532	per Unit	56							56					
40X90	4-2	356,999	per Unit	74					50	24						
50x100	4-2	473,732	per Unit	116					50	50	16					
Duplex-Family	4-3	335,466	per Unit	66						50	16					
Duplex	4-3	453,332	per Unit	51								51				
Standard Lot (60' X 100')	4-4	509,999	per Unit	107						40	40	27				
Standard Lot (70' X 100')	4-4	589,048	per Unit	66						40	26					
Duplex-Family	4-5	335,466	per Unit	38					38							
Triplex Adult	4-6	301,466	per Unit	84					40	44						
45x80	4-7	362,666	per Unit	40					40							
45x80	4-7	362,666	per Unit	56						56						
Duplex-Family	4-8	335,466	per Unit	51						34	17					
Duplex-Family	4-8	335,466	per Unit	41							30	11				

Exhibit A - Fiscal Impact Analysis
Table 3 - Riverside County Land Use and Absorption Assumptions
Paradise Valley
February 15, 2017

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Description	PA	Base Price	Measure	Total Units/ Sq. Ft.	Absorption (Units/Sq. Ft) (a) Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12
Village 5 (East Village)																
Duplex Family	5-1	335,466	per Unit	191									50	50	50	41
40 x 100	5-1	362,666	per Unit	134										50	50	
70X100	5-3	589,048	per Unit	81									40	41		
85X115	5-3	632,398	per Unit	46									46			
45X100	5-4	387,599	per Unit	172										50	50	50
50X70	5-6	356,432	per Unit	207									50	50	50	57
50X90	5-7	447,665	per Unit	109											50	59
55X100	5-8	504,332	per Unit	121										50	50	21
60X100	5-8	509,999	per Unit	162									50	50	50	12
55X100	5-8	515,665	per Unit	98									30	40	28	
55X100	5-9	504,332	per Unit	139											39	50
70X100	5-9	589,048	per Unit	88										40	40	8
50X100	5-10	473,732	per Unit	140											50	50
55X100	5-10	515,665	per Unit	56											16	40
40X90	5-10	368,332	per Unit	86											50	36
70X100	5-11	611,998	per Unit	156										40	40	40
Village 6 (South Village)																
50X70	6-1	356,432	per Unit	156											50	50
50x90	6-1	447,665	per Unit	62											50	12
40X90	6-1	356,999	per Unit	90											50	40
40X90	6-1	368,332	per Unit	55												30
50x90	6-1	447,665	per Unit	97												39
40X90	6-1	356,999	per Unit	70												40
75x100	6-3	611,998	per Unit	87											30	30
75x100	6-4	515,665	per Unit	30												
65x110	6-4	456,165	per Unit	36											36	
65x110	6-5	456,165	per Unit	85												40
duplex-family	6-6	335,466	per Unit	143											50	50
50X100	6-7	473,732	per Unit	44												
85X115	6-8	632,398	per Unit	86											30	30
TOTAL RESIDENTIAL		**$ 395,121**		**8,490**	**300**	**342**	**635**	**522**	**606**	**597**	**579**	**563**	**740**	**862**	**1,234**	**964**
		Value per Sq. Ft. (a)														
NON-RESIDENTIAL LAND USE																
Office		$ 296	per Sq. Ft.	450,323	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640
Retail		$ 231	per Sq. Ft.	441,687	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976
Light Industrial		$ 193	per Sq. Ft.	106,380	-	-	-	-	-	13,298	13,298	13,298	13,298	13,298	13,298	13,298
Subtotal Office/Retail		256		998,390	68,616	68,616	68,616	68,616	68,616	81,914	81,914	81,914	81,914	81,914	81,914	81,914
Hotel - Business (Limited Service)	(e)	$ 95,000	per room	100	-	-	-	-	100	-	-	-	-	-	-	-
Hotel - Resort	(e)	$ 200,000	per room	300	-	-	-	-	-	-	-	-	-	300	-	-
Schools		-	per Sq. Ft.	-	-	-	-	-	-	-	-	-	-	-	-	-
Other	(d)	-	per Sq. Ft.	-	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal Hotel/School/Other				400	-	-	-	-	100	-	-	-	-	300	-	-
TOTAL NON-RESIDENTIAL				**998,390**	**68,616**	**68,616**	**68,616**	**68,616**	**68,616**	**81,914**	**81,914**	**81,914**	**81,914**	**81,914**	**81,914**	**81,914**

LAND USE OVERVIEW		
Residents	15,724	
Employees:		
Office/Retail/Light Industrial	3,634	
Occupancy Rate	95%	(d)
Subtotal	3,452	
Hotel/School/Other	1,260	
Total Employees	4,712	(d)
Equivalent Residents (Residents & 50% Employees)	18,080	

Footnotes:

(a) Per information provided by Glorious Land Company, LLC and its consultants.

(b) PPH per The Natelson Dale Group's demographic analysis. TNDG analysis indicates 31% of total units to be seasonal units at 50% occupancy. Estimated PPH of 2.19 for full time units. Blended PPH calculated as weighted average of seasonal and full time units.

(c) Per The Natelson Dale Group, Analysis of Onsite Employment Potentials, dated April 19, 2016.

(d) Employment calculations assume that retail, light industrial, and office space will have a stabilized occupancy rate of 95%. Employment also includes 335 hotel employees, 497 school employees and 428 employment activities not tied to permanent commercial/institutional locations. Calculations per The Natelson Dale Group, Analysis of Onsite Employment Potentials, dated April 19, 2016.

(e) Per DPFG database of fiscal impact studies.

(f) For purposes of this analysis, we have not assumed an assessed value for employment activities not tied to permanent commercial/institutional locations. We have also assumed that schools are exempt from the payment of property taxes.

Exhibit A - Fiscal Impact Analysis
Table 3 - Riverside County Land Use and Absorption Assumptions
Paradise Valley
February 15, 2017

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Description	PA	Base Price	Measure	Total Units/ Sq. Ft.	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Assessed Value	Persons per Household	Residents/ Employees
(a)	(a)	(a)		(a)											(b)	
RESIDENTIAL LAND USE																
Village 1 (Town Center)																
TOWNS	1-1	$ 349,066	per Unit	92										$ 32,114,072	1.85	170
Stacked flats HHDR	1-3	271,999	per Unit	211										57,391,789	1.85	391
Stacked flats	1-4	305,999	per Unit	413										126,377,587	1.85	765
55'x100'	1-6	504,332	per Unit	114										57,493,848	1.85	211
50'X70'	1-7	356,432	per Unit	88										31,366,016	1.85	163
45'X80'	1-7	362,666	per Unit	67										24,298,622	1.85	124
45'X80'	1-7	362,686	per Unit	59										21,398,474	1.85	109
55'X100'	1-8	504,332	per Unit	66										33,285,912	1.85	122
60'X100'	1-8	509,999	per Unit	70										35,699,930	1.85	130
Village 2 (Town Center West)																
60'X100'	2-1	509,999	per Unit	77										39,269,923	1.85	143
50x100	2-2	473,732	per Unit	92										43,583,344	1.85	170
45x80	2-2	362,686	per Unit	100										36,268,600	1.85	185
50'x100	2-2	473,732	per Unit	89										42,162,148	1.85	165
50'x100	2-4	473,732	per Unit	118										55,900,376	1.85	219
Duplex	2-4	344,532	per Unit	129										44,444,628	1.85	239
40'X62'	2-5	314,499	per Unit	122										38,368,878	1.85	226
Stacked flats	2-6	226,686	per Unit	420										95,208,120	1.85	778
Triplex-adult	2-7	301,466	per Unit	60										18,087,960	1.85	111
Triplex-adult	2-7	301,466	per Unit	130										39,190,580	1.85	241
45X100	2-9	387,599	per Unit	172										66,667,028	1.85	319
Village 3 (Casa Activie Adult)																
MIXED USE HHDR	3-1	271,999	per Unit	418										113,695,582	1.85	774
DUPLEX	3-2	275,399	per Unit	46										12,668,354	1.85	85
DUPLEX	3-2	275,399	per Unit	101										27,815,299	1.85	187
65x110	3-3	456,165	per Unit	86										39,230,190	1.85	159
75x100	3-3	515,665	per Unit	74										38,159,210	1.85	137
65x110	3-3	456,165	per Unit	73										33,300,045	1.85	135
DUPLEX	3-4	275,399	per Unit	114										31,395,486	1.85	211
50x90	3-5	362,666	per Unit	90										32,639,940	1.85	167
50x70	3-5	396,666	per Unit	97										38,476,602	1.85	180
DUPLEX	3-5	275,399	per Unit	146										40,208,254	1.85	270
40X90	3-5	335,466	per Unit	92										30,862,872	1.85	170
50x90	3-5	362,666	per Unit	94										34,090,604	1.85	174
40x90	3-5	335,466	per Unit	116										38,914,056	1.85	215
75x100	3-6	515,665	per Unit	100										51,566,500	1.85	185
85x115	3-6	632,398	per Unit	51										32,252,298	1.85	94
85x115	3-7	632,398	per Unit	51										32,252,298	1.85	94
75x100	3-7	515,665	per Unit	102										52,597,830	1.85	189
Village 4 (North Village)																
Duplex-Adult	4-1	344,532	per Unit	97										33,419,604	1.85	180
Duplex-Adult	4-1	344,532	per Unit	56										19,293,792	1.85	104
40X90	4-2	356,999	per Unit	74										26,417,926	1.85	137
50x100	4-2	473,732	per Unit	116										54,952,912	1.85	215
Duplex-Family	4-3	335,466	per Unit	66										22,140,756	1.85	122
Duplex	4-3	453,332	per Unit	51										23,119,932	1.85	94
Standard Lot (60' X 100')	4-4	509,999	per Unit	107										54,569,893	1.85	198
Standard Lot (70' X 100')	4-4	589,048	per Unit	66										38,877,168	1.85	122
Duplex-Family	4-5	335,466	per Unit	38										12,747,708	1.85	70
Triplex Adult	4-6	301,466	per Unit	84										25,323,144	1.85	156
45x80	4-7	362,666	per Unit	40										14,506,640	1.85	74
45x80	4-7	362,666	per Unit	56										20,309,296	1.85	104
Duplex-Family	4-8	335,466	per Unit	51										17,108,766	1.85	94
Duplex-Family	4-8	335,466	per Unit	41										13,754,106	1.85	76

Exhibit A - Fiscal Impact Analysis
Table 3 - Riverside County Land Use and Absorption Assumptions
Paradise Valley
February 15, 2017

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Description	PA	Base Price	Measure	Total Units/ Sq. Ft.	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Assessed Value	Persons per Household	Residents/ Employees
Village 5 (East Village)																
Duplex Family	5-1	335,466	per Unit	191										64,074,006	1.85	354
40 x 100	5-1	362,666	per Unit	134	34									48,597,244	1.85	248
70X100	5-3	589,048	per Unit	81										47,712,888	1.85	150
85X115	5-3	632,398	per Unit	46										29,090,308	1.85	85
45X100	5-4	387,599	per Unit	172	22									66,667,028	1.85	319
50X70	5-6	356,432	per Unit	207										73,781,424	1.85	383
50X90	5-7	447,665	per Unit	109										48,795,485	1.85	202
55X100	5-8	504,332	per Unit	121										61,024,172	1.85	224
60X100	5-8	509,999	per Unit	162										82,619,838	1.85	300
55X100	5-8	515,665	per Unit	98										50,535,170	1.85	182
55X100	5-9	504,332	per Unit	139	50									70,102,148	1.85	257
70X100	5-9	589,048	per Unit	88										51,836,224	1.85	163
50X100	5-10	473,732	per Unit	140	40									66,322,480	1.85	259
55X100	5-10	515,665	per Unit	56										28,877,240	1.85	104
40X90	5-10	368,332	per Unit	86										31,676,552	1.85	159
70X100	5-11	611,998	per Unit	156	36									95,471,688	1.85	289
Village 6 (South Village)																
50X70	6-1	356,432	per Unit	156	56									55,603,392	1.85	289
50x90	6-1	447,665	per Unit	62										27,755,230	1.85	115
40X90	6-1	356,999	per Unit	90										32,129,910	1.85	167
40X90	6-1	368,332	per Unit	55	25									20,258,260	1.85	102
50x90	6-1	447,665	per Unit	97	58									43,423,505	1.85	180
40X90	6-1	356,999	per Unit	70	30									24,989,930	1.85	130
75x100	6-3	611,998	per Unit	87	27									53,243,826	1.85	161
75x100	6-4	515,665	per Unit	30	30									15,469,950	1.85	56
65x110	6-4	456,165	per Unit	36										16,421,940	1.85	67
65x110	6-5	456,165	per Unit	65	25									29,650,725	1.85	120
duplex-family	6-6	335,466	per Unit	143	43									47,971,638	1.85	265
50X100	6-7	473,732	per Unit	44	44									20,844,208	1.85	81
85X115	6-8	632,398	per Unit	86	26									54,386,228	1.85	159
TOTAL RESIDENTIAL		**$ 395,121**		**8,490**	**546**	-	-	-	-	-	-	-	-	**$ 3,364,577,535**		**15,724**

NON-RESIDENTIAL LAND USE		Value per Sq. Ft. (a)													Sq. Ft./room per Employee (c)	
Office		$ 296	per Sq. Ft.	450,323	34,640	-	-	-	-	-	-	-	-	133,295,608	175	2,573
Retail		$ 231	per Sq. Ft.	441,687	33,976	-	-	-	-	-	-	-	-	102,029,697	500	883
Light Industrial		$ 193	per Sq. Ft.	106,380	13,298	-	-	-	-	-	-	-	-	20,531,340	600	177
Subtotal Office/Retail		256		998,390	81,914	-	-	-	-	-	-	-	-	255,856,645	275	3,634
Hotel - Business (Limited Service)	(e)	$ 95,000	per room	100	-	-	-	-	-	-	-	-	-	9,500,000	0.35	35
Hotel - Resort	(e)	$ 200,000	per room	300	-	-	-	-	-	-	-	-	-	60,000,000	1	300
Schools		-	per Sq. Ft.	-	-	-	-	-	-	-	-	-	-	(f)	-	497
Other	(d)	-	per Sq. Ft.	-	-	-	-	-	-	-	-	-	-	(f)	-	428
Subtotal Hotel/School/Other				400	-	-	-	-	-	-	-	-	-	69,500,000	1	1,260
TOTAL NON-RESIDENTIAL				**998,390**	**81,914**	-	-	-	-	-	-	-	-	**$ 325,356,645**		**4,894**

LAND USE OVERVIEW		
Residents	15,724	
Employees:		
Office/Retail/Light Industrial	3,634	
Occupancy Rate	95%	(d)
Subtotal	3,452	
Hotel/School/Other	1,260	
Total Employees	4,712	(d)
Equivalent Residents (Residents & 50% Employees)	18,080	

Footnotes:
(a) Per information provided by Glorious Land Company, LLC and its consultants.
(b) PPH per The Natelson Dale Group's demographic analysis. TNDG analysis indicates 31 weighted average of seasonal and full time units.
(c) Per The Natelson Dale Group, Analysis of Onsite Employment Potentials, dated April 19
(d) Employment calculations assume that retail, light industrial, and office space will have a activities not tied to permanent commercial/institutional locations. Calculations per The N
(e) Per DPFG database of fiscal impact studies.
(f) For purposes of this analysis, we have not assumed an assessed value for employment schools are exempt from the payment of property taxes.

Exhibit A - Fiscal Impact Analysis
Table 4 - Riverside County Property Tax and Documentary Transfer Tax Calculations
Paradise Valley
February 15, 2017

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	Table Ref.		
I. Property Tax			
Residential Property Tax			
Total Residential Assessed Value Adjusted for Deflation Factor of 0.41% (See Exhibit C) (a)		$	3,181,779,482
Basic Rate			1.000%
Basic Tax Paid		$	31,817,795
County General Fund Share of Basic Tax	2		14.0253%
Total Residential Property Tax		**$**	**4,462,540**
Non-Residential Property Tax			
Secured Property Tax			
Total Non-Residential Assessed Value Adjusted for Deflation Factor of 0.41% (See Exhibit C) (a)		$	307,896,313
Basic Rate			1.000%
Basic Tax Paid		$	3,078,963
County General Fund Share of Basic Tax	2		14.02530%
Total Secured Property Tax		**$**	**431,834**
Unsecured Property Tax			
Non-Residential Unsecured Property Tax as a % of Secured			10%
Total Unsecured Property Tax		**$**	**43,183**
Total Non-Residential Property Tax		**$**	**475,017**
Total County General Fund Share of the Basic Tax		**$**	**4,937,557**
II. Property Tax In-Lieu of Sales-Tax			
Add On-Site Sales Tax Redirected to Property Tax (b)	5	$	-
Add Off-Site Sales Tax Redirected to Property Tax (b)	5		-
Total Property Tax In-Lieu of Sales Tax		**$**	**-**
III. Documentary Transfer Tax			
Residential Documentary Transfer Tax			
Residential Turnover Rate (c)			14%
Total Residential Assessed Value Adjusted for Deflation Factor of 0.41% (See Exhibit C) (a)		$	3,181,779,482
Value of Annual Turnover		$	454,539,926
Transfer Tax Rate (d)			0.1100%
Total Residential Documentary Transfer Tax		**$**	**499,994**
Non-Residential Documentary Transfer Tax			
Non-Residential Turnover Rate (c)			10%
Total Non-Residential Assessed Value Adjusted for Deflation Factor of 0.41% (See Exhibit C) (a)		$	307,896,313
Value of Annual Turnover		$	30,789,631
Transfer Tax Rate (d)			0.1100%
Total Non-Residential Documentary Transfer Tax		**$**	**33,869**
Total Documentary Transfer Tax		**$**	**533,863**

Footnotes:

(a) This analysis assumes an annual assessed value deflation factor of 0.41% (Calculated by subtracting the 2% limit on annual increases in assessed value imposed by Proposition 13 from the historical average U.S. inflation rate from 1993 through 2014 of 2.41%, per InflationData.com).

(b) Project is assumed to be developed after termination of the triple flip on January 1, 2016.

(c) Assumes residential property is sold approximately every 7 years and non-residential property is sold approximately every 10 years.

(d) The County may levy a transfer tax at the rate of $0.55 for each $500 of assessed value. A City within the County that levies this tax can levy a transfer tax at a rate of $0.55 per $1,000. If both the County and City levy the transfer tax, a credit shall be allowed against the amount imposed by the County in the amount of tax that is imposed by the City per California Revenue and Taxation Code 11911.

Exhibit A - Fiscal Impact Analysis
Table 5 (Page 1 of 2) - Riverside County Sales and Use Tax, Interest Earnings & MVLF Calculations
Paradise Valley
February 15, 2017

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I. On-Site Sales and Use Tax	Table Ref.	Sq. Ft.	Taxable Sales per Sq. Ft.	% of Sq. Ft./ Acres Generating Taxable Sales	Total Taxable Sales
Taxable Sales				(c)	
Office	3	450,323	-	0%	-
Retail	3	441,687	(b) 200	100%	88,337,400
Light Industrial	3	106,380	-	0%	-
Schools	3	-	-	0%	-
Other	3	-	-	0%	-
Non-Residential Direct Taxable Sales		998,390			88,337,400

	Available Rooms	Revenue per Room	Adjustment % Factor	Adjusted Revenue per Room	Total Taxable Sales
	[1]			[2]	[1] x [2]
Hotel - Business (Limited Service) (p)					
Other Operated Departments Revenue (l)	100	383	74.95%	287	28,705
Rentals and Other Income (l)	100	118	74.95%	88	8,844
Subtotal		$ 501		$ 375	37,549
Hotel - Resort					
Food and Beverage Revenue (o)	300	$ 39,095	60.02%	$ 23,464	7,039,256
Other Operated Departments Revenue (o)	300	12,410	60.02%	7,448	2,234,485
Rentals and Other Income	300	3,145	60.02%	1,888	566,273
Subtotal		$ 54,650		$ 32,800	9,840,014
Total Direct Taxable Sales					$ 98,214,964
Project On-Site Sales and Use Tax to County					
Sales Tax (@ 1.00% of Taxable Sales)				1.00%	$ 982,150
Use Tax (@ 10.5% of Sales Tax)				10.50%	103,126
Total On-Site Sales and Use Tax					$ 1,085,275
Less 0.25% Reclassified to Property Taxes (g)				0.00%	-
Net On-Site Sales and Use Tax					$ 1,085,275

II. Off-Site Sales and Use Tax from Residential		
Total Residential AV Adj. for Deflation Factor of 0.41% (See Table 4 and Exhibit C)		$ 3,181,779,482
Household Income (@ 25% of Assessed Valuation) (d)	25.0%	795,444,870
Retail Taxable Sales (@ 32% of Household Income) (e)	32.0%	254,542,359
Projected Off-Site Taxable Sales (@ 0% of Retail Taxable Sales) (f)	0.0%	-
Sales Tax (@ 1.00% of Taxable Sales)	1.00%	$ -
Use Tax (@ 10.5% of Sales Tax)	10.50%	-
Total Off-Site Sales and Use Tax		$ -
Less 0.25% Reclassified to Property Taxes (g)	0.00%	-
Net Off-Site Sales and Use Tax		$ -

III. Transient Occupancy Tax ("TOT")	Available Rooms	Annual Rooms Available	Average Occupancy Rate	Average Room Rate	Hotel Rental Revenue
			(n)	(n)	
Hotel - Business					
Hotel - Business Rental Revenue Subject to TOT	100	36,500	58.0%	$ 87	1,831,840
Transient Occupancy Tax Rate (m)					10.0%
					$ 183,184
Hotel - Resort					
Hotel - Resort Revenue Subject to TOT	300	109,500	60.0%	$ 178	11,694,600
Transient Occupancy Tax Rate (m)					10.0%
					$ 1,169,460
Total/ Weighted Average	400	146,000	59.5%	$ 155	
Total Transient Occupancy Tax Revenue					$ 1,352,644

Footnotes:
(a) Not used.
(b) Source: DPFG estimate based on peer review comments on other Riverside County FIAs.
(c) Analysis assumes that 0% of light industrial and office space and 100% of retail space will provide products and services that generate sales tax revenue.
(d) Per County of Riverside Guide to Preparing Fiscal Impact Reports dated January 1995.
(e) Per U. S. Bureau of Labor Statistics Consumer Expenditure Survey, 2008 which indicates that retail taxable purchases represent approximately 32% of total household income for the average U.S. household.
(f) To be conservative and avoid potential double-counting of sales tax revenue, this analysis assumes that there will be no additional sales tax generated by project residents for the County of Riverside through taxable purchases made outside of the project area, but within Riverside County.
(g) Project is assumed to be developed after termination of the triple flip on January 1, 2016.
(h) Investment earnings, as specified in the Guide to Preparing Fiscal Impact Reports, are estimated using the historic average interest rate of the 90-day Treasury Bill. The analysis assumes a rate of 1.13%, the 10-year historic average interest rate from 2006 through 2015 of the 90-day Treasury Bill. In 1994, the Guide to Preparing Fiscal Impact Reports calculated a historic average interest rate of 6.98%.
(i) Per the Division of Accounting and Reporting at the California State Controller's Office.
(j) Per page 354 from the County of Riverside FY 2015-16 Recommended Budget.
(k) Per the County of Riverside Assessor County Clerk Recorder, Assessed Value Report FY 2015-16 (http://www.asrclkrec.com/QuickLinks/AnnualReports.aspx).
(l) Revenue per available room for limited service hotels in the Mountain and Pacific region per the 2014 USA Edition of Trends in the Hotel Industry prepared by PKF Hospitality Research. Amounts have been adjusted based on information from the Smith Travel Research ("STR") report.
(m) Per the County of Riverside Tax Collector, Transient Occupancy Tax form.
(n) Average occupancy rate and average room rate per Smith Travel Research ("STR") report.
(o) Revenue per available room for resort hotels in the Mountain and Pacific region per the 2014 USA Edition of Trends in the Hotel Industry prepared by PKF Hospitality Research. Amounts have been adjusted based on information from the Smith Travel Research ("STR") report.
(p) Per STR website, limited-service hotels have rooms-only operations, (i.e. without food and beverage service) or offer a bedroom and bathroom for the night, but very few other services and amenities. These hotels are often in the budget or economy group and do not report food and beverage revenue.

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IV. Interest Earnings	Table Ref.	
County Share of Residential and Non-Residential Property Tax	4	$ 4,937,557
Documentary Transfer Tax	4	533,863
Net Off-Site Sales and Use Tax		-
Net On-Site Sales and Use Tax		1,085,275
Total Revenue Generating Interest Earnings		**$ 6,556,695**
Interest Earnings @ 1.13% (h)		**$ 74,091**

V. Motor Vehicle License Fee ("MVLF")

A. Nominal Dollars

	FY 2004-05	FY2015-16		Change
Property Tax Vehicle License Fees (VLF)	$ (i) 128,200,332	$ (j) 220,920,864	[1]	$ 92,720,532.00
Assessed Valuation	(i) 138,771,615,256	(k) 242,716,731,251	[2]	103,945,115,995
VLF Increase per Assessed Valuation (AV) Increase			=[1]/[2]	0.000892
VLF Increase per $1,000,000 increase in AV			[3]	$ 892

B. Property Tax In-Lieu of Vehicle License Fee

Total Residential Assessed Value Adjusted for Deflation Factor of 0.45% (See Exhibit C)	[4]	$ 3,181,779,482
Total Non-Residential Assessed Value Adjusted for Deflation Factor of 0.45% (See Exhibit C)		307,896,313
Total Assessed Valuation (Table 3)		$ 3,489,675,795
Assessed Valuation / 1,000,000	[5]=[4]/1,000,000	3,490
VLF Increase per $1,000,000 Increase in AV	=[3]	892
Property Tax In-Lieu of Vehicle License Fee	=[3]*[5]	**$ 3,112,791**

Footnotes:

(a) Not used.
(b) Source: DPFG estimate based on peer review comments on other Riverside County FIAs.
(c) Analysis assumes that 0% of light industrial and office space and 100% of retail space will provide products and services that generate sales tax revenue.
(d) Per County of Riverside Guide to Preparing Fiscal Impact Reports dated January 1995.
(e) Per U. S. Bureau of Labor Statistics Consumer Expenditure Survey, 2008 which indicates that retail taxable purchases represent approximately 32% of total household income for the average U.S. household.
(f) To be conservative and avoid potential double-counting of sales tax revenue, this analysis assumes that there will be no additional sales tax generated by project residents for the County of Riverside through taxable purchases made outside of the project area, but within Riverside County.
(g) Project is assumed to be developed after termination of the triple flip on January 1, 2016.
(h) Investment earnings, as specified in the Guide to Preparing Fiscal Impact Reports, are estimated using the historic average interest rate of the 90-day Treasury Bill. The analysis assumes a rate of 1.13%, the 10-year historic average interest rate from 2006 through 2015 of the 90-day Treasury Bill. In 1994, the Guide to Preparing Fiscal Impact Reports calculated a historic average interest rate of 6.98%.
(i) Per the Division of Accounting and Reporting at the California State Controller's Office.
(j) Per page 354 from the County of Riverside FY 2015-16 Recommended Budget.
(k) Per the County of Riverside Assessor County Clerk Recorder, Assessed Value Report FY 2015-16 (http://www.asrclkrec.com/QuickLinks/AnnualReports.aspx).
(l) Revenue per available room for limited service hotels in the Mountain and Pacific region per the 2014 USA Edition of Trends in the Hotel Industry prepared by PKF Hospitality Research. Amounts have been adjusted based on information from the Smith Travel Research ("STR") report.
(m) Per the County of Riverside Tax Collector, Transient Occupancy Tax form.
(n) Average occupancy rate and average room rate per Smith Travel Research ("STR") report.
(o) Revenue per available room for resort hotels in the Mountain and Pacific region per the 2014 USA Edition of Trends in the Hotel Industry prepared by PKF Hospitality Research. Amounts have been adjusted based on information from the Smith Travel Research ("STR") report.
(p) Per STR website, limited-service hotels have rooms-only operations, (i.e. without food and beverage service) or offer a bedroom and bathroom for the night, but very few other services and amenities. These hotels are often in the budget or economy group and do not report food and beverage revenue.
(q) Per STR website, full-service hotels are generally mid-price, upscale or luxury hotels with a restaurant, lounge facilities and meeting space, and offer minimum service levels, often including bell service and room service. These hotels report food and beverage revenue.

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Exhibit A - Fiscal Impact Analysis
Table 6 - Riverside County Other General Fund Discretionary Revenue Calculations
Paradise Valley
February 15, 2017

Description	Page Ref.	FY 15/16 Budget (a)	County Equivalent Units (b)	Factor	Measurement (b)	Project Equivalent Units (c)	Financing Requirements
		[1]	[2]	[1]/[2]=[3]		[4]	[3]X[4]
General Fund Discretionary Revenue							
Property Tax							
Prop Tax Current Secured	33	$ 209,093,408			See Table 4		
Prop Tax Current Unsecured	33	8,325,622			See Table 4		
Prop Tax Prior Unsecured	33	750,000			See Table 4		
Prop Tax Current Supplemental	33	4,027,600	-	-	not used	-	-
Prop Tax Prior Supplemental	33	2,383,499	-	-	not used	-	-
Contractual Revenue	42	94,007,376	-	-	not used	-	-
Total Property Tax		$ 318,587,505		$ -			$ -
Sales & Use Taxes	33	$ 31,470,867			See Table 5		
Property Transfer Tax	33	$ 14,375,400			See Table 4		
Franchises	33	$ 4,145,413	412,123	$ 10.06	per service population, unincorporated only	18,080	$ 181,864
Fines and Penalties							
Fee-POC Transaction	34	$ 260,000	2,788,991	$ 0.09	per service population, entire county	18,080	$ 1,686
Fine-Traffic Motor Vehicle MC	34	1,191,306	412,123	2.89	per service population, unincorporated only	18,080	52,264
Health-Safety Fees	34	4,000	-	-	not used	-	-
Administration Costs	34	-	-	-	not used	-	-
Fine-Traffic School	34	1,681,793	412,123	4.08	per service population, unincorporated only	18,080	73,782
AB233 Realignment	34	16,101,645	-	-	not used	-	-
Other Court Fines Non Dept	34	312,088	2,788,991	0.11	per service population, entire county	18,080	2,023
Criminal-Co. 25%	34	61,464	2,788,991	0.02	per service population, entire county	18,080	398
Penalties & Int On Del Taxes	34	3,100,000	2,788,991	1.11	per service population, entire county	18,080	20,097
Total Fines and Penalties		$ 22,712,296		$ 8.31			$ 150,250
Teeter Overflow	34	$ 25,000,000	-	$ -	not used	-	$ -
Interest							
Interest-Invested Funds	34	$ 3,108,494			See Table 5		
Interest-Other	34	-			See Table 5		
Total Interest		$ 3,108,494		$ -			$ -
CA-Motor Vehicle In-Lieu Tax	35	$ 220,920,864			See Table 5		
Miscellaneous Federal and State							
CA-Homeowners Tax Relief	36	$ 2,606,205	-	$ -	not used	-	$ -
CA-Suppl Homeowners Tax Relief	36	42,000	-	-	not used	-	-
CA-Mandate Reimbursement	36	94,002	-	-	not used	-	-
Federal In Lieu Taxes	37	3,000,000	2,308,441	1.30	per capita, entire county	15,724	20,435
Oth Gov-EVTDA/Cabazon Funding		-	-	-	not used	-	-
In Lieu-Tax from So Cal Fair	42	32,600	-	-	not used	-	-
Total Federal and State		$ 5,774,807		$ 1.30			$ 20,435
Tobacco Tax Settlement	43	$ 10,000,000	-	$ -	not used	-	$ -
Miscellaneous Revenue							
Transient Occupancy	33	$ 2,265,620	-	$ -	not used	-	$ -
Non Commn Aircraft	33	244,055	-	-	not used	-	-
Racehorse Tax	33	10,000	-	-	not used	-	-
Small Claims Fee			-	-	not used	-	-
Court Fees & Costs	38	416,800	2,788,991	0.15	per service population, entire county	18,080	2,702
Superior Court Fees	38	69,368	2,788,991	0.02	per service population, entire county	18,080	450
Unclaimed Money	42	-	-	-	not used	-	-
Judgments	43	-	-	-	not used	-	-
Cash Over-Short	42	53,105	-	-	not used	-	-
El Sobrante Land Fill	42	1,700,000	-	-	not used	-	-
Sale Of Real Estate			-	-	not used	-	-
Rebates & Refunds	42	1,500	2,788,991	0.00	per service population, entire county	18,080	10
Total Miscellaneous Revenue		$ 4,760,448		$ 0.17			$ 3,161
Total General Fund Discretionary Revenue		$ 660,856,094		$ 19.84			$ 355,711

Footnotes:
(a) Based on County of Riverside Fiscal Year 2015-16 Recommended Budget.
(b) Based on (1) 2,308,441 total Riverside County residents and 368,823 residents in the unincorporated sections of Riverside County per the California Department of Finance, January 1, 2015, (2) 961,100 total Riverside County employees and 86,600 employees in the unincorporated sections of Riverside County per the California Employment Development Department, October 2015, and (3) for service population calculation, employment was reduced by 50% to account for the estimated less frequent use of county public services by employees than residents.
(c) See Table 2 - Land Use Assumptions.

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Exhibit A - Fiscal Impact Analysis
Table 7 - Riverside County General Fund Financing Requirements Budget, Net of Revenue Sources
Paradise Valley
February 15, 2017

Description	FY 2015-16 Budget (a) Page Ref.	Fund	Total	Intergovernmental	Charges for Services	Licenses and Permits	Fines, Forfeitures & Penalties	Other	Retained Earnings Contribution	General Fund Contribution	Marginal Increase	Net General Fund Contribution
General Financing Requirements												
Legislative and Administrative												
Board of Supervisors	97	10000	$ 7,644,982	$ -	$ 842,609	$ 3,368,908	$ -	$ -	$ -	$ 3,433,465	50%	$ 1,716,733
Assessment Appeals Board	97	10000	-	-	-	-	-	-	-	-	50%	-
Executive Office	97	10000	4,821,397	-	2,110,370	-	-	911,910	-	1,799,117	50%	899,559
Health and Juvenile Services	98	22430	1,439,000	-	-	-	-	1,439,000	-	-	NA	-
Casa Blanca Clinic Pass-Thru	98	22850	226,215	-	-	-	-	226,215	-	-	NA	-
Cabazon CRA Infrastructure	98	30360	50	-	-	-	-	715,227	(715,177)	-	NA	-
Wine Country Infrastructure	99	30370	50	-	-	-	-	227,636	(227,586)	-	NA	-
AB 2766 Air Quality		22300	-	-	-	-	-	-	-	-	NA	-
RDA Capital Improvements	99	31540	26,547,752	-	-	-	-	28,247,188	(1,699,436)	-	NA	-
Contribution to Other Funds	100	10000	62,237,151	-	-	-	-	-	-	62,237,151	100%	62,237,151
Court Subfund	100	10000	9,174,166	-	2,500	-	7,270,532	-	-	1,901,134	100%	1,901,134
Legislative Litigation Services	101	10000	2,400,749	-	50,000	-	-	-	-	2,350,749	100%	2,350,749
EO Subfund Budgets	102	10000	10,760,659	-	56,643	-	2,808,398	1,754	-	7,893,864	100%	7,893,864
Solar Revenue Fund	102	22840	1,357,404	-	352,872	-	657,000	-	347,532	-	50%	-
Legislative /Admin Services		10000	-	-	-	-	-	-	-	-	50%	-
CFD/AD Administration	104	22050	790,000	-	740,000	-	-	50,000	-	-	NA	-
Total Legislative and Administrative			$ 127,399,575	$ -	$ 4,154,994	$ 3,368,908	$ 10,735,930	$ 31,818,930	$ (2,294,667)	$ 79,615,480		$ 76,999,189
Finance												
Assessor	104	10000	$ 28,908,893		$ 12,886,028	$ -	$ 1	$ 1,936,150	$ -	$ 12,086,714	50%	$ 6,043,357
Assessment Appeals Board	97	10000	1,081,861	-	385,000	-	-	-	-	696,861	50%	348,431
Auditor-controller	105	10000	7,114,216	-	4,976,720	-	-	-	-	2,137,496	50%	1,068,748
Crest Property Tax Mgmt. System	105	33600	11,278,219	-	3,661,293	-	-	1,829,157	5,787,769	-	NA	-
Internal Audits	106	10000	1,664,568	-	-	-	-	-	-	1,664,568	50%	832,284
ACO: Payroll Services	106	10000	802,628	-	802,628	-	-	-	-	-	50%	-
Cowcap Reimbursement	106	10000	(13,776,847)	-	8,896,447	-	-	-	-	(22,673,294)	50%	(11,336,647)
Treasurer-Tax Collector	107	10000	14,462,122	-	10,142,190	-	3,444,388	3,800	-	871,744	50%	435,872
Purchasing	113	10000	2,581,434	-	1,331,052	-	-	34,305	-	1,216,077	50%	608,039
Total Finance			$ 52,117,094	$ -	$ 43,081,358	$ -	$ 3,444,389	$ 3,803,412	$ 5,787,769	$ (3,999,834)		$ (1,999,917)
Counsel												
Court Transcripts	103	10000	$ 1,500,000	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,500,000	25%	$ 375,000
County Counsel	107	10000	5,206,052	35,000	3,052,000	-	-	-	-	2,119,052	50%	$ 1,059,526
Total Counsel			$ 6,706,052	$ 35,000	$ 3,052,000	$ -	$ -	$ -	$ -	$ 3,619,052		$ 1,434,526
Personnel												
HR: Administration	104	10000	$ 10,144,231	$ -	$ 7,783,304	$ -	$ -	$ 2,360,927	$ -	$ -	50%	$ -
Rideshare		22000	-	-	-	-	-	-	-	-	NA	-
Total Personnel			$ 10,144,231	$ -	$ 7,783,304	$ -	$ -	$ 2,360,927	$ -	$ -		$ -
Elections												
Registrar of Voters	107	10000	$ 9,598,525	$ 105,000	$ 1,114,150	$ -	$ -	$ 40,000	$ -	$ 8,339,375	50%	$ 4,169,688
Total Elections			$ 9,598,525	$ 105,000	$ 1,114,150	$ -	$ -	$ 40,000	$ -	$ 8,339,375		$ 4,169,688
Property Management												
Facil-Mgt: Administration	111	10000	$ 4,532,582	$ -	$ 4,532,582	$ -	$ -	$ -	$ -	$ -	50%	$ -
Facil-Mgt: Design & Construct		10000	-	-	-	-	-	-	-	-	50%	-
Facil-Mgt: Project Management	111	10000	6,078,702	-	6,078,702	-	-	-	-	-	50%	-
Facil-Mgt: Parking	112	10000	2,049,617	-	149,081	-	127,088	1,773,448	-	-	50%	-
Facil-Mgt: Energy Management	112	10000	15,860,247	-	7,929,427	-	-	237,742	-	7,693,078	50%	3,846,539
Facil-Mgt: Facilities Cap Proj		30100	-	-	-	-	-	-	-	-	NA	-
Total Property Management			$ 28,521,148	$ -	$ 18,689,792	$ -	$ 127,088	$ 2,011,190	$ -	$ 7,693,078		$ 3,846,539

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Paradise Valley
February 15, 2017

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Plant Acquisition												
Accumulative Capital Outlay	99	30000	$ 1,495,550	$ -	$ -	$ -	$ -	$ 1,495,550	$ -	$ -	NA	-
Capital Improvement Program	103	30700	10,317,874	-	-	-	-	3,835,000	6,482,874	-	NA	-
Tobacco Securitization	103	30120	3,815,200	-	-	-	-	380,000	3,435,200	-	NA	-
EDA: Blythe Const & Land		22350	-	-	-	-	-	-	-	-	NA	-
EDA: Thermal Const & Land		22350	-	-	-	-	-	-	-	-	NA	-
EDA: Hemet-Ryan Constr & Land		22350	-	-	-	-	-	-	-	-	NA	-
EDA: French Val Constr & Land		22350	-	-	-	-	-	-	-	-	NA	-
EDA: Capital Projects	112	30100	148,327,933	-	147,720,430	-	-	607,503	-	-	NA	-
Fire: Const & Land Acq	110	30300	1,165,502	-	-	-	-	-	1,165,502	-	NA	-
Total Plant Acquisition			$ 165,122,059	$ -	$ 147,720,430	$ -	$ -	$ 6,318,053	$ 11,083,576	$ -		$ -
Promotion												
EDA: Administration	108	21100	$ 4,590,034	$ -	$ 4,579,734	$ -	$ -	$ 10,300	$ -	$ -	NA	$ -
EDA: Mitigation Fund	108	32710	10,000	-	5,000	-	-	5,000	-	-	NA	-
EDA: Admin Subfunds	109	21100	818,387	-	123,387	-	-	695,000	-	-	NA	-
EDA: Economic Development Progr	109	21100	5,180,124	-	398,423	-	-	4,781,701	-	-	NA	-
EDA: Fair National Date Festival	110	22200	4,179,628	-	2,500	-	-	4,177,128	-	-	NA	-
Total Promotion			$ 14,778,173	$ -	$ 5,109,044	$ -	$ -	$ 9,669,129	$ -	$ -		$ -
Other General												
Contribution to Other Funds		10000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	100%	$ -
Court Sub-Funds		10000	-	-	-	-	-	-	-	-	100%	-
Successor Agency to the RDA		25000	-	-	-	-	-	-	-	-	NA	-
Successor Agency to the RDA		32700	-	-	-	-	-	-	-	-	NA	-
Successor Agency to the RDA		37100	-	-	-	-	-	-	-	-	NA	-
Successor Agency to the RDA		37250	-	-	-	-	-	-	-	-	NA	-
Mitigation Project Ops	101	30500	645,100	-	200,000	-	-	1,500	443,600	-	NA	-
Developer's Impact Fee Ops	101	30500	28,006,000	-	4,110,600	-	-	275,000	23,620,400	-	NA	-
Surveyor	110	20260	4,952,402	-	4,753,059	-	-	199,343	-	-	NA	-
Geographical Information Syst	113	22570	1,892,601	-	1,728,601	-	-	164,000	-	-	NA	-
EO Subfund Budgets		10000	-	-	-	-	-	-	-	-	100%	-
Total Other General			$ 35,496,103	$ -	$ 10,792,260	$ -	$ -	$ 639,843	$ 24,064,000	$ -		$ -
Total General Financing Requirements			$ 449,882,960	$ 140,000	$ 241,497,332	$ 3,368,908	$ 14,307,407	$ 56,661,484	$ 38,640,678	$ 95,267,151		$ 84,450,025
Public Protection												
Judicial												
Contribution to Trial Court	127	10000	$ 29,482,850	$ -	$ -	$ -	$ -	$ 10	$ -	$ 29,482,840	25%	$ 7,370,710
Confidential Court Orders	127	10000	560,014	-	-	-	-	-	-	560,014	25%	140,004
Court Facilities	127	10000	4,895,120	-	-	-	-	-	-	4,895,120	25%	1,223,780
Grand Jury Admin	127	10000	567,471	-	-	-	-	-	-	567,471	25%	141,868
Court Transcripts		10000	-	-	-	-	-	-	-	-	25%	-
District Attorney: Criminal	129	10000	97,427,602	34,399,986	2,551,500	-	109,300	380,000	-	59,986,816	25%	14,996,704
District Attorney: Forensics	130	10000	600,000	-	-	-	600,000	-	-	-	25%	-
Child Support Services	130	10000	35,267,754	35,260,154	-	-	-	7,600	-	-	25%	-
Alternate Public Defender		10000	-	-	-	-	-	-	-	-	25%	-
Indigent Defense	128	10000	11,005,500	-	105,000	-	-	-	-	10,900,500	25%	2,725,125
Capital Defender	131	10000	-	-	-	-	-	-	-	-	25%	-
Public Defender	131	10000	35,434,540	1,859,959	207,326	-	-	-	-	33,367,255	25%	8,341,814
Total Judicial			$ 215,240,851	$ 71,520,099	$ 2,863,826	$ -	$ 709,300	$ 387,610	$ -	$ 139,760,016		$ 34,940,004

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Paradise Valley
February 15, 2017

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Police Protection												
Sheriff: Administration	131	10000	$ 12,140,591	$ 7,000	$ 1,820,249	$ 84,000	$ -	$ -	$ -	$ 10,229,342	50%	$ 5,114,671
Sheriff: Support	132	10000	45,443,386	15,838,924	17,841,041	4,700	-	24	-	11,758,697	100%	11,758,697
Sheriff: Patrol	132	10000	317,472,233	56,414,775	172,661,937	36,273	15,500	88,700	-	88,255,048	100%	88,255,048
Sheriff: Court Services	134	10000	26,987,709	16,885,104	4,378,040	-	-	118	-	5,704,447	100%	5,704,447
Sheriff: CAC Security	134	10000	655,544	-	-	-	-	-	-	655,544	100%	655,544
Sheriff: Training Center	134	10000	12,741,938	1,112,104	775,841	-	-	1,247,164	-	9,606,829	100%	9,606,829
Sheriff: Cal-ID	136	22250	5,216,502	-	4,848,912	-	-	367,590	-	-	NA	-
Sheriff: Cal-DNA	136	22250	351,257	-	350,757	-	-	500	-	-	NA	-
Sheriff: Cal-Photo	137	22250	230,533	-	230,533	-	-	-	-	-	NA	-
Total Police Protection			$ 421,219,693	$ 90,257,907	$ 202,907,310	$ 124,973	$ 15,500	$ 1,704,096	$ -	$ 126,209,907		$ 121,095,236
Detention and Correction												
Sheriff: Corrections	133	10000	$ 214,488,243	$ 81,955,055	$ 2,846,599	$ -	$ 3,945,480	$ 3,199,040	$ -	$ 122,742,069	50%	$ 61,371,035
Probation: Admin & Support	138	10000	12,556,093	3,337,373	-	-	-	-	-	9,218,720	50%	$ 4,609,360
Probation: Juvenile Hall	137	10000	44,324,374	26,126,472	300,000	-	-	-	-	17,897,902	50%	8,948,951
Probation	137	10000	69,431,851	57,172,924	1,906,811	-	-	-	-	10,352,116	50%	5,176,058
Total Detention and Correction			$ 340,800,561	$ 168,591,824	$ 4,853,410	$ -	$ 3,945,480	$ 3,199,040	$ -	$ 160,210,807		$ 80,105,404
Fire Protection												
Fire Protection: Forest	138	10000	$ 125,781,236	$ 16,631,297	$ 55,931,981	$ -	$ -	$ 584,858	$ -	$ 52,633,100	0%	$ -
Fire: Non-Forest	139	21000	53,562,952	487,885	-	-	-	53,075,067	-	-	NA	-
Fire Protection: Contracts	139	10000	83,694,608	-	83,694,608	-	-	-	-	-	100%	-
Total Fire Protection			$ 263,038,796	$ 17,119,182	$ 139,626,589	$ -	$ -	$ 53,659,925	$ -	$ 52,633,100		$ -
Protection/Inspection												
Agricultural Commissioner	140	10000	$ 5,748,722	$ 2,157,000	$ 2,680,100	$ 34,000	$ 35,000	$ -	$ -	$ 842,622	50%	$ 421,311
Building & Safety	141	10000	6,605,423	-	3,567,370	2,810,037	-	4,600	-	223,416	0%	-
Total Protection/Inspection			$ 12,354,145	$ 2,157,000	$ 6,247,470	$ 2,844,037	$ 35,000	$ 4,600	$ -	$ 1,066,038		$ 421,311
Other Protection												
Nat. Pollut. Discrg Elm. Sys.	128	10000	$ 1,000,000	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,000,000	100%	$ 1,000,000
HR:Rideshare	128	22000	603,800	-	571,000	32,800	-	-	-	-	50%	-
County Clerk-Recorder	129	10000	20,031,512	-	15,999,000	-	-	1,001	-	4,031,511	50%	2,015,756
Sheriff: Public Administrator	135	10000	1,641,228	-	582,400	-	-	9,864	-	1,048,964	50%	524,482
Range Improvement	140	22500	16,948	-	-	-	-	-	16,948	-	NA	-
Environmental Programs	140	20200	950,196	-	-	-	-	952,776	(12,580)	-	NA	-
TLMA: Planning	141	10000	8,470,174	500,000	3,808,498	-	-	10,500	-	4,151,176	0%	-
Planning: Airport LUC		22650	-	-	-	-	-	-	-	-	0%	-
TLMA: Crossing Guard		20000	-	-	-	-	-	-	-	-	NA	-
Sheriff: Coroner	135	10000	8,761,784	3,738,178	646,204	-	-	47,835	-	4,329,567	100%	4,329,567
Code Enforcement	142	10000	13,333,777	945,000	2,189,438	37,590	491,750	310,730	-	9,359,269	100%	9,359,269
Mental Health: Public Guardian	142	10000	4,677,991	3,522,281	457,224	-	-	3	-	698,483	100%	698,483
AB2766 Air Quality	143	22300	486,000	486,000	-	-	-	500	(500)	-	NA	-
PSEC 800MHz Radio Project	144	33500	-	-	-	-	-	-	-	-	NA	-
Animal Services	143	10000	18,373,890	-	8,837,596	924,000	-	220,000	-	8,392,294	100%	8,392,294
Total Other Protection			$ 78,347,300	$ 9,191,459	$ 33,091,360	$ 994,390	$ 491,750	$ 1,563,209	$ 3,868	$ 33,011,264		$ 26,319,851
Total Public Protection			$ 1,331,001,346	$ 358,837,471	$ 389,589,965	$ 3,963,400	$ 5,197,030	$ 60,518,480	$ 3,868	$ 512,891,132		$ 262,881,805

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Paradise Valley
February 15, 2017

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Public Ways & Facilities												
Public Ways												
Multi-Spec Habitat Plan	149	22450	$ 4,200,000	$ -	$ 4,200,000	$ -	$ -	$ 12,000	$ (12,000)	$ -	NA	$ -
EDA: Airport		22100	-	-	-	-	-	-	-	-	NA	-
GIS		20200	-	-	-	-	-	-	-	-	NA	-
TLMA: Administration	152	20200	11,405,318	-	11,004,543	-	-	775	400,000	-	NA	-
TLMA: Consolidated Counter	153	20200	4,924,327	-	1,439,535	50	-	984,742	2,500,000	-	NA	-
Environmental Programs		20200	-	-	-	-	-	-	-	-	NA	-
TLMA: Transportation	153	20000	42,659,579	32,656,534	9,328,312	205,118	21,000	448,615	-	-	NA	-
TLMA: Landscape Maint Dist	154	20300	1,389,671	-	497,682	-	-	588,693	303,296	-	NA	-
Facility Management: Parking		10000	-	-	-	-	-	-	-	-	100%	-
TLMA: Sub Road Dist No 4	154	22400	1,139,482	7,778	-	-	-	656,331	475,373	-	NA	-
TLMA: Transp Const Project	154	20000	143,661,460	61,345,522	49,737,218	-	-	32,578,720	-	-	NA	$ -
TLMA: RBBD: Menifee	155	31600	2,163,000	-	-	-	-	1,994	2,161,006	-	NA	-
TLMA: RBBD - Southwest	155	31610	1,120,635	-	-	-	-	415,568	705,067	-	NA	-
TLMA: Signal Mitigation	156	31630	2,000	-	2,000	-	-	-	-	-	NA	-
TLMA: RBBD: Mira Loma	156	31640	11,750,710	-	-	-	-	12,403	11,738,307	-	NA	-
TLMA: DA/DIF	156	31650	3,067,956	-	-	-	-	3,067,974	(18)	-	NA	-
TLMA: Dev Agreements	157	31680	601,000	-	-	-	-	450	600,550	-	NA	-
TLMA: Signal DIF	157	31690	3,235,477	-	-	-	-	3,235,499	(22)	-	NA	-
TLMA: RBBD - Scott Road	157	31693	810,000	-	-	-	-	972	809,028	-	NA	-
TLMA: Trans Equip (Garage)	158	20000	1,538,025	-	508,350	9,947	-	213,086	806,642	-	NA	-
Total Public Ways			$ 233,668,640	$ 94,009,834	$ 76,717,640	$ 215,115	$ 21,000	$ 42,217,822	$ 20,487,229	$ -		$ -
Transportation Terminals												
EDA: Blythe Constr Land	149	22350	$ 995,000	$ 945,250	$ 100	$ -	$ -	$ 49,650	$ -	$ -	NA	$ -
EDA: Thermal Constr Land	149	22350	209,379	198,910	100	-	-	10,369	-	-	NA	-
EDA: Hemet-Ryan Constr Land	150	22350	621,532	590,456	100	-	-	30,976	-	-	NA	-
Const Land - Chiriaco	150	22350	500,000	499,500	-	-	-	500	-	-	NA	-
Const Land - Desert Center	151	22350	203,164	500	-	-	-	8,600	194,064	-	NA	-
EDA: French Val Constr Land	151	22350	2,091,375	1,986,806	100	-	-	104,469	-	-	NA	-
EDA: County Airport	152	22100	2,978,510	50,000	142,494	500	-	2,551,284	234,232	-	NA	-
TLMA: Airport Land Use Comm	158	22650	732,402	197,444	207,446	-	-	263,031	64,481	-	NA	-
Total Transportation Terminals			$ 8,331,362	$ 4,468,866	$ 350,340	$ 500	$ -	$ 3,018,879	$ 492,777	$ -		$ -
Total Public Ways and Facilities			$ 242,000,002	$ 98,478,700	$ 77,067,980	$ 215,615	$ 21,000	$ 45,236,701	$ 20,980,006	$ -		$ -

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Health and Sanitation												
Health												
Mental Health: Treatment Prog	165	10000	$ 280,384,323	$ 268,808,260	$ 4,161,108	$ -	$ -	$ 3,421,704	$ -	$ 3,993,251	100%	$ 3,993,251
Cont to Health/Mental Health	165	10000	43,878,775	-	-	-	-	-	-	43,878,775	100%	43,878,775
Mental Health: Detention Prog	166	10000	16,697,023	5,371,186	3	-	-	3	-	5,325,831	100%	5,325,831
Mental Health: Administration	167	10000	14,388,968	13,909,730	73,235	-	-	406,003	-	-	50%	-
Mental Health: Substance Abuse	167	10000	27,050,196	24,379,440	739,766	-	1,725,893	4	-	205,093	100%	205,093
Public Health	167	10000	57,907,051	35,382,929	13,071,723	-	-	2,598,003	-	6,854,396	100%	6,854,396
Public Health: Bio-Terrorism Prep	168	21750	2,590,971	2,590,971	-	-	-	-	-	-	NA	-
Public Health: Hosp. Prep. Program Alloc.	168	21760	684,230	684,230	-	-	-	-	-	-	NA	-
CHA: Environmental Health	170	10000	26,736,797	708,269	15,471,377	8,544,050	1,356,481	656,610	-	-	100%	-
Public Health Ambulatory Care		10000	-	-	-	-	-	-	-	-	100%	-
RCRMC: Detention Health		10000	-	-	-	-	-	-	-	-	100%	-
Total Health			$ 464,318,334	$ 351,835,015	$ 33,517,212	$ 8,544,050	$ 3,082,384	$ 7,082,327	$ -	$ 60,257,346		$ 60,257,346
Hospital Care												
Ambulatory Care	170	10000	$ 41,919,274	$ 2,022,497	$ 39,637,849	$ -	$ -	$ 258,928	$ -	$ -	100%	$ -
Ambulatory Care EPM/ HER Project	171	21790	4,534,357	-	-	-	-	4,534,357	-	-	100%	$ -
RCRMC: Detention Health	171	10000	26,888,022	-	-	-	-	-	-	26,888,022	100%	$ 26,888,022
RCRMC: Med Indigent Services	171	10000	7,783,810	5,483,270	76,482	-	-	-	-	2,224,058	100%	$ 2,224,058
Total Hospital Care			$ 81,125,463	$ 7,505,767	$ 39,714,331	$ -	$ -	$ 4,793,285	$ -	$ 29,112,080		$ 29,112,080
California Children's Services												
CHA: CA Children's Services	169	10000	$ 21,086,397	$ 14,706,032	$ -	$ -	$ -	$ -	$ -	$ 6,380,365	100%	$ 6,380,365
Total California Children's Services			$ 21,086,397	$ 14,706,032	$ -	$ -	$ -	$ -	$ -	$ 6,380,365		$ 6,380,365
Sanitation												
Waster: Area 8 Assessment	172	23000	$ 800,000	$ -	$ 800,000	$ -	$ -	$ 50	$ (50)	$ -	NA	$ -
Total Sanitation			$ 800,000	$ -	$ 800,000	$ -	$ -	$ 50	$ (50)	$ -		$ -
Total Health and Sanitation			$ 567,330,194	$ 374,046,814	$ 74,031,543	$ 8,544,050	$ 3,082,384	$ 11,875,662	$ (50)	$ 95,749,791		$ 95,749,791
Public Assistance												
Administration												
DPSS Administration	181	10000	$ 557,651,457	$ 543,347,658	$ 1,944,369	$ -	$ -	$ 1,235,125	$ -	$ 11,124,305	10%	$ 1,112,431
Total Administration			$ 557,651,457	$ 543,347,658	$ 1,944,369	$ -	$ -	$ 1,235,125	$ -	$ 11,124,305		$ 1,112,431
Aid Programs												
DPSS: Mandated Client Serv	181	10000	$ 66,182,443	$ 56,660,432	$ -	$ -	$ -	$ -	$ -	$ 9,522,011	10%	$ 952,201
DPSS: Categorical Aid	181	10000	367,564,386	345,480,958	-	-	-	8,300,265	-	13,783,163	10%	1,378,316
DPSS: Other Aid	182	10000	2,347,379	40,000	-	231,000	99,000	-	-	1,977,379	10%	197,738
DPSS: Homeless Housing Relief	182	21300	8,254,443	8,254,443	-	-	-	-	-	-	NA	-
Total Aid Programs			$ 444,348,651	$ 410,435,833	$ -	$ 231,000	$ 99,000	$ 8,300,265	$ -	$ 25,282,553		$ 2,528,255
Care of Court Wards												
Probation: Court Placement	180	10000	$ 600,489	$ -	$ -	$ -	$ -	$ -	$ -	$ 600,489	100%	$ 600,489
Total Care of Court Wards			$ 600,489	$ -	$ -	$ -	$ -	$ -	$ -	$ 600,489		$ 600,489
Veteran's Services												
Veteran's Services	185	10000	$ 1,473,758	$ 192,000	$ 125,000	$ -	$ -	$ -	$ -	$ 1,156,758	100%	$ 1,156,758
Total Veteran's Services			$ 1,473,758	$ 192,000	$ 125,000	$ -	$ -	$ -	$ -	$ 1,156,758		$ 1,156,758

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Exhibit A - Fiscal Impact Analysis
Table 7 - Riverside County General Fund Financing Requirements Budget, Net of Revenue Sources
Paradise Valley
February 15, 2017

Description	FY 2015-16 Budget (a) Page Ref.	Fund	Total	Intergovernmental	Charges for Services	Licenses and Permits	Fines, Forfeitures & Penalties	Other	Retained Earnings Contribution	General Fund Contribution	Marginal Increase	Net General Fund Contribution
Other Assistance												
EDA: Community Dev - HUD	179	21350	$ 8,815,893	$ 8,735,296	$ -	$ -	$ -	$ 80,597	$ -	$ -	NA	$ -
Neighborhood Stabilization NSP	179	21550	3,751,637	2,136,101	-	-	-	1,615,536	-	-	NA	-
EDA: Work Force Development	179	21550	26,894,691	25,300,910	525,990	-	-	1,067,791	-	-	NA	-
HUD		21250	-	-	-	-	-	-	-	-	NA	-
Home Program Fund	180	21250	3,504,872	2,856,738	-	-	-	648,134	-	-	NA	-
DPSS: Homeless	182	21300	3,635,980	561,437	-	-	-	2,806,401	268,142	-	NA	-
Cap of Riv. County	183	21050	2,805,205	2,750,000	55,205	-	-	-	-	-	NA	-
Cap of Riv. County: Local Initiative	183	21050	7,056,240	6,921,240	35,000	-	-	100,000	-	-	NA	-
Cap of Riv. County: Other Programs	184	21050	537,718	70,000	-	-	-	467,718	-	-	NA	-
Office on Aging Title III	184	21450	12,533,489	9,769,218	1,052,085	-	-	1,712,186	-	-	NA	-
Total Other Assistance			$ 69,535,725	$ 59,100,940	$ 1,668,280	$ -	$ -	$ 8,498,363	$ 268,142	$ -		$ -
Total Public Assistance			$ 1,073,610,080	$ 1,013,076,431	$ 3,737,649	$ 231,000	$ 99,000	$ 18,033,753	$ 268,142	$ 38,164,105		$ 5,397,933
Education, Recreation & Cultural Services												
Library Services												
County Free Library	189	21200	$ 24,208,027	$ 252,303	$ 213,756	$ -	$ 400,000	$ 20,025,191	$ 3,316,777	$ -	NA	$ -
Total Library Services			$ 24,208,027	$ 252,303	$ 213,756	$ -	$ 400,000	$ 20,025,191	$ 3,316,777	$ -		$ -
Other Education												
Cooperative Extension	189	10000	$ 614,064	$ -	$ -	$ -	$ -	$ -	$ -	$ 614,064	100%	$ 614,064
Total Other Education			$ 614,064	$ -	$ -	$ -	$ -	$ -	$ -	$ 614,064		$ 614,064
Recreation & Cultural Services												
EDA: Edward Dean Museum	190	10000	$ 320,588	$ -	$ -	$ -	$ -	$ 247,207	$ -	$ 73,381	100%	73,381
EDA: Community Centers	190	21140	-	-	-	-	-	-	-	-	NA	-
Total Recreation & Cultural Services			$ 320,588	$ -	$ -	$ -	$ -	$ 247,207	$ -	$ 73,381		$ 73,381
Total Education, Recreation & Cultural Services			$ 25,142,679	$ 252,303	$ 213,756	$ -	$ 400,000	$ 20,272,398	$ 3,316,777	$ 687,445		$ 687,445
Debt Service												
Other General												
Appropriation for Contingency	195	10000	$ 20,000,000	$ -	$ -	$ -	$ -	$ 3,106,405	$ -	$ 16,893,595	0%	$ -
Total Other General			$ 20,000,000	$ -	$ -	$ -	$ -	$ 3,106,405	$ -	$ 16,893,595		$ -
Retirement of Long-Term Debt												
Pension Obligation Bonds	196	35000	$ 36,639,366	$ -	$ 36,639,366	$ -	$ -	$ -	$ -	$ -	NA	$ -
Total Retirement of Long-Term Debt			$ 36,639,366	$ -	$ 36,639,366	$ -	$ -	$ -	$ -	$ -		$ -
Debt Service - Principal												
Teeter Debt Service	196	37050	$ 2,832,398	$ -	$ -	$ -	$ -	$ 2,832,398	$ -	$ -	NA	$ -
Total Debt Service - Principal			$ 2,832,398	$ -	$ -	$ -	$ -	$ 2,832,398	$ -	$ -		$ -
Interest on Short-Term Debt												
Interest on Trans	196	10000	$ 4,703,573	$ -	$ -	$ -	$ -	$ 3,447,500	$ -	$ 1,256,073	0%	$ -
Total Interest on Short-Term Debt			$ 4,703,573	$ -	$ -	$ -	$ -	$ 3,447,500	$ -	$ 1,256,073		$ -
Total Debt Service			$ 64,175,337	$ -	$ 36,639,366	$ -	$ -	$ 9,386,303	$ -	$ 18,149,668		$ -
Total Financing Requirements			$ 3,753,142,598	$ 1,844,831,719	$ 822,777,591	$ 16,322,973	$ 23,106,821	$ 221,984,781	$ 63,209,421	$ 760,909,292		$ 449,166,998

Footnotes:
(a) Per the County of Riverside FY 2015-16 Recommended Budget.

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Exhibit A - Fiscal Impact Analysis
Table 8 - Riverside County General Fund Financing Requirements Calculations
Paradise Valley
February 15, 2017

Description	Table Ref.	FY 15/16 Budget (a)	Net Amount (b)	County Equivalent Units (c)	Factor	Measurement (c)	Project Equivalent Units (d)	Financing Requirements
			[1]	[2]	[1]/[2]=[3]		[4]	[3]X[4]
General Financing Requirements					$ -			
Legislative and Administrative	7	$ 127,399,575	$ 76,999,189	2,788,991	$ 27.61	per capita & 50% employee, entire county	18,080	$ 499,167
Finance	7	52,117,094	(1,999,917)	2,788,991	(0.72)	per capita & 50% employee, entire county	18,080	(12,965)
Counsel	7	6,706,052	1,434,526	2,788,991	0.51	per capita & 50% employee, entire county	18,080	9,300
Personnel	7	10,144,231	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
Elections	7	9,598,525	4,169,688	2,788,991	1.50	per capita & 50% employee, entire county	18,080	27,031
Property Management	7	28,521,148	3,846,539	2,788,991	1.38	per capita & 50% employee, entire county	18,080	24,936
Plant Acquisition	7	165,122,059	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
Promotion	7	14,778,173	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
Other General	7	35,496,103	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
Total General Financing Requirements		**$ 449,882,960**	**$ 84,450,025**		**$ 30.28**			**$ 547,469**
Public Protection								
Judicial	7	$ 215,240,851	$ 34,940,004	2,788,991	$ 12.53	per capita & 50% employee, entire county	18,080	$ 226,507
Police Protection	7	421,219,693	121,095,236			Case Study: See Table 9		2,416,270
Detention and Correction	7	340,800,561	80,105,404	2,788,991	28.72	per capita & 50% employee, entire county	18,080	519,304
Fire Protection (Transfers to the Fire Fund)	7	263,038,796	-			Case Study: See Table 10		609,039
Protection/Inspection	7	12,354,145	421,311	2,788,991	0.15	per capita & 50% employee, entire county	18,080	2,731
Other Protection	7	78,347,300	26,319,851	2,788,991	9.44	per capita & 50% employee, entire county	18,080	170,625
Total Public Protection		**$1,331,001,346**	**$ 262,881,805**		**$ 50.84**			**$ 3,944,476**
Public Ways & Facilities								
Public Ways	7	$ 233,668,640	$ -	412,123	$ -	per capita & 50% employee, unincorporated only	18,080	$ -
Transportation Terminals	7	8,331,362	-	412,123	-	per capita & 50% employee, unincorporated only	18,080	-
Total Public Ways and Facilities		**$ 242,000,002**	**$ -**					**$ -**
Health and Sanitation								
Health	7	$ 464,318,334	$ 60,257,346	2,308,441	$ 26.10	per capita, entire county	15,724	$ 410,450
Hospital Care	7	81,125,463	29,112,080	2,308,441	12.61	per capita, entire county	15,724	198,300
California Children's Services	7	21,086,397	6,360,365	2,308,441	2.76	per capita, entire county	15,724	43,461
Sanitation	7	800,000	-	2,308,441	-	per capita, entire county	15,724	-
Total Health and Sanitation		**$ 567,330,194**	**$ 95,749,791**		**$ 41.48**			**$ 652,211**
Public Assistance								
Administration	7	$ 557,651,457	$ 1,112,431	2,308,441	$ 0.48	per capita, entire county	15,724	$ 7,577
Aid Programs	7	444,348,651	2,528,255	2,308,441	1.10	per capita, entire county	15,724	17,222
Care of Court Wards	7	600,489	600,489	2,308,441	0.26	per capita, entire county	15,724	4,090
Veteran's Services	7	1,473,758	1,156,758	2,308,441	0.50	per capita, entire county	15,724	7,879
Other Assistance	7	69,535,725	-	2,308,441	-	per capita, entire county	15,724	-
Total Public Assistance		**$1,073,610,080**	**$ 5,397,932.80**		**$ 2.34**			**$ 36,769**
Education								
Library Services	7	$ 24,208,027	$ -	2,308,441	$ -	per capita, entire county	15,724	$ -
Agricultural Extension	7	614,064	614,064	2,308,441	0.27	per capita, entire county	15,724	4,183
Total Education		**$ 24,822,091**	**$ 614,064**		**$ 0.27**			**$ 4,183**
Recreation & Cultural Services								
Total Cultural Services	7	$ 320,588	$ 73,381	2,308,441	$ 0.03	per capita, entire county	15,724	$ 500
Total Recreation & Cultural Services		**$ 320,588**	**$ 73,381**		**$ 0.03**			**$ 500**
Debt Service								
Appropriation for Contingency	7	$ 20,000,000	$ -	-	$ -	not used	-	$ -
Debt Service - Principal	7	2,832,398	-	-	-	not used	-	-
Retirement of Long-Term Debt	7	36,639,366	-	-	-	not used	-	-
Interest on Long-Term Debt	7	4,703,573	-	-	-	not used	-	-
Total Debt Service		**$ 64,175,337**	**$ -**		**$ -**			**$ -**
Total General Fund Financing Requirements		**$3,753,142,598**	**$ 449,166,998.30**		**$ 125.23**			**$ 5,185,607**

Footnotes:
(a) Per the County of Riverside Fiscal Year 2015-16 Recommended Budget.
(b) See Table 7.
(c) Based on (1) 2,308,441 total Riverside County residents and 368,823 residents in the unincorporated sections of Riverside County per the California Department of Finance, January 1, 2015, (2) 961,100 total Riverside County employees and 86,600 employees in the unincorporated sections of Riverside County per the California Employment Development Department, October 2015, and (3) for service population calculation, employment was reduced by 50% to account for the estimated less frequent use of county public services by employees than residents.
(d) See Table 3.

Exhibit A - Fiscal Impact Analysis
Table 9 - Riverside County Police Protection Cost Calculation
Paradise Valley
DRAFT **February 15, 2017**

	Table Ref.	FY 2015-16 Budget	
Police Protection Costs			
Net General Fund Contribution	7	$ 121,095,236	
City Contracts for Sheriff's Services	7	172,661,937	
Net Police Protection Budget	[1]	$ 293,757,173	

Sheriff Authorized Positions Filled	Budget Page	FY 2015-16 Budget	
Administration	123	42	
Support	123	21	
Patrol	123	2,038	
Court Services	124	164	
CAC Security	124	-	
Training Center	-	29	(b)
Total Sworn Officers	[2]	2,294	
Cost per Sworn Officer	[3]=[1]/[2]	$ 128,055	

	Table Ref.		
Projected Residents	3	15,724	
Service Standard			
Sworn Officers per 1,000 residents		1.20	(d)
Additional Sworn Officers Required @ buildout	[4]	18.87	
Total Police Protection Costs	=[3]*[4]	$ 2,416,270	

Footnotes:

(a) Per the County of Riverside Fiscal Year 2015-16 Recommended Budget.
(b) Per phone discussions with Undersheriff of Ben Clark Training Center, dated 3/11/2016.
(d) The Board of Supervisors expects law enforcement services at a targeted staffing ratio of 1.2 deputy sheriff per 1,000 population in the unincorporated area per page 123 of the County of Riverside Fiscal Year 2015-16 Budget.

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Exhibit A - Fiscal Impact Analysis
Table 10 - Riverside County Fiscal Impact to Fire Fund
Paradise Valley
February 15, 2017

Fiscal Impact to Fire Fund

	Table Ref.	Project Impact	Marginal Increase	Project Impact
Financing Sources				
Fire Fund Ad Valorem Tax				
Assessed Value Adjusted for Deflation				
Residential Basic Tax	4	$ 31,817,795		
Non-Residential Basic Tax	4	3,078,963		
Total Assessed Value Adjusted for Deflation		**$ 34,896,758**		
Structural Fire Fund Post-ERAF Share of Basic Tax	2	5.851%		
Total Fire Fund Ad Valorem Tax		**$ 2,041,961**	100%	**$ 2,041,961**
Total Financing Sources			[1]	**$ 2,041,961**
Financing Requirements				
Calculation of Fire Costs				
Fire Protection Costs - Station Costs				7 Person
7-Person Engine Company (a)				$ 3,500,000
Total Cost Per Station				$ 3,500,000
Stations Required for Project (a)				2 Station
Total Fire Protection Costs			[2]	$ 3,500,000
Total Financing Requirements				**$ 3,500,000**
Net Annual Surplus/ (Deficit) Before Additional Financing Sources			[3]=[1]-[2]	**$ (1,458,039)**
Amount Needed from CSA Special Tax				(1,458,039)
CSA Tax Per Unit				100
Residential Units				8,490
CSA Tax Revenue			[4]	$ 849,000
Net Annual Surplus/ (Deficit) Before Additional Financing Sources			[5]=[3]+[4]	**$ (609,039)**
Use General Fund Surplus	Yes			
Surplus Available	Yes	$ 5,763,048		
Surplus Used			[6]	$ 609,039
Financing Sources				
Fire Fund			[1]	$ 2,041,961
CSA Tax			[4]	849,000
General Fund Transfer			[6]	609,039
Total Sources			[7]=[1]+[4]+[6]	$ 3,500,000
Total Financing Requirements			[2]	3,500,000
Net Annual Surplus/ (Deficit) After Additional Financing Sources			[8]=[7]-[2]	$ -

Footnotes:
(a) See Exhibit B for Fire phasing.

Exhibit A - Fiscal Impact Analysis
Table 11 - Riverside County Fiscal Impact to Library Fund
Paradise Valley
February 15, 2017

DRAFT

Fiscal Impact to Library Fund

	Table Ref.	Project Impact	Marginal Increase	Project Impact
Financing Sources				
County Library Ad Valorem Tax				
Assessed Value Adjusted for Deflation				
Residential Basic Tax Adj. for Deflation	4	$ 31,817,795		
Non-Residential Basic Tax Adj. for Deflation	4	3,078,963		
Total Assessed Value Adjusted for Deflation		$ 34,896,758		
County Library Post-ERAF Share of Basic Tax	2	1.431%		
Total County Library Ad Valorem Tax		$ 499,460	100%	$ 499,460

Other Financing Sources	Budget Page Ref.	Budget Amount (a)	Marginal Increase	Net Amount	County Equivalent Units (b)	Factor	Measure	Project Equivalent Units (c)	Project Impact
Fines, Forfeitures & Penalties									
Library Fines and Fees	50	$ 400,000	100%	$ 400,000	2,788,991	$ 0.14	per capita & 50% employee, entire county	18,080	$ 2,593
Revenue from Use of Money and Property									
Interest-Invest Funds	51	5,000	0%	-	-	-	not used	-	-
Rents	51	19,176	100%	19,176	2,788,991	0.01	per capita & 50% employee, entire county	18,080	124
Lease to Non-County Agency	51	2,306	0%	-	-	-	not used	-	-
Intergovernmental Revenues									
CA-State Revenue	51	25,000	0%	-	-	-	not used	-	-
CA-Homeowner's Tax Relief	51	162,303	0%	-	-	-	not used	-	-
CA-Other Operating Grants	51	-	0%	-	-	-	not used	-	-
Fed-Community Redevelopment Hn	51	65,000	0%	-	-	-	not used	-	-
Charges for Current Services									
Communications Services	51	150,000	0%	-	-	-	not used	-	-
Interfund - Leases	51	63,756	0%	-	-	-	not used	-	-
Interfund - Miscellaneous	51	-	0%	-	-	-	not used	-	-
Interfund - Salary Reimbursement	51	-	0%	-	-	-	not used	-	-
Other In-Lieu and Other Govt									
Oth Gov-City Governments	51	608,466	0%	-	-	-	not used	-	-
Other Revenue									
Contractual Revenue	51	6,870,066	0%	-	-	-	not used	-	-
Cash Over-Short	51	-	0%	-	-	-	not used	-	-
Rebates & Refunds	51	-	0%	-	-	-	not used	-	-
Contributions & Donations	51	10,000	0%	-	-	-	not used	-	-
Other Misc. Revenue	51	-	0%	-	-	-	not used	-	-
Total Financing Sources									$ 502,177
Financing Requirements									
Library Services	Table 7	24,208,027	100%	24,208,027	2,788,991	8.68	per capita & 50% employee, entire county	18,080	156,935
Total Financing Requirements									$ 156,935
Net Annual Surplus/ (Deficit)									$ 345,242
Per Development Unit									$ 41

Footnotes:
(a) Per the County of Riverside Fiscal Year 2015-16 Recommended Budget.
(b) Based on (1) 2,308,441 total Riverside County residents and 368,823 residents in the unincorporated sections of Riverside County per the California Department of Finance, January 1, 2015, (2) 961,100 total Riverside County employees and 86,600 employees in the unincorporated sections of Riverside County per the California Employment Development Department, October 2015, and (3) for service population calculation, employment was reduced by 50% to account for the estimated less frequent use of county public services by employees than residents.
(c) See Table 3.

Exhibit A - Fiscal Impact Analysis
Table 12 - Riverside County Fiscal Impact to Transportation Fund
Paradise Valley
February 15, 2017

DRAFT

Fiscal Impact to Transportation Fund

	Table Ref.	Net Amount	Marginal Increase	Project Impact
Financing Sources				
Measure A Sales Tax (d)				
On-Site and Off-Site Taxable Sales	5	$ 98,214,964		
Half Cent Transportation Sales Tax		0.50%		
Total Measure A Sales Tax		$ 491,075	0%	$ -

Other Financing Sources	Budget Page Ref.	Budget Amount (a)	Marginal Increase	Net Amount	County Equivalent Units (b)	Factor	Measure	Project Equivalent Units (c)	Project Impact
Intergovernmental Revenues									
CA-HWY User/Gas Tax Sec 2104A (e)	44	30,309,322	100%	30,309,322	2,788,991	10.87	per capita & 50% employee, entire county	18,080	$ 196,488
CA-HWY User/Gas Tax Sec 2104B (e)	44	-	100%	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
CA-HWY User/Gas Tax Sec 2103 (e)	44	1,849,286	100%	1,849,286	2,788,991	0.66	per capita & 50% employee, entire county	18,080	11,988
CA-HWY User/Gas Tax Sec 2104C (e)	44	-	100%	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
CA-HWY User/Gas Tax Sec 2104DEF (e)	44	-	100%	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
CA-HWY User/Gas Tax Sec 2105 (e)	44	-	100%	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
CA-HWY User/Gas Tax Sec 2106 (e)	44	-	100%	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
Road Maint Expense Reimb	44	210,537	100%	210,537	2,788,991	0.08	per capita & 50% employee, entire county	18,080	1,365
Road Signal Maint Exp Reimb	44	1,344,663	100%	1,344,663	2,788,991	0.48	per capita & 50% employee, entire county	18,080	8,717
Total Financing Sources									**$ 218,558**
Financing Requirements									
Street Maintenance Cost									
Total Project Lane Miles (f)								[1]	(h) 104.84
Street Maintenance Cost per Lane Mile (g)								[2]	$ 6,885
Total Project Street Maintenance Cost per Lane Mile								[3]=[1]*[2]	$ 721,834
Total Financing Requirements									**$ 721,834**
Net Annual Surplus/ (Deficit)								[4]	**$ (503,275)**
Net Annual Surplus/ (Deficit) Before Additional Financing Sources								[5]=[3]+[4]	**$ 503,275**
Use General Fund Surplus	Yes								
Surplus Available	Yes							$ 5,763,048	
Surplus Used								[6]	$ 503,275
Financing Sources									
Transportation Fund								[1]	$ 218,558
General Fund Transfer								[6]	503,275
Total Sources								[7]=[1]+[6]	$ 721,834
Total Financing Requirements								[3]	721,834
Net Annual Surplus/ (Deficit) After Additional Financing Sources								[8]=[7]-[3]	$ -

Footnotes:
(a) Per the County of Riverside Fiscal Year 2015-16 Recommended Budget.
(b) Based on (1) 2,308,441 total Riverside County residents and 368,823 residents in the unincorporated sections of Riverside County per the California Department of Finance, January 1, 2015, (2) 961,100 total Riverside County employees and 86,600 employees in the unincorporated sections of Riverside County per the California Employment Development Department, October 2015, and (3) for service population calculation, employment was reduced by 50% to account for the estimated less frequent use of county public services by employees than residents.
(c) See Table 3.
(d) All of the Measure A sales tax is earmarked for non-recurring capital projects per conversations with the Transportation Fund administrative office.
(e) All of the Gas Tax is earmarked for recurring street maintenance costs per conversations with the Transportation Fund administrative office.
(f) Per email from Glorious Land Company and KWC Engineers, dated 3/22/2016.
(g) Per discussions on 3/29/2016 with Paul Russell of the Riverside County Land Transportation and Land Management Agency, FY 2015-16 road maintenance cost was $6,885 per lane mile.
(h) Timing of lane miles to be allocated per residential unit per conference call discussions with client on 4/1/2016.

Exhibit B - Fire and Tansporation Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

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Development Year	Ref.	Factor	-2	-1	0	1	2	3	4	5	6	7	8	9
Fiscal Impact to Fire Fund														
Financing Sources														
Fire Fund Ad Valorem Tax			$ -	$ -	$ -	$ 1,333,050	$ 2,810,889	$ 5,338,069	$ 7,342,895	$ 9,710,399	$ 12,127,652	$ 14,328,792	$ 16,528,216	$ 19,684,324
Basic Tax Adj. for Deflation			$ -	$ -	$ -	$ 78,003	$ 164,477	$ 312,412	$ 429,665	$ 568,198	$ 709,642	$ 838,440	$ 967,138	$ 1,151,815
Total Fire Fund Tax	10	5.851%												
Total Financing Sources			0	0	0	$ 78,003	$ 164,477	$ 312,412	$ 429,665	$ 568,198	$ 709,642	$ 838,440	$ 967,138	$ 1,151,815
Financing Requirements														
Stations Required for Project		2.00	-	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	2.00	2.00
Staffing Level			-	3	3	3	3	4	4	4	4	4	7	7
Cost per Fire Fighter			$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000
Fire Cost	10	$3,500,000	$ -	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 3,500,000	$ 3,500,000
Total Financing Requirements			$ -	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 3,500,000	$ 3,500,000
Net Annual Surplus (Deficit) Before Additional Sources			$ -	$ (1,500,000)	$ (1,500,000)	$ (1,421,997)	$ (1,335,523)	$ (1,687,588)	$ (1,570,335)	$ (1,431,802)	$ (1,290,358)	$ (1,161,560)	$ (2,532,862)	$ (2,348,185)
CSA/CFD Charge per Unit at Buildout														
Net Annual Deficit Before Additional Sources			$ -	$ 1,500,000	$ 1,500,000	$ 1,421,997	$ 1,335,523	$ 1,687,588	$ 1,570,335	$ 1,431,802	$ 1,290,358	$ 1,161,560	$ 2,532,862	$ 2,348,185
Offset from General Fund Surplus			-	-	-	238,946	508,970	897,307	1,210,552	1,191,302	990,158	803,460	2,118,462	1,859,785
Amount Required for CSA/CFD Charge			$ -	$ 1,500,000	$ 1,500,000	$ 1,183,051	$ 826,552	$ 790,281	$ 359,783	$ 240,500	$ 300,200	$ 358,100	$ 414,400	$ 488,400
Allocation of CSA/CFD Charge for Fire Services														
Cumulative Residential Units			-	-	-	300	842	1,277	1,799	2,405	3,002	3,581	4,144	4,884
CSA/CFD Charge from Sold Units		$ 100.00	$ -	$ -	$ -	$ 30,000	$ 64,200	$ 127,700	$ 179,900	$ 240,500	$ 300,200	$ 358,100	$ 414,400	$ 488,400
Developer Subsidy/Undeveloped Land Tax		5,757,868	-	1,500,000	1,500,000	1,153,051	762,352	662,581	179,883	-	-	-	-	-
Total			$ -	$ 1,500,000	$ 1,500,000	$ 1,183,051	$ 826,552	$ 790,281	$ 359,783	$ 240,500	$ 300,200	$ 358,100	$ 414,400	$ 488,400
Additional Financing Sources														
General Fund Surplus			$ -	$ -	$ -	$ 238,946	$ 508,970	$ 897,307	$ 1,210,552	$ 1,756,562	$ 2,135,357	$ 2,260,404	$ 2,568,324	$ 3,016,237
Minimum CSA/CFD Charge Required for Fire Services (		6,159,668	-	1,500,000	1,500,000	1,183,051	826,552	790,281	359,783	-	-	-	-	-
Total Additional Financing Sources			$ -	$ 1,500,000	$ 1,500,000	$ 1,421,997	$ 1,335,523	$ 1,687,588	$ 1,570,335	$ 1,756,562	$ 2,135,357	$ 2,260,404	$ 2,568,324	$ 3,016,237
Financing Sources														
Fire Fund			$ -	$ -	$ -	$ 78,003	$ 164,477	$ 312,412	$ 429,665	$ 568,198	$ 709,642	$ 838,440	$ 967,138	$ 1,151,815
CSA Tax			-	1,500,000	1,500,000	1,183,051	826,552	790,281	359,783	240,500	300,200	358,100	414,400	488,400
General Fund Transfer			-	-	-	238,946	508,970	897,307	1,210,552	1,191,302	990,158	803,460	2,118,462	1,859,785
Total Financing Sources			$ -	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 3,500,000	$ 3,500,000
Total Financing Requirements			$ -	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 3,500,000	$ 3,500,000
Net Annual Surplus (Deficit) After Additional Sources			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Fiscal Impact to Transportation Fund														
Financing Sources														
Intergovernmental Revenues														
CA-HWY User/Gas Tax Sec 2104A (e)	12	$ 10.87	$ -	$ -	$ -	$ 10,194	$ 18,543	$ 32,871	$ 44,893	$ 58,819	$ 72,486	$ 85,785	$ 98,758	$ 115,342
CA-HWY User/Gas Tax Sec 2103 (e)	12	$ 0.66	$ -	$ -	$ -	$ 822	$ 1,131	$ 2,005	$ 2,739	$ 3,589	$ 4,423	$ 5,234	$ 6,026	$ 7,037
Charges for Services														
Road Maint Expense Reimb	12	$ 0.08	$ -	$ -	$ -	$ 71	$ 129	$ 228	$ 312	$ 409	$ 504	$ 596	$ 686	$ 801
Road Signal Maint Exp Reimb	12	$ 0.48	$ -	$ -	$ -	$ 452	$ 823	$ 1,458	$ 1,992	$ 2,609	$ 3,216	$ 3,806	$ 4,381	$ 5,117
Total Financing Sources			$ -	$ -	$ -	$ 11,339	$ 20,626	$ 36,563	$ 49,936	$ 65,426	$ 80,628	$ 95,421	$ 109,851	$ 128,298
Financing Requirements														
Share of Residential Units	Exhibit C		0.0%	0.0%	0.0%	3.6%	7.6%	15.0%	21.2%	28.3%	36.4%	42.2%	48.8%	57.5%
Total Project Lane Miles (b)			-	-	-	104.84	104.84	104.84	104.84	104.84	104.84	104.84	104.84	104.84
Estimated Annual Lane Miles to be Maintained (b)			-	-	-	3.70	7.9	15.8	22.2	29.7	37.1	44.2	51.2	60.3
Street Maintenance Cost per Lane Mile	12	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885
Total Financing Requirements			$ -	$ -	$ -	$ 25,506	$ 54,584	$ 108,573	$ 152,954	$ 204,477	$ 255,235	$ 304,463	$ 352,330	$ 415,246
Net Annual Surplus (Deficit) Before Additional Sources			$ -	$ -	$ -	$ (14,168)	$ (33,958)	$ (72,009)	$ (103,018)	$ (139,051)	$ (174,607)	$ (209,042)	$ (242,479)	$ (286,948)
Additional Financing Sources														
General Fund Surplus			$ -	$ -	$ -	$ -	$ 238,946	$ 508,970	$ 897,307	$ 1,210,552	$ 1,756,562	$ 2,135,357	$ 2,260,404	$ 2,568,324
General Fund Transfers to Fire Fund (Less)			-	-	-	-	238,946	508,970	897,307	1,210,552	1,191,302	990,158	803,460	2,118,462
Total Additional Financing Sources			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 565,260	$ 1,145,199	$ 1,456,944	$ 449,862
Financing Sources														
Transportation Fund			$ -	$ -	$ -	$ 11,339	$ 20,626	$ 36,563	$ 49,936	$ 65,426	$ 80,628	$ 95,421	$ 109,851	$ 128,298
General Fund Transfer			-	-	-	-	-	-	-	-	-	209,042	242,479	286,948
Total Financing Sources			$ -	$ -	$ -	$ 11,339	$ 20,626	$ 36,563	$ 49,936	$ 65,426	$ 80,628	$ 304,463	$ 352,330	$ 415,246
Total Financing Requirements			$ -	$ -	$ -	$ 25,506	$ 54,584	$ 108,573	$ 152,954	$ 204,477	$ 255,235	$ 304,463	$ 352,330	$ 415,246
Net Annual Surplus (Deficit) After Additional Sources			$ -	$ -	$ -	$ (14,168)	$ (33,958)	$ (72,009)	$ (103,018)	$ (139,051)	$ (174,607)	$ -	$ -	$ -

Footnotes:
(a) Represents amount needed to fund the estimated annual negative fiscal impact. CFD and CSA charges are examples of potential funding mechanisms to finance ongoing negative impacts. Amount and funding mechanism would need to be negotiated with the County.
(b) Transportation Fund Requirements are phased based on the housing absorption schedule.

Exhibit B - Fire and Transporation Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

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Development Year			10	11	12	13	14	15	16	17	18	19	20	21
Fiscal Impact to Fire Fund	**Ref.**	**Factor**												
Financing Sources														
Fire Fund Ad Valorem Tax														
Basic Tax Adj. for Deflation			$ 23,946,364	$ 29,358,830	$ 33,523,748	$ 36,072,000	$ 35,922,957	$ 35,774,530	$ 35,626,716	$ 35,479,513	$ 35,332,918	$ 35,186,929	$ 35,041,543	$ 34,896,758
Total Fire Fund Tax	10	5.851%	$ 1,401,206	$ 1,717,913	$ 1,961,620	$ 2,110,730	$ 2,102,008	$ 2,093,323	$ 2,084,674	$ 2,076,061	$ 2,067,483	$ 2,058,940	$ 2,050,433	$ 2,041,961
Total Financing Sources			$ 1,401,206	$ 1,717,913	$ 1,961,620	$ 2,110,730	$ 2,102,008	$ 2,093,323	$ 2,084,674	$ 2,076,061	$ 2,067,483	$ 2,058,940	$ 2,050,433	$ 2,041,961
Financing Requirements														
Stations Required for Project		2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
Staffing Level			7	7	7	7	7	7	7	7	7	7	7	7
Cost per Fire Fighter			$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000
Fire Cost	10	$3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000
Total Financing Requirements			$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000
Net Annual Surplus (Deficit) Before Additional Sources			$ (2,098,794)	$ (1,782,087)	$ (1,538,380)	$ (1,389,270)	$ (1,397,992)	$ (1,406,677)	$ (1,415,326)	$ (1,423,939)	$ (1,432,517)	$ (1,441,060)	$ (1,449,567)	$ (1,458,039)
CSA/CFD Charge per Unit at Buildout														
Net Annual Deficit Before Additional Sources			$ 2,098,794	$ 1,782,087	$ 1,538,380	$ 1,389,270	$ 1,397,992	$ 1,406,677	$ 1,415,326	$ 1,423,939	$ 1,432,517	$ 1,441,060	$ 1,449,567	$ 1,458,039
Offset from General Fund Surplus			1,524,194	1,084,087	743,980	540,270	548,992	557,677	566,326	574,939	583,517	592,060	600,567	609,039
Amount Required for CSA/CFD Charge			$ 574,600	$ 698,000	$ 794,400	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000
Allocation of CSA/CFD Charge for Fire Services														
Cumulative Residential Units			5,746	6,980	7,944	8,490	8,490	8,490	8,490	8,490	8,490	8,490	8,490	8,490
CSA/CFD Charge from Sold Units		$ 100.00	$ 574,600	$ 698,000	$ 794,400	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000
Developer Subsidy/Undeveloped Land Tax		6,757,888	-	-	-	-	-	-	-	-	-	-	-	-
Total			$ 574,600	$ 698,000	$ 794,400	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000
Additional Financing Sources														
General Fund Surplus			$ 4,948,396	$ 5,684,845	$ 6,260,028	$ 6,663,266	$ 6,626,339	$ 6,589,565	$ 6,552,942	$ 6,516,471	$ 6,480,151	$ 6,443,980	$ 6,407,959	$ 6,372,087
Minimum CSA/CFD Charge Required for Fire Services (		6,159,688	-	-	-	-	-	-	-	-	-	-	-	-
Total Additional Financing Sources			$ 4,948,396	$ 5,684,845	$ 6,260,028	$ 6,663,266	$ 6,626,339	$ 6,589,565	$ 6,552,942	$ 6,516,471	$ 6,480,151	$ 6,443,980	$ 6,407,959	$ 6,372,087
Financing Sources														
Fire Fund			$ 1,401,206	$ 1,717,913	$ 1,961,620	$ 2,110,730	$ 2,102,008	$ 2,093,323	$ 2,084,674	$ 2,076,061	$ 2,067,483	$ 2,058,940	$ 2,050,433	$ 2,041,961
CSA Tax			574,600	698,000	794,400	849,000	849,000	849,000	849,000	849,000	849,000	849,000	849,000	849,000
General Fund Transfer			1,524,194	1,084,087	743,980	540,270	548,992	557,677	566,326	574,939	583,517	592,060	600,567	609,039
Total Financing Sources			$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000
Total Financing Requirements			$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000
Net Annual Surplus (Deficit) After Additional Sources			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Fiscal Impact to Transportation Fund	**Ref.**	**Factor**												
Financing Sources														
Intergovernmental Revenues														
CA-HWY User/Gas Tax Sec 2104A (e)	12	$ 10.87	$ 136,045	$ 162,708	$ 183,862	$ 196,488	$ 196,488	$ 196,488	$ 196,488	$ 196,488	$ 196,488	$ 196,488	$ 196,488	$ 196,488
CA-HWY User/Gas Tax Sec 2103 (e)	12	$ 0.66	$ 8,301	$ 9,927	$ 11,218	$ 11,988	$ 11,988	$ 11,988	$ 11,988	$ 11,988	$ 11,988	$ 11,988	$ 11,988	$ 11,988
Charges for Services														
Road Maint Expense Reimb	12	$ 0.08	$ 945	$ 1,130	$ 1,277	$ 1,365	$ 1,365	$ 1,365	$ 1,365	$ 1,365	$ 1,365	$ 1,365	$ 1,365	$ 1,365
Road Signal Maint Exp Reimb	12	$ 0.48	$ 6,036	$ 7,218	$ 8,157	$ 8,717	$ 8,717	$ 8,717	$ 8,717	$ 8,717	$ 8,717	$ 8,717	$ 8,717	$ 8,717
Total Financing Sources			$ 151,327	$ 180,984	$ 204,514	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558
Financing Requirements														
Share of Residential Units	Exhibit C		67.7%	82.2%	93.6%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Total Project Lane Miles (b)			104.84	104.84	104.84	104.84	104.84	104.84	104.84	104.84	104.84	104.84	104.84	104.84
Estimated Annual Lane Miles to be Maintained (b)			71.0	86.2	98.1	104.8	104.8	104.8	104.8	104.8	104.8	104.8	104.8	104.8
Street Maintenance Cost per Lane Mile	12	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885
Total Financing Requirements			$ 488,534	$ 593,451	$ 675,412	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834
Net Annual Surplus (Deficit) Before Additional Sources			$ (337,208)	$ (412,467)	$ (470,898)	$ (503,275)	$ (503,275)	$ (503,275)	$ (503,275)	$ (503,275)	$ (503,275)	$ (503,275)	$ (503,275)	$ (503,275)
Additional Financing Sources														
General Fund Surplus			$ 3,016,237	$ 4,948,396	$ 5,684,845	$ 6,260,028	$ 6,663,266	$ 6,626,339	$ 6,589,565	$ 6,552,942	$ 6,516,471	$ 6,480,151	$ 6,443,980	$ 6,407,959
General Fund Transfers to Fire Fund (Less)			1,859,785	1,524,194	1,084,087	743,980	540,270	548,992	557,677	566,326	574,939	583,517	592,060	600,567
Total Additional Financing Sources			$ 1,156,453	$ 3,424,202	$ 4,600,758	$ 5,516,048	$ 6,122,996	$ 6,077,348	$ 6,031,888	$ 5,986,616	$ 5,941,532	$ 5,896,633	$ 5,851,921	$ 5,807,393
Financing Sources														
Transportation Fund			$ 151,327	$ 180,984	$ 204,514	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558
General Fund Transfer			337,208	412,467	470,898	503,275	503,275	503,275	503,275	503,275	503,275	503,275	503,275	503,275
Total Financing Sources			$ 488,534	$ 593,451	$ 675,412	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834
Total Financing Requirements			$ 488,534	$ 593,451	$ 675,412	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834
Net Annual Surplus (Deficit) After Additional Sources			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -

Footnotes:
(a) Represents amount needed to fund the estimated annual negative fiscal im
(b) Transportation Fund Requirements are phased based on the housing abso

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

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	Table Ref.	Factor	1	2	3	4	5	6	7	8	9	10	11
General Fund Financing Sources													
Property Tax	4		$ 189,503	$ 398,303	$ 758,405	$ 1,039,955	$ 1,375,835	$ 1,717,703	$ 2,029,249	$ 2,340,542	$ 2,766,002	$ 3,394,976	$ 4,156,838
Property Tax In-Lieu of Sales-Tax	4		-	-	-	-	-	-	-	-	-	-	-
Documentary Transfer Tax	4		20,095	42,468	81,350	111,996	147,912	184,943	218,581	252,196	300,849	364,056	448,185
Property Tax In-Lieu of MVLF	5		118,908	250,731	478,245	654,986	866,168	1,081,787	1,278,128	1,474,317	1,755,842	2,138,018	2,618,808
On-Site Retail Sales and Use Tax	5		75,087	150,174	225,260	300,347	375,849	450,936	526,022	601,109	676,196	860,015	935,102
Off-Site Retail Sales and Use Tax	5		-	-	-	-	-	-	-	-	-	-	-
Transient Occupancy Tax	5		-	-	-	-	183,184	183,184	183,184	183,184	183,184	1,352,644	1,352,644
Interest Earnings	5		3,217	6,689	12,012	16,411	21,465	26,595	31,345	36,090	42,522	52,195	62,603
Other Discretionary Revenue	6		18,116	33,187	59,163	80,933	105,154	130,911	154,998	176,490	208,569	245,970	294,436
Total Financing Sources			$ 424,925	$ 882,551	$ 1,610,436	$ 2,204,629	$ 3,075,567	$ 3,776,058	$ 4,421,507	$ 5,065,929	$ 5,953,164	$ 8,405,872	$ 9,868,616
General Fund Financing Requirements													
General Financing Requirements	8	$ 30.28	$ 28,402	$ 51,667	$ 91,587	$ 125,084	$ 163,886	$ 201,965	$ 239,021	$ 275,167	$ 321,375	$ 379,059	$ 453,348
Public Protection													
Judicial	8	12.53	11,751	21,377	37,893	51,752	67,806	83,560	98,892	113,847	132,984	156,831	187,568
Police Protection	9		85,381	182,714	363,437	511,999	684,467	854,375	1,019,159	1,179,390	1,389,995	1,635,322	1,986,521
Detention and Correction	8	28.72	26,941	49,009	86,876	118,649	155,455	191,575	226,724	261,011	304,841	359,568	430,025
Fire Protection (Transfers to the Fire Fund)	8	-	238,946	508,970	897,307	1,210,552	1,191,302	990,158	803,460	2,118,462	1,859,785	1,524,194	1,084,087
Protection/Inspection	8	0.15	142	258	457	624	818	1,008	1,192	1,373	1,603	1,891	2,262
Other Protection	8	9.44	8,852	16,103	28,544	38,984	51,077	62,945	74,494	85,759	100,160	118,138	141,291
Transfers to the Transportation Fund	12	-	-	-	-	-	-	-	209,042	242,479	286,948	337,208	412,467
Public Ways & Facilities	8	-	-	-	-	-	-	-	-	-	-	-	-
Health and Sanitation	8	41.48	23,046	49,319	98,101	138,201	184,755	230,617	275,096	318,347	375,194	441,414	536,211
Public Assistance	8	2.34	1,299	2,780	5,530	7,791	10,416	13,001	15,509	17,947	21,152	24,885	30,229
Education	8	0.27	148	318	629	886	1,185	1,479	1,764	2,042	2,406	2,831	3,439
Recreation & Cultural Services	8	0.03	18	38	75	106	142	177	211	244	288	338	411
Debt Service	8	-	-	-	-	-	-	-	-	-	-	-	-
Total Financing Requirements			$ 424,925	$ 882,551	$ 1,610,436	$ 2,204,629	$ 2,511,308	$ 2,630,859	$ 2,964,564	$ 4,616,066	$ 4,796,712	$ 4,981,670	$ 5,267,858
General Fund Fiscal Impact													
Ongoing Surplus/(Deficit)			$ -	$ -	$ -	$ -	$ 565,260	$ 1,145,199	$ 1,456,944	$ 449,862	$ 1,156,453	$ 3,424,202	$ 4,600,758
Surplus/(Deficit) per Unit			$ -	$ -	$ -	$ -	$ 235	$ 381	$ 407	$ 109	$ 237	$ 596	$ 859
Revenue/Cost Ratio			1.00	1.00	1.00	1.00	1.23	1.44	1.49	1.10	1.24	1.69	1.87
Fiscal Impact to Fire Fund													
Financing Sources	10, Exhibit B		$ 1,500,000	$ 1,500,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000
Financing Requirements	10, Exhibit B		1,500,000	1,500,000	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000	3,500,000	3,500,000	3,500,000	3,500,000
Net Annual Surplus / (Deficit)			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Fiscal Impact to Library Fund													
Financing Sources	11		$ 19,220	$ 40,487	$ 76,870	$ 105,716	$ 139,793	$ 174,579	$ 206,267	$ 237,926	$ 283,327	$ 344,614	$ 422,448
Financing Requirements	11		8,142	14,811	26,254	35,856	46,979	57,894	68,517	78,878	92,124	108,659	129,955
Net Annual Surplus / (Deficit)			$ 11,079	$ 25,677	$ 50,616	$ 69,860	$ 92,815	$ 116,685	$ 137,751	$ 159,048	$ 191,203	$ 235,954	$ 292,494
Fiscal Impact to Transportation Fund													
Financing Sources	12		$ 11,339	$ 20,626	$ 36,563	$ 49,936	$ 65,426	$ 80,628	$ 304,463	$ 352,330	$ 415,246	$ 488,534	$ 593,451
Financing Requirements	12		25,506	54,584	108,573	152,954	204,477	255,235	304,463	352,330	415,246	488,534	593,451
Net Annual Surplus / (Deficit)			$ (14,166)	$ (33,958)	$ (72,009)	$ (103,018)	$ (139,051)	$ (174,607)	$ -	$ -	$ -	$ -	$ -
Net Fiscal Impact of Project													
Financing Sources			$ 1,955,484	$ 2,443,665	$ 3,723,869	$ 4,360,281	$ 5,281,787	$ 6,031,266	$ 6,932,237	$ 9,156,184	$ 10,151,737	$ 12,739,020	$ 14,384,516
Financing Requirements			1,958,573	2,451,946	3,745,262	4,393,439	4,762,763	4,943,989	5,337,543	8,547,274	8,804,081	9,078,864	9,491,264
Net Annual Surplus / (Deficit)			$ (3,089)	$ (8,281)	$ (21,393)	$ (33,158)	$ 519,023	$ 1,087,277	$ 1,594,694	$ 608,910	$ 1,347,656	$ 3,660,156	$ 4,893,252

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
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RESIDENTIAL FINANCING SOURCES Residential Absorption	Table Ref.	1	2	3	4	5	6	7	8	9	10	11
Village 1 (Town Center)												
TOWNS	3	50	42	-	-	-	-	-	-	-	-	-
Stacked flats HHDR	3	50	50	50	50	11	-	-	-	-	-	-
Stacked flats	3	50	50	50	50	50	50	50	50	13	-	-
55'x100'	3	50	50	14	-	-	-	-	-	-	-	-
50'X70'	3	-	50	38	-	-	-	-	-	-	-	-
45'X80'	3	50	17	-	-	-	-	-	-	-	-	-
45'X80'	3	-	33	26	-	-	-	-	-	-	-	-
55'X100'	3	-	-	36	30	-	-	-	-	-	-	-
60'X100'	3	50	20	-	-	-	-	-	-	-	-	-
Village 2 (Town Center West)												
60'X100'	3	-	30	47	-	-	-	-	-	-	-	-
50x100	3	-	-	50	42	-	-	-	-	-	-	-
45x80	3	-	-	24	50	26	-	-	-	-	-	-
50'x100	3	-	-	-	-	32	50	7	-	-	-	-
50'x100	3	-	-	50	50	18	-	-	-	-	-	-
Duplex	3	-	-	50	50	29	-	-	-	-	-	-
40'X62'	3	-	-	50	50	22	-	-	-	-	-	-
Stacked flats	3	-	-	50	50	50	50	50	50	50	50	20
Triplex-adult	3	-	-	50	10	-	-	-	-	-	-	-
Triplex-adult	3	-	-	-	40	50	40	-	-	-	-	-
45X100	3	-	-	50	50	50	22	-	-	-	-	-
Village 3 (Casa Activia Adult)												
MIXED USE HHDR	3	-	-	-	-	-	-	75	75	75	75	75
DUPLEX	3	-	-	-	-	-	-	46	-	-	-	-
DUPLEX	3	-	-	-	-	-	-	-	50	51	-	-
65x110	3	-	-	-	-	-	-	50	36	-	-	-
75x100	3	-	-	-	-	-	-	-	50	24	-	-
65x110	3	-	-	-	-	-	-	-	23	50	-	-
DUPLEX	3	-	-	-	-	-	-	-	-	-	50	50
50x90	3	-	-	-	-	-	-	50	40	-	-	-
50x70	3	-	-	-	-	-	-	-	50	47	-	-
DUPLEX	3	-	-	-	-	-	-	-	-	-	50	50
40X90	3	-	-	-	-	-	-	-	-	42	50	-
50x90	3	-	-	-	-	-	-	-	-	50	44	-
40x90	3	-	-	-	-	-	-	50	50	16	-	-
75x100	3	-	-	-	-	-	-	-	-	26	24	50
85x115	3	-	-	-	-	-	-	-	-	30	21	-
85x115	3	-	-	-	-	-	-	-	-	-	11	40
75x100	3	-	-	-	-	-	-	-	-	-	26	40
Village 4 (North Village)												
Duplex-Adult	3	-	-	-	-	50	47	-	-	-	-	-
Duplex-Adult	3	-	-	-	-	-	-	56	-	-	-	-
40X90	3	-	-	-	-	50	24	-	-	-	-	-
50x100	3	-	-	-	-	50	50	16	-	-	-	-
Duplex-Family	3	-	-	-	-	-	50	16	-	-	-	-
Duplex	3	-	-	-	-	-	-	-	51	-	-	-
Standard Lot (60' X 100')	3	-	-	-	-	-	40	40	27	-	-	-
Standard Lot (70' X 100')	3	-	-	-	-	-	40	26	-	-	-	-
Duplex-Family	3	-	-	-	-	38	-	-	-	-	-	-
Triplex Adult	3	-	-	-	-	40	44	-	-	-	-	-
45x80	3	-	-	-	-	40	-	-	-	-	-	-
45x80	3	-	-	-	-	-	56	-	-	-	-	-
Duplex-Family	3	-	-	-	-	-	34	17	-	-	-	-
Duplex-Family	3	-	-	-	-	-	-	30	11	-	-	-
Village 5 (East Village)												
Duplex Family	3	-	-	-	-	-	-	-	-	50	50	50
40 x 100	3	-	-	-	-	-	-	-	-	-	50	50
70X100	3	-	-	-	-	-	-	-	-	40	41	-
85X115	3	-	-	-	-	-	-	-	-	46	-	-
45X100	3	-	-	-	-	-	-	-	-	-	50	50
50X70	3	-	-	-	-	-	-	-	-	50	50	50
50X90	3	-	-	-	-	-	-	-	-	-	-	50
55X100	3	-	-	-	-	-	-	-	-	-	50	50
60X100	3	-	-	-	-	-	-	-	-	50	50	50
55X100	3	-	-	-	-	-	-	-	-	30	40	28
55X100	3	-	-	-	-	-	-	-	-	-	-	39
70X100	3	-	-	-	-	-	-	-	-	-	40	40
50X100	3	-	-	-	-	-	-	-	-	-	-	50
55X100	3	-	-	-	-	-	-	-	-	-	-	16
40X90	3	-	-	-	-	-	-	-	-	-	-	50
70X100	3	-	-	-	-	-	-	-	-	-	40	40
Village 6 (South Village)												
50X70	3	-	-	-	-	-	-	-	-	-	-	50
50x90	3	-	-	-	-	-	-	-	-	-	-	50
40X90	3	-	-	-	-	-	-	-	-	-	-	50
40X90	3	-	-	-	-	-	-	-	-	-	-	-
50x90	3	-	-	-	-	-	-	-	-	-	-	-
40X90	3	-	-	-	-	-	-	-	-	-	-	-
75x100	3	-	-	-	-	-	-	-	-	-	-	30
75x100	3	-	-	-	-	-	-	-	-	-	-	-
65x110	3	-	-	-	-	-	-	-	-	-	-	36
65x110	3	-	-	-	-	-	-	-	-	-	-	-
duplex-family	3	-	-	-	-	-	-	-	-	-	-	50
50X100	3	-	-	-	-	-	-	-	-	-	-	-
85X115	3	-	-	-	-	-	-	-	-	-	-	30
Total Residential Absorption		300	342	635	522	606	597	579	583	740	862	1,234
Cumulative Residential Absorption		300	642	1,277	1,799	2,405	3,002	3,581	4,164	4,884	5,746	6,980
Share of Residential Units		3.5%	7.6%	15.0%	21.2%	28.3%	35.4%	42.2%	48.8%	57.5%	67.7%	82.2%

	Table Ref.	Persons per Household											
Total Population	3	1.85	556	633	1,176	967	1,122	1,106	1,072	1,043	1,371	1,596	2,285
Cumulative Population			556	1,189	2,365	3,332	4,454	5,560	6,632	7,675	9,046	10,642	12,928

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
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Residential Assessed Value	Table Ref.	Average Value	1	2	3	4	5	6	7	8	9	10	11
Development Area A													
TOWNS	3	$ 349,066	$ 17,453,300	$ 14,660,772	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Stacked flats HHDR	3	271,999	13,599,950	13,599,950	13,599,950	13,599,950	2,991,989	-	-	-	-	-	-
Stacked flats	3	305,999	15,299,950	15,299,950	15,299,950	15,299,950	15,299,950	15,299,950	15,299,950	15,299,950	3,977,987	-	-
55'x100'	3	504,332	25,216,600	25,216,600	7,060,648	-	-	-	-	-	-	-	-
50'X70'	3	356,432	-	17,821,600	13,544,416	-	-	-	-	-	-	-	-
45'X80'	3	362,666	18,133,300	6,165,322	-	-	-	-	-	-	-	-	-
45'X80'	3	362,686	-	11,968,638	9,429,836	-	-	-	-	-	-	-	-
55'X100'	3	504,332	-	-	18,155,952	15,129,960	-	-	-	-	-	-	-
60'X100'	3	509,999	25,499,950	10,199,980	-	-	-	-	-	-	-	-	-
Village 2 (Town Center West)													
60'X100'	3	509,999	-	15,299,970	23,969,953	-	-	-	-	-	-	-	-
50x100	3	473,732	-	-	23,686,600	19,896,744	-	-	-	-	-	-	-
45x80	3	362,686	-	-	8,704,464	18,134,300	9,429,836	-	-	-	-	-	-
50'x100	3	473,732	-	-	-	-	15,159,424	23,686,600	3,316,124	-	-	-	-
50'x100	3	473,732	-	-	23,686,600	23,686,600	8,527,176	-	-	-	-	-	-
Duplex	3	344,532	-	-	17,226,600	17,226,600	9,991,428	-	-	-	-	-	-
40'X62'	3	314,499	-	-	15,724,950	15,724,950	6,918,978	-	-	-	-	-	-
Stacked flats	3	226,686	-	-	11,334,300	11,334,300	11,334,300	11,334,300	11,334,300	11,334,300	11,334,300	11,334,300	4,533,720
Triplex-adult	3	301,466	-	-	15,073,300	3,014,660	-	-	-	-	-	-	-
Triplex-adult	3	301,466	-	-	-	12,058,640	15,073,300	12,058,640	-	-	-	-	-
45X100	3	387,599	-	-	19,379,950	19,379,950	19,379,950	8,527,178	-	-	-	-	-
Village 3 (Casa Activio Adult)													
MIXED USE HHDR	3	271,999	-	-	-	-	-	-	20,399,925	20,399,925	20,399,925	20,399,925	20,399,925
DUPLEX	3	275,399	-	-	-	-	-	-	12,668,354	-	-	-	-
DUPLEX	3	275,399	-	-	-	-	-	-	-	13,769,950	14,045,349	-	-
65x110	3	456,165	-	-	-	-	-	-	22,808,250	16,421,940	-	-	-
75x100	3	515,665	-	-	-	-	-	-	-	25,783,250	12,375,960	-	-
65x110	3	456,165	-	-	-	-	-	-	-	10,491,795	22,808,250	-	-
DUPLEX	3	275,399	-	-	-	-	-	-	-	-	-	13,769,950	13,769,950
50x90	3	362,666	-	-	-	-	-	-	18,133,300	14,506,640	-	-	-
50x70	3	398,666	-	-	-	-	-	-	-	19,833,300	18,643,302	-	-
DUPLEX	3	275,399	-	-	-	-	-	-	-	-	-	13,769,950	13,769,950
40X90	3	335,466	-	-	-	-	-	-	-	-	14,089,572	16,773,300	-
50x90	3	362,666	-	-	-	-	-	-	-	-	18,133,300	15,957,304	-
40x90	3	335,466	-	-	-	-	-	-	16,773,300	16,773,300	5,367,456	-	-
75x100	3	515,665	-	-	-	-	-	-	-	-	13,407,290	12,375,960	25,783,250
65x115	3	632,398	-	-	-	-	-	-	-	-	18,971,940	13,280,358	-
65x115	3	632,398	-	-	-	-	-	-	-	-	-	6,956,378	25,295,920
75x100	3	515,665	-	-	-	-	-	-	-	-	-	13,407,290	20,626,600
Village 4 (North Village)													
Duplex-Adult	3	344,532	-	-	-	-	17,226,600	16,193,004	-	-	-	-	-
Duplex-Adult	3	344,532	-	-	-	-	-	-	19,293,792	-	-	-	-
40X90	3	356,999	-	-	-	-	17,849,950	8,567,976	-	-	-	-	-
50x100	3	473,732	-	-	-	-	23,686,600	23,686,600	7,579,712	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	-	16,773,300	5,367,456	-	-	-	-
Duplex	3	453,332	-	-	-	-	-	-	-	23,119,932	-	-	-
Standard Lot (60' X 100')	3	509,999	-	-	-	-	-	20,399,960	20,399,960	13,769,973	-	-	-
Standard Lot (70' X 100')	3	589,048	-	-	-	-	-	23,561,920	15,315,248	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	12,747,708	-	-	-	-	-	-
Triplex Adult	3	301,466	-	-	-	-	12,058,640	13,264,504	-	-	-	-	-
45x80	3	362,666	-	-	-	-	14,506,640	-	-	-	-	-	-
45x80	3	362,666	-	-	-	-	-	20,309,296	-	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	-	11,405,844	5,702,922	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	-	-	10,063,980	3,690,126	-	-	-
Village 5 (East Village)													
Duplex Family	3	335,466	-	-	-	-	-	-	-	-	16,773,300	16,773,300	16,773,300
40 x 100	3	362,666	-	-	-	-	-	-	-	-	-	18,133,300	18,133,300
70X100	3	589,048	-	-	-	-	-	-	-	-	23,561,920	24,150,958	-
65X115	3	632,398	-	-	-	-	-	-	-	-	29,090,308	-	-
45X100	3	387,599	-	-	-	-	-	-	-	-	-	19,379,950	19,379,950
50X70	3	356,432	-	-	-	-	-	-	-	-	17,821,600	17,821,600	17,821,600
50X90	3	447,665	-	-	-	-	-	-	-	-	-	-	22,383,250
55X100	3	504,332	-	-	-	-	-	-	-	-	-	25,216,600	25,216,600
60X100	3	509,999	-	-	-	-	-	-	-	-	25,499,950	25,499,950	25,499,950
55X100	3	515,665	-	-	-	-	-	-	-	-	15,469,950	20,626,600	14,438,620
55X100	3	504,332	-	-	-	-	-	-	-	-	-	-	19,668,948
70X100	3	589,048	-	-	-	-	-	-	-	-	-	23,561,920	23,561,920
50X100	3	473,732	-	-	-	-	-	-	-	-	-	-	23,686,600
55X100	3	515,665	-	-	-	-	-	-	-	-	-	-	8,250,640
40X90	3	368,332	-	-	-	-	-	-	-	-	-	-	18,416,600
70X100	3	611,998	-	-	-	-	-	-	-	-	-	24,479,920	24,479,920
Village 6 (South Village)													
50X70	3	356,432	-	-	-	-	-	-	-	-	-	-	17,821,600
50x90	3	447,665	-	-	-	-	-	-	-	-	-	-	22,383,250
40X90	3	356,999	-	-	-	-	-	-	-	-	-	-	17,849,950
40X90	3	368,332	-	-	-	-	-	-	-	-	-	-	-
50x90	3	447,665	-	-	-	-	-	-	-	-	-	-	-
40X90	3	358,999	-	-	-	-	-	-	-	-	-	-	-
75x100	3	611,998	-	-	-	-	-	-	-	-	-	-	18,359,940
75x100	3	515,665	-	-	-	-	-	-	-	-	-	-	-
65x110	3	456,165	-	-	-	-	-	-	-	-	-	-	16,421,940
65x110	3	456,165	-	-	-	-	-	-	-	-	-	-	-
duplex-family	3	335,466	-	-	-	-	-	-	-	-	-	-	16,773,300
50X100	3	473,732	-	-	-	-	-	-	-	-	-	-	-
65X115	3	632,398	-	-	-	-	-	-	-	-	-	-	18,971,940
Total Residential Assessed Value			$ 115,203,050	$ 130,232,782	$ 235,877,469	$ 184,486,604	$ 212,182,469	$ 225,069,072	$ 204,456,573	$ 205,194,381	$ 301,771,659	$ 353,688,823	$ 530,472,433
Total Current Period Assessed Value Additions			$ 115,203,050	$ 130,232,782	$ 235,877,469	$ 184,486,604	$ 212,182,469	$ 225,069,072	$ 204,456,573	$ 205,194,381	$ 301,771,659	$ 353,688,823	$ 530,472,433
Current Period Cumulative Assessed Value Additions			$ 115,203,050	$ 245,435,832	$ 481,313,301	$ 665,799,905	$ 877,982,374	$ 1,103,051,446	$ 1,307,508,019	$ 1,512,702,400	$ 1,814,474,059	$ 2,168,162,882	$ 2,698,615,315
Previous Period Adjusted Assessed Value			-	115,203,050	244,959,834	479,825,173	662,329,227	871,775,072	1,093,242,128	1,293,181,623	1,493,032,813	1,788,635,532	2,134,914,038
Deflation Factor @ 0.41%			0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996
Cumulative Residential AV Adj. for Deflation Factor of 0.41%			$ 115,203,050	$ 244,959,834	$ 479,825,173	$ 662,329,227	$ 871,775,072	$ 1,093,242,128	$ 1,293,181,623	$ 1,493,032,813	$ 1,788,635,532	$ 2,134,914,038	$ 2,656,565,394

Exhibit C - Phasing Analysis, Constant Dollars
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	Table Ref.	Factor	1	2	3	4	5	6	7	8	9	10	11
Residential Property Tax													
Basic Tax Paid	4	1.000%	$ 1,152,031	$ 2,449,598	$ 4,798,252	$ 6,823,292	$ 8,717,751	$ 10,932,421	$ 12,931,816	$ 14,930,328	$ 17,886,355	$ 21,349,140	$ 26,565,654
Total Residential Property Tax	4	14.0253%	$ 161,576	$ 343,563	$ 672,989	$ 928,936	$ 1,222,690	$ 1,533,305	$ 1,813,726	$ 2,094,023	$ 2,508,814	$ 2,994,280	$ 3,725,912
Residential Property Tax In-Lieu of Sales Tax													
Off-Site Sales Tax Redirected to Property Tax			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Property Tax From MVLF	Table Ref.	Factor											
Cumulative Residential AV Adj. for Deflation Factor of 0.41%			$ 115,203,050	$ 244,959,834	$ 479,825,173	$ 662,329,227	$ 871,775,072	$ 1,093,242,128	$ 1,293,181,623	$ 1,493,032,813	$ 1,788,635,532	$ 2,134,914,038	$ 2,656,565,394
Cumulative Non-Residential AV Adj. for Deflation Factor of 0.41%			$ 18,101,947	$ 36,129,099	$ 54,081,767	$ 71,960,257	$ 99,264,877	$ 119,523,097	$ 139,697,613	$ 159,788,772	$ 179,796,918	$ 259,722,394	$ 279,317,632
Total Assessed Valuation			$ 133,304,997	$ 281,088,933	$ 533,906,940	$ 734,289,484	$ 971,039,949	$ 1,212,765,225	$ 1,432,879,236	$ 1,652,821,585	$ 1,968,432,450	$ 2,394,636,432	$ 2,935,893,026
Assessed Valuation / 1,000,000	5	$ 892	$ 133	$ 281	$ 534	$ 734	$ 971	$ 1,213	$ 1,433	$ 1,653	$ 1,968	$ 2,395	$ 2,936
Property Tax From MVLF	5		$ 118,908	$ 250,731	$ 476,245	$ 654,986	$ 866,168	$ 1,081,767	$ 1,278,128	$ 1,474,317	$ 1,755,842	$ 2,136,016	$ 2,618,808
Residential Documentary Transfer Tax	Ref.	Factor											
Residential Property Turnover Rate	4	14.3%											
Transfer Tax as a % of Price	4	0.11%											
Total Residential Documentary Transfer Tax			$ 18,103	$ 38,494	$ 75,401	$ 104,080	$ 136,993	$ 171,795	$ 203,214	$ 234,619	$ 281,071	$ 335,486	$ 417,460
Off-Site Sales Tax	Table Ref.	Factor											
Household Income (@ 25% of Assessed Valuation) (d)	5	25.00%	$ 28,800,763	$ 61,239,958	$ 119,956,293	$ 165,582,307	$ 217,943,768	$ 273,310,532	$ 323,295,406	$ 373,258,203	$ 447,158,883	$ 533,728,510	$ 664,141,349
Retail Taxable Sales (@ 32% of Household Income) (e)	5	32.00%	9,216,244	19,596,787	38,386,014	52,986,338	69,742,006	87,459,370	103,454,530	119,442,625	143,090,843	170,793,123	212,525,232
Projected Off-Site Taxable Sales (@ 0% of Retail Taxable Sales) (f)	5	0.00%	-	-	-	-	-	-	-	-	-	-	-
Sales Tax (@ 1.00% of Taxable Sales)	5	1.00%	-	-	-	-	-	-	-	-	-	-	-
Use Tax (@ 10.5% of Sales Tax)	5	10.50%	-	-	-	-	-	-	-	-	-	-	-
Less: 0.25% Reclassified to Property Tax	5	0.00%	-	-	-	-	-	-	-	-	-	-	-
Total Off-Site Sales Tax Passed Through to County			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
NON-RESIDENTIAL FINANCING SOURCES	Measure	Table Ref.	Factor											
Office														
Square Feet		3	450,323	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640
Cumulative Square Feet				34,640	69,280	103,921	138,561	173,201	207,841	242,482	277,122	311,762	346,402	381,043
Assessed Value Additions	per Sq. Ft.	3	$ 298	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508
Cumulative Employees	per Sq. Ft.	3	175	188	376	564	752	940	1,128	1,316	1,504	1,692	1,880	2,069
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Retail														
Square Feet		3	441,687	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976
Cumulative Square Feet				33,976	67,952	101,928	135,904	169,880	203,856	237,831	271,807	305,783	339,759	373,735
Assessed Value Additions	per Sq. Ft.	3	$ 231	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438
Cumulative Employees	per Sq. Ft.	3	500	65	129	194	258	323	387	452	516	581	646	710
Taxable Sales	per Sq. Ft.	5	200	6,795,185	13,590,369	20,385,554	27,180,738	33,975,923	40,771,108	47,566,292	54,361,477	61,156,662	67,951,846	74,747,031
Light Industrial														
Square Feet		3	106,380	-	-	-	-	-	13,298	13,298	13,298	13,298	13,298	13,298
Cumulative Square Feet				-	-	-	-	-	13,298	26,595	39,893	53,190	66,488	79,785
Assessed Value Additions	per Sq. Ft.	3	$ 193	$ -	$ -	$ -	$ -	$ -	$ 2,566,418	$ 2,566,418	$ 2,566,418	$ 2,566,418	$ 2,566,418	$ 2,566,418
Cumulative Employees	per Sq. Ft.	3	600	-	-	-	-	-	21	42	63	84	105	126
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Hotel - Business (Limited Service)														
Number of Rooms		3	100	-	-	-	-	100	-	-	-	-	-	-
Cumulative Number of Rooms				-	-	-	-	100	100	100	100	100	100	100
Assessed Value Additions	per room	3	$ 95,000	$ -	$ -	$ -	$ -	$ 9,500,000	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees		3	0.35	-	-	-	-	35	35	35	35	35	35	35
Taxable Sales	per room	5	375	-	-	-	-	37,549	37,549	37,549	37,549	37,549	37,549	37,549
Hotel - Resort														
Number of Rooms		3	300	-	-	-	-	-	-	-	-	-	300	-
Cumulative Number of Rooms				-	-	-	-	-	-	-	-	-	300	300
Assessed Value Additions	per room	3	$ 200,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 60,000,000	$ -
Cumulative Employees		3	1	-	-	-	-	-	-	-	-	-	300	300
Taxable Sales	per room	5	32,800	-	-	-	-	-	-	-	-	9,840,014	9,840,014	9,840,014
Schools														
Square Feet		3	-	-	-	-	-	-	-	-	-	-	-	-
Cumulative Square Feet				-	-	-	-	-	-	-	-	-	-	-
Assessed Value Additions	per Sq. Ft.	3	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees	per Sq. Ft.	3	497	497	497	497	497	497	497	497	497	497	497	497
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Other														
Square Feet		3	-	-	-	-	-	-	-	-	-	-	-	-
Cumulative Square Feet				-	-	-	-	-	-	-	-	-	-	-
Assessed Value Additions	per Sq. Ft.	3	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees	per Sq. Ft.	3	428	15	32	64	91	121	151	181	209	246	290	352
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Total Non-Residential Assessed Value Additions				$ 18,101,947	$ 18,101,947	$ 18,101,947	$ 18,101,947	$ 27,601,947	$ 20,668,364	$ 20,668,364	$ 20,668,364	$ 20,668,364	$ 80,668,364	$ 20,668,364
Current Period Cumulative Assessed Value Additions				$ 18,101,947	$ 36,203,893	$ 54,305,840	$ 72,407,786	$ 100,009,733	$ 120,678,097	$ 141,346,461	$ 162,014,825	$ 182,683,189	$ 263,351,553	$ 284,019,917
Previous Period Adjusted Assessed Value				-	18,101,947	36,129,099	54,081,767	71,960,257	99,264,877	119,523,097	139,697,613	159,788,772	179,796,918	259,722,394
Deflation Factor				0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996
Cumulative Non-Residential AV Adj. for Deflation Factor of 0.41%				$ 18,101,947	$ 36,129,099	$ 54,081,767	$ 71,960,257	$ 99,264,877	$ 119,523,097	$ 139,697,613	$ 159,788,772	$ 179,796,918	$ 259,722,394	$ 279,317,632
Total Non-Residential Cumulative Employees				765	1,035	1,319	1,598	1,916	2,220	2,523	2,825	3,135	3,753	4,089
50% of Cumulative Employees				382	517	660	799	958	1,110	1,261	1,412	1,568	1,876	2,044
Equivalent Residents (Residents & 50% Employees)				938	1,706	3,025	4,131	5,412	6,670	7,894	9,087	10,614	12,519	14,972
Total Taxable Sales				$ 6,795,185	$ 13,590,369	$ 20,385,554	$ 27,180,738	$ 34,013,472	$ 40,808,657	$ 47,603,841	$ 54,399,026	$ 61,194,211	$ 77,829,410	$ 84,624,594

Exhibit C - Phasing Analysis, Constant Dollars
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	Table Ref.	Factor	1	2	3	4	5	6	7	8	9	10	11
Non-Residential Property Tax													
Basic Tax Paid	4	1.00%	$ 181,019	$ 361,291	$ 540,818	$ 719,603	$ 992,649	$ 1,195,231	$ 1,396,976	$ 1,597,888	$ 1,797,969	$ 2,597,224	$ 2,793,176
Non-Residential Unsecured Property Tax as a % of Secured	4	10.00%	18,102	36,129	54,082	71,960	99,265	119,523	139,698	159,789	179,797	259,722	279,318
Total Non-Residential Property Tax	4	14.03%	$ 27,927	$ 55,739	$ 83,436	$ 111,019	$ 153,144	$ 184,398	$ 215,523	$ 246,519	$ 277,388	$ 400,695	$ 430,926
Non-Residential Property Tax In-Lieu of Sales Tax													
On-Site Sales Tax Redirected to Property Tax			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
	Table Ref.	Factor											
Non-Residential Documentary Transfer Tax													
Non-Residential Property Turnover Rate	4	10.00%											
Transfer Tax as a % of Price	4	0.11%											
Total Non-Residential Documentary Transfer Tax			$ 1,991	$ 3,974	$ 5,949	$ 7,916	$ 10,919	$ 13,148	$ 15,367	$ 17,577	$ 19,778	$ 28,589	$ 30,725
	Table Ref.	Factor											
On-Site Sales Tax													
Sales Tax (@ 1.00% of Taxable Sales)	5	1.00%	$ 67,952	$ 135,904	$ 203,856	$ 271,807	$ 340,135	$ 408,087	$ 476,038	$ 543,990	$ 611,942	$ 778,294	$ 846,246
Use Tax (@ 10.5% of Sales Tax)	5	10.50%	7,135	14,270	21,405	28,540	35,714	42,849	49,984	57,119	64,254	81,721	88,856
Less: 0.25% Reclassified to Property Tax	5	0.00%	-	-	-	-	-	-	-	-	-	-	-
Total On-Site Sales Tax Allocated to County			$ 75,087	$ 150,174	$ 225,260	$ 300,347	$ 375,849	$ 450,936	$ 526,022	$ 601,109	$ 676,196	$ 860,015	$ 935,102
Proposition 172 - Half Cent Sales Tax	5		$ 32,026	$ 64,051	$ 96,077	$ 128,103	$ 160,305	$ 192,331	$ 224,357	$ 256,383	$ 288,408	$ 366,810	$ 398,836
	Table Ref.	Factor											
Transient Occupancy Tax													
Hotel - Business Rental Revenue Subject to TOT	5	10.00%	$ -	$ -	$ -	$ -	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184
Hotel - Resort Revenue Subject to TOT	5	10.00%	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,169,460	$ 1,169,460
Total Transient Occupancy Tax Allocated to County			$ -	$ -	$ -	$ -	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 1,352,644	$ 1,352,644
	Table Ref.	Factor											
Interest Earnings													
County Share of Residential and Non-Residential Property Tax	4		$ 189,503	$ 399,303	$ 756,405	$ 1,039,955	$ 1,375,835	$ 1,717,703	$ 2,029,249	$ 2,340,542	$ 2,766,002	$ 3,394,976	$ 4,156,838
Documentary Transfer Tax	4		20,095	42,468	81,350	111,896	147,912	184,943	218,581	252,196	300,849	364,056	448,185
Net Off-Site Sales and Use Tax	5		-	-	-	-	-	-	-	-	-	-	-
Net On-Site Sales and Use Tax	5		75,087	150,174	225,260	300,347	375,849	450,936	526,022	601,109	676,196	860,015	935,102
Total Revenue Generating Interest Earnings			$ 284,684	$ 591,944	$ 1,063,016	$ 1,452,299	$ 1,899,596	$ 2,353,581	$ 2,773,852	$ 3,193,848	$ 3,763,047	$ 4,619,046	$ 5,540,125
Total Interest Earnings	5	1.13%	$ 3,217	$ 6,689	$ 12,012	$ 16,411	$ 21,485	$ 26,595	$ 31,345	$ 36,090	$ 42,522	$ 52,195	$ 62,603
	Table Ref.	Factor											
Other General Fund Discretionary Revenue													
Franchises	6	$ 10.06	$ 9,435	$ 17,163	$ 30,425	$ 41,552	$ 54,442	$ 67,091	$ 79,401	$ 91,408	$ 106,758	$ 125,920	$ 150,598
Fines and Penalties	6	8.31	7,795	14,180	25,136	34,329	44,978	55,428	65,598	75,516	88,200	104,031	124,419
Miscellaneous Federal and State	6	1.30	722	1,545	3,074	4,330	5,789	7,226	8,619	9,974	11,755	13,830	16,800
Miscellaneous Revenue	6	0.17	164	298	529	722	946	1,166	1,380	1,589	1,856	2,189	2,618
Criminal-Co. 25%	6	-	-	-	-	-	-	-	-	-	-	-	-
Penalties & Int On Del Taxes	6	-	-	-	-	-	-	-	-	-	-	-	-
Court Fees & Costs	6	-	-	-	-	-	-	-	-	-	-	-	-
Superior Court Fees	6	-	-	-	-	-	-	-	-	-	-	-	-
Rebates & Refunds	6	-	-	-	-	-	-	-	-	-	-	-	-
Total Other General Fund Discretionary Revenue			$ 18,116	$ 33,187	$ 59,163	$ 80,933	$ 106,154	$ 130,911	$ 154,998	$ 178,490	$ 208,569	$ 245,970	$ 294,436

Exhibit C - Phasing Analysis, Constant Dollars
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POLICE PHASING	Table Ref.	Factor	1	2	3	4	5	6	7	8	9	10	11
Cumulative Residents			556	1,189	2,365	3,332	4,454	5,560	6,632	7,675	9,046	10,642	12,928
Staffing Service Standard Sworn Officer per 1,000 residents	9	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20
Number of Sworn Officers Required			0.67	1.43	2.84	4.00	5.35	6.67	7.96	9.21	10.85	12.77	15.51
Police Costs	9	$ 128,055	$ 85,381	$ 182,714	$ 363,437	$ 511,999	$ 684,467	$ 854,375	$ 1,019,159	$ 1,179,390	$ 1,389,995	$ 1,635,322	$ 1,986,521
FISCAL IMPACT TO OTHER COUNTY FUNDS													
Fiscal Impact to Library Fund	**Table Ref.**	**Factor**											
Financing Sources													
Library Fund Ad Valorem Tax			$ 1,333,050	$ 2,810,889	$ 5,339,069	$ 7,342,895	$ 9,710,399	$ 12,127,652	$ 14,328,792	$ 16,528,216	$ 19,684,324	$ 23,946,364	$ 29,358,830
Basic Tax Adj. for Deflation													
Total County Library Tax	11	1.43%	$ 19,079	$ 40,231	$ 76,415	$ 105,095	$ 138,980	$ 173,577	$ 205,081	$ 236,560	$ 281,732	$ 342,732	$ 420,198
Fines, Forfeitures & Penalties													
Library Fines and Fees	11	$ 0.14	$ 135	$ 245	$ 434	$ 592	$ 776	$ 957	$ 1,132	$ 1,303	$ 1,522	$ 1,795	$ 2,147
Revenue from Use of Money and Property													
Rents	11	$ 0.01	$ 6	$ 12	$ 21	$ 28	$ 37	$ 46	$ 54	$ 62	$ 73	$ 86	$ 103
Total Financing Sources			$ 19,220	$ 40,487	$ 76,870	$ 105,716	$ 139,793	$ 174,579	$ 206,267	$ 237,926	$ 283,327	$ 344,614	$ 422,448
Financing Requirements													
Library Services	11	$ 8.88	$ 8,142	$ 14,811	$ 26,254	$ 35,856	$ 46,979	$ 57,894	$ 68,517	$ 78,878	$ 92,124	$ 108,659	$ 129,955
Total Financing Requirements			$ 8,142	$ 14,811	$ 26,254	$ 35,856	$ 46,979	$ 57,894	$ 68,517	$ 78,878	$ 92,124	$ 108,659	$ 129,955
Net Annual Surplus/ (Deficit)			$ 11,079	$ 25,677	$ 50,616	$ 69,860	$ 92,815	$ 116,685	$ 137,751	$ 159,048	$ 191,203	$ 235,954	$ 292,494

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
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	Table Ref.	Factor	12	13	14	15	16	17	18	19	20	21	30	31
General Fund Financing Sources														
Property Tax	4		$ 4,743,717	$ 5,103,843	$ 5,082,755	$ 5,061,754	$ 5,040,839	$ 5,020,012	$ 4,999,270	$ 4,978,614	$ 4,958,043	$ 4,937,557	$ 4,836,391	$ 4,737,288
Property Tax In-Lieu of Sales-Tax	4		-	-	-	-	-	-	-	-	-	-	-	-
Documentary Transfer Tax	4		512,714	551,842	549,562	547,291	545,030	542,778	540,535	538,302	536,077	533,863	522,924	512,210
Property Tax In-Lieu of MVLF	5		2,990,318	3,217,622	3,204,328	3,191,088	3,177,903	3,164,773	3,151,696	3,138,674	3,125,706	3,112,791	3,049,013	2,986,541
On-Site Retail Sales and Use Tax	5		1,010,189	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275
Off-Site Retail Sales and Use Tax	5		-	-	-	-	-	-	-	-	-	-	-	-
Transient Occupancy Tax	5		1,352,644	1,352,644	1,352,644	1,352,644	1,352,644	1,352,644	1,352,644	1,352,644	1,352,644	1,352,644	1,352,644	1,352,644
Interest Earnings	5		70,813	76,173	75,909	75,646	75,384	75,123	74,863	74,605	74,347	74,091	72,824	71,583
Other Discretionary Revenue	6		332,852	355,711	355,711	355,711	355,711	355,711	355,711	355,711	355,711	355,711	355,711	355,711
Total Financing Sources			$ 11,013,247	$ 11,743,110	$ 11,706,183	$ 11,669,409	$ 11,632,786	$ 11,596,315	$ 11,559,995	$ 11,523,824	$ 11,487,803	$ 11,451,931	$ 11,274,782	$ 11,101,252
General Fund Financing Requirements														
General Financing Requirements	8	$ 30.28	$ 512,289	$ 547,469	$ 547,469	$ 547,469	$ 547,469	$ 547,469	$ 547,469	$ 547,469	$ 547,469	$ 547,469	$ 547,469	$ 547,469
Public Protection														
Judicial	8	12.53	211,952	226,507	226,507	226,507	226,507	226,507	226,507	226,507	226,507	226,507	226,507	226,507
Police Protection	9		2,260,877	2,416,270	2,416,270	2,416,270	2,416,270	2,416,270	2,416,270	2,416,270	2,416,270	2,416,270	2,416,270	2,416,270
Detention and Correction	8	28.72	485,934	519,304	519,304	519,304	519,304	519,304	519,304	519,304	519,304	519,304	519,304	519,304
Fire Protection (Transfers to the Fire Fund)	8	-	743,980	540,270	548,992	557,677	566,326	574,939	583,517	592,060	600,567	609,039	650,877	691,858
Protection/Inspection	8	0.15	2,556	2,731	2,731	2,731	2,731	2,731	2,731	2,731	2,731	2,731	2,731	2,731
Other Protection	8	9.44	159,661	170,625	170,625	170,625	170,625	170,625	170,625	170,625	170,625	170,625	170,625	170,625
Transfers to the Transportation Fund	12	-	470,698	503,275	503,275	503,275	503,275	503,275	503,275	503,275	503,275	503,275	503,275	503,275
Public Ways & Facilities	8	-	-	-	-	-	-	-	-	-	-	-	-	-
Health and Sanitation	8	41.48	610,267	652,211	652,211	652,211	652,211	652,211	652,211	652,211	652,211	652,211	652,211	652,211
Public Assistance	8	2.34	34,404	36,769	36,769	36,769	36,769	36,769	36,769	36,769	36,769	36,769	36,769	36,769
Education	8	0.27	3,914	4,183	4,183	4,183	4,183	4,183	4,183	4,183	4,183	4,183	4,183	4,183
Recreation & Cultural Services	8	0.03	468	500	500	500	500	500	500	500	500	500	500	500
Debt Service	8	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Financing Requirements			$ 5,497,199	$ 5,620,114	$ 5,628,836	$ 5,637,521	$ 5,646,170	$ 5,654,783	$ 5,663,361	$ 5,671,904	$ 5,680,411	$ 5,688,883	$ 5,730,721	$ 5,771,702
General Fund Fiscal Impact														
Ongoing Surplus/(Deficit)			$ 5,516,048	$ 6,122,996	$ 6,077,348	$ 6,031,888	$ 5,986,616	$ 5,941,532	$ 5,896,633	$ 5,851,921	$ 5,807,393	$ 5,763,048	$ 5,544,061	$ 5,329,551
Surplus/(Deficit) per Unit			$ 694	$ 721	$ 716	$ 710	$ 705	$ 700	$ 695	$ 689	$ 684	$ 679	$ 653	$ 628
Revenue/Cost Ratio			2.00	2.09	2.08	2.07	2.06	2.05	2.04	2.03	2.02	2.01	1.97	1.92
Fiscal Impact to Fire Fund														
Financing Sources	10, Exhibit B		$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000
Financing Requirements	10, Exhibit B		3,500,000	3,500,000	3,500,000	3,500,000	3,500,000	3,500,000	3,500,000	3,500,000	3,500,000	3,500,000	3,500,000	3,500,000
Net Annual Surplus / (Deficit)			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Fiscal Impact to Library Fund														
Financing Sources	11		$ 482,351	$ 518,998	$ 516,865	$ 514,740	$ 512,625	$ 510,518	$ 508,420	$ 506,330	$ 504,249	$ 502,177	$ 491,944	$ 481,920
Financing Requirements	11		146,850	156,935	156,935	156,935	156,935	156,935	156,935	156,935	156,935	156,935	156,935	156,935
Net Annual Surplus / (Deficit)			$ 335,501	$ 362,063	$ 359,930	$ 357,805	$ 355,690	$ 353,583	$ 351,485	$ 349,395	$ 347,315	$ 345,242	$ 335,009	$ 324,985
Fiscal Impact to Transportation Fund														
Financing Sources	12		$ 675,412	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834
Financing Requirements	12		675,412	721,834	721,834	721,834	721,834	721,834	721,834	721,834	721,834	721,834	721,834	721,834
Net Annual Surplus / (Deficit)			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Net Fiscal Impact of Project														
Financing Sources			$ 15,671,010	$ 16,483,942	$ 16,444,881	$ 16,405,883	$ 16,367,245	$ 16,328,667	$ 16,290,248	$ 16,251,988	$ 16,213,887	$ 16,175,942	$ 15,988,860	$ 15,805,016
Financing Requirements			9,819,461	9,998,883	10,007,604	10,016,289	10,024,938	10,033,552	10,042,130	10,050,672	10,059,179	10,067,652	10,109,489	10,150,470
Net Annual Surplus / (Deficit)			$ 5,851,549	$ 6,485,059	$ 6,437,277	$ 6,389,593	$ 6,342,306	$ 6,295,115	$ 6,248,118	$ 6,201,316	$ 6,154,707	$ 6,108,291	$ 5,879,370	$ 5,654,545

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

RESIDENTIAL FINANCING SOURCES Residential Absorption	Table Ref.	12	13	14	15	16	17	18	19	20	21	26	31
Village 1 (Town Center)													
TOWNS	3	-	-	-	-	-	-	-	-	-	-	-	-
Stacked flats HHDR	3	-	-	-	-	-	-	-	-	-	-	-	-
Stacked flats	3	-	-	-	-	-	-	-	-	-	-	-	-
55'x100'	3	-	-	-	-	-	-	-	-	-	-	-	-
50'X70'	3	-	-	-	-	-	-	-	-	-	-	-	-
45'X80'	3	-	-	-	-	-	-	-	-	-	-	-	-
45'X80'	3	-	-	-	-	-	-	-	-	-	-	-	-
55'X100'	3	-	-	-	-	-	-	-	-	-	-	-	-
60'X100'	3	-	-	-	-	-	-	-	-	-	-	-	-
Village 2 (Town Center West)													
60'X100'	3	-	-	-	-	-	-	-	-	-	-	-	-
50x100	3	-	-	-	-	-	-	-	-	-	-	-	-
45x80	3	-	-	-	-	-	-	-	-	-	-	-	-
50'x100	3	-	-	-	-	-	-	-	-	-	-	-	-
50'x100	3	-	-	-	-	-	-	-	-	-	-	-	-
Duplex	3	-	-	-	-	-	-	-	-	-	-	-	-
40'X82'	3	-	-	-	-	-	-	-	-	-	-	-	-
Stacked flats	3	-	-	-	-	-	-	-	-	-	-	-	-
Triplex-adult	3	-	-	-	-	-	-	-	-	-	-	-	-
Triplex-adult	3	-	-	-	-	-	-	-	-	-	-	-	-
45X100	3	-	-	-	-	-	-	-	-	-	-	-	-
Village 3 (Casa Activie Adult)													
MIXED USE HHDR	3	43	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	-	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	-	-	-	-	-	-	-	-	-	-	-	-
65x110	3	-	-	-	-	-	-	-	-	-	-	-	-
75x100	3	-	-	-	-	-	-	-	-	-	-	-	-
65x110	3	-	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	14	-	-	-	-	-	-	-	-	-	-	-
50x90	3	-	-	-	-	-	-	-	-	-	-	-	-
50x70	3	-	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	46	-	-	-	-	-	-	-	-	-	-	-
40X90	3	-	-	-	-	-	-	-	-	-	-	-	-
50x90	3	-	-	-	-	-	-	-	-	-	-	-	-
40x90	3	-	-	-	-	-	-	-	-	-	-	-	-
75x100	3	-	-	-	-	-	-	-	-	-	-	-	-
85x115	3	-	-	-	-	-	-	-	-	-	-	-	-
85x115	3	-	-	-	-	-	-	-	-	-	-	-	-
75x100	3	36	-	-	-	-	-	-	-	-	-	-	-
Village 4 (North Village)													
Duplex-Adult	3	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Adult	3	-	-	-	-	-	-	-	-	-	-	-	-
40X90	3	-	-	-	-	-	-	-	-	-	-	-	-
50x100	3	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	-	-	-	-	-	-	-	-	-	-	-	-
Duplex	3	-	-	-	-	-	-	-	-	-	-	-	-
Standard Lot (60' X 100')	3	-	-	-	-	-	-	-	-	-	-	-	-
Standard Lot (70' X 100')	3	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	-	-	-	-	-	-	-	-	-	-	-	-
Triplex Adult	3	-	-	-	-	-	-	-	-	-	-	-	-
45x80	3	-	-	-	-	-	-	-	-	-	-	-	-
45x80	3	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	-	-	-	-	-	-	-	-	-	-	-	-
Village 5 (East Village)													
Duplex Family	3	41	-	-	-	-	-	-	-	-	-	-	-
40 x 100	3	-	34	-	-	-	-	-	-	-	-	-	-
70X100	3	-	-	-	-	-	-	-	-	-	-	-	-
85X115	3	-	-	-	-	-	-	-	-	-	-	-	-
45X100	3	50	22	-	-	-	-	-	-	-	-	-	-
50X70	3	57	-	-	-	-	-	-	-	-	-	-	-
50X90	3	59	-	-	-	-	-	-	-	-	-	-	-
55X100	3	21	-	-	-	-	-	-	-	-	-	-	-
60X100	3	12	-	-	-	-	-	-	-	-	-	-	-
55X100	3	-	-	-	-	-	-	-	-	-	-	-	-
55X100	3	50	50	-	-	-	-	-	-	-	-	-	-
70X100	3	8	-	-	-	-	-	-	-	-	-	-	-
50X100	3	50	40	-	-	-	-	-	-	-	-	-	-
55X100	3	40	-	-	-	-	-	-	-	-	-	-	-
40X90	3	36	-	-	-	-	-	-	-	-	-	-	-
70X100	3	40	36	-	-	-	-	-	-	-	-	-	-
Village 6 (South Village)													
50X70	3	50	56	-	-	-	-	-	-	-	-	-	-
50x90	3	12	-	-	-	-	-	-	-	-	-	-	-
40X90	3	40	-	-	-	-	-	-	-	-	-	-	-
40X90	3	30	25	-	-	-	-	-	-	-	-	-	-
50x90	3	39	58	-	-	-	-	-	-	-	-	-	-
40X90	3	40	30	-	-	-	-	-	-	-	-	-	-
75x100	3	30	27	-	-	-	-	-	-	-	-	-	-
75x100	3	-	30	-	-	-	-	-	-	-	-	-	-
65x110	3	-	-	-	-	-	-	-	-	-	-	-	-
65x110	3	40	25	-	-	-	-	-	-	-	-	-	-
duplex-family	3	50	43	-	-	-	-	-	-	-	-	-	-
50X100	3	-	44	-	-	-	-	-	-	-	-	-	-
85X115	3	30	26	-	-	-	-	-	-	-	-	-	-
Total Residential Absorption		964	546	-	-	-	-	-	-	-	-	-	-
Cumulative Residential Absorption		7,944	8,490	8,490	8,490	8,490	8,490	8,490	8,490	8,490	8,490	8,490	8,490
Share of Residential Units		93.6%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
	Table Ref.	Persons per Household											
Total Population	3	1.85	1,785	1,011	-	-	-	-	-	-	-	-	-
Cumulative Population			14,713	15,724	15,724	15,724	15,724	15,724	15,724	15,724	15,724	15,724	15,724

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

Residential Assessed Value	Table Ref.	Average Value	12	13	14	15	16	17	18	19	20	21	26	31
Development Area A														
TOWNS	3	$ 349,066	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Stacked flats HHDR	3	271,999	-	-	-	-	-	-	-	-	-	-	-	-
Stacked flats	3	305,999	-	-	-	-	-	-	-	-	-	-	-	-
55'x100'	3	504,332	-	-	-	-	-	-	-	-	-	-	-	-
50'X70'	3	356,432	-	-	-	-	-	-	-	-	-	-	-	-
45'X80'	3	362,666	-	-	-	-	-	-	-	-	-	-	-	-
45'X80'	3	362,666	-	-	-	-	-	-	-	-	-	-	-	-
55'X100'	3	504,332	-	-	-	-	-	-	-	-	-	-	-	-
60'X100'	3	509,999	-	-	-	-	-	-	-	-	-	-	-	-
Village 2 (Town Center West)														
60'X100'	3	509,999	-	-	-	-	-	-	-	-	-	-	-	-
50x100	3	473,732	-	-	-	-	-	-	-	-	-	-	-	-
45x80	3	362,666	-	-	-	-	-	-	-	-	-	-	-	-
50'x100	3	473,732	-	-	-	-	-	-	-	-	-	-	-	-
50'x100	3	473,732	-	-	-	-	-	-	-	-	-	-	-	-
Duplex	3	344,532	-	-	-	-	-	-	-	-	-	-	-	-
40'X62'	3	314,499	-	-	-	-	-	-	-	-	-	-	-	-
Stacked flats	3	226,666	-	-	-	-	-	-	-	-	-	-	-	-
Triplex-adult	3	301,466	-	-	-	-	-	-	-	-	-	-	-	-
Triplex-adult	3	301,466	-	-	-	-	-	-	-	-	-	-	-	-
45X100	3	387,599	-	-	-	-	-	-	-	-	-	-	-	-
Village 3 (Casa Activie Adult)														
MIXED USE HHDR	3	271,999	11,695,957	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	275,399	-	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	275,399	-	-	-	-	-	-	-	-	-	-	-	-
65x110	3	458,165	-	-	-	-	-	-	-	-	-	-	-	-
75x100	3	515,665	-	-	-	-	-	-	-	-	-	-	-	-
65x110	3	458,165	-	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	275,399	3,855,586	-	-	-	-	-	-	-	-	-	-	-
50x90	3	362,666	-	-	-	-	-	-	-	-	-	-	-	-
50x70	3	396,666	-	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	275,399	12,668,354	-	-	-	-	-	-	-	-	-	-	-
40X80	3	335,466	-	-	-	-	-	-	-	-	-	-	-	-
50x90	3	362,666	-	-	-	-	-	-	-	-	-	-	-	-
40x90	3	335,466	-	-	-	-	-	-	-	-	-	-	-	-
75x100	3	515,665	-	-	-	-	-	-	-	-	-	-	-	-
85x115	3	632,398	-	-	-	-	-	-	-	-	-	-	-	-
85x115	3	632,398	-	-	-	-	-	-	-	-	-	-	-	-
75x100	3	515,665	18,563,940	-	-	-	-	-	-	-	-	-	-	-
Village 4 (North Village)														
Duplex-Adult	3	344,532	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Adult	3	344,532	-	-	-	-	-	-	-	-	-	-	-	-
40X90	3	356,999	-	-	-	-	-	-	-	-	-	-	-	-
50x100	3	473,732	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	-	-	-	-	-	-	-	-
Duplex	3	453,332	-	-	-	-	-	-	-	-	-	-	-	-
Standard Lot (60' X 100')	3	509,999	-	-	-	-	-	-	-	-	-	-	-	-
Standard Lot (70' X 100')	3	589,048	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	-	-	-	-	-	-	-	-
Triplex Adult	3	301,466	-	-	-	-	-	-	-	-	-	-	-	-
45x80	3	362,666	-	-	-	-	-	-	-	-	-	-	-	-
45x80	3	362,666	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	-	-	-	-	-	-	-	-
Village 5 (East Village)														
Duplex Family	3	335,466	13,754,106	-	-	-	-	-	-	-	-	-	-	-
40 x 100	3	362,666	-	12,330,644	-	-	-	-	-	-	-	-	-	-
70X100	3	589,048	-	-	-	-	-	-	-	-	-	-	-	-
85X115	3	632,398	-	-	-	-	-	-	-	-	-	-	-	-
45X100	3	387,599	19,379,950	8,527,178	-	-	-	-	-	-	-	-	-	-
50X70	3	356,432	20,316,624	-	-	-	-	-	-	-	-	-	-	-
50X90	3	447,665	26,412,235	-	-	-	-	-	-	-	-	-	-	-
55X100	3	504,332	10,590,972	-	-	-	-	-	-	-	-	-	-	-
60X100	3	509,999	6,119,988	-	-	-	-	-	-	-	-	-	-	-
55X100	3	515,665	-	-	-	-	-	-	-	-	-	-	-	-
55X100	3	504,332	25,216,600	25,216,600	-	-	-	-	-	-	-	-	-	-
70X100	3	589,048	4,712,384	-	-	-	-	-	-	-	-	-	-	-
50X100	3	473,732	23,686,600	18,949,280	-	-	-	-	-	-	-	-	-	-
55X100	3	515,665	20,626,600	-	-	-	-	-	-	-	-	-	-	-
40X90	3	388,332	13,259,952	-	-	-	-	-	-	-	-	-	-	-
70X100	3	611,998	24,479,920	22,031,928	-	-	-	-	-	-	-	-	-	-
Village 6 (South Village)														
50X70	3	356,432	17,821,600	19,960,192	-	-	-	-	-	-	-	-	-	-
50x90	3	447,665	5,371,980	-	-	-	-	-	-	-	-	-	-	-
40X90	3	356,999	14,279,960	-	-	-	-	-	-	-	-	-	-	-
40X90	3	368,332	11,049,960	9,208,300	-	-	-	-	-	-	-	-	-	-
50x90	3	447,665	17,458,935	25,964,570	-	-	-	-	-	-	-	-	-	-
40X90	3	356,999	14,279,960	10,709,970	-	-	-	-	-	-	-	-	-	-
75x100	3	611,998	18,359,940	16,523,946	-	-	-	-	-	-	-	-	-	-
75x100	3	515,665	-	15,469,950	-	-	-	-	-	-	-	-	-	-
65x110	3	456,165	-	-	-	-	-	-	-	-	-	-	-	-
65x110	3	456,165	18,246,600	11,404,125	-	-	-	-	-	-	-	-	-	-
duplex-family	3	335,466	16,773,300	14,425,038	-	-	-	-	-	-	-	-	-	-
50X100	3	473,732	-	20,844,208	-	-	-	-	-	-	-	-	-	-
85X115	3	632,398	18,971,940	16,442,348	-	-	-	-	-	-	-	-	-	-
Total Residential Assessed Value			$ 407,953,943	$ 248,008,277	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Current Period Assessed Value Additions			$ 407,953,943	$ 248,008,277	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Current Period Cumulative Assessed Value Additions			$ 3,106,589,258	$ 3,354,577,535	$ 3,354,577,535	$ 3,354,577,535	$ 3,354,577,535	$ 3,354,577,535	$ 3,354,577,535	$ 3,354,577,535	$ 3,354,577,535	$ 3,354,577,535		
Previous Period Adjusted Assessed Value			2,696,565,394	3,053,542,892	3,288,934,485	3,275,345,206	3,261,812,075	3,248,334,861	3,234,913,332	3,221,547,258	3,208,236,410	3,194,980,561	3,181,779,462	3,116,587,762
Deflation Factor @ 0.41%			0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.980	0.980
Cumulative Residential AV Adj. for Deflation Factor of 0.41%			$ 3,053,542,892	$ 3,288,934,485	$ 3,275,345,206	$ 3,261,812,075	$ 3,248,334,861	$ 3,234,913,332	$ 3,221,547,258	$ 3,208,236,410	$ 3,194,980,561	$ 3,181,779,462	$ 3,116,587,762	$ 3,052,751,758

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

	Table Ref.	Factor	12	13	14	15	16	17	18	19	20	21	30	31
Residential Property Tax														
Basic Tax Paid	4	1.000%	$ 30,535,429	$ 32,889,345	$ 32,753,452	$ 32,618,121	$ 32,483,349	$ 32,349,133	$ 32,215,473	$ 32,082,364	$ 31,949,808	$ 31,817,795	$ 31,186,678	$ 30,527,319
Total Residential Property Tax	4	14.0253%	$ 4,282,685	$ 4,612,828	$ 4,593,769	$ 4,574,788	$ 4,555,886	$ 4,537,062	$ 4,518,316	$ 4,499,647	$ 4,481,055	$ 4,462,540	$ 4,371,107	$ 4,281,547
Residential Property Tax In-Lieu of Sales Tax														
Off-Site Sales Tax Redirected to Property Tax			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Property Tax From MVLF	**Table Ref.**	**Factor**												
Cumulative Residential AV Adj. for Deflation Factor of 0.41%			$ 3,053,542,892	$ 3,288,934,485	$ 3,275,345,206	$ 3,261,812,075	$ 3,248,334,861	$ 3,234,913,332	$ 3,221,547,258	$ 3,208,236,410	$ 3,194,980,561	$ 3,181,779,482	$ 3,116,587,782	$ 3,052,731,759
Cumulative Non-Residential AV Adj. for Deflation Factor of 0.41%			$ 298,831,906	$ 318,265,551	$ 316,950,536	$ 315,640,954	$ 314,336,783	$ 313,038,001	$ 311,744,584	$ 310,456,512	$ 309,173,763	$ 307,896,313	$ 301,587,802	$ 295,408,547
Total Assessed Valuation			$ 3,352,374,799	$ 3,607,200,037	$ 3,592,295,742	$ 3,577,453,029	$ 3,562,671,644	$ 3,547,951,332	$ 3,533,291,842	$ 3,518,692,923	$ 3,504,154,323	$ 3,489,675,795	$ 3,418,175,584	$ 3,348,140,306
Assessed Valuation / 1,000,000	5	$ 892	$ 3,352	$ 3,607	$ 3,592	$ 3,577	$ 3,563	$ 3,548	$ 3,533	$ 3,519	$ 3,504	$ 3,490	$ 3,418	$ 3,348
Property Tax From MVLF	5		$ 2,990,318	$ 3,217,622	$ 3,204,328	$ 3,191,088	$ 3,177,903	$ 3,164,773	$ 3,151,696	$ 3,138,674	$ 3,125,706	$ 3,112,791	$ 3,049,013	$ 2,986,541
Residential Documentary Transfer Tax	**Ref.**	**Factor**												
Residential Property Turnover Rate	4	14.3%												
Transfer Tax as a % of Price	4	0.11%												
Total Residential Documentary Transfer Tax			$ 479,842	$ 516,833	$ 514,897	$ 512,570	$ 510,453	$ 508,344	$ 506,243	$ 504,151	$ 502,068	$ 499,994	$ 489,750	$ 479,713
Off-Site Sales Tax	**Table Ref.**	**Factor**												
Household Income (@ 25% of Assessed Valuation) (d)	5	25.00%	$ 763,385,723	$ 822,233,621	$ 818,836,301	$ 815,453,019	$ 812,083,715	$ 808,728,333	$ 805,386,814	$ 802,059,103	$ 798,745,140	$ 795,444,870	$ 779,148,940	$ 763,182,940
Retail Taxable Sales (@ 32% of Household Income) (e)	5	32.00%	244,283,431	263,114,759	262,027,616	260,944,966	259,866,789	258,793,067	257,723,781	256,658,913	255,598,445	254,542,359	249,327,021	244,218,541
Projected Off-Site Taxable Sales (@ 0% of Retail Taxable Sales) (f)	5	0.00%	-	-	-	-	-	-	-	-	-	-	-	-
Sales Tax (@ 1.00% of Taxable Sales)	5	1.00%	-	-	-	-	-	-	-	-	-	-	-	-
Use Tax (@ 10.5% of Sales Tax)	5	10.50%	-	-	-	-	-	-	-	-	-	-	-	-
Less: 0.25% Reclassified to Property Tax	5	0.00%	-	-	-	-	-	-	-	-	-	-	-	-
Total Off-Site Sales Tax Passed Through to County			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
NON-RESIDENTIAL FINANCING SOURCES	**Measure**	**Table Ref.**	**Factor**											
Office														
Square Feet		3	450,323	34,640	34,640	-	-	-	-	-	-	-	-	-
Cumulative Square Feet				415,683	450,323	450,323	450,323	450,323	450,323	450,323	450,323	450,323	450,323	450,323
Assessed Value Additions	per Sq. Ft.	3	$ 296	$ 10,253,508	$ 10,253,508	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees	per Sq. Ft.	3	175	2,257	2,445	2,445	2,445	2,445	2,445	2,445	2,445	2,445	2,445	2,445
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Retail														
Square Feet		3	441,687	33,976	33,976	-	-	-	-	-	-	-	-	-
Cumulative Square Feet				407,711	441,687	441,687	441,687	441,687	441,687	441,687	441,687	441,687	441,687	441,687
Assessed Value Additions	per Sq. Ft.	3	$ 231	$ 7,848,438	$ 7,848,438	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees	per Sq. Ft.	3	500	775	839	839	839	839	839	839	839	839	839	839
Taxable Sales	per Sq. Ft.	5	200	81,542,215	88,337,400	88,337,400	88,337,400	88,337,400	88,337,400	88,337,400	88,337,400	88,337,400	88,337,400	88,337,400
Light Industrial														
Square Feet		3	106,380	13,298	13,298	-	-	-	-	-	-	-	-	-
Cumulative Square Feet				93,083	106,380	106,380	106,380	106,380	106,380	106,380	106,380	106,380	106,380	106,380
Assessed Value Additions	per Sq. Ft.	3	$ 193	$ 2,566,418	$ 2,566,418	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees	per Sq. Ft.	3	600	147	168	168	168	168	168	168	168	168	168	168
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Hotel - Business (Limited Service)														
Number of Rooms		3	100	-	-	-	-	-	-	-	-	-	-	-
Cumulative Number of Rooms				100	100	100	100	100	100	100	100	100	100	100
Assessed Value Additions	per room	3	$ 95,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees		3	0.35	35	35	35	35	35	35	35	35	35	35	35
Taxable Sales	per room	5	375	37,549	37,549	37,549	37,549	37,549	37,549	37,549	37,549	37,549	37,549	37,549
Hotel - Resort														
Number of Rooms		3	300	-	-	-	-	-	-	-	-	-	-	-
Cumulative Number of Rooms				300	300	300	300	300	300	300	300	300	300	300
Assessed Value Additions	per room	3	$ 200,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees		3	1	300	300	300	300	300	300	300	300	300	300	300
Taxable Sales	per room	5	32,800	9,840,014	9,840,014	9,840,014	9,840,014	9,840,014	9,840,014	9,840,014	9,840,014	9,840,014	9,840,014	9,840,014
Schools														
Square Feet		3	-	-	-	-	-	-	-	-	-	-	-	-
Cumulative Square Feet				-	-	-	-	-	-	-	-	-	-	-
Assessed Value Additions	per Sq. Ft.	3	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees	per Sq. Ft.	3	497	497	497	497	497	497	497	497	497	497	497	497
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Other														
Square Feet		3	-	-	-	-	-	-	-	-	-	-	-	-
Cumulative Square Feet				-	-	-	-	-	-	-	-	-	-	-
Assessed Value Additions	per Sq. Ft.	3	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees	per Sq. Ft.	3	428	400	428	428	428	428	428	428	428	428	428	428
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Total Non-Residential Assessed Value Additions				$ 20,668,364	$ 20,668,364	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Current Period Cumulative Assessed Value Additions				$ 304,688,281	$ 325,356,645	$ 325,356,645	$ 325,356,645	$ 325,356,645	$ 325,356,645	$ 325,356,645	$ 325,356,645	$ 325,356,645		
Previous Period Adjusted Assessed Value				279,317,632	298,831,906	318,265,551	316,950,536	315,640,954	314,336,783	313,038,001	311,744,584	310,456,512	307,896,313	301,587,802
Deflation Factor				0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.980	0.980
Cumulative Non-Residential AV Adj. for Deflation Factor of 0.41%				$ 298,831,906	$ 318,265,551	$ 316,950,536	$ 315,640,954	$ 314,336,783	$ 313,038,001	$ 311,744,584	$ 310,456,512	$ 309,173,763	$ 307,896,313	$ 301,587,802	$ 295,408,547
Total Non-Residential Cumulative Employees				4,411	4,712	4,712	4,712	4,712	4,712	4,712	4,712	4,712	4,712	4,712
50% of Cumulative Employees				2,206	2,356	2,356	2,356	2,356	2,356	2,356	2,356	2,356	2,356	2,356
Equivalent Residents (Residents & 50% Employees)				16,919	18,080	18,080	18,080	18,080	18,080	18,080	18,080	18,080	18,080	18,080
Total Taxable Sales				$ 91,419,779	$ 98,214,964	$ 98,214,964	$ 98,214,964	$ 98,214,964	$ 98,214,964	$ 98,214,964	$ 98,214,964	$ 98,214,964	$ 98,214,964	$ 98,214,964

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

	Table Ref.	Factor	12	13	14	15	16	17	18	19	20	21	30	31
Non-Residential Property Tax														
Basic Tax Paid	4	1.00%	$ 2,988,319	$ 3,182,656	$ 3,169,505	$ 3,156,410	$ 3,143,368	$ 3,130,380	$ 3,117,446	$ 3,104,565	$ 3,091,738	$ 3,078,963	$ 3,015,878	$ 2,954,085
Non-Residential Unsecured Property Tax as a % of Secured	4	10.00%	298,832	318,266	316,951	315,641	314,337	313,038	311,745	310,457	309,174	307,896	301,588	295,409
Total Non-Residential Property Tax	4	14.03%	$ 461,033	$ 491,015	$ 488,986	$ 486,965	$ 484,953	$ 482,950	$ 480,954	$ 478,967	$ 476,988	$ 475,017	$ 465,264	$ 455,751
Non-Residential Property Tax In-Lieu of Sales Tax														
On-Site Sales Tax Redirected to Property Tax			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
	Table Ref.	**Factor**												
Non-Residential Documentary Transfer Tax														
Non-Residential Property Turnover Rate	4	10.00%												
Transfer Tax as a % of Price	4	0.11%												
Total Non-Residential Documentary Transfer Tax			$ 32,872	$ 35,009	$ 34,865	$ 34,721	$ 34,577	$ 34,434	$ 34,292	$ 34,150	$ 34,009	$ 33,869	$ 33,175	$ 32,493
	Table Ref.	**Factor**												
On-Site Sales Tax														
Sales Tax (@ 1.00% of Taxable Sales)	5	1.00%	$ 914,198	$ 982,150	$ 982,150	$ 982,150	$ 982,150	$ 982,150	$ 982,150	$ 982,150	$ 982,150	$ 982,150	$ 982,150	$ 982,150
Use Tax (@ 10.5% of Sales Tax)	5	10.50%	95,991	103,126	103,126	103,126	103,126	103,126	103,126	103,126	103,126	103,126	103,126	103,126
Less: 0.25% Reclassified to Property Tax	5	0.00%	-	-	-	-	-	-	-	-	-	-	-	-
Total On-Site Sales Tax Allocated to County			$ 1,010,189	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275
Proposition 172 - Half Cent Sales Tax	5		$ 430,861	$ 462,887	$ 462,887	$ 462,887	$ 462,887	$ 462,887	$ 462,887	$ 462,887	$ 462,887	$ 462,887	$ 462,887	$ 462,887
	Table Ref.	**Factor**												
Transient Occupancy Tax														
Hotel - Business Rental Revenue Subject to TOT	5	10.00%	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184
Hotel - Resort Revenue Subject to TOT	5	10.00%	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460
Total Transient Occupancy Tax Allocated to County			$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644
	Table Ref.	**Factor**												
Interest Earnings														
County Share of Residential and Non-Residential Property Tax	4		$ 4,743,717	$ 5,103,843	$ 5,082,755	$ 5,061,754	$ 5,040,839	$ 5,020,012	$ 4,999,270	$ 4,978,614	$ 4,958,043	$ 4,937,557	$ 4,836,381	$ 4,737,298
Documentary Transfer Tax	4		512,714	551,842	549,562	547,291	545,030	542,778	540,535	538,302	536,077	533,863	522,924	512,210
Net Off-Site Sales and Use Tax	5		-	-	-	-	-	-	-	-	-	-	-	-
Net On-Site Sales and Use Tax	5		1,010,189	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275
Total Revenue Generating Interest Earnings			$ 6,266,620	$ 6,740,960	$ 6,717,592	$ 6,694,320	$ 6,671,144	$ 6,648,065	$ 6,625,080	$ 6,602,191	$ 6,579,396	$ 6,556,695	$ 6,444,581	$ 6,334,783
Total Interest Earnings	5	1.13%	$ 70,813	$ 76,173	$ 75,909	$ 75,646	$ 75,384	$ 75,123	$ 74,863	$ 74,605	$ 74,347	$ 74,091	$ 72,824	$ 71,563
	Table Ref.	**Factor**												
Other General Fund Discretionary Revenue														
Franchises	6	$ 10.08	$ 170,178	$ 181,864	$ 181,864	$ 181,864	$ 181,864	$ 181,864	$ 181,864	$ 181,864	$ 181,864	$ 181,864	$ 181,864	$ 181,864
Fines and Penalties	6	8.31	140,595	150,250	150,250	150,250	150,250	150,250	150,250	150,250	150,250	150,250	150,250	150,250
Miscellaneous Federal and State	6	1.30	19,121	20,435	20,435	20,435	20,435	20,435	20,435	20,435	20,435	20,435	20,435	20,435
Miscellaneous Revenue	6	0.17	2,958	3,161	3,161	3,161	3,161	3,161	3,161	3,161	3,161	3,161	3,161	3,161
Criminal-Co. 25%	6	-	-	-	-	-	-	-	-	-	-	-	-	-
Penalties & Int On Del Taxes	6	-	-	-	-	-	-	-	-	-	-	-	-	-
Court Fees & Costs	6	-	-	-	-	-	-	-	-	-	-	-	-	-
Superior Court Fees	6	-	-	-	-	-	-	-	-	-	-	-	-	-
Rebates & Refunds	6	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Other General Fund Discretionary Revenue			$ 332,852	$ 355,711	$ 355,711	$ 355,711	$ 355,711	$ 355,711	$ 355,711	$ 355,711	$ 355,711	$ 355,711	$ 355,711	$ 355,711

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

	Table Ref.	Factor	12	13	14	15	16	17	18	19	20	21	30	31
POLICE PHASING														
Cumulative Residents			14,713	15,724	15,724	15,724	15,724	15,724	15,724	15,724	15,724	15,724	15,724	15,724
Staffing Service Standard Sworn Officer per 1,000 residents	9	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20
Number of Sworn Officers Required			17.66	18.87	18.87	18.87	18.87	18.87	18.87	18.87	18.87	18.87	18.87	18.87
Police Costs	9	$ 128,055	$ 2,260,877	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270
FISCAL IMPACT TO OTHER COUNTY FUNDS														
Fiscal Impact to Library Fund	**Table Ref.**	**Factor**												
Financing Sources														
Library Fund Ad Valorem Tax			$ 33,523,748	$ 38,072,000	$ 35,922,957	$ 35,774,530	$ 35,626,716	$ 35,479,513	$ 35,332,918	$ 35,186,929	$ 35,041,543	$ 34,896,758	$ 34,181,756	$ 33,481,403
Basic Tax Adj. for Deflation														
Total County Library Tax	11	1.43%	$ 479,808	$ 516,280	$ 514,147	$ 512,023	$ 509,907	$ 507,800	$ 505,702	$ 503,613	$ 501,532	$ 499,460	$ 489,226	$ 479,207
Fines, Forfeitures & Penalties														
Library Fines and Fees	11	$ 0.14	$ 2,426	$ 2,593	$ 2,593	$ 2,593	$ 2,593	$ 2,593	$ 2,593	$ 2,593	$ 2,593	$ 2,593	$ 2,593	$ 2,593
Revenue from Use of Money and Property														
Rents	11	$ 0.01	$ 116	$ 124	$ 124	$ 124	$ 124	$ 124	$ 124	$ 124	$ 124	$ 124	$ 124	$ 124
Total Financing Sources			$ 482,351	$ 518,998	$ 516,865	$ 514,740	$ 512,625	$ 510,518	$ 508,420	$ 506,330	$ 504,249	$ 502,177	$ 491,944	$ 481,924
Financing Requirements														
Library Services	11	$ 8.68	$ 146,850	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935
Total Financing Requirements			$ 146,850	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935
Net Annual Surplus/ (Deficit)			$ 335,501	$ 362,063	$ 359,930	$ 357,805	$ 355,690	$ 353,583	$ 351,485	$ 349,395	$ 347,315	$ 345,242	$ 335,009	$ 324,989

Michael Baker
INTERNATIONAL

We Make a Difference

July 12, 2017

To: Russell Brady
Riverside County Planning Department

From: Derek Wong, AICP
Dino Serafini, PE

RE: Review of Paradise Valley (Specific Plan No. 00339) Fiscal Impact Analysis, dated February 15, 2017

Michael Baker International has performed a review of the Fiscal Impact Analysis (FIA) prepared for the Paradise Valley land development project (Project). The Project proposes to develop up to 8,500 housing units and 1.4 million square feet of non-residential construction (including 400 business and resort hotel rooms and time share units) on approximately 5,000 acres in the Coachella Valley area east of the City of Coachella. The FIA was prepared by Development Planning and Finance Group (DPFG), Inc. The FIA evaluates the potential fiscal impacts from development of the Project on the operating budgets of four Riverside County funds: the General Fund, Transportation Fund, Library and the Fire Fund.

Fiscal impacts to school, recreation and park, water, sewer districts are not analyzed in the FIA. There are currently no special service districts established on the property.

The FIA does not analyze capital costs or impacts on public facilities needed by the project, which should be treated separately from a fiscal impact study.

The objectives of our review of the FIA are three-fold and validate whether:

1. The assumptions made in the FIA are reasonable;
2. The modeling is according to industry standards and follows Riverside County's *1995 Guide to Preparing Fiscal Impact Reports* (Guide) adjusted to current budget conditions ; and
3. The conclusions can be supported by the calculations and documentation in the FIA.

Michael Baker's review included a multi-step approach that included the following:

- Review of the County of Riverside FY 2016–17 adopted and recommended budgets (the FIA was based on the 2015–16 budget);

- Spot check of data references and assumptions through outside research;
- Evaluate whether alternative methodologies used in the FIA are comparable to methodologies described in the Guide; and
- Preparation of the review memo on our findings.

This memorandum is organized into three sections. The first provides context to the FIA, the second describes the findings of the study and the third section provides our review conclusions.

Context to the FIA

The FIA relies on the County's 2015–16 budget to derive cost and revenue multipliers for County General Fund activities where use of the multiplier method is in accordance with the Guide. The Guide permits the use of countywide multipliers for several General Fund cost areas, including the following:

- General Government
- Public Protection (except for Sheriff Patrol and direct Animal Control services)
- Health and Sanitation
- Public Assistance
- Education, Recreation & Culture
- Debt Service

For specific plans and land use studies, the Guide states that project-specific case-study methods should be used for Animal Control and Sheriff Patrol costs.

Fire Protection, Road Maintenance and Library are independent funds. For Fire Protection, the Guide generally allows costs to be calculated by the multiplier method. However, for large projects which will require expansion of service, including new fire stations, a case-study method is necessary. The FIA also provides a case-study analyses for Library and Road Maintenance.[1]

It should be noted that the fiscal impacts of the Project as identified in the FIA are based on data available at the time of the preparation of the FIA and do not represent absolute financial projections at build-out of the Project. It is particularly important for the reader to keep this caveat in mind when considering inputs and factors used to estimate the ongoing fiscal impacts of the Project on the County General Fund and the other funds. The FIA provides the fiscal impacts for a 13-year Project absorption/phasing schedule and a 31-year cash-flow analysis.

[1] In addition to these funds analyzed in the FIA the County Flood Control and Water Conservation District also operates independently of the General Fund. However, the District does not operate in the eastern area of the County (east of Palm Springs).

In accordance with the methodology prescribed in the Guide, except for property taxes, property transfer tax, sales tax, Transient Occupancy Tax and Property Tax in-lieu of Motor Vehicle Fee (MVLF), which are based on project-specific case-study analyses, all recurring revenues are calculated using per capita multipliers based on the 2015–16 adopted budget totals (we have recalculated the revenue multipliers using 2016-17 adopted budget and current population and employment numbers and have found them to be generally consistent with those in the FIA).

Findings

The FIA in general conforms to the Guide with modifications as noted in the following areas:

General Fund Costs

The FIA calculates the net General Fund contribution or "Net Cost to County" (NCC) for each departmental expense line item. The NCC is calculated by subtracting nondiscretionary revenue (including such revenues as intergovernmental funds for specific programs and direct cost recovery user fees) from the budgeted expenditures as directed in the Guide. The FIA then assigns a marginal increase factor that accounts for fixed overhead versus variable costs of departments that are affected by population growth. This is an industry standard approach to estimating the cost impacts related to growth. The Guide does not specify what marginal factor to use, which may range from 0% to 100%, depending on the department's function. The lower percentage indicates lower overall impact to the department's operations as a result of growth, whereas a high percentage means the department will likely incur increased cost—usually due to increased staffing in response to growth. The FIA percentages are either 25%, 50% or 100%. For the General Fund as a whole, the overall factored NCC is 59% of the total financing requirements (total budget minus nondiscretionary revenues). In other words, the FIA estimates that approximately 59% of the General Fund budget increases over time are due to population growth. Our analysis of the last seven years of the County's budget data comparing NCC to the County's population growth supports an overall NCC marginal increase factor of between 50% and 60%.

General Fund Revenues

Per Capita Revenues

The revenue sources determined by per capita multipliers, based on the 2015/16 adopted budget and 2016 population, include franchise fees, licenses and permits, fines and penalties, Federal in-lieu taxes, and court fees. These are all revenues that go to the General Fund to offset discretionary programs and expenditures. The aggregate per capita revenue from these sources

is $19.84 (totaling $355,711 for the Project). We arrived at essentially the same revenue factor using the 2016/17 budget and the 2017 California Department of Finance population estimate (unincorporated and Countywide) and the current Employment Development Department information for employment. We concur with the methodology and calculations for multiplier-derived revenues.

Case-Study Revenues

The largest Project revenues will be derived from the secured and unsecured ad valorem property tax ($4.9 million), the MVLF ($3.1 million), Transient Occupancy Tax ($1.35 million), and Sales and Use Taxes ($1.1 million). These major revenues were estimated by the case-study method as directed in the Guide. Property taxes and the MVLF revenues are driven by assessed valuations, which are based on assumptions of expected home prices and non-residential construction costs in the area. The range of sale prices assumed for the Project range from $272,000 for a stacked flat condominium unit to $632,000 for a single family unit on the largest (85' x 115') lot. The lower end prices are comparable to the median price for condominiums in the City of Coachella ($240,000, for units in buildings with 5 or more units). The median prices for single family homes in Coachella are somewhat lower than the mid-range home in the Project: $370,000 for a detached home in Coachella vs. $450,000 in the Project (home on a 50' x 90' lot in Village 5). Prices in the next closest cities, La Quinta and Indio, are similar to Coachella's.

The construction cost valuations for the non-residential buildings are reasonable for the type of construction proposed by the Project developers.

The Transient Occupancy Tax (TOT) revenues are derived from the Project's business and resort hotel rooms. The Riverside County TOT is 10% of hotel rental revenue. The FIA assumes a business room rate of $87 per night and a resort rate of $178 per night. Occupancies are assumed at 56% and 60%, respectively, which is consistent with the Guide. The assumed room rates appear comparable to higher-end lodging found in Coachella, La Quinta and Indio.

Sales and Use taxes are derived only from the retail floor area, projected at approximately 442,000 square feet at build-out. The FIA assumes $200 of taxable sales per square foot, which is a typical value found in fiscal impact studies. Sales and use tax revenues are also derived from the business and resort hotels' food, beverage and other sales, in addition to the tax on room rate revenues. To avoid double-counting taxable sales, the FIA does not consider household taxable expenditures. This approach also avoids needing to adjust for potential sales leakage to off-site retail and gives some assurance that the taxable sales are "new" and not taking sales away from existing retail in the County.

The other case-study revenue is the documentary transfer tax, which was determined by assuming a 14% annual turnover rate applied to residential property resulting in $500,000 in transfer taxes and 10% applied to non-residential, which provides another $33,900 in revenues. The Guide specifies a 10% turnover rate for residential, which if applied to the Project, would reduce the residential transfer tax by about $150,000.

Sheriff Patrol Cost: Case-Study Method

The FIA estimates Sheriff Protection cost for the Project based on the Board of Supervisor's Sheriff Deputy staffing policy of 1.2 officers per 1,000 residents and a calculated cost per deputy. The Guide specifies that the case-study method is to be used for Sheriff Patrol costs, while other "Police Protection" may be calculated using the multiplier method. The FIA used a modified case-study approach by incorporating the Police Protection costs in the cost per deputy. This procedure attempts to capture the fully-burdened cost for each deputy (salaries and benefits, supplies and expenses and administrative overhead). The Police Protection costs included in the FIA's analysis are: Administration, Support, Patrol, Court Services, CAC Security and Training Center. The net General Fund contribution total for these functions is added to the charge for Sheriff Patrol services contracted by the cities to calculate the fully-burdened cost to the County per deputy of approximately $128,000 per year. While this amount might be a reasonable estimate of net County cost per deputy, it may not accurately capture the overall Police Protection costs that may otherwise be derived using the multiplier method for all Police Department costs other than Patrol. The NCC for Police Protection less Patrol is $37.4 million (2016-17 Adopted Budget). Assuming a 59% marginal increase factor, then dividing by the unincorporated residential population (373,755) results in a per capita multiplier of approximately $59. The Project's impact on Police Protection would then be: $59 times the Project's residential population of 15,724, or $928,000. The Sheriff Patrol expenditures for 2016-17 is $228.1 million, which is divided by 1,792, the number of filled Sheriff Patrol positions, resulting in an estimated annual cost of $127,300 to provide one deputy. At the rate of 1.2 deputies per 1,000 residents the Project will require 19 deputies for a total annual cost of $2.42 million. The cost of additional patrol officers is combined with the Project's cost for Police Protection (net of Patrol) for a total Project cost of $3.35 million compared to the $2.4 million calculated in the FIA using the modified case-study method.

Animal Control Case Study

The Guide also requires a case study approach for Animal Control. A similar analysis as above for Sheriff Patrol may be done for Animal Control. Animal Services is included in Public Protection-Other Protection. If calculated separately, the portion of the Other Protection budget allocated

to Animal Services would be about $3.00 per capita (NCC of Animal Services divided by total county population). The County Department of Animal Services provides animal control field and shelter services to 11 cities with a combined population of 829,126 at a cost of $9,438,523, for a cost per capita of $11.38. The $3.00 per capita in the Public Protection cost per capita should be replaced with $11.38, which we believe is more indicative of the actual cost to provide field and shelter services for new development. The additional $8.38 in cost per capita results in $131,800 more in total Animal Control costs for the Project.

Other County Funds

The FIA addresses the following non General Funds, each the subject of a case-study analysis:

- County Transportation fund
- Fire Fund (County Structural Fire Protection)
- Library Fund

Each fund has its own revenue sources, either a percentage of the property tax or, in the case of transportation, the Highway User/Gas Tax subventions from the state and the Measure A sales tax. Although the funds operate independently of the General Fund, funds may be transferred from time to time from the General Fund to cover deficits in the fund balances. As required in the Guide, the impacts to each fund is analyzed in more detail as follows:

Transportation Fund

Transportation Fund revenues may rely on a per capita multiplier for the countywide Highway Users/Gas Tax. The FIA calculates a per capita revenue of $12.09, (based on residential population plus 50% of employment). Measure A revenue is not considered since it is used for non-recurring capital projects. The revenue sources are then compared to the estimated actual cost of maintaining public streets in the Project, plus the Project's share to maintain arterial roadway improvements needed by the Project. A cost of $6,885 per lane-mile was provided by TLMA staff. The Project will have an estimated 104.84 lane-miles for a total financing requirement of $721,800. Of the total Highway Users/Gas Tax, the Guide states that only 77% is allocated to local roads and 23% to arterials. Therefore of the $12.09 only $9.31 per capita would be available for the Project's backbone and in-tract roadways. The Project will generate $168,300 annually for local roads, resulting in a deficit of $553,500. The FIA, using 100% of the Highway Users/Gas Tax, calculated a deficit of $503,275. This deficit shows up as an annual General Fund transfer under Financing Sources in the Fire and Transportation Phasing Analysis (FIA Exhibit B).

Structural Fire Protection Fund

The FIA calculates $2.04 million in property tax revenues to the Fire Fund derived from the Project's assessed valuation. The cost of fire protection for a project of this size warrants a case-study analysis. The Specific Plan document provides a general description of the fire protection infrastructure and staffing required in phases through build-out. The following schedule of fire services is presented in Section 5 of SP-00339[2]:

- A temporary fire station staffed with one 3-person fire engine, concurrent with the delivery of combustibles;
- A permanent station with one 3-person fire engine concurrent with the 1,000th residential building permit;
- A second squad, fire engine and/or fire sub-station may be required prior to build-out;
- A third squad, fire engine and/or fire sub-station may be required at build-out.

For purposes of calculating the cost of providing fire-fighting staff, the FIA assumes two new fire stations with 7-person staffing each at a cost of $3.5 million per station. The FIA gives a total cost of only $3.5 million, therefore it's not clear if the $3.5 million cost is intended for one station or two. Also, it is not clear whether this cost includes the maintenance of the stations and the apparatus in addition to the staffing costs. An engine company normally comprises 3 to 4 fire-fighters. A fully-staffed squad would include three shifts requiring up to 12 fire-fighters. A fully-burdened annual cost for each fire-fighter may be estimated at $170,000, resulting in a staffing cost of up to $4.08 million for two stations.[3] DPFG should verify the FIA's assumptions, by contacting Riverside County Fire Department to establish: 1) the fire station requirements for the Project and 2) an annual cost to the County to staff and maintain the station(s) and apparatus.

The FIA indicates that the Fire Fund deficit ($1.46 million based on FIA cost assumptions) will be covered by a combination of proceeds from a proposed new County Service Area (CSA) and by transfers from the General Fund. The FIA assumes a CSA tax of $100 per residential unit, for a total CSA tax revenue of $849,000. The balance of the deficit--$609,000--would be transfers from the General Fund.

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[2] The Specific Plan states that the Riverside County Fire Department will be consulted for the actual infrastructure requirements as various Project milestones. The cost of fire engines and construction of stations is not included in fiscal impact studies.

[3] Since the County contracts with the California Department of Forestry and Fire Protection (CALFIRE) for staffing of stations, the actual cost of staffing and other contractual services may not be estimated directly using County budget data.

Library Fund

The primary Library Fund revenue source is derived from property taxes. The basic tax rate allocated to the Library Fund is used to determine Project revenues. Annual Project library property tax revenues are estimated at $499,460; rents and interest on the fund balance bring the total revenue to $502,000.

The cost for Library Services is estimated by the multiplier method. The Library Fund's NCC of approximately $24 million is divided by the total County service population, for a cost per capita of about $8.68. The library cost for the Project would then be $157,000 ($8.68 x 18,080). Therefore, the Project is shown to generate a surplus at build-out for the County's Library Fund of approximately $345,000.

Special District Impacts

The Guide requires an analysis of impacts on any affected special service districts including CSAs, Community Service Districts (CSDs) and Community Facilities Districts (CFDs). There are none of these special districts currently established on the property. However, the Specific Plan and the FIA propose the formation of one or more such districts to provide funding for identified deficits in the Transportation Fund, and the Fire Fund and other Project maintenance costs. Formation of a Lighting and Landscape Maintenance District (LLMD) may also be considered for streetlights and median and parkway landscaping. The FIA does not discuss park operation and maintenance costs. The property is within the Coachella Valley Recreation and Park District, which provides regional park facilities. Maintenance of the Project's public parks would not necessarily be funded from the CVRPD budget, therefore a CFD would need to be formed for that purpose.

Conclusion

With exception for specific areas noted above, the FIA is conducted within general industry standards and in accordance with the County's Guide. The cost and revenue factors used in the FIA are based on data from the County's FY 2015–16 adopted budget. We have verified that the cost and revenues are essentially the same as those calculated using the 2016-17 adopted budget. The following is a summary of findings of impacts to the County funds:

- The Project surplus of $6.1 million at build-out stated in the FIA would be reduced if case-study analyses were conducted for Sheriff Patrol and Animal Control. This review identifies an additional cost of about $1,810,000 for these two functions.

- The Project may generate a much greater shortfall in the County Structural Fire Protection Fund than the $1.46 million estimated (before CSA revenues). DPFG should verify its assumptions of Fire Protection costs.
- The sales prices of homes assumed in the FIA tend to be higher than prices for new homes in the City of Coachella. The Project's property tax revenues should be reviewed after the first phase has been sold, and/or sensitivity testing on assessed valuations and their resulting fiscal impact to fund public services.
- The phasing plan shows the Project generating a small deficit for each of the first four years. Beginning in the fifth year the Project generates a surplus that grows until the 13th year, which is the final year of Project absorption. The net surplus diminishes every year after that (the calculations are extended to the 31st year after absorption begins). The diminishing surplus is due to the 0.41% net reduction in assessed valuations, which is the procedure specified in the Guide to account for inflationary cost increases. The 2% Prop. 13 increase is subtracted from the historic average inflation of 2.41% (Consumer Price Index LA/Anaheim/Riverside-1990 to present). The resulting annual decreases in assessed valuation results in reduced property tax, MVLF and the documentary transfer tax. Revenue reduction is used rather than applying cost increases to departmental operations. Overall, this is a conservative approach since it does not incorporate increases in assessed valuation that occur from turnover, nor increases in sales & use taxes due to inflationary increases considered in the model.
- Maintenance of local parks and open space in the County is funded through County Service Areas and is not a General Plan activity. The FIA should provide a cost analysis for the Project's proposed local public parks including revenue requirements from CSA assessments. The Guide states impacts to special districts are to be analyzed.

DPFG
DEVELOPMENT PLANNING & FINANCING GROUP, INC

Memorandum

To:	Specific Plan No. 00339 (Paradise Valley) File
From:	DPFG
Date:	February 15, 2017 (April 20, 2018 Revision)
Subject:	February 2017 FIA

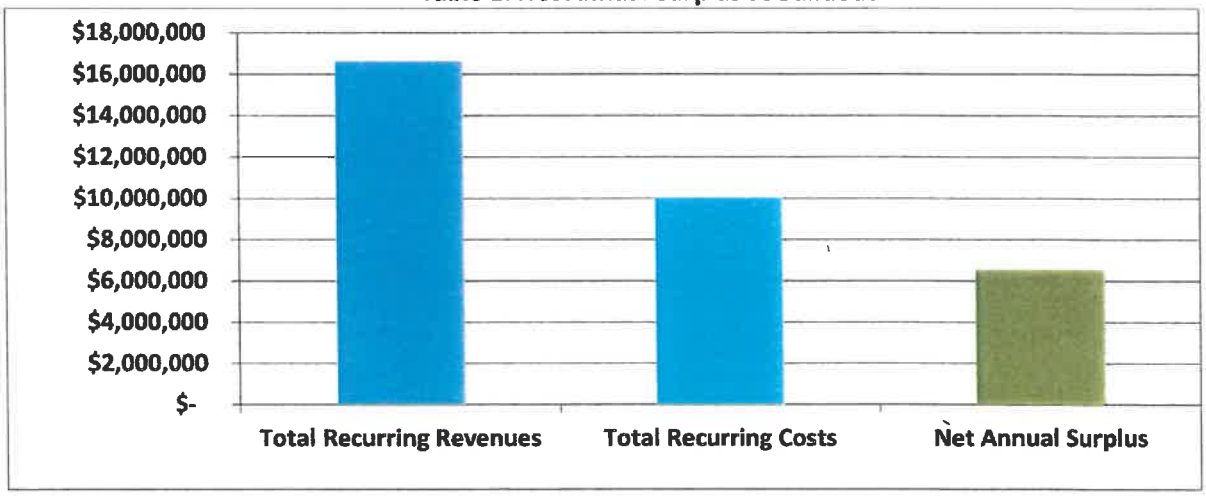
Introduction and Conclusions

This revision reflects final review comments received from Michael Baker International.

The February 2017 FIA was prepared in accordance with the general methodologies outlined in the County FIA Guidelines to Preparing Fiscal Impact Reports ("County FIA Guidelines"), dated January 1995. The February 2017 FIA examines the financial impact the Project will have on the County's general fund ("General Fund"), fire fund ("Fire Fund"), library fund ("Library Fund"), and transportation fund ("Transportation Fund"). The Project will generate additional income for the General Fund primarily through increased property taxes, sales taxes, and transient occupancy taxes, while increasing the need for County services such as police, fire, and health and sanitation.

Based on the assumptions and calculations detailed in the attached February 2017 FIA, the Project is expected to yield a new net annual surplus at buildout of approximately $6.6 million (see Exhibit A, Table 1).

Table 1: Net Annual Surplus at Buildout



The Draft FIA is based on the following key assumptions:

- Per the County FIA Guidelines, the methodology used to determine the allocable revenue and cost impacts to County Funds as a result of the Project's development is a combination of case study methods and multiplier methods
- County Budget: Riverside County 2015-16 Recommended Budget
- Fire Phasing Analysis is based on draft fire conditions
- General Fund revenues are assumed to be transferred at various times to the Fire Fund and Transportation Fund

The FIA is organized as follows:

- Exhibit A – Fiscal Impact Analysis at buildout
- Exhibit B – Fire and Transportation Funds Phasing Analysis
- Exhibit C – Phasing Analysis

Exhibit A - Fiscal Impact Analysis
Table 1 - Riverside County Fiscal Impact Analysis Summary
Paradise Valley
February 15, 2017

I. Fiscal Impact to General Fund	Table Ref.	Per Unit	Buildout	Percent of Total
A. Financing Sources				
Property Tax	4	$ 582	$ 4,937,557	43.1%
Property Tax In-Lieu of Sales-Tax	4	-	-	0.0%
Documentary Transfer Tax	4	63	533,863	4.7%
Property Tax In-Lieu of MVLF	5	367	3,112,791	27.2%
On-Site Retail Sales and Use Tax	5	128	1,085,275	9.5%
Off-Site Retail Sales and Use Tax	5	-	-	0.0%
Transient Occupancy Tax	5	159	1,352,644	11.8%
Interest Earnings	5	9	74,091	0.6%
Other Discretionary Revenue	6	42	355,711	3.1%
Total Financing Sources		$ 1,349	$ 11,451,931	100.0%
B. Financing Requirements				
General Financing Requirements	8	$ 64	$ 547,469	9.5%
Public Protection				
Judicial	8	27	226,507	3.9%
Police Protection	9	285	2,416,270	42.1%
Detention and Correction	8	61	519,304	9.0%
Fire Protection (Transfers to the Fire Fund)	10	72	609,039	10.6%
Protection/Inspection	8	0	2,731	0.0%
Animal Services	8	13	110,157	1.9%
Other Protection	8	14	116,220	2.0%
Transfers to the Transportation Fund	12	59	503,275	8.8%
Public Ways & Facilities	8	-	-	0.0%
Health and Sanitation	8	77	652,211	11.4%
Public Assistance	8	4	36,769	0.6%
Education	8	0	4,183	0.1%
Recreation & Cultural Services	8	0	500	0.0%
Debt Service	8	-	-	0.0%
Total Financing Requirements		$ 677	$ 5,744,635	100.0%
Net Annual Surplus / (Deficit)		**$ 672**	**$ 5,707,297**	
II. Fiscal Impact to Fire Fund				
A. Financing Sources (a)	10	$ 412	$ 3,500,000	
B. Financing Requirements	10	412	3,500,000	
Net Annual Surplus / (Deficit)		$ -	$ -	
III. Fiscal Impact to Library Fund				
A. Financing Sources	11	$ 59	$ 502,177	
B. Financing Requirements	11	18	156,935	
Net Annual Surplus / (Deficit)		**$ 41**	**$ 345,242**	
IV. Fiscal Impact to Transportation Fund				
A. Financing Sources	12	$ 85	$ 721,834	
B. Financing Requirements	12	85	721,834	
Net Annual Surplus / (Deficit)		$ -	$ -	
V. Net Fiscal Impact of Project				
A. Financing Sources		$ 1,905	$ 16,175,942	
B. Financing Requirements		1,192	10,123,403	
Net Annual Surplus / (Deficit)		**$ 713**	**$ 6,052,539**	
VI. Net Fiscal Impact of Project with Measure A Sales Tax				
A. Financing Sources		$ 1,963	$ 16,667,017	
B. Financing Requirements		1,192	10,123,403	
Net Annual Surplus / (Deficit)		**$ 771**	**$ 6,543,614**	

Footnotes:

(a) Assumes additional financing sources generated from CSA/CFD.

Exhibit A - Fiscal Impact Analysis
Table 2 - Riverside County Post-ERAF Share of the Basic Tax Calculation
Paradise Valley
February 15, 2017

Agency (b)	Tax Rate Area (a) 058-002	Tax Rate Area (a) 058-011	Weighted Average (c)
General	**14.0181%**	**14.3133%**	**14.0253%**
County Free Library	**1.4305%**	**1.4606%**	**1.4312%**
County Structure Fire Protection	**5.8484%**	**5.9716%**	**5.8514%**
Supervisorial Road District 4	1.0005%	1.0216%	1.0010%
Coachella Valley Unified School	46.4394%	47.4176%	46.4634%
Desert Community College	7.4951%	7.6530%	7.4990%
Riv. Co. Office Of Education	4.0777%	4.1636%	4.0798%
Riv Co Reg Park & Open Space	0.3460%	0.3533%	0.3462%
Coachella Valley Public Cemetery	0.2289%	0.2338%	0.2290%
Cv Mosq & Vector Control	0.9734%	0.9939%	0.9739%
Coachella Valley Rec & Park	1.1785%	0.0000%	1.1496%
Coachella Valley Resource Conserv	0.0349%	0.0357%	0.0350%
Educational Revenue Augmentation Fund	16.9285%	16.3820%	16.9151%
Total	**1.0000%**	**1.0000%**	**1.0000%**
Acres (d)	1,460.92	36.70	1,497.62
% of Total	97.55%	2.45%	100.00%

Footnotes:

Source: FY 2014-15 Property Tax Share per Riverside County Auditor-Controller's Office, Property Tax Division.

(a) In additional to other ad valorem charges imposed by various local agencies, land owners in California are required to pay annual property taxes of 1% on the assessed value of their property pursuant to Proposition 13. Each County in California is divided into tax rate areas ("TRA"). After the basic 1% property tax is collected by the county, the tax is allocated to various local agencies based on each agency's share of the basic tax within the property's applicable TRA. This exhibit shows the share of the basic tax applicable to both of the TRAs applicable to the Project.

(b) Shares of the basic tax that are received by the County for each tax rate area are highlighted in bold print.

(c) For purposes of the analysis, the weighted average tax rates were calculated based on the acreage of the TRAs within the Project.

(d) Acres based on total acreage of parcels that include a portion of the development planned for Phase I. Parcel acreage was not adjusted to remove parcel area that overlaps with undeveloped areas and subsequent phases of development.

Exhibit A - Fiscal Impact Analysis
Table 3 - Riverside County Land Use and Absorption Assumptions
Paradise Valley
February 15, 2017

Description	PA	Base Price	Measure	Total Units/ Sq. Ft.	Absorption (Units/Sq. Ft) (a) Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12
(a)	(a)	(a)		(a)												
RESIDENTIAL LAND USE																
Village 1 (Town Center)																
TOWNS	1-1	$ 349,066	per Unit	92	50	42										
Stacked flats HHDR	1-3	271,999	per Unit	211	50	50	50	50	11							
Stacked flats	1-4	305,999	per Unit	413	50	50	50	50	50	50	50	50	13			
55'x100'	1-6	504,332	per Unit	114	50	50	14									
50'X70'	1-7	356,432	per Unit	88		50	38									
45'X80'	1-7	362,666	per Unit	67	50	17										
45'X80'	1-7	362,686	per Unit	59		33	26									
55'X100'	1-8	504,332	per Unit	66			36	30								
60'X100'	1-8	509,999	per Unit	70	50	20										
Village 2 (Town Center West)																
60'X100'	2-1	509,999	per Unit	77		30	47									
50x100	2-2	473,732	per Unit	92			50	42								
45x80	2-2	362,686	per Unit	100			24	50	26							
50'x100	2-2	473,732	per Unit	89					32	50	7					
50'x100	2-4	473,732	per Unit	118			50	50	18							
Duplex	2-4	344,532	per Unit	129			50	50	29							
40'X62'	2-5	314,499	per Unit	122			50	50	22							
Stacked flats	2-6	226,686	per Unit	420			50	50	50	50	50	50	50	50	20	
Triplex-adult	2-7	301,466	per Unit	60			50	10								
Triplex-adult	2-7	301,466	per Unit	130				40	50	40						
45X100	2-9	387,599	per Unit	172			50	50	50	22						
Village 3 (Casa Activie Adult)																
MIXED USE HHDR	3-1	271,999	per Unit	418							75	75	75	75	75	43
DUPLEX	3-2	275,399	per Unit	46							46					
DUPLEX	3-2	275,399	per Unit	101								50	51			
65x110	3-3	456,165	per Unit	86							50	36				
75x100	3-3	515,665	per Unit	74								50	24			
65x110	3-3	456,165	per Unit	73								23	50			
DUPLEX	3-4	275,399	per Unit	114										50	50	14
50x90	3-5	362,666	per Unit	90							50	40				
50x70	3-5	396,666	per Unit	97								50	47			
DUPLEX	3-5	275,399	per Unit	146										50	50	46
40X90	3-5	335,466	per Unit	92									42	50		
50x90	3-5	362,666	per Unit	94									50	44		
40x90	3-5	335,466	per Unit	116							50	50	16			
75x100	3-6	515,665	per Unit	100									26	24	50	
85x115	3-6	632,398	per Unit	51									30	21		
85x115	3-7	632,398	per Unit	51										11	40	
75x100	3-7	515,665	per Unit	102										26	40	36
Village 4 (North Village)																
Duplex-Adult	4-1	344,532	per Unit	97					50	47						
Duplex-Adult	4-1	344,532	per Unit	56							56					
40X90	4-2	356,999	per Unit	74					50	24						
50x100	4-2	473,732	per Unit	116					50	50	16					
Duplex-Family	4-3	335,466	per Unit	66						50	16					
Duplex	4-3	453,332	per Unit	51								51				
Standard Lot (60' X 100')	4-4	509,999	per Unit	107						40	40	27				
Standard Lot (70' X 100')	4-4	589,048	per Unit	66						40	26					
Duplex-Family	4-5	335,466	per Unit	38					38							
Triplex Adult	4-6	301,466	per Unit	84					40	44						
45x80	4-7	362,666	per Unit	40					40							
45x80	4-7	362,666	per Unit	56						56						
Duplex-Family	4-8	335,466	per Unit	51						34	17					
Duplex-Family	4-8	335,466	per Unit	41							30	11				

Exhibit A - Fiscal Impact Analysis
Table 3 - Riverside County Land Use and Absorption Assumptions
Paradise Valley
February 16, 2017

Description	PA	Base Price	Measure	Total Units/ Sq. Ft.	Absorption (Units/Sq. Ft) (a) Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12
Village 5 (East Village)																
Duplex Family	5-1	335,466	per Unit	191									50	50	50	41
40 x 100	5-1	362,666	per Unit	134										50	50	
70X100	5-3	589,048	per Unit	81									40	41		
85X115	5-3	632,398	per Unit	46									46			
45X100	5-4	387,599	per Unit	172										50	50	50
50X70	5-6	356,432	per Unit	207									50	50	50	57
50X90	5-7	447,665	per Unit	109											50	59
55X100	5-8	504,332	per Unit	121										50	50	21
60X100	5-8	509,999	per Unit	162									50	50	50	12
55X100	5-8	515,665	per Unit	98									30	40	28	
55X100	5-9	504,332	per Unit	139											39	50
70X100	5-9	589,048	per Unit	88										40	40	8
50X100	5-10	473,732	per Unit	140											50	50
55X100	5-10	515,665	per Unit	56											16	40
40X90	5-10	368,332	per Unit	86											50	36
70X100	5-11	611,998	per Unit	156										40	40	40
Village 6 (South Village)																
50X70	6-1	356,432	per Unit	156											50	50
50x90	6-1	447,665	per Unit	62											50	12
40X90	6-1	356,999	per Unit	90											50	40
40X90	6-1	368,332	per Unit	55												30
50x90	6-1	447,665	per Unit	97												39
40X90	6-1	356,999	per Unit	70												40
75x100	6-3	611,998	per Unit	87											30	30
75x100	6-4	515,665	per Unit	30												
65x110	6-4	456,165	per Unit	36											36	
65x110	6-5	456,165	per Unit	65												40
duplex-family	6-6	335,466	per Unit	143											50	50
50X100	6-7	473,732	per Unit	44												
85X115	6-8	632,398	per Unit	86											30	30
TOTAL RESIDENTIAL		**$ 395,121**		**8,490**	**300**	**342**	**635**	**522**	**606**	**597**	**579**	**563**	**740**	**862**	**1,234**	**964**

NON-RESIDENTIAL LAND USE		Value per Sq. Ft. (a)														
Office		$ 296	per Sq. Ft.	450,323	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640
Retail		$ 231	per Sq. Ft.	441,687	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976
Light Industrial		$ 193	per Sq. Ft.	106,380	-	-	-	-	-	13,298	13,298	13,298	13,298	13,298	13,298	13,298
Subtotal Office/Retail		256		998,390	68,616	68,616	68,616	68,616	68,616	81,914	81,914	81,914	81,914	81,914	81,914	81,914
Hotel - Business (Limited Service)	(e)	$ 95,000	per room	100	-	-	-	-	100	-	-	-	-	-	-	-
Hotel - Resort	(e)	$ 200,000	per room	300	-	-	-	-	-	-	-	-	-	300	-	-
Schools		-	per Sq. Ft.	-	-	-	-	-	-	-	-	-	-	-	-	-
Other	(d)	-	per Sq. Ft.	-	-	-	-	-	-	-	-	-	-	-	-	-
Subtotal Hotel/School/Other				400	-	-	-	-	100	-	-	-	-	300	-	-
TOTAL NON-RESIDENTIAL				**998,390**	**68,616**	**68,616**	**68,616**	**68,616**	**68,616**	**81,914**	**81,914**	**81,914**	**81,914**	**81,914**	**81,914**	**81,914**

LAND USE OVERVIEW		
Residents	15,724	
Employees:		
Office/Retail/Light Industrial	3,634	
Occupancy Rate	95%	(d)
Subtotal	3,452	
Hotel/School/Other	1,260	
Total Employees	4,712	(d)
Equivalent Residents (Residents & 50% Employees)	18,080	

Footnotes:
(a) Per information provided by Glorious Land Company, LLC and its consultants.
(b) PPH per The Natelson Dale Group's demographic analysis. TNDG analysis indicates 31% of total units to be seasonal units at 50% occupancy. Estimated PPH of 2.19 for full time units. Blended PPH calculated as weighted average of seasonal and full time units.
(c) Per The Natelson Dale Group, Analysis of Onsite Employment Potentials, dated April 19, 2016.
(d) Employment calculations assume that retail, light industrial, and office space will have a stabilized occupancy rate of 95%. Employment also includes 335 hotel employees, 497 school employees and 428 employment activities not tied to permanent commercial/institutional locations. Calculations per The Natelson Dale Group, Analysis of Onsite Employment Potentials, dated April 19, 2016.
(e) Per DPFG database of fiscal impact studies.
(f) For purposes of this analysis, we have not assumed an assessed value for employment activities not tied to permanent commercial/institutional locations. We have also assumed that schools are exempt from the payment of property taxes.

Exhibit A - Fiscal Impact Analysis
Table 3 - Riverside County Land Use and Absorption Assumptions
Paradise Valley
February 15, 2017

Description	PA	Base Price	Measure	Total Units/ Sq. Ft.	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Assessed Value	Persons per Household	Residents/ Employees
(a)	(a)	(a)		(a)											(b)	
RESIDENTIAL LAND USE																
Village 1 (Town Center)																
TOWNS	1-1	$ 349,066	per Unit	92										$ 32,114,072	1.85	170
Stacked flats HHDR	1-3	271,999	per Unit	211										57,391,789	1.85	391
Stacked flats	1-4	305,999	per Unit	413										126,377,587	1.85	765
55'x100'	1-6	504,332	per Unit	114										57,493,848	1.85	211
50'X70'	1-7	356,432	per Unit	88										31,366,016	1.85	163
45'X80'	1-7	362,666	per Unit	67										24,298,622	1.85	124
45'X80'	1-7	362,686	per Unit	59										21,398,474	1.85	109
55'X100'	1-8	504,332	per Unit	66										33,285,912	1.85	122
60'X100'	1-8	509,999	per Unit	70										35,699,930	1.85	130
Village 2 (Town Center West)																
60'X100'	2-1	509,999	per Unit	77										39,269,923	1.85	143
50x100	2-2	473,732	per Unit	92										43,583,344	1.85	170
45x80	2-2	362,686	per Unit	100										36,268,600	1.85	185
50'x100	2-2	473,732	per Unit	89										42,162,148	1.85	165
50'x100	2-4	473,732	per Unit	118										55,900,376	1.85	219
Duplex	2-4	344,532	per Unit	129										44,444,628	1.85	239
40'X62'	2-5	314,499	per Unit	122										38,368,878	1.85	226
Stacked flats	2-6	226,686	per Unit	420										95,208,120	1.85	778
Triplex-adult	2-7	301,466	per Unit	60										18,087,960	1.85	111
Triplex-adult	2-7	301,466	per Unit	130										39,190,580	1.85	241
45X100	2-9	387,599	per Unit	172										66,667,028	1.85	319
Village 3 (Casa Activie Adult)																
MIXED USE HHDR	3-1	271,999	per Unit	418										113,695,582	1.85	774
DUPLEX	3-2	275,399	per Unit	46										12,668,354	1.85	85
DUPLEX	3-2	275,399	per Unit	101										27,815,299	1.85	187
65x110	3-3	456,165	per Unit	86										39,230,190	1.85	159
75x100	3-3	515,665	per Unit	74										38,159,210	1.85	137
65x110	3-3	456,165	per Unit	73										33,300,045	1.85	135
DUPLEX	3-4	275,399	per Unit	114										31,395,486	1.85	211
50x90	3-5	362,666	per Unit	90										32,639,940	1.85	167
50x70	3-5	396,666	per Unit	97										38,476,602	1.85	180
DUPLEX	3-5	275,399	per Unit	146										40,208,254	1.85	270
40X90	3-5	335,466	per Unit	92										30,862,872	1.85	170
50x90	3-5	362,666	per Unit	94										34,090,604	1.85	174
40x90	3-5	335,466	per Unit	116										38,914,056	1.85	215
75x100	3-6	515,665	per Unit	100										51,566,500	1.85	185
85x115	3-6	632,398	per Unit	51										32,252,298	1.85	94
85x115	3-7	632,398	per Unit	51										32,252,298	1.85	94
75x100	3-7	515,665	per Unit	102										52,597,830	1.85	189
Village 4 (North Village)																
Duplex-Adult	4-1	344,532	per Unit	97										33,419,604	1.85	180
Duplex-Adult	4-1	344,532	per Unit	56										19,293,792	1.85	104
40X90	4-2	356,999	per Unit	74										26,417,926	1.85	137
50x100	4-2	473,732	per Unit	116										54,952,912	1.85	215
Duplex-Family	4-3	335,466	per Unit	66										22,140,756	1.85	122
Duplex	4-3	453,332	per Unit	51										23,119,932	1.85	94
Standard Lot (60' X 100')	4-4	509,999	per Unit	107										54,569,893	1.85	198
Standard Lot (70' X 100')	4-4	589,048	per Unit	66										38,877,168	1.85	122
Duplex-Family	4-5	335,466	per Unit	38										12,747,708	1.85	70
Triplex Adult	4-6	301,466	per Unit	84										25,323,144	1.85	156
45x80	4-7	362,666	per Unit	40										14,506,640	1.85	74
45x80	4-7	362,666	per Unit	56										20,309,296	1.85	104
Duplex-Family	4-8	335,466	per Unit	51										17,108,766	1.85	94
Duplex-Family	4-8	335,466	per Unit	41										13,754,106	1.85	76

Exhibit A - Fiscal Impact Analysis
Table 3 - Riverside County Land Use and Absorption Assumptions
Paradise Valley
February 15, 2017

Description	PA	Base Price	Measure	Total Units/ Sq. Ft.	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Assessed Value	Persons per Household	Residents/ Employees
Village 5 (East Village)																
Duplex Family	5-1	335,466	per Unit	191										64,074,006	1.85	354
40 x 100	5-1	362,666	per Unit	134	34									48,597,244	1.85	248
70X100	5-3	589,048	per Unit	81										47,712,888	1.85	150
85X115	5-3	632,398	per Unit	46										29,090,308	1.85	85
45X100	5-4	387,599	per Unit	172	22									66,667,028	1.85	319
50X70	5-6	356,432	per Unit	207										73,781,424	1.85	383
50X90	5-7	447,665	per Unit	109										48,795,485	1.85	202
55X100	5-8	504,332	per Unit	121										61,024,172	1.85	224
60X100	5-8	509,999	per Unit	162										82,619,838	1.85	300
55X100	5-8	515,665	per Unit	98										50,535,170	1.85	182
55X100	5-9	504,332	per Unit	139	50									70,102,148	1.85	257
70X100	5-9	589,048	per Unit	89										51,836,224	1.85	163
50X100	5-10	473,732	per Unit	140	40									66,322,480	1.85	259
55X100	5-10	515,665	per Unit	56										28,877,240	1.85	104
40X90	5-10	368,332	per Unit	86										31,676,552	1.85	159
70X100	5-11	611,998	per Unit	156	36									95,471,688	1.85	269
Village 6 (South Village)																
50X70	6-1	356,432	per Unit	156	56									55,603,392	1.85	289
50x90	6-1	447,665	per Unit	62										27,755,230	1.85	115
40X90	6-1	356,999	per Unit	90										32,129,910	1.85	167
40X90	6-1	368,332	per Unit	55	25									20,258,260	1.85	102
50x90	6-1	447,665	per Unit	97	58									43,423,505	1.85	180
40X90	6-1	356,999	per Unit	70	30									24,989,930	1.85	130
75x100	6-3	611,998	per Unit	87	27									53,243,826	1.85	161
75x100	6-4	515,665	per Unit	30	30									15,469,950	1.85	56
65x110	6-4	456,165	per Unit	36										16,421,940	1.85	67
65x110	6-5	456,165	per Unit	65	25									29,650,725	1.85	120
duplex-family	6-6	335,466	per Unit	143	43									47,971,638	1.85	265
50X100	6-7	473,732	per Unit	44	44									20,844,208	1.85	81
85X115	6-8	632,398	per Unit	86	26									54,386,228	1.85	159
TOTAL RESIDENTIAL		**$ 395,121**		**8,490**	**546**	-	-	-	-	-	-	-	-	**$3,364,577,536**		**15,724**

		Value per Sq. Ft.													Sq. Ft./room per Employee	
		(a)													(c)	
NON-RESIDENTIAL LAND USE																
Office		$ 296	per Sq. Ft.	450,323	34,640	-	-	-	-	-	-	-	-	133,295,608	175	2,573
Retail		$ 231	per Sq. Ft.	441,687	33,976	-	-	-	-	-	-	-	-	102,029,697	500	883
Light Industrial		$ 193	per Sq. Ft.	106,380	13,298	-	-	-	-	-	-	-	-	20,531,340	600	177
Subtotal Office/Retail		256		998,390	81,914	-	-	-	-	-	-	-	-	255,856,645	275	3,634
Hotel - Business (Limited Service)	(e)	$ 95,000	per room	100	-	-	-	-	-	-	-	-	-	9,500,000	0.35	35
Hotel - Resort	(e)	$ 200,000	per room	300	-	-	-	-	-	-	-	-	-	60,000,000	1	300
Schools		-	per Sq. Ft.	-	-	-	-	-	-	-	-	-	-	(f)	-	497
Other	(d)	-	per Sq. Ft.	-	-	-	-	-	-	-	-	-	-	(f)	-	428
Subtotal Hotel/School/Other				400	-	-	-	-	-	-	-	-	-	69,500,000	1	1,260
TOTAL NON-RESIDENTIAL				**998,390**	**81,914**	-	-	-	-	-	-	-	-	**$ 325,356,645**		**4,894**

LAND USE OVERVIEW			
Residents	15,724		
Employees:			
Office/Retail/Light Industrial	3,634		
Occupancy Rate	95%	(d)	
Subtotal	3,452		
Hotel/School/Other	1,260		
Total Employees	4,712	(d)	
Equivalent Residents (Residents & 50% Employees)	18,080		

Footnotes:
(a) Per information provided by Glorious Land Company, LLC and its consultants.
(b) PPH per The Natelson Dale Group's demographic analysis. TNDG analysis indicates 31 weighted average of seasonal and full time units.
(c) Per The Natelson Dale Group, Analysis of Onsite Employment Potentials, dated April 19
(d) Employment calculations assume that retail, light industrial, and office space will have a activities not tied to permanent commercial/institutional locations. Calculations per The N
(e) Per DPFG database of fiscal impact studies.
(f) For purposes of this analysis, we have not assumed an assessed value for employment schools are exempt from the payment of property taxes.

Exhibit A - Fiscal Impact Analysis
Table 4 - Riverside County Property Tax and Documentary Transfer Tax Calculations
Paradise Valley
February 15, 2017

	Table Ref.		
I. Property Tax			
Residential Property Tax			
Total Residential Assessed Value Adjusted for Deflation Factor of 0.41% (See Exhibit C) (a)		$	3,181,779,482
Basic Rate			1.000%
Basic Tax Paid		$	31,817,795
County General Fund Share of Basic Tax	2		14.0253%
Total Residential Property Tax		**$**	**4,462,540**
Non-Residential Property Tax			
Secured Property Tax			
Total Non-Residential Assessed Value Adjusted for Deflation Factor of 0.41% (See Exhibit C) (a)		$	307,896,313
Basic Rate			1.000%
Basic Tax Paid		$	3,078,963
County General Fund Share of Basic Tax	2		14.02530%
Total Secured Property Tax		**$**	**431,834**
Unsecured Property Tax			
Non-Residential Unsecured Property Tax as a % of Secured			10%
Total Unsecured Property Tax		**$**	**43,183**
Total Non-Residential Property Tax		**$**	**475,017**
Total County General Fund Share of the Basic Tax		**$**	**4,937,557**
II. Property Tax In-Lieu of Sales-Tax			
Add On-Site Sales Tax Redirected to Property Tax (b)	5	$	-
Add Off-Site Sales Tax Redirected to Property Tax (b)	5		-
Total Property Tax In-Lieu of Sales Tax		**$**	**-**
III. Documentary Transfer Tax			
Residential Documentary Transfer Tax			
Residential Turnover Rate (c)			14%
Total Residential Assessed Value Adjusted for Deflation Factor of 0.41% (See Exhibit C) (a)		$	3,181,779,482
Value of Annual Turnover		$	454,539,926
Transfer Tax Rate (d)			0.1100%
Total Residential Documentary Transfer Tax		**$**	**499,994**
Non-Residential Documentary Transfer Tax			
Non-Residential Turnover Rate (c)			10%
Total Non-Residential Assessed Value Adjusted for Deflation Factor of 0.41% (See Exhibit C) (a)		$	307,896,313
Value of Annual Turnover		$	30,789,631
Transfer Tax Rate (d)			0.1100%
Total Non-Residential Documentary Transfer Tax		**$**	**33,869**
Total Documentary Transfer Tax		**$**	**533,863**

Footnotes:

(a) This analysis assumes an annual assessed value deflation factor of 0.41% (Calculated by subtracting the 2% limit on annual increases in assessed value imposed by Proposition 13 from the historical average U.S. inflation rate from 1993 through 2014 of 2.41%, per InflationData.com).

(b) Project is assumed to be developed after termination of the triple flip on January 1, 2016.

(c) Assumes residential property is sold approximately every 7 years and non-residential property is sold approximately every 10 years.

(d) The County may levy a transfer tax at the rate of $0.55 for each $500 of assessed value. A City within the County that levies this tax can levy a transfer tax at a rate of $0.55 per $1,000. If both the County and City levy the transfer tax, a credit shall be allowed against the amount imposed by the County in the amount of tax that is imposed by the City per California Revenue and Taxation Code 11911.

Exhibit A - Fiscal Impact Analysis
Table 5 (Page 1 of 2) - Riverside County Sales and Use Tax, Interest Earnings & MVLF Calculations
Paradise Valley
February 15, 2017

I. On-Site Sales and Use Tax	Table Ref.	Sq. Ft.	Taxable Sales per Sq. Ft.	% of Sq. Ft./ Acres Generating Taxable Sales	Total Taxable Sales
Taxable Sales				(c)	
Office	3	450,323	-	0%	-
Retail	3	441,687	(b) 200	100%	88,337,400
Light Industrial	3	106,380	-	0%	-
Schools	3	-	-	0%	-
Other	3	-	-	0%	-
Non-Residential Direct Taxable Sales		**998,390**			**88,337,400**

	Available Rooms	Revenue per Room	Adjustment % Factor	Adjusted Revenue per Room	Total Taxable Sales
	[1]			[2]	[1] x [2]
Hotel - Business (Limited Service) (p)					
Other Operated Departments Revenue (l)	100	383	74.95%	287	28,705
Rentals and Other Income (l)	100	118	74.95%	88	8,844
Subtotal		**$ 501**		**$ 375**	**37,549**
Hotel - Resort					
Food and Beverage Revenue (o)	300	$ 39,095	60.02%	$ 23,464	7,039,256
Other Operated Departments Revenue (o)	300	12,410	60.02%	7,448	2,234,485
Rentals and Other Income	300	3,145	60.02%	1,888	566,273
Subtotal		**$ 54,650**		**$ 32,800**	**9,840,014**
Total Direct Taxable Sales					**$ 98,214,964**
Project On-Site Sales and Use Tax to County					
Sales Tax (@ 1.00% of Taxable Sales)				1.00%	$ 982,150
Use Tax (@ 10.5% of Sales Tax)				10.50%	103,126
Total On-Site Sales and Use Tax					$ 1,085,275
Less 0.25% Reclassified to Property Taxes (g)				0.00%	-
Net On-Site Sales and Use Tax					**$ 1,085,275**

II. Off-Site Sales and Use Tax from Residential		
Total Residential AV Adj. for Deflation Factor of 0.41% (See Table 4 and Exhibit C)		$ 3,181,779,482
Household Income (@ 25% of Assessed Valuation) (d)	25.0%	795,444,870
Retail Taxable Sales (@ 32% of Household Income) (e)	32.0%	254,542,359
Projected Off-Site Taxable Sales (@ 0% of Retail Taxable Sales) (f)	0.0%	-
Sales Tax (@ 1.00% of Taxable Sales)	1.00%	$ -
Use Tax (@ 10.5% of Sales Tax)	10.50%	-
Total Off-Site Sales and Use Tax		$ -
Less 0.25% Reclassified to Property Taxes (g)	0.00%	-
Net Off-Site Sales and Use Tax		**$ -**

III. Transient Occupancy Tax ("TOT")	Available Rooms	Annual Rooms Available	Average Occupancy Rate	Average Room Rate	Hotel Rental Revenue
			(n)	(n)	
Hotel - Business					
Hotel - Business Rental Revenue Subject to TOT	100	36,500	58.0%	$ 87	1,831,840
Transient Occupancy Tax Rate (m)					10.0%
					$ 183,184
Hotel - Resort					
Hotel - Resort Revenue Subject to TOT	300	109,500	60.0%	$ 178	11,694,600
Transient Occupancy Tax Rate (m)					10.0%
					$ 1,169,460
Total/ Weighted Average	400	146,000	59.5%	$ 155	
Total Transient Occupancy Tax Revenue					**$ 1,352,644**

Footnotes:
(a) Not used.
(b) Source: DPFG estimate based on peer review comments on other Riverside County FIAs.
(c) Analysis assumes that 0% of light industrial and office space and 100% of retail space will provide products and services that generate sales tax revenue.
(d) Per County of Riverside Guide to Preparing Fiscal Impact Reports dated January 1995.
(e) Per U. S. Bureau of Labor Statistics Consumer Expenditure Survey, 2008 which indicates that retail taxable purchases represent approximately 32% of total household income for the average U.S. household.
(f) To be conservative and avoid potential double-counting of sales tax revenue, this analysis assumes that there will be no additional sales tax generated by project residents for the County of Riverside through taxable purchases made outside of the project area, but within Riverside County.
(g) Project is assumed to be developed after termination of the triple flip on January 1, 2016.
(h) Investment earnings, as specified in the Guide to Preparing Fiscal Impact Reports, are estimated using the historic average interest rate of the 90-day Treasury Bill. The analysis assumes a rate of 1.13%, the 10-year historic average interest rate from 2006 through 2015 of the 90-day Treasury Bill. In 1994, the Guide to Preparing Fiscal Impact Reports calculated a historic average interest rate of 6.98%.
(i) Per the Division of Accounting and Reporting at the California State Controller's Office.
(j) Per page 354 from the County of Riverside FY 2015-16 Recommended Budget.
(k) Per the County of Riverside Assessor County Clerk Recorder, Assessed Value Report FY 2015-16 (http://www.asrclkrec.com/QuickLinks/AnnualReports.aspx).
(l) Revenue per available room for limited service hotels in the Mountain and Pacific region per the 2014 USA Edition of Trends in the Hotel Industry prepared by PKF Hospitality Research. Amounts have been adjusted based on information from the Smith Travel Research ("STR") report.
(m) Per the County of Riverside Tax Collector, Transient Occupancy Tax form.
(n) Average occupancy rate and average room rate per Smith Travel Research ("STR") report.
(o) Revenue per available room for resort hotels in the Mountain and Pacific region per the 2014 USA Edition of Trends in the Hotel Industry prepared by PKF Hospitality Research. Amounts have been adjusted based on information from the Smith Travel Research ("STR") report.
(p) Per STR website, limited-service hotels have rooms-only operations, (i.e. without food and beverage service) or offer a bedroom and bathroom for the night, but very few other services and amenities. These hotels are often in the budget or economy group and do not report food and beverage revenue.

Exhibit A - Fiscal Impact Analysis
Table 5 (Page 2 of 2) - Riverside County Sales and Use Tax, Interest Earnings & MVLF Calculations
Paradise Valley
February 15, 2017

IV. Interest Earnings	**Table Ref.**		
County Share of Residential and Non-Residential Property Tax	4	$	4,937,557
Documentary Transfer Tax	4		533,863
Net Off-Site Sales and Use Tax			-
Net On-Site Sales and Use Tax			1,085,275
Total Revenue Generating Interest Earnings		**$**	**6,556,695**
Interest Earnings @ 1.13% (h)		**$**	**74,091**

V. Motor Vehicle License Fee ("MVLF")

A. Nominal Dollars	**FY 2004-05**	**FY2015-16**		**Change**
Property Tax Vehicle License Fees (VLF)	$ (i) 128,200,332	$ (j) 220,920,864	[1]	$ 92,720,532.00
Assessed Valuation	(i) 138,771,615,256	(k) 242,716,731,251	[2]	103,945,115,995
VLF Increase per Assessed Valuation (AV) Increase			=[1]/[2]	0.000892
VLF Increase per $1,000,000 increase in AV			[3]	$ 892

B. Property Tax In-Lieu of Vehicle License Fee			
Total Residential Assessed Value Adjusted for Deflation Factor of 0.45% (See Exhibit C)		[4]	$ 3,181,779,482
Total Non-Residential Assessed Value Adjusted for Deflation Factor of 0.45% (See Exhibit C)			307,896,313
Total Assessed Valuation (Table 3)			$ 3,489,675,795
Assessed Valuation / 1,000,000		[5]=[4]/1,000,000	3,490
VLF Increase per $1,000,000 Increase in AV		=[3]	892
Property Tax In-Lieu of Vehicle License Fee		=[3]*[5]	$ 3,112,791

Footnotes:

(a) Not used.
(b) Source: DPFG estimate based on peer review comments on other Riverside County FIAs.
(c) Analysis assumes that 0% of light industrial and office space and 100% of retail space will provide products and services that generate sales tax revenue.
(d) Per County of Riverside Guide to Preparing Fiscal Impact Reports dated January 1995.
(e) Per U. S. Bureau of Labor Statistics Consumer Expenditure Survey, 2008 which indicates that retail taxable purchases represent approximately 32% of total household income for the average U.S. household.
(f) To be conservative and avoid potential double-counting of sales tax revenue, this analysis assumes that there will be no additional sales tax generated by project residents for the County of Riverside through taxable purchases made outside of the project area, but within Riverside County.
(g) Project is assumed to be developed after termination of the triple flip on January 1, 2016.
(h) Investment earnings, as specified in the Guide to Preparing Fiscal Impact Reports, are estimated using the historic average interest rate of the 90-day Treasury Bill. The analysis assumes a rate of 1.13%, the 10-year historic average interest rate from 2006 through 2015 of the 90-day Treasury Bill. In 1994, the Guide to Preparing Fiscal Impact Reports calculated a historic average interest rate of 6.98%.
(i) Per the Division of Accounting and Reporting at the California State Controller's Office.
(j) Per page 354 from the County of Riverside FY 2015-16 Recommended Budget.
(k) Per the County of Riverside Assessor County Clerk Recorder, Assessed Value Report FY 2015-16 (http://www.asrclkrec.com/QuickLinks/AnnualReports.aspx).
(l) Revenue per available room for limited service hotels in the Mountain and Pacific region per the 2014 USA Edition of Trends in the Hotel Industry prepared by PKF Hospitality Research. Amounts have been adjusted based on information from the Smith Travel Research ("STR") report.
(m) Per the County of Riverside Tax Collector, Transient Occupancy Tax form.
(n) Average occupancy rate and average room rate per Smith Travel Research ("STR") report.
(o) Revenue per available room for resort hotels in the Mountain and Pacific region per the 2014 USA Edition of Trends in the Hotel Industry prepared by PKF Hospitality Research. Amounts have been adjusted based on information from the Smith Travel Research ("STR") report.
(p) Per STR website, limited-service hotels have rooms-only operations, (i.e. without food and beverage service) or offer a bedroom and bathroom for the night, but very few other services and amenities. These hotels are often in the budget or economy group and do not report food and beverage revenue.
(q) Per STR website, full-service hotels are generally mid-price, upscale or luxury hotels with a restaurant, lounge facilities and meeting space, and offer minimum service levels, often including bell service and room service. These hotels report food and beverage revenue.

Exhibit A - Fiscal Impact Analysis
Table 6 - Riverside County Other General Fund Discretionary Revenue Calculations
Paradise Valley
February 15, 2017

Description	Page Ref.	FY 15/16 Budget (a)	County Equivalent Units (b)	Factor	Measurement (b)	Project Equivalent Units (c)	Financing Requirements
		[1]	[2]	[1]/[2]=[3]		[4]	[3]X[4]
General Fund Discretionary Revenue							
Property Tax							
Prop Tax Current Secured	33	$ 209,093,408			See Table 4		
Prop Tax Current Unsecured	33	8,325,622			See Table 4		
Prop Tax Prior Unsecured	33	750,000			See Table 4		
Prop Tax Current Supplemental	33	4,027,600	-	-	not used	-	-
Prop Tax Prior Supplemental	33	2,383,499	-	-	not used	-	-
Contractual Revenue	42	94,007,376	-	-	not used	-	-
Total Property Tax		$ 318,587,505		$ -			$ -
Sales & Use Taxes	33	$ 31,470,867			See Table 5		
Property Transfer Tax	33	$ 14,375,400			See Table 4		
Franchises	33	$ 4,145,413	412,123	$ 10.06	per service population, unincorporated only	18,080	$ 181,864
Fines and Penalties							
Fee-POC Transaction	34	$ 260,000	2,788,991	$ 0.09	per service population, entire county	18,080	$ 1,686
Fine-Traffic Motor Vehicle MC	34	1,191,306	412,123	2.89	per service population, unincorporated only	18,080	52,264
Health-Safety Fees	34	4,000	-	-	not used	-	-
Administration Costs	34	-	-	-	not used	-	-
Fine-Traffic School	34	1,681,793	412,123	4.08	per service population, unincorporated only	18,080	73,782
AB233 Realignment	34	16,101,645	-	-	not used	-	-
Other Court Fines Non Dept	34	312,088	2,788,991	0.11	per service population, entire county	18,080	2,023
Criminal-Co. 25%	34	61,464	2,788,991	0.02	per service population, entire county	18,080	398
Penalties & Int On Del Taxes	34	3,100,000	2,788,991	1.11	per service population, entire county	18,080	20,097
Total Fines and Penalties		$ 22,712,296		$ 8.31			$ 150,250
Teeter Overflow	34	$ 25,000,000	-	$ -	not used	-	$ -
Interest							
Interest-Invested Funds	34	$ 3,108,494			See Table 5		
Interest-Other	34	-			See Table 5		
Total Interest		$ 3,108,494		$ -			$ -
CA-Motor Vehicle In-Lieu Tax	35	$ 220,920,864			See Table 5		
Miscellaneous Federal and State							
CA-Homeowners Tax Relief	36	$ 2,606,205	-	$ -	not used	-	$ -
CA-Suppl Homeowners Tax Relief	36	42,000	-	-	not used	-	-
CA-Mandate Reimbursement	36	94,002	-	-	not used	-	-
Federal In Lieu Taxes	37	3,000,000	2,308,441	1.30	per capita, entire county	15,724	20,435
Oth Gov-EVTDA/Cabazon Funding		-	-	-	not used	-	-
In Lieu-Tax from So Cal Fair	42	32,600	-	-	not used	-	-
Total Federal and State		$ 5,774,807		$ 1.30			$ 20,435
Tobacco Tax Settlement	43	$ 10,000,000	-	$ -	not used	-	$ -
Miscellaneous Revenue							
Transient Occupancy	33	$ 2,265,620	-	$ -	not used	-	$ -
Non Commn Aircraft	33	244,055	-	-	not used	-	-
Racehorse Tax	33	10,000	-	-	not used	-	-
Small Claims Fee			-	-	not used	-	-
Court Fees & Costs	38	416,800	2,788,991	0.15	per service population, entire county	18,080	2,702
Superior Court Fees	38	69,368	2,788,991	0.02	per service population, entire county	18,080	450
Unclaimed Money	42	-	-	-	not used	-	-
Judgments	43	-	-	-	not used	-	-
Cash Over-Short	42	53,105	-	-	not used	-	-
El Sobrante Land Fill	42	1,700,000	-	-	not used	-	-
Sale Of Real Estate			-	-	not used	-	-
Rebates & Refunds	42	1,500	2,788,991	0.00	per service population, entire county	18,080	10
Total Miscellaneous Revenue		$ 4,760,448		$ 0.17			$ 3,161
Total General Fund Discretionary Revenue		$ 660,856,094		$ 19.84			$ 355,711

Footnotes:

(a) Based on County of Riverside Fiscal Year 2015-16 Recommended Budget.

(b) Based on (1) 2,308,441 total Riverside County residents and 368,823 residents in the unincorporated sections of Riverside County per the California Department of Finance, January 1, 2015, (2) 961,100 total Riverside County employees and 86,600 employees in the unincorporated sections of Riverside County per the California Employment Development Department, October 2015, and (3) for service population calculation, employment was reduced by 50% to account for the estimated less frequent use of county public services by employees than residents.

(c) See Table 2 - Land Use Assumptions.

Exhibit A - Fiscal Impact Analysis
Table 7 - Riverside County General Fund Financing Requirements Budget, Net of Revenue Sources
Paradise Valley
February 15, 2017

Description	FY 2015-16 Budget (a) Page Ref.	Fund	Total	Intergovernmental	Charges for Services	Licenses and Permits	Fines, Forfeitures & Penalties	Other	Retained Earnings Contribution	General Fund Contribution	Marginal Increase	Net General Fund Contribution
General Financing Requirements												
Legislative and Administrative												
Board of Supervisors	97	10000	$ 7,644,982	$ -	$ 842,609	$ 3,368,908	$ -	$ -	$ -	$ 3,433,465	50%	$ 1,716,733
Assessment Appeals Board	97	10000	-	-	-	-	-	-	-	-	50%	-
Executive Office	97	10000	4,821,397	-	2,110,370	-	-	911,910	-	1,799,117	50%	899,559
Health and Juvenile Services	98	22430	1,439,000	-	-	-	-	1,439,000	-	-	NA	-
Casa Blanca Clinic Pass-Thru	98	22850	226,215	-	-	-	-	226,215	-	-	NA	-
Cabazon CRA Infrastructure	98	30360	50	-	-	-	-	715,227	(715,177)	-	NA	-
Wine Country Infrastructure	99	30370	50	-	-	-	-	227,636	(227,586)	-	NA	-
AB 2766 Air Quality		22300	-	-	-	-	-	-	-	-	NA	-
RDA Capital Improvements	99	31540	26,547,752	-	-	-	-	28,247,188	(1,699,436)	-	NA	-
Contribution to Other Funds	100	10000	62,237,151	-	-	-	-	-	-	62,237,151	100%	62,237,151
Court Subfund	100	10000	9,174,166	-	2,500	-	7,270,532	-	-	1,901,134	100%	1,901,134
Legislative Litigation Services	101	10000	2,400,749	-	50,000	-	-	-	-	2,350,749	100%	2,350,749
EO Subfund Budgets	102	10000	10,760,659	-	56,643	-	2,808,398	1,754	-	7,893,864	100%	7,893,864
Solar Revenue Fund	102	22840	1,357,404	-	352,872	-	657,000	-	347,532	-	50%	-
Legislative /Admin Services		10000	-	-	-	-	-	-	-	-	50%	-
CFD/AD Administration	104	22050	790,000	-	740,000	-	-	50,000	-	-	NA	-
Total Legislative and Administrative			$ 127,399,575	$ -	$ 4,154,994	$ 3,368,908	$ 10,735,930	$ 31,818,930	$ (2,294,667)	$ 79,615,480		$ 76,999,189
Finance												
Assessor	104	10000	$ 26,908,893		$ 12,886,028	$ -	$ 1	$ 1,936,150	$ -	$ 12,086,714	50%	$ 6,043,357
Assessment Appeals Board	97	10000	1,081,861	-	385,000	-	-	-	-	696,861	50%	348,431
Auditor-controller	105	10000	7,114,216	-	4,976,720	-	-	-	-	2,137,496	50%	1,068,748
Crest Property Tax Mgmt. System	105	33600	11,278,219	-	3,661,293	-	-	1,829,157	5,787,769	-	NA	-
Internal Audits	106	10000	1,664,568	-	-	-	-	-	-	1,664,568	50%	832,284
ACO: Payroll Services	106	10000	802,628	-	802,628	-	-	-	-	-	50%	-
Cowcap Reimbursement	106	10000	(13,776,847)	-	8,896,447	-	-	-	-	(22,673,294)	50%	(11,336,647)
Treasurer-Tax Collector	107	10000	14,462,122	-	10,142,190	-	3,444,388	3,800	-	871,744	50%	435,872
Purchasing	113	10000	2,581,434	-	1,331,052	-	-	34,305	-	1,216,077	50%	608,039
Total Finance			$ 52,117,094	$ -	$ 43,081,358	$ -	$ 3,444,389	$ 3,803,412	$ 5,787,769	$ (3,999,834)		$ (1,999,917)
Counsel												
Court Transcripts	103	10000	$ 1,500,000	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,500,000	25%	$ 375,000
County Counsel	107	10000	5,206,052	35,000	3,052,000	-	-	-	-	2,119,052	50%	$ 1,059,526
Total Counsel			$ 6,706,052	$ 35,000	$ 3,052,000	$ -	$ -	$ -	$ -	$ 3,619,052		$ 1,434,526
Personnel												
HR: Administration	104	10000	$ 10,144,231	$ -	$ 7,783,304	$ -	$ -	$ 2,360,927	$ -	$ -	50%	$ -
Rideshare		22000	-	-	-	-	-	-	-	-	NA	-
Total Personnel			$ 10,144,231	$ -	$ 7,783,304	$ -	$ -	$ 2,360,927	$ -	$ -		$ -
Elections												
Registrar of Voters	107	10000	$ 9,598,525	$ 105,000	$ 1,114,150	$ -	$ -	$ 40,000	$ -	$ 8,339,375	50%	$ 4,169,688
Total Elections			$ 9,598,525	$ 105,000	$ 1,114,150	$ -	$ -	$ 40,000	$ -	$ 8,339,375		$ 4,169,688
Property Management												
Facil-Mgt: Administration	111	10000	$ 4,532,582	$ -	$ 4,532,582	$ -	$ -	$ -	$ -	$ -	50%	$ -
Facil-Mgt: Design & Construct		10000	-	-	-	-	-	-	-	-	50%	-
Facil-Mgt: Project Management	111	10000	6,078,702	-	6,078,702	-	-	-	-	-	50%	-
Facil-Mgt: Parking	112	10000	2,049,617	-	149,081	-	127,088	1,773,448	-	-	50%	-
Facil-Mgt: Energy Management	112	10000	15,860,247	-	7,929,427	-	-	237,742	-	7,693,078	50%	3,846,539
Facil-Mgt: Facilities Cap Proj		30100	-	-	-	-	-	-	-	-	NA	-
Total Property Management			$ 28,521,148	$ -	$ 18,689,792	$ -	$ 127,088	$ 2,011,190	$ -	$ 7,693,078		$ 3,846,539

Exhibit A - Fiscal Impact Analysis
Table 7 - Riverside County General Fund Financing Requirements Budget, Net of Revenue Sources
Paradise Valley
February 15, 2017

Description	FY 2015-16 Budget (a) Page Ref.	Fund	Total	Intergovernmental	Charges for Services	Licenses and Permits	Fines, Forfeitures & Penalties	Other	Retained Earnings Contribution	General Fund Contribution	Marginal Increase	Net General Fund Contribution
Plant Acquisition												
Accumulative Capital Outlay	99	30000	$ 1,495,550	$ -	$ -	$ -	$ -	$ 1,495,550	$ -	$ -	NA	-
Capital Improvement Program	103	30700	10,317,874	-	-	-	-	3,835,000	6,482,874	-	NA	-
Tobacco Securitization	103	30120	3,815,200	-	-	-	-	380,000	3,435,200	-	NA	-
EDA: Blythe Const & Land		22350	-	-	-	-	-	-	-	-	NA	-
EDA: Thermal Const & Land		22350	-	-	-	-	-	-	-	-	NA	-
EDA: Hemet-Ryan Constr & Land		22350	-	-	-	-	-	-	-	-	NA	-
EDA: French Val Constr & Land		22350	-	-	-	-	-	-	-	-	NA	-
EDA: Capital Projects	112	30100	148,327,933	-	147,720,430	-	-	607,503	-	-	NA	-
Fire: Const & Land Acq	110	30300	1,165,502	-	-	-	-	-	1,165,502	-	NA	-
Total Plant Acquisition			$ 165,122,059	$ -	$ 147,720,430	$ -	$ -	$ 6,318,053	$ 11,083,576	$ -		$ -
Promotion												
EDA: Administration	108	21100	$ 4,590,034	$ -	$ 4,579,734	$ -	$ -	$ 10,300	$ -	$ -	NA	$ -
EDA: Mitigation Fund	108	32710	10,000	-	5,000	-	-	5,000	-	-	NA	-
EDA: Admin Subfunds	109	21100	818,387	-	123,387	-	-	695,000	-	-	NA	-
EDA: Economic Development Progr	109	21100	5,180,124	-	398,423	-	-	4,781,701	-	-	NA	-
EDA: Fair National Date Festival	110	22200	4,179,628	-	2,500	-	-	4,177,128	-	-	NA	-
Total Promotion			$ 14,778,173	$ -	$ 5,109,044	$ -	$ -	$ 9,669,129	$ -	$ -		$ -
Other General												
Contribution to Other Funds		10000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	100%	$ -
Court Sub-Funds		10000	-	-	-	-	-	-	-	-	100%	-
Successor Agency to the RDA		25000	-	-	-	-	-	-	-	-	NA	-
Successor Agency to the RDA		32700	-	-	-	-	-	-	-	-	NA	-
Successor Agency to the RDA		37100	-	-	-	-	-	-	-	-	NA	-
Successor Agency to the RDA		37250	-	-	-	-	-	-	-	-	NA	-
Mitigation Project Ops	101	30500	645,100	-	200,000	-	-	1,500	443,600	-	NA	-
Developer's Impact Fee Ops	101	30500	28,006,000	-	4,110,600	-	-	275,000	23,620,400	-	NA	-
Surveyor	110	20260	4,952,402	-	4,753,059	-	-	199,343	-	-	NA	-
Geographical Information Syst	113	22570	1,892,601	-	1,728,601	-	-	164,000	-	-	NA	-
EO Subfund Budgets		10000	-	-	-	-	-	-	-	-	100%	-
Total Other General			$ 35,496,103	$ -	$ 10,792,260	$ -	$ -	$ 639,843	$ 24,064,000	$ -		$ -
Total General Financing Requirements			$ 449,882,960	$ 140,000	$ 241,497,332	$ 3,368,908	$ 14,307,407	$ 56,661,484	$ 38,640,678	$ 95,267,151		$ 84,450,025
Public Protection												
Judicial												
Contribution to Trial Court	127	10000	$ 29,482,850	$ -	$ -	$ -	$ -	$ 10	$ -	$ 29,482,840	25%	$ 7,370,710
Confidential Court Orders	127	10000	560,014	-	-	-	-	-	-	560,014	25%	140,004
Court Facilities	127	10000	4,895,120	-	-	-	-	-	-	4,895,120	25%	1,223,780
Grand Jury Admin	127	10000	567,471	-	-	-	-	-	-	567,471	25%	141,868
Court Transcripts		10000	-	-	-	-	-	-	-	-	25%	-
District Attorney: Criminal	129	10000	97,427,602	34,399,986	2,551,500	-	109,300	380,000	-	59,986,816	25%	14,996,704
District Attorney: Forensics	130	10000	600,000	-	-	-	600,000	-	-	-	25%	-
Child Support Services	130	10000	35,267,754	35,260,154	-	-	-	7,600	-	-	25%	-
Alternate Public Defender		10000	-	-	-	-	-	-	-	-	25%	-
Indigent Defense	128	10000	11,005,500	-	105,000	-	-	-	-	10,900,500	25%	2,725,125
Capital Defender	131	10000	-	-	-	-	-	-	-	-	25%	-
Public Defender	131	10000	35,434,540	1,859,959	207,326	-	-	-	-	33,367,255	25%	8,341,814
Total Judicial			$ 215,240,851	$ 71,520,099	$ 2,863,826	$ -	$ 709,300	$ 387,610	$ -	$ 139,760,016		$ 34,940,004

Exhibit A - Fiscal Impact Analysis
Table 7 - Riverside County General Fund Financing Requirements Budget, Net of Revenue Sources
Paradise Valley
February 15, 2017

Description	FY 2015-16 Budget (a) Page Ref.	Fund	Total	Intergovernmental	Charges for Services	Licenses and Permits	Fines, Forfeitures & Penalties	Other	Retained Earnings Contribution	General Fund Contribution	Marginal Increase	Net General Fund Contribution
Police Protection												
Sheriff: Administration	131	10000	$ 12,140,591	$ 7,000	$ 1,820,249	$ 84,000	$ -	$ -	$ -	$ 10,229,342	50%	$ 5,114,671
Sheriff: Support	132	10000	45,443,386	15,838,924	17,841,041	4,700	-	24	-	11,758,697	100%	11,758,697
Sheriff: Patrol	132	10000	317,472,233	56,414,775	172,661,937	36,273	15,500	88,700	-	88,255,048	100%	88,255,048
Sheriff: Court Services	134	10000	26,967,709	16,885,104	4,378,040	-	-	118	-	5,704,447	100%	5,704,447
Sheriff: CAC Security	134	10000	655,544	-	-	-	-	-	-	655,544	100%	655,544
Sheriff: Training Center	134	10000	12,741,938	1,112,104	775,841	-	-	1,247,164	-	9,606,829	100%	9,606,829
Sheriff: Cal-ID	136	22250	6,216,502	-	4,848,912	-	-	367,590	-	-	NA	-
Sheriff: Cal-DNA	136	22250	351,257	-	350,757	-	-	500	-	-	NA	-
Sheriff: Cal-Photo	137	22250	230,533	-	230,533	-	-	-	-	-	NA	-
Total Police Protection			$ 421,219,693	$ 90,257,907	$ 202,907,310	$ 124,973	$ 15,500	$ 1,704,096	$ -	$ 126,209,907		$ 121,095,236
Detention and Correction												
Sheriff: Corrections	133	10000	$ 214,488,243	$ 81,955,055	$ 2,646,599	$ -	$ 3,945,480	$ 3,199,040	$ -	$ 122,742,069	50%	$ 61,371,035
Probation: Admin & Support	138	10000	12,556,093	3,337,373	-	-	-	-	-	9,218,720	50%	$ 4,609,360
Probation: Juvenile Hall	137	10000	44,324,374	26,126,472	300,000	-	-	-	-	17,897,902	50%	8,948,951
Probation	137	10000	69,431,851	57,172,924	1,906,811	-	-	-	-	10,352,116	50%	5,176,058
Total Detention and Correction			$ 340,800,561	$ 168,591,824	$ 4,853,410	$ -	$ 3,945,480	$ 3,199,040	$ -	$ 160,210,807		$ 80,105,404
Fire Protection												
Fire Protection: Forest	138	10000	$ 125,781,236	$ 16,631,297	$ 55,931,981	$ -	$ -	$ 584,858	$ -	$ 52,633,100	0%	$ -
Fire: Non-Forest	139	21000	53,562,952	487,885	-	-	-	53,075,067	-	-	NA	-
Fire Protection: Contracts	139	10000	83,694,608	-	83,694,608	-	-	-	-	-	100%	-
Total Fire Protection			$ 263,038,796	$ 17,119,182	$ 139,626,589	$ -	$ -	$ 53,659,925	$ -	$ 52,633,100		$ -
Protection/Inspection												
Agricultural Commissioner	140	10000	$ 5,748,722	$ 2,157,000	$ 2,880,100	$ 34,000	$ 35,000	$ -	$ -	$ 842,622	50%	$ 421,311
Building & Safety	141	10000	6,605,423	-	3,567,370	2,810,037	-	4,600	-	223,416	0%	-
Total Protection/Inspection			$ 12,354,145	$ 2,157,000	$ 6,247,470	$ 2,844,037	$ 35,000	$ 4,600	$ -	$ 1,066,038		$ 421,311
Other Protection												
Nat. Pollut. Discrg Elm. Sys.	128	10000	$ 1,000,000	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,000,000	100%	$ 1,000,000
HR:Rideshare	128	22000	603,800	-	571,000	32,800	-	-	-	-	50%	-
County Clerk-Recorder	129	10000	20,031,512	-	15,999,000	-	-	1,001	-	4,031,511	50%	2,015,756
Sheriff: Public Administrator	135	10000	1,641,228	-	592,400	-	-	9,864	-	1,048,964	50%	524,482
Range Improvement	140	22500	16,948	-	-	-	-	-	16,948	-	NA	-
Environmental Programs	140	20200	950,196	-	-	-	-	962,776	(12,580)	-	NA	-
TLMA: Planning	141	10000	8,470,174	500,000	3,808,498	-	-	10,500	-	4,151,176	0%	-
Planning: Airport LUC		22650	-	-	-	-	-	-	-	-	0%	-
TLMA: Crossing Guard		20000	-	-	-	-	-	-	-	-	NA	-
Sheriff: Coroner	135	10000	8,761,784	3,738,178	646,204	-	-	47,835	-	4,329,567	100%	4,329,567
Code Enforcement	142	10000	13,333,777	945,000	2,189,438	37,590	491,750	310,730	-	9,359,269	100%	9,359,269
Mental Health: Public Guardian	142	10000	4,677,991	3,522,281	457,224	-	-	3	-	698,483	100%	698,483
AB2766 Air Quality	143	22300	486,000	486,000	-	-	-	500	(500)	-	NA	-
PSEC 800MHz Radio Project	144	33500	-	-	-	-	-	-	-	-	NA	-
Total Other Protection			$ 59,973,410	$ 9,191,459	$ 24,253,764	$ 70,390	$ 491,750	$ 1,343,209	$ 3,868	$ 24,618,970		$ 17,927,557
Animal Services												
Animal Servicers	143	10000	18,373,890	-	8,837,596	924,000	-	220,000	-	8,392,294	100%	8,392,294
Total Animal Services			$ 18,373,890	$ -	$ 8,837,596	$ 924,000	$ -	$ 220,000	$ -	$ 8,392,294		$ 8,392,294
Total Public Protection			$ 1,331,001,346	$ 358,837,471	$ 389,589,965	$ 3,983,400	$ 5,197,030	$ 60,518,480	$ 3,868	$ 512,891,132		$ 262,881,805

Exhibit A - Fiscal Impact Analysis
Table 7 - Riverside County General Fund Financing Requirements Budget, Net of Revenue Sources
Paradise Valley
February 15, 2017

Description	FY 2015-16 Budget (a) Page Ref.	Fund	Total	Intergovernmental	Charges for Services	Licenses and Permits	Fines, Forfeitures & Penalties	Other	Retained Earnings Contribution	General Fund Contribution	Marginal Increase	Net General Fund Contribution
Public Ways & Facilities												
Public Ways												
Multi-Spec Habitat Plan	149	22450	$ 4,200,000	$ -	$ 4,200,000	$ -	$ -	$ 12,000	$ (12,000)	$ -	NA	$ -
EDA: Airport		22100	-	-	-	-	-	-	-	-	NA	-
GIS		20200	-	-	-	-	-	-	-	-	NA	-
TLMA: Administration	152	20200	11,405,318	-	11,004,543	-	-	775	400,000	-	NA	-
TLMA: Consolidated Counter	153	20200	4,924,327	-	1,439,535	50	-	984,742	2,500,000	-	NA	-
Environmental Programs		20200	-	-	-	-	-	-	-	-	NA	-
TLMA: Transportation	153	20000	42,659,579	32,656,534	9,328,312	205,118	21,000	448,615	-	-	NA	-
TLMA: Landscape Maint Dist	154	20300	1,389,671	-	497,682	-	-	588,693	303,296	-	NA	-
Facility Management: Parking		10000	-	-	-	-	-	-	-	-	100%	-
TLMA: Sub Road Dist No 4	154	22400	1,139,482	7,778	-	-	-	656,331	475,373	-	NA	-
TLMA: Transp Const Project	154	20000	143,661,460	61,345,522	49,737,218	-	-	32,578,720	-	-	NA	$ -
TLMA: RBBD: Menifee	155	31600	2,163,000	-	-	-	-	1,994	2,161,006	-	NA	-
TLMA: RBBD - Southwest	155	31610	1,120,635	-	-	-	-	415,568	705,067	-	NA	-
TLMA: Signal Mitigation	156	31630	2,000	-	2,000	-	-	-	-	-	NA	-
TLMA: RBBD: Mira Loma	156	31640	11,750,710	-	-	-	-	12,403	11,738,307	-	NA	-
TLMA: DA/DIF	156	31650	3,067,956	-	-	-	-	3,067,974	(18)	-	NA	-
TLMA: Dev Agreements	157	31680	601,000	-	-	-	-	450	600,550	-	NA	-
TLMA: Signal DIF	157	31690	3,235,477	-	-	-	-	3,235,499	(22)	-	NA	-
TLMA: RBBD - Scott Road	157	31693	810,000	-	-	-	-	972	809,028	-	NA	-
TLMA: Trans Equip (Garage)	158	20000	1,538,025	-	508,350	9,947	-	213,086	806,642	-	NA	-
Total Public Ways			$ 233,668,640	$ 94,009,834	$ 76,717,640	$ 215,115	$ 21,000	$ 42,217,822	$ 20,487,229	$ -		$ -
Transportation Terminals												
EDA: Blythe Constr Land	149	22350	$ 995,000	$ 945,250	$ 100	$ -	$ -	$ 49,650	$ -	$ -	NA	$ -
EDA: Thermal Constr Land	149	22350	209,379	198,910	100	-	-	10,369	-	-	NA	-
EDA: Hemet-Ryan Constr Land	150	22350	621,532	590,456	100	-	-	30,976	-	-	NA	-
Const Land - Chiriaco	150	22350	500,000	499,500	-	-	-	500	-	-	NA	-
Const Land - Desert Center	151	22350	203,164	500	-	-	-	8,600	194,064	-	NA	-
EDA: French Val Constr Land	151	22350	2,091,375	1,986,806	100	-	-	104,469	-	-	NA	-
EDA: County Airport	152	22100	2,978,510	50,000	142,494	500	-	2,551,284	234,232	-	NA	-
TLMA: Airport Land Use Comm	158	22650	732,402	197,444	207,446	-	-	263,031	64,481	-	NA	-
Total Transportation Terminals			$ 8,331,362	$ 4,468,866	$ 350,340	$ 500	$ -	$ 3,018,879	$ 492,777	$ -		$ -
Total Public Ways and Facilities			$ 242,000,002	$ 98,478,700	$ 77,067,980	$ 215,615	$ 21,000	$ 45,236,701	$ 20,980,006	$ -		$ -

Exhibit A - Fiscal Impact Analysis
Table 7 - Riverside County General Fund Financing Requirements Budget, Net of Revenue Sources
Paradise Valley
February 15, 2017

Description	FY 2015-16 Budget (a) Page Ref.	Fund	Total	Intergovernmental	Charges for Services	Licenses and Permits	Fines, Forfeitures & Penalties	Other	Retained Earnings Contribution	General Fund Contribution	Marginal Increase	Net General Fund Contribution
Health and Sanitation												
Health												
Mental Health: Treatment Prog	165	10000	$ 280,384,323	$ 268,808,260	$ 4,161,108	$ -	$ -	$ 3,421,704	$ -	$ 3,993,251	100%	$ 3,993,251
Cont to Health/Mental Health	165	10000	43,878,775	-	-	-	-	-	-	43,878,775	100%	43,878,775
Mental Health: Detention Prog	166	10000	10,697,023	5,371,186	3	-	-	3	-	5,325,831	100%	5,325,831
Mental Health: Administration	167	10000	14,388,968	13,909,730	73,235	-	-	406,003	-	-	50%	-
Mental Health: Substance Abuse	167	10000	27,050,196	24,379,440	739,766	-	1,725,893	4	-	205,093	100%	205,093
Public Health	167	10000	57,907,051	35,382,929	13,071,723	-	-	2,598,003	-	6,854,396	100%	6,854,396
Public Health: Bio-Terrorism Prep	168	21750	2,590,971	2,590,971	-	-	-	-	-	-	NA	-
Public Health: Hosp. Prep. Program Alloc.	168	21760	684,230	684,230	-	-	-	-	-	-	NA	-
CHA: Environmental Health	170	10000	26,736,797	708,269	15,471,377	8,544,050	1,356,491	656,610	-	-	100%	-
Public Health Ambulatory Care		10000	-	-	-	-	-	-	-	-	100%	-
RCRMC: Detention Health		10000	-	-	-	-	-	-	-	-	100%	-
Total Health			$ 464,318,334	$ 351,835,015	$ 33,517,212	$ 8,544,050	$ 3,082,384	$ 7,082,327	$ -	$ 60,257,346		$ 60,257,346
Hospital Care												
Ambulatory Care	170	10000	$ 41,919,274	$ 2,022,497	$ 39,637,849	$ -	$ -	$ 258,928	$ -	$ -	100%	$ -
Ambulatory Care EPM/ HER Project	171	21790	4,534,357	-	-	-	-	4,534,357	-	-	100%	$ -
RCRMC: Detention Health	171	10000	26,888,022	-	-	-	-	-	-	26,888,022	100%	$ 26,888,022
RCRMC: Med Indigent Services	171	10000	7,783,810	5,483,270	76,482	-	-	-	-	2,224,058	100%	$ 2,224,058
Total Hospital Care			$ 81,125,463	$ 7,505,767	$ 39,714,331	$ -	$ -	$ 4,793,285	$ -	$ 29,112,080		$ 29,112,080
California Children's Services												
CHA: CA Children's Services	169	10000	$ 21,086,397	$ 14,706,032	$ -	$ -	$ -	$ -	$ -	$ 6,380,365	100%	$ 6,380,365
Total California Children's Services			$ 21,086,397	$ 14,706,032	$ -	$ -	$ -	$ -	$ -	$ 6,380,365		$ 6,380,365
Sanitation												
Waster: Area 8 Assessment	172	23000	$ 800,000	$ -	$ 800,000	$ -	$ -	$ 50	$ (50)	$ -	NA	$ -
Total Sanitation			$ 800,000	$ -	$ 800,000	$ -	$ -	$ 50	$ (50)	$ -		$ -
Total Health and Sanitation			$ 567,330,194	$ 374,046,814	$ 74,031,543	$ 8,544,050	$ 3,082,384	$ 11,875,662	$ (50)	$ 95,749,791		$ 95,749,791
Public Assistance												
Administration												
DPSS Administration	181	10000	$ 557,651,457	$ 543,347,658	$ 1,944,369	$ -	$ -	$ 1,235,125	$ -	$ 11,124,305	10%	$ 1,112,431
Total Administration			$ 557,651,457	$ 543,347,658	$ 1,944,369	$ -	$ -	$ 1,235,125	$ -	$ 11,124,305		$ 1,112,431
Aid Programs												
DPSS: Mandated Client Serv	181	10000	$ 66,182,443	$ 56,660,432	$ -	$ -	$ -	$ -	$ -	$ 9,522,011	10%	$ 952,201
DPSS: Categorical Aid	181	10000	367,564,386	345,480,958	-	-	-	8,300,265	-	13,783,163	10%	1,378,316
DPSS: Other Aid	182	10000	2,347,379	40,000	-	231,000	99,000	-	-	1,977,379	10%	197,738
DPSS: Homeless Housing Relief	182	21300	8,254,443	8,254,443	-	-	-	-	-	-	NA	-
Total Aid Programs			$ 444,348,651	$ 410,435,833	$ -	$ 231,000	$ 99,000	$ 8,300,255	$ -	$ 25,282,553		$ 2,528,255
Care of Court Wards												
Probation: Court Placement	180	10000	$ 600,489	$ -	$ -	$ -	$ -	$ -	$ -	$ 600,489	100%	$ 600,489
Total Care of Court Wards			$ 600,489	$ -	$ -	$ -	$ -	$ -	$ -	$ 600,489		$ 600,489
Veteran's Services												
Veteran's Services	185	10000	$ 1,473,758	$ 192,000	$ 125,000	$ -	$ -	$ -	$ -	$ 1,156,758	100%	$ 1,156,758
Total Veteran's Services			$ 1,473,758	$ 192,000	$ 125,000	$ -	$ -	$ -	$ -	$ 1,156,758		$ 1,156,758

Exhibit A - Fiscal Impact Analysis
Table 7 - Riverside County General Fund Financing Requirements Budget, Net of Revenue Sources
Paradise Valley
February 15, 2017

Description	FY 2015-16 Budget (a) Page Ref.	Fund	Total	Intergovernmental	Charges for Services	Licenses and Permits	Fines, Forfeitures & Penalties	Other	Retained Earnings Contribution	General Fund Contribution	Marginal Increase	Net General Fund Contribution
Other Assistance												
EDA: Community Dev - HUD	179	21350	$ 8,815,893	$ 8,735,296	$ -	$ -	$ -	$ 80,597	$ -	$ -	NA	$ -
Neighborhood Stabilization NSP	179	21550	3,751,637	2,136,101	-	-	-	1,615,536	-	-	NA	-
EDA: Work Force Development	179	21550	26,894,691	25,300,910	525,990	-	-	1,067,791	-	-	NA	-
HUD		21250	-	-	-	-	-	-	-	-	NA	-
Home Program Fund	180	21250	3,504,872	2,856,738	-	-	-	648,134	-	-	NA	-
DPSS: Homeless	182	21300	3,635,980	561,437	-	-	-	2,806,401	268,142	-	NA	-
Cap of Riv. County	183	21050	2,805,205	2,750,000	55,205	-	-	-	-	-	NA	-
Cap of Riv. County: Local Initiative	183	21050	7,056,240	6,921,240	35,000	-	-	100,000	-	-	NA	-
Cap of Riv. County: Other Programs	184	21050	537,718	70,000	-	-	-	467,718	-	-	NA	-
Office on Aging Title III	184	21450	12,533,489	9,769,218	1,052,085	-	-	1,712,186	-	-	NA	-
Total Other Assistance			$ 69,535,725	$ 59,100,940	$ 1,668,280	$ -	$ -	$ 8,498,363	$ 268,142	$ -		$ -
Total Public Assistance			$ 1,073,610,080	$ 1,013,076,431	$ 3,737,649	$ 231,000	$ 99,000	$ 18,033,753	$ 268,142	$ 38,164,105		$ 5,397,933
Education, Recreation & Cultural Services												
Library Services												
County Free Library	189	21200	$ 24,208,027	$ 252,303	$ 213,756	$ -	$ 400,000	$ 20,025,191	$ 3,316,777	$ -	NA	$ -
Total Library Services			$ 24,208,027	$ 252,303	$ 213,756	$ -	$ 400,000	$ 20,025,191	$ 3,316,777	$ -		$ -
Other Education												
Cooperative Extension	189	10000	$ 614,064	$ -	$ -	$ -	$ -	$ -	$ -	$ 614,064	100%	$ 614,064
Total Other Education			$ 614,064	$ -	$ -	$ -	$ -	$ -	$ -	$ 614,064		$ 614,064
Recreation & Cultural Services												
EDA: Edward Dean Museum	190	10000	$ 320,588	$ -	$ -	$ -	$ -	$ 247,207	$ -	$ 73,381	100%	73,381
EDA: Community Centers	190	21140	-	-	-	-	-	-	-	-	NA	-
Total Recreation & Cultural Services			$ 320,588	$ -	$ -	$ -	$ -	$ 247,207	$ -	$ 73,381		$ 73,381
Total Education, Recreation & Cultural Services			$ 25,142,679	$ 252,303	$ 213,756	$ -	$ 400,000	$ 20,272,398	$ 3,316,777	$ 687,445		$ 687,445
Debt Service												
Other General												
Appropriation for Contingency	195	10000	$ 20,000,000	$ -	$ -	$ -	$ -	$ 3,106,405	$ -	$ 16,893,595	0%	$ -
Total Other General			$ 20,000,000	$ -	$ -	$ -	$ -	$ 3,106,405	$ -	$ 16,893,595		$ -
Retirement of Long-Term Debt												
Pension Obligation Bonds	195	35000	$ 36,639,366	$ -	$ 36,639,366	$ -	$ -	$ -	$ -	$ -	NA	$ -
Total Retirement of Long-Term Debt			$ 36,639,366	$ -	$ 36,639,366	$ -	$ -	$ -	$ -	$ -		$ -
Debt Service - Principal												
Teeter Debt Service	195	37050	$ 2,832,398	$ -	$ -	$ -	$ -	$ 2,832,398	$ -	$ -	NA	$ -
Total Debt Service - Principal			$ 2,832,398	$ -	$ -	$ -	$ -	$ 2,832,398	$ -	$ -		$ -
Interest on Short-Term Debt												
Interest on Trans	195	10000	$ 4,703,573	$ -	$ -	$ -	$ -	$ 3,447,500	$ -	$ 1,256,073	0%	$ -
Total Interest on Short-Term Debt			$ 4,703,573	$ -	$ -	$ -	$ -	$ 3,447,500	$ -	$ 1,256,073		$ -
Total Debt Service			$ 64,175,337	$ -	$ 36,639,366	$ -	$ -	$ 9,386,303	$ -	$ 18,149,668		$ -
Total Financing Requirements			$ 3,753,142,598	$ 1,844,831,719	$ 822,777,591	$ 16,322,973	$ 23,106,821	$ 221,984,781	$ 53,209,421	$ 760,909,292		$ 449,166,998

Footnotes:

(a) Per the County of Riverside FY 2015-16 Recommended Budget.

Exhibit A - Fiscal Impact Analysis
Table 8 - Riverside County General Fund Financing Requirements Calculations
Paradise Valley
February 15, 2017

Description	Table Ref.	FY 15/16 Budget (a)	Net Amount (b)	County Equivalent Units (c)	Factor	Measurement (c)	Project Equivalent Units (d)	Financing Requirements
			[1]	[2]	[1]/[2]=[3]		[4]	[3]X[4]
General Financing Requirements					$ -			
Legislative and Administrative	7	$ 127,399,575	$ 76,999,189	2,788,991	$ 27.61	per capita & 50% employee, entire county	18,080	$ 499,167
Finance	7	52,117,094	(1,999,917)	2,788,991	(0.72)	per capita & 50% employee, entire county	18,080	(12,965)
Counsel	7	6,706,052	1,434,526	2,788,991	0.51	per capita & 50% employee, entire county	18,080	9,300
Personnel	7	10,144,231	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
Elections	7	9,598,525	4,169,688	2,788,991	1.50	per capita & 50% employee, entire county	18,080	27,031
Property Management	7	28,521,148	3,846,539	2,788,991	1.38	per capita & 50% employee, entire county	18,080	24,936
Plant Acquisition	7	165,122,059	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
Promotion	7	14,776,173	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
Other General	7	35,496,103	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
Total General Financing Requirements		$ 449,882,960	$ 84,450,025		$ 30.28			$ 547,469
Public Protection								
Judicial	7	$ 215,240,851	$ 34,940,004	2,788,991	$ 12.53	per capita & 50% employee, entire county	18,080	$ 226,507
Police Protection	7	421,219,693	121,095,236			Case Study: See Table 9		2,416,270
Detention and Correction	7	340,800,561	80,105,404	2,788,991	28.72	per capita & 50% employee, entire county	18,080	519,304
Fire Protection (Transfers to the Fire Fund)	7	263,038,796	-			Case Study: See Table 11		609,039
Protection/Inspection	7	12,354,145	421,311	2,788,991	0.15	per capita & 50% employee, entire county	18,080	2,731
Other Protection	7	59,973,410	17,927,557	2,788,991	6.43	per capita & 50% employee, entire county	18,080	116,220
Total Public Protection		$1,312,627,456	$ 254,489,511		$ 47.83			$ 3,890,071
Animal Services								
Animal Services	7	$ 18,373,890	$ 8,392,294	1,197,949	$ 7.01	per capita, unincorporated & contract cities	15,724	$ 110,157
Total Animal Services		$ 18,373,890	$ 8,392,294		$ 7.01			$ 110,157
Public Ways & Facilities								
Public Ways	7	$ 233,668,640	$ -	412,123	$ -	per capita & 50% employee, unincorporated only	18,080	$ -
Transportation Terminals	7	8,331,362	-	412,123	-	per capita & 50% employee, unincorporated only	18,080	-
Total Public Ways and Facilities		$ 242,000,002	$ -					$ -
Health and Sanitation								
Health	7	$ 464,318,334	$ 60,257,346	2,308,441	$ 26.10	per capita, entire county	15,724	$ 410,450
Hospital Care	7	81,125,463	29,112,080	2,308,441	12.61	per capita, entire county	15,724	198,300
California Children's Services	7	21,086,397	6,380,365	2,308,441	2.76	per capita, entire county	15,724	43,461
Sanitation	7	800,000	-	2,308,441	-	per capita, entire county	15,724	-
Total Health and Sanitation		$ 567,330,194	$ 95,749,791		$ 41.48			$ 652,211
Public Assistance								
Administration	7	$ 557,651,457	$ 1,112,431	2,308,441	$ 0.48	per capita, entire county	15,724	$ 7,577
Aid Programs	7	444,348,651	2,528,255	2,308,441	1.10	per capita, entire county	15,724	17,222
Care of Court Wards	7	600,489	600,489	2,308,441	0.26	per capita, entire county	15,724	4,090
Veteran's Services	7	1,473,758	1,156,758	2,308,441	0.50	per capita, entire county	15,724	7,879
Other Assistance	7	69,535,725	-	2,308,441	-	per capita, entire county	15,724	-
Total Public Assistance		$1,073,610,080	$ 5,397,932.80		$ 2.34			$ 36,769
Education								
Library Services	7	$ 24,208,027	$ -	2,308,441	$ -	per capita, entire county	15,724	$ -
Agricultural Extension	7	614,064	614,064	2,308,441	0.27	per capita, entire county	15,724	4,183
Total Education		$ 24,822,091	$ 614,064		$ 0.27			$ 4,183
Recreation & Cultural Services								
Total Cultural Services	7	$ 320,588	$ 73,381	2,308,441	$ 0.03	per capita, entire county	15,724	$ 500
Total Recreation & Cultural Services		$ 320,588	$ 73,381		$ 0.03			$ 500
Debt Service								
Appropriation for Contingency	7	$ 20,000,000	$ -	-	$ -	not used	-	$ -
Debt Service - Principal	7	2,832,398	-	-	-	not used	-	-
Retirement of Long-Term Debt	7	36,639,366	-	-	-	not used	-	-
Interest on Long-Term Debt	7	4,703,573	-	-	-	not used	-	-
Total Debt Service		$ 64,175,337	$ -		$ -			$ -
Total General Fund Financing Requirements		$3,734,768,708	$ 440,774,704.30		$ 122.22			$ 5,131,202

Footnotes:

(a) Per the County of Riverside Fiscal Year 2015-16 Recommended Budget.

(b) See Table 7.

(c) Based on (1) 2,308,441 total Riverside County residents and 368,823 residents in the unincorporated sections of Riverside County per the California Department of Finance, January 1, 2015, (2) 961,100 total Riverside County employees and 86,600 employees in the unincorporated sections of Riverside County per the California Employment Development Department, October 2015, and (3) for service population calculation, employment was reduced by 50% to account for the estimated less frequent use of county public services by employees than residents.

(d) See Table 3.

(e) The County Department of Animal Services provides animal control field and shelter services to 11 cities with a combined population of 829,126.

Exhibit A - Fiscal Impact Analysis
Table 9 - Riverside County Police Protection Cost Calculation
Paradise Valley
February 15, 2017

	Table Ref.	FY 2015-16 Budget	
I. Police Protection Costs			
Police Protection Patrol Costs			
Net General Fund Contribution	Table 7	$ 121,095,236	
City Contracts for Sheriff's Services	Table 7	172,661,937	
Net Police Protection Budget	[1]	$ 293,757,173	

Sheriff Authorized Positions Filled	Budget Page	FY 2015-16 Budget	
Administration	127	42	
Support	127	21	
Patrol	127	2,038	
Court Services	128	164	
CAC Security	128	-	
Training Center	-	29	(b)
Total Sworn Officers	[2]	2,294	
Cost per Sworn Officer	[3]=[1]/[2]	$ 128,055	

	Table Ref.		
Projected Residents	Table 3	15,724	
Service Standard			
Sworn Officers per 1,000 residents		1.20	(c)
Additional Sworn Officers Required @ buildout	[4]	18.87	
Total Police Protection Patrol Costs	=[3]*[4]	$ 2,416,270	

Footnotes:

(a) Per the County of Riverside Fiscal Year 2015-16 Recommended Budget.
(b) Per phone discussions with Undersheriff of Ben Clark Training Center, dated 3/11/2016.
(c) The Board of Supervisors expects law enforcement services at a targeted staffing ratio of 1.2 deputy sheriff per 1,000 population in the unincorporated area per page 123 of the County of Riverside Fiscal Year 2015-16 Budget.

(d) Per County of Riverside Fiscal Year 2015-15 Budget, pages 348-349.

Exhibit A - Fiscal Impact Analysis
Table 10 - Riverside County Fiscal Impact to Fire Fund
Paradise Valley
February 15, 2017

Fiscal Impact to Fire Fund

	Table Ref.	Project Impact	Marginal Increase	Project Impact
Financing Sources				
Fire Fund Ad Valorem Tax				
Assessed Value Adjusted for Deflation				
Residential Basic Tax	4	$ 31,817,795		
Non-Residential Basic Tax	4	3,078,963		
Total Assessed Value Adjusted for Deflation		**$ 34,896,758**		
Structural Fire Fund Post-ERAF Share of Basic Tax	2	5.851%		
Total Fire Fund Ad Valorem Tax		**$ 2,041,961**	100%	**$ 2,041,961**
Total Financing Sources			[1]	**$ 2,041,961**
Financing Requirements				
Calculation of Fire Costs				
Fire Protection Costs - Station Costs				7 Person
7-Person Engine Company (a)				$ 3,500,000
Total Cost Per Station				$ 3,500,000
Stations Required for Project (a)				2 Station
Total Fire Protection Costs			[2]	$ 3,500,000
Total Financing Requirements				**$ 3,500,000**
Net Annual Surplus/ (Deficit) Before Additional Financing Sources			[3]=[1]-[2]	**$ (1,458,039)**
Amount Needed from CSA Special Tax				(1,458,039)
CSA Tax Per Unit				100
Residential Units				8,490
CSA Tax Revenue			[4]	$ 849,000
Net Annual Surplus/ (Deficit) Before Additional Financing Sources			[5]=[3]+[4]	**$ (609,039)**
Use General Fund Surplus	Yes			
Surplus Available	Yes	$ 5,817,454		
Surplus Used			[6]	$ 609,039
Financing Sources				
Fire Fund			[1]	$ 2,041,961
CSA Tax			[4]	849,000
General Fund Transfer			[6]	609,039
Total Sources			[7]=[1]+[4]+[6]	$ 3,500,000
Total Financing Requirements			[2]	3,500,000
Net Annual Surplus/ (Deficit) After Additional Financing Sources			[8]=[7]-[2]	$ -

Footnotes:
(a) See Exhibit B for Fire phasing.

Exhibit A - Fiscal Impact Analysis
Table 11 - Riverside County Fiscal Impact to Library Fund
Paradise Valley
February 15, 2017

Fiscal Impact to Library Fund

	Table Ref.	Project Impact	Marginal Increase	Project Impact
Financing Sources				
County Library Ad Valorem Tax				
Assessed Value Adjusted for Deflation				
Residential Basic Tax Adj. for Deflation	4	$ 31,817,795		
Non-Residential Basic Tax Adj. for Deflation	4	3,078,963		
Total Assessed Value Adjusted for Deflation		$ 34,896,758		
County Library Post-ERAF Share of Basic Tax	2	1.431%		
Total County Library Ad Valorem Tax		$ 499,460	100%	$ 499,460

Other Financing Sources	Budget Page Ref.	Budget Amount (a)	Marginal Increase	Net Amount	County Equivalent Units (b)	Factor	Measure	Project Equivalent Units (c)	Project Impact
Fines, Forfeitures & Penalties									
Library Fines and Fees	50	$ 400,000	100%	$ 400,000	2,788,991	$ 0.14	per capita & 50% employee, entire county	18,080	$ 2,593
Revenue from Use of Money and Property									
Interest-Invest Funds	51	5,000	0%	-	-	-	not used	-	-
Rents	51	19,176	100%	19,176	2,788,991	0.01	per capita & 50% employee, entire county	18,080	124
Lease to Non-County Agency	51	2,306	0%	-	-	-	not used	-	-
Intergovernmental Revenues									
CA-State Revenue	51	25,000	0%	-	-	-	not used	-	-
CA-Homeowner's Tax Relief	51	162,303	0%	-	-	-	not used	-	-
CA-Other Operating Grants	51	-	0%	-	-	-	not used	-	-
Fed-Community Redevelopment Hn	51	65,000	0%	-	-	-	not used	-	-
Charges for Current Services									
Communications Services	51	150,000	0%	-	-	-	not used	-	-
Interfund - Leases	51	63,756	0%	-	-	-	not used	-	-
Interfund - Miscellaneous	51	-	0%	-	-	-	not used	-	-
Interfund - Salary Reimbursement	51	-	0%	-	-	-	not used	-	-
Other In-Lieu and Other Govt									
Oth Gov-City Governments	51	608,466	0%	-	-	-	not used	-	-
Other Revenue									
Contractual Revenue	51	6,870,066	0%	-	-	-	not used	-	-
Cash Over-Short	51	-	0%	-	-	-	not used	-	-
Rebates & Refunds	51	-	0%	-	-	-	not used	-	-
Contributions & Donations	51	10,000	0%	-	-	-	not used	-	-
Other Misc. Revenue	51	-	0%	-	-	-	not used	-	-
Total Financing Sources									$ 502,177
Financing Requirements									
Library Services	Table 7	24,208,027	100%	24,208,027	2,788,991	8.68	per capita & 50% employee, entire county	18,080	156,935
Total Financing Requirements									$ 156,935
Net Annual Surplus/ (Deficit)									$ 345,242
Per Development Unit									$ 41

Footnotes:

(a) Per the County of Riverside Fiscal Year 2015-16 Recommended Budget.

(b) Based on (1) 2,308,441 total Riverside County residents and 368,823 residents in the unincorporated sections of Riverside County per the California Department of Finance, January 1, 2015, (2) 961,100 total Riverside County employees and 86,600 employees in the unincorporated sections of Riverside County per the California Employment Development Department, October 2015, and (3) for service population calculation, employment was reduced by 50% to account for the estimated less frequent use of county public services by employees than residents.

(c) See Table 3.

Exhibit A - Fiscal Impact Analysis
Table 12 - Riverside County Fiscal Impact to Transportation Fund
Paradise Valley
February 15, 2017

Fiscal Impact to Transportation Fund

	Table Ref.	Net Amount	Marginal Increase	Project Impact
Financing Sources				
Measure A Sales Tax (d)				
On-Site and Off-Site Taxable Sales	5	$ 98,214,964		
Half Cent Transportation Sales Tax		0.50%		
Total Measure A Sales Tax		**$ 491,075**	0%	$ -

Other Financing Sources	Budget Page Ref.	Budget Amount (a)	Marginal Increase	Net Amount	County Equivalent Units (b)	Factor	Measure	Project Equivalent Units (c)	Project Impact
Intergovernmental Revenues									
CA-HWY User/Gas Tax Sec 2104A (e)	44	30,309,322	100%	30,309,322	2,788,991	10.87	per capita & 50% employee, entire county	18,080	$ 196,488
CA-HWY User/Gas Tax Sec 2104B (e)	44	-	100%	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
CA-HWY User/Gas Tax Sec 2103 (e)	44	1,849,286	100%	1,849,286	2,788,991	0.66	per capita & 50% employee, entire county	18,080	11,988
CA-HWY User/Gas Tax Sec 2104C (e)	44	-	100%	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
CA-HWY User/Gas Tax Sec 2104DEF (e)	44	-	100%	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
CA-HWY User/Gas Tax Sec 2105 (e)	44	-	100%	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
CA-HWY User/Gas Tax Sec 2106 (e)	44	-	100%	-	2,788,991	-	per capita & 50% employee, entire county	18,080	-
Road Maint Expense Reimb	44	210,537	100%	210,537	2,788,991	0.08	per capita & 50% employee, entire county	18,080	1,365
Road Signal Maint Exp Reimb	44	1,344,663	100%	1,344,663	2,788,991	0.48	per capita & 50% employee, entire county	18,080	8,717
Total Financing Sources									$ 218,558
Financing Requirements									
Street Maintenance Cost									
Total Project Lane Miles (f)								[1]	(h) 104.84
Street Maintenance Cost per Lane Mile (g)								[2]	$ 6,885
Total Project Street Maintenance Cost per Lane Mile								[3]=[1]*[2]	$ 721,834
Total Financing Requirements									$ 721,834
Net Annual Surplus/ (Deficit)								[4]	$ (503,275)
Net Annual Surplus/ (Deficit) Before Additional Financing Sources								[5]=[3]+[4]	**$ 503,275**
Use General Fund Surplus	Yes								
Surplus Available	Yes							$ 5,817,454	
Surplus Used								[6]	$ 503,275
Financing Sources									
Transportation Fund								[1]	$ 218,558
General Fund Transfer								[6]	503,275
Total Sources								[7]=[1]+[6]	$ 721,834
Total Financing Requirements								[3]	721,834
Net Annual Surplus/ (Deficit) After Additional Financing Sources								**[8]=[7]-[3]**	$ -

Footnotes:

(a) Per the County of Riverside Fiscal Year 2015-16 Recommended Budget.

(b) Based on (1) 2,308,441 total Riverside County residents and 368,823 residents in the unincorporated sections of Riverside County per the California Department of Finance, January 1, 2015, (2) 961,100 total Riverside County employees and 86,600 employees in the unincorporated sections of Riverside County per the California Employment Development Department, October 2015, and (3) for service population calculation, employment was reduced by 50% to account for the estimated less frequent use of county public services by employees than residents.

(c) See Table 3.

(d) All of the Measure A sales tax is earmarked for non-recurring capital projects per conversations with the Transportation Fund administrative office.

(e) All of the Gas Tax is earmarked for recurring street maintenance costs per conversations with the Transportation Fund administrative office.

(f) Per email from Glorious Land Company and KWC Engineers, dated 3/22/2016.

(g) Per discussions on 3/29/2016 with Paul Russell of the Riverside County Land Transportation and Land Management Agency, FY 2015-16 road maintenance cost was $6,885 per lane mile.

(h) Timing of lane miles to be allocated per residential unit per conference call discussions with client on 4/1/2016.

Exhibit B - Fire and Tansporation Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

Development Year	Ref.	Factor	-2	-1	0	1	2	3	4	5	6	7	8	9
Fiscal Impact to Fire Fund														
Financing Sources														
Fire Fund Ad Valorem Tax			$ -	$ -	$ -	$ 1,333,050	$ 2,810,889	$ 5,339,069	$ 7,342,895	$ 9,710,399	$ 12,127,652	$ 14,328,792	$ 16,528,216	$ 19,684,324
Basic Tax Adj. for Deflation			$ -	$ -	$ -	$ 78,003	$ 164,477	$ 312,412	$ 429,665	$ 568,198	$ 709,642	$ 838,440	$ 967,138	$ 1,151,815
Total Fire Fund Tax	10	5.851%												
Total Financing Sources			0	0	0	$ 78,003	$ 164,477	$ 312,412	$ 429,665	$ 568,198	$ 709,642	$ 838,440	$ 967,138	$ 1,151,815
Financing Requirements														
Stations Required for Project		2.00	-	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	2.00	2.00
Staffing Level			-	3	3	3	3	4	4	4	4	4	7	7
Cost per Fire Fighter			$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000
Fire Cost	10	$3,500,000	$ -	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 3,500,000	$ 3,500,000
Total Financing Requirements			$ -	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 3,500,000	$ 3,500,000
Net Annual Surplus (Deficit) Before Additional Sources			$ -	$ (1,500,000)	$ (1,500,000)	$ (1,421,997)	$ (1,335,523)	$ (1,687,588)	$ (1,570,335)	$ (1,431,802)	$ (1,290,358)	$ (1,161,560)	$ (2,532,862)	$ (2,348,185)
CSA/CFD Charge per Unit at Buildout														
Net Annual Deficit Before Additional Sources			$ -	$ 1,500,000	$ 1,500,000	$ 1,421,997	$ 1,335,523	$ 1,687,588	$ 1,570,335	$ 1,431,802	$ 1,290,358	$ 1,161,560	$ 2,532,862	$ 2,348,185
Offset from General Fund Surplus			-	-	-	241,769	514,105	906,408	1,222,982	1,191,302	990,158	803,460	2,118,462	1,859,785
Amount Required for CSA/CFD Charge			$ -	$ 1,500,000	$ 1,500,000	$ 1,180,229	$ 821,418	$ 781,180	$ 347,353	$ 240,500	$ 300,200	$ 358,100	$ 414,400	$ 488,400
Allocation of CSA/CFD Charge for Fire Services														
Cumulative Residential Units			-	-	-	300	642	1,277	1,799	2,405	3,002	3,581	4,144	4,884
CSA/CFD Charge from Sold Units		$ 100.00	$ -	$ -	$ -	$ 30,000	$ 64,200	$ 127,700	$ 179,900	$ 240,500	$ 300,200	$ 358,100	$ 414,400	$ 488,400
Developer Subsidy/Undeveloped Land Tax		5,726,379	-	1,500,000	1,500,000	1,150,229	757,218	553,480	167,453	-	-	-	-	-
Total			$ -	$ 1,500,000	$ 1,500,000	$ 1,180,229	$ 821,418	$ 781,180	$ 347,353	$ 240,500	$ 300,200	$ 358,100	$ 414,400	$ 488,400
Additional Financing Sources														
General Fund Surplus			$ -	$ -	$ -	$ 241,769	$ 514,105	$ 906,408	$ 1,222,982	$ 1,772,848	$ 2,155,428	$ 2,284,156	$ 2,595,669	$ 3,048,174
Minimum CSA/CFD Charge Required for Fire Services (		6,130,179	-	1,500,000	1,500,000	1,180,229	821,418	781,180	347,353	-	-	-	-	-
Total Additional Financing Sources			$ -	$ 1,500,000	$ 1,500,000	$ 1,421,997	$ 1,335,523	$ 1,687,588	$ 1,570,335	$ 1,772,848	$ 2,155,428	$ 2,284,156	$ 2,595,669	$ 3,048,174
Financing Sources														
Fire Fund			$ -	$ -	$ -	$ 78,003	$ 164,477	$ 312,412	$ 429,665	$ 568,198	$ 709,642	$ 838,440	$ 967,138	$ 1,151,815
CSA Tax			-	1,500,000	1,500,000	1,180,229	821,418	781,180	347,353	240,500	300,200	358,100	414,400	488,400
General Fund Transfer			-	-	-	241,769	514,105	906,408	1,222,982	1,191,302	990,158	803,460	2,118,462	1,859,785
Total Financing Sources			$ -	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 3,500,000	$ 3,500,000
Total Financing Requirements			$ -	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 1,500,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 3,500,000	$ 3,500,000
Net Annual Surplus (Deficit) After Additional Sources			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -

Fiscal Impact to Transportation Fund	Ref.	Factor												
Financing Sources														
Intergovernmental Revenues														
CA-HWY User/Gas Tax Sec 2104A (e)	12	$ 10.87	$ -	$ -	$ -	$ 10,194	$ 18,543	$ 32,871	$ 44,893	$ 58,819	$ 72,486	$ 85,785	$ 98,758	$ 115,342
CA-HWY User/Gas Tax Sec 2103 (e)	12	$ 0.66	$ -	$ -	$ -	$ 622	$ 1,131	$ 2,006	$ 2,739	$ 3,589	$ 4,423	$ 5,234	$ 6,026	$ 7,037
Charges for Services														
Road Maint Expense Reimb	12	$ 0.08	$ -	$ -	$ -	$ 71	$ 129	$ 228	$ 312	$ 409	$ 504	$ 596	$ 686	$ 801
Road Signal Maint Exp Reimb	12	$ 0.48	$ -	$ -	$ -	$ 452	$ 823	$ 1,458	$ 1,992	$ 2,609	$ 3,216	$ 3,806	$ 4,381	$ 5,117
Total Financing Sources			$ -	$ -	$ -	$ 11,339	$ 20,626	$ 36,563	$ 49,936	$ 65,426	$ 80,628	$ 95,421	$ 109,851	$ 128,298
Financing Requirements														
Share of Residential Units	Exhibit C		0.0%	0.0%	0.0%	3.5%	7.8%	15.0%	21.2%	28.3%	35.4%	42.2%	48.8%	57.5%
Total Project Lane Miles (b)			-	-	-	104.84	104.84	104.84	104.84	104.84	104.84	104.84	104.84	104.84
Estimated Annual Lane Miles to be Maintained (b)			-	-	-	3.70	7.9	15.8	22.2	29.7	37.1	44.2	51.2	60.3
Street Maintenance Cost per Lane Mile	12	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885
Total Financing Requirements			$ -	$ -	$ -	$ 25,508	$ 54,584	$ 108,573	$ 152,954	$ 204,477	$ 255,235	$ 304,463	$ 352,330	$ 415,246
Net Annual Surplus (Deficit) Before Additional Sources			$ -	$ -	$ -	$ (14,168)	$ (33,958)	$ (72,009)	$ (103,018)	$ (139,051)	$ (174,607)	$ (209,042)	$ (242,479)	$ (286,948)
Additional Financing Sources														
General Fund Surplus			$ -	$ -	$ -	$ -	$ 241,769	$ 514,105	$ 906,408	$ 1,222,982	$ 1,772,848	$ 2,155,428	$ 2,284,156	$ 2,595,669
General Fund Transfers to Fire Fund (Less)			-	-	-	-	241,769	514,105	906,408	1,222,982	1,191,302	990,158	803,460	2,118,462
Total Additional Financing Sources			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 581,546	$ 1,165,270	$ 1,480,696	$ 477,207
Financing Sources														
Transportation Fund			$ -	$ -	$ -	$ 11,339	$ 20,626	$ 36,563	$ 49,936	$ 65,426	$ 80,628	$ 95,421	$ 109,851	$ 128,298
General Fund Transfer			-	-	-	-	-	-	-	-	-	209,042	242,479	288,948
Total Financing Sources			$ -	$ -	$ -	$ 11,339	$ 20,626	$ 36,563	$ 49,936	$ 65,426	$ 80,628	$ 304,463	$ 352,330	$ 415,246
Total Financing Requirements			$ -	$ -	$ -	$ 25,508	$ 54,584	$ 108,573	$ 152,954	$ 204,477	$ 255,235	$ 304,463	$ 352,330	$ 415,246
Net Annual Surplus (Deficit) After Additional Sources			$ -	$ -	$ -	$ (14,168)	$ (33,958)	$ (72,009)	$ (103,018)	$ (139,051)	$ (174,607)	$ -	$ -	$ -

Footnotes:
(a) Represents amount needed to fund the estimated annual negative fiscal impact. CFD and CSA charges are examples of potential funding mechanisms to finance ongoing negative impacts. Amount and funding mechanism would need to be negotiated with the County.
(b) Transportation Fund Requirements are phased based on the housing absorption schedule.

Exhibit B - Fire and Tansporation Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

Development Year	Ref.	Factor	10	11	12	13	14	15	16	17	18	19	20	21
Fiscal Impact to Fire Fund														
Financing Sources														
Fire Fund Ad Valorem Tax														
Basic Tax Adj. for Deflation			$ 23,948,384	$ 29,358,830	$ 33,523,748	$ 36,072,000	$ 35,922,957	$ 35,774,530	$ 35,626,716	$ 35,479,513	$ 35,332,918	$ 35,186,929	$ 35,041,543	$ 34,896,758
Total Fire Fund Tax	10	5.851%	$ 1,401,206	$ 1,717,913	$ 1,961,620	$ 2,110,730	$ 2,102,008	$ 2,093,323	$ 2,084,674	$ 2,076,061	$ 2,067,483	$ 2,058,940	$ 2,050,433	$ 2,041,961
Total Financing Sources			$ 1,401,206	$ 1,717,913	$ 1,961,620	$ 2,110,730	$ 2,102,008	$ 2,093,323	$ 2,084,674	$ 2,076,061	$ 2,067,483	$ 2,058,940	$ 2,050,433	$ 2,041,961
Financing Requirements														
Stations Required for Project		2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
Staffing Level			7	7	7	7	7	7	7	7	7	7	7	7
Cost per Fire Fighter			$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000	$ 500,000
Fire Cost	10	$3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000
Total Financing Requirements			$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000
Net Annual Surplus (Deficit) Before Additional Sources			$ (2,098,794)	$ (1,782,087)	$ (1,538,380)	$ (1,389,270)	$ (1,397,992)	$ (1,406,677)	$ (1,415,326)	$ (1,423,939)	$ (1,432,517)	$ (1,441,060)	$ (1,449,567)	$ (1,458,039)
CSA/CFD Charge per Unit at Buildout														
Net Annual Deficit Before Additional Sources			$ 2,098,794	$ 1,782,087	$ 1,538,380	$ 1,389,270	$ 1,397,992	$ 1,406,677	$ 1,415,326	$ 1,423,939	$ 1,432,517	$ 1,441,060	$ 1,449,567	$ 1,458,039
Offset from General Fund Surplus			1,524,194	1,084,087	743,980	540,270	548,992	557,677	566,326	574,939	583,517	592,060	600,567	609,039
Amount Required for CSA/CFD Charge			$ 574,600	$ 698,000	$ 794,400	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000
Allocation of CSA/CFD Charge for Fire Services														
Cumulative Residential Units			5,746	6,980	7,944	8,490	8,490	8,490	8,490	8,490	8,490	8,490	8,490	8,490
CSA/CFD Charge from Sold Units		$ 100.00	$ 574,600	$ 698,000	$ 794,400	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000
Developer Subsidy/Undeveloped Land Tax		5,728,379	-	-	-	-	-	-	-	-	-	-	-	-
Total			$ 574,600	$ 698,000	$ 794,400	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000	$ 849,000
Additional Financing Sources														
General Fund Surplus			$ 4,986,065	$ 5,729,897	$ 6,310,937	$ 6,717,671	$ 6,680,744	$ 6,643,970	$ 6,607,347	$ 6,570,876	$ 6,534,556	$ 6,498,386	$ 6,462,365	$ 6,426,493
Minimum CSA/CFD Charge Required for Fire Services (		6,130,179	-	-	-	-	-	-	-	-	-	-	-	-
Total Additional Financing Sources			$ 4,986,065	$ 5,729,897	$ 6,310,937	$ 6,717,671	$ 6,680,744	$ 6,643,970	$ 6,607,347	$ 6,570,876	$ 6,534,556	$ 6,498,386	$ 6,462,365	$ 6,426,493
Financing Sources														
Fire Fund			$ 1,401,206	$ 1,717,913	$ 1,961,620	$ 2,110,730	$ 2,102,008	$ 2,093,323	$ 2,084,674	$ 2,076,061	$ 2,067,483	$ 2,058,940	$ 2,050,433	$ 2,041,961
CSA Tax			574,600	698,000	794,400	849,000	849,000	849,000	849,000	849,000	849,000	849,000	849,000	849,000
General Fund Transfer			1,524,194	1,084,087	743,980	540,270	548,992	557,677	566,326	574,939	583,517	592,060	600,567	609,039
Total Financing Sources			$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000
Total Financing Requirements			$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000
Net Annual Surplus (Deficit) After Additional Sources			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Fiscal Impact to Transportation Fund														
Financing Sources														
Intergovernmental Revenues														
CA-HWY User/Gas Tax Sec 2104A (e)	12	$ 10.87	$ 136,045	$ 162,708	$ 183,862	$ 195,488	$ 196,488	$ 196,488	$ 196,488	$ 196,488	$ 196,488	$ 196,488	$ 196,488	$ 196,488
CA-HWY User/Gas Tax Sec 2103 (e)	12	$ 0.66	$ 8,301	$ 9,927	$ 11,218	$ 11,988	$ 11,988	$ 11,988	$ 11,988	$ 11,988	$ 11,988	$ 11,988	$ 11,988	$ 11,988
Charges for Services														
Road Maint Expense Reimb	12	$ 0.08	$ 945	$ 1,130	$ 1,277	$ 1,365	$ 1,365	$ 1,365	$ 1,365	$ 1,365	$ 1,365	$ 1,365	$ 1,365	$ 1,365
Road Signal Maint Exp Reimb	12	$ 0.48	$ 6,036	$ 7,218	$ 8,157	$ 8,717	$ 8,717	$ 8,717	$ 8,717	$ 8,717	$ 8,717	$ 8,717	$ 8,717	$ 8,717
Total Financing Sources			$ 151,327	$ 180,984	$ 204,514	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558
Financing Requirements														
Share of Residential Units	Exhibit C		67.7%	82.2%	93.6%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Total Project Lane Miles (b)			104.84	104.84	104.84	104.84	104.84	104.84	104.84	104.84	104.84	104.84	104.84	104.84
Estimated Annual Lane Miles to be Maintained (b)			71.0	86.2	98.1	104.8	104.8	104.8	104.8	104.8	104.8	104.8	104.8	104.8
Street Maintenance Cost per Lane Mile	12	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885	$ 6,885
Total Financing Requirements			$ 488,534	$ 593,451	$ 675,412	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834
Net Annual Surplus (Deficit) Before Additional Sources			$ (337,208)	$ (412,467)	$ (470,898)	$ (503,275)	$ (503,275)	$ (503,275)	$ (503,275)	$ (503,275)	$ (503,275)	$ (503,275)	$ (503,275)	$ (503,275)
Additional Financing Sources														
General Fund Surplus			$ 3,048,174	$ 4,986,065	$ 5,729,897	$ 6,310,937	$ 6,717,671	$ 6,680,744	$ 6,643,970	$ 6,607,347	$ 6,570,876	$ 6,534,556	$ 6,498,386	$ 6,462,365
General Fund Transfers to Fire Fund (Less)			1,859,785	1,524,194	1,084,087	743,980	540,270	548,992	557,677	566,326	574,939	583,517	592,060	600,567
Total Additional Financing Sources			$ 1,188,389	$ 3,461,871	$ 4,645,810	$ 5,566,957	$ 6,177,401	$ 6,131,753	$ 6,086,293	$ 6,041,022	$ 5,995,937	$ 5,951,039	$ 5,906,326	$ 5,861,798
Financing Sources														
Transportation Fund			$ 151,327	$ 180,984	$ 204,514	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558	$ 218,558
General Fund Transfer			337,208	412,467	470,898	503,275	503,275	503,275	503,275	503,275	503,275	503,275	503,275	503,275
Total Financing Sources			$ 488,534	$ 593,451	$ 675,412	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834
Total Financing Requirements			$ 488,534	$ 593,451	$ 675,412	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834
Net Annual Surplus (Deficit) After Additional Sources			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -

Footnotes:
(a) Represents amount needed to fund the estimated annual negative fiscal im
(b) Transportation Fund Requirements are phased based on the housing abso

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

	Table Ref.	Factor	1	2	3	4	5	6	7	8	9	10	11
General Fund Financing Sources													
Property Tax	4		$ 189,503	$ 399,303	$ 756,405	$ 1,039,955	$ 1,375,835	$ 1,717,703	$ 2,029,249	$ 2,340,542	$ 2,786,002	$ 3,394,976	$ 4,156,838
Property Tax In-Lieu of Sales-Tax	4		-	-	-	-	-	-	-	-	-	-	-
Documentary Transfer Tax	4		20,095	42,468	81,350	111,996	147,912	184,943	218,581	252,196	300,849	364,056	448,185
Property Tax In-Lieu of MVLF	5		118,908	250,731	476,245	654,986	866,166	1,081,787	1,278,128	1,474,317	1,755,842	2,136,016	2,618,808
On-Site Retail Sales and Use Tax	5		75,087	158,174	225,280	309,347	375,849	450,936	526,022	601,109	676,196	860,015	935,102
Off-Site Retail Sales and Use Tax	5		-	-	-	-	-	-	-	-	-	-	-
Transient Occupancy Tax	5		-	-	-	-	183,184	183,184	183,184	183,184	183,184	1,352,644	1,352,644
Interest Earnings	5		3,217	8,889	12,012	16,411	21,465	26,595	31,345	36,090	42,522	52,195	62,603
Other Discretionary Revenue	6		18,116	33,187	59,183	80,933	106,154	130,911	154,998	178,490	208,569	245,970	294,436
Total Financing Sources			$ 424,925	$ 882,551	$ 1,610,436	$ 2,204,829	$ 3,076,567	$ 3,776,058	$ 4,421,507	$ 5,065,929	$ 5,953,164	$ 8,405,872	$ 9,868,616
General Fund Financing Requirements													
General Financing Requirements	8	$ 30.28	$ 28,402	$ 51,667	$ 91,587	$ 125,084	$ 163,886	$ 201,965	$ 238,021	$ 275,167	$ 321,375	$ 379,059	$ 453,348
Public Protection													
Judicial	8	12.53	11,751	21,377	37,893	51,752	67,806	83,560	98,892	113,847	132,964	156,831	187,566
Police Protection	9		85,381	182,714	363,437	511,999	684,467	854,375	1,019,159	1,179,390	1,389,985	1,635,322	1,986,521
Detention and Correction	8	28.72	26,941	49,009	86,876	118,649	155,455	191,575	226,724	261,011	304,841	359,558	430,025
Fire Protection (Transfers to the Fire Fund)	8	-	241,769	514,105	906,408	1,222,982	1,191,302	990,158	803,460	2,118,462	1,859,785	1,524,194	1,084,087
Protection/Inspection	8	0.15	142	258	457	624	818	1,008	1,192	1,373	1,603	1,891	2,262
Other Protection	8	6.43	6,028	10,968	19,443	26,554	34,791	42,874	50,741	58,414	68,223	80,469	96,239
Transfers to the Transportation Fund	12	-	-	-	-	-	-	-	209,042	242,479	286,948	337,208	412,467
Public Ways & Facilities	8	-	-	-	-	-	-	-	-	-	-	-	-
Health and Sanitation	8	41.48	23,046	49,319	98,101	138,201	184,755	230,617	275,096	318,347	375,194	441,414	536,211
Public Assistance	8	2.34	1,299	2,780	5,530	7,791	10,416	13,001	15,509	17,947	21,152	24,885	30,229
Education	8	0.27	148	316	629	886	1,185	1,479	1,764	2,042	2,406	2,831	3,439
Recreation & Cultural Services	8	0.03	18	38	75	106	142	177	211	244	288	338	411
Debt Service	8	-	-	-	-	-	-	-	-	-	-	-	-
Total Financing Requirements			$ 424,925	$ 882,551	$ 1,610,436	$ 2,204,629	$ 2,495,021	$ 2,610,789	$ 2,940,811	$ 4,588,722	$ 4,764,775	$ 4,944,001	$ 5,222,806
General Fund Fiscal Impact													
Ongoing Surplus/(Deficit)			$ -	$ -	$ -	$ -	$ 581,546	$ 1,165,270	$ 1,480,696	$ 477,207	$ 1,188,389	$ 3,461,871	$ 4,645,810
Surplus/(Deficit) per Unit			$ -	$ -	$ -	$ -	$ 242	$ 388	$ 413	$ 115	$ 243	$ 602	$ 666
Revenue/Cost Ratio			1.00	1.00	1.00	1.00	1.23	1.45	1.50	1.10	1.25	1.70	1.89
Fiscal Impact to Fire Fund													
Financing Sources	10, Exhibit B		$ 1,500,000	$ 1,500,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 2,000,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000
Financing Requirements	10, Exhibit B		1,500,000	1,500,000	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000	3,500,000	3,500,000	3,500,000	3,500,000
Net Annual Surplus / (Deficit)			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Fiscal Impact to Library Fund													
Financing Sources	11		$ 19,220	$ 40,487	$ 76,870	$ 105,716	$ 139,793	$ 174,579	$ 206,267	$ 237,926	$ 283,327	$ 344,614	$ 422,448
Financing Requirements	11		8,142	14,811	26,254	35,856	46,979	57,894	68,517	78,676	92,124	108,659	129,955
Net Annual Surplus / (Deficit)			$ 11,079	$ 25,677	$ 50,616	$ 69,860	$ 92,815	$ 116,685	$ 137,751	$ 159,048	$ 191,203	$ 235,954	$ 292,494
Fiscal Impact to Transportation Fund													
Financing Sources	12		$ 11,339	$ 20,626	$ 38,583	$ 49,936	$ 65,426	$ 80,628	$ 304,463	$ 352,330	$ 415,246	$ 488,534	$ 593,451
Financing Requirements	12		25,506	54,584	108,573	152,954	204,477	255,235	304,463	352,330	415,246	488,534	593,451
Net Annual Surplus / (Deficit)			$ (14,168)	$ (33,958)	$ (72,009)	$ (103,018)	$ (139,051)	$ (174,607)	$ -	$ -	$ -	$ -	$ -
Net Fiscal Impact of Project													
Financing Sources			$ 1,955,484	$ 2,443,665	$ 3,723,869	$ 4,360,281	$ 5,281,787	$ 6,031,266	$ 6,932,237	$ 9,156,184	$ 10,151,737	$ 12,738,020	$ 14,384,516
Financing Requirements			1,958,573	2,451,946	3,745,262	4,393,439	4,746,477	4,923,918	5,313,790	8,519,929	8,772,144	9,041,194	9,446,212
Net Annual Surplus / (Deficit)			$ (3,089)	$ (8,281)	$ (21,393)	$ (33,158)	$ 535,309	$ 1,107,347	$ 1,618,447	$ 636,255	$ 1,379,593	$ 3,697,826	$ 4,938,304

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
February 16, 2017

RESIDENTIAL FINANCING SOURCES Residential Absorption	Table Ref.	1	2	3	4	5	6	7	8	9	10	11
Village 1 (Town Center)												
TOWNS	3	50	42	-	-	-	-	-	-	-	-	-
Stacked flats HHDR	3	50	50	50	50	11	-	-	-	-	-	-
Stacked flats	3	50	50	50	50	50	50	50	50	13	-	-
55'x100'	3	50	50	14	-	-	-	-	-	-	-	-
50'X70'	3	-	50	38	-	-	-	-	-	-	-	-
45'X80'	3	50	17	-	-	-	-	-	-	-	-	-
45'X80'	3	-	33	26	-	-	-	-	-	-	-	-
55'X100'	3	-	-	36	30	-	-	-	-	-	-	-
60'X100'	3	50	20	-	-	-	-	-	-	-	-	-
Village 2 (Town Center West)												
60'X100'	3	-	30	47	-	-	-	-	-	-	-	-
50x100	3	-	-	50	42	-	-	-	-	-	-	-
45x80	3	-	-	24	50	26	-	-	-	-	-	-
50'x100	3	-	-	-	-	32	50	7	-	-	-	-
50'x100	3	-	-	50	50	18	-	-	-	-	-	-
Duplex	3	-	-	50	50	29	-	-	-	-	-	-
40'X62'	3	-	-	50	50	22	-	-	-	-	-	-
Stacked flats	3	-	-	50	50	50	50	50	50	50	50	20
Triplex-adult	3	-	-	50	10	-	-	-	-	-	-	-
Triplex-adult	3	-	-	-	40	50	40	-	-	-	-	-
45X100	3	-	-	50	50	50	22	-	-	-	-	-
Village 3 (Case Activie Adult)												
MIXED USE HHDR	3	-	-	-	-	-	-	75	75	75	75	75
DUPLEX	3	-	-	-	-	-	-	46	-	-	-	-
DUPLEX	3	-	-	-	-	-	-	-	50	51	-	-
65x110	3	-	-	-	-	-	-	50	36	-	-	-
75x100	3	-	-	-	-	-	-	-	50	24	-	-
65x110	3	-	-	-	-	-	-	-	23	50	-	-
DUPLEX	3	-	-	-	-	-	-	-	-	-	50	50
50x90	3	-	-	-	-	-	-	50	40	-	-	-
50x70	3	-	-	-	-	-	-	-	50	47	-	-
DUPLEX	3	-	-	-	-	-	-	-	-	-	50	50
40X90	3	-	-	-	-	-	-	-	-	42	50	-
50x90	3	-	-	-	-	-	-	-	-	50	44	-
40x80	3	-	-	-	-	-	-	50	50	18	-	-
75x100	3	-	-	-	-	-	-	-	-	28	24	50
85x115	3	-	-	-	-	-	-	-	-	30	21	-
85x115	3	-	-	-	-	-	-	-	-	-	11	40
75x100	3	-	-	-	-	-	-	-	-	-	26	40
Village 4 (North Village)												
Duplex-Adult	3	-	-	-	-	50	47	-	-	-	-	-
Duplex-Adult	3	-	-	-	-	-	-	56	-	-	-	-
40X90	3	-	-	-	-	50	24	-	-	-	-	-
50x100	3	-	-	-	-	50	50	16	-	-	-	-
Duplex-Family	3	-	-	-	-	-	50	16	-	-	-	-
Duplex	3	-	-	-	-	-	-	-	51	-	-	-
Standard Lot (60' X 100')	3	-	-	-	-	-	40	40	27	-	-	-
Standard Lot (70' X 100')	3	-	-	-	-	-	40	26	-	-	-	-
Duplex-Family	3	-	-	-	-	38	-	-	-	-	-	-
Triplex Adult	3	-	-	-	-	40	44	-	-	-	-	-
45x80	3	-	-	-	-	40	-	-	-	-	-	-
45x80	3	-	-	-	-	-	58	-	-	-	-	-
Duplex-Family	3	-	-	-	-	-	34	17	-	-	-	-
Duplex-Family		-	-	-	-	-	-	30	11	-	-	-
Village 5 (East Village)												
Duplex Family	3	-	-	-	-	-	-	-	-	50	50	50
40 x 100	3	-	-	-	-	-	-	-	-	-	50	50
70X100	3	-	-	-	-	-	-	-	-	40	41	-
85X115	3	-	-	-	-	-	-	-	-	46	-	-
45X100	3	-	-	-	-	-	-	-	-	-	50	50
50X70	3	-	-	-	-	-	-	-	-	50	50	50
50X90	3	-	-	-	-	-	-	-	-	-	-	50
55X100	3	-	-	-	-	-	-	-	-	-	50	50
60X100	3	-	-	-	-	-	-	-	-	50	50	50
55X100	3	-	-	-	-	-	-	-	-	30	40	28
55X100	3	-	-	-	-	-	-	-	-	-	-	39
70X100	3	-	-	-	-	-	-	-	-	-	40	40
50X100	3	-	-	-	-	-	-	-	-	-	-	50
55X100	3	-	-	-	-	-	-	-	-	-	-	16
40X90	3	-	-	-	-	-	-	-	-	-	-	50
70X100	3	-	-	-	-	-	-	-	-	-	40	40
Village 6 (South Village)												
50X70	3	-	-	-	-	-	-	-	-	-	-	50
50x90	3	-	-	-	-	-	-	-	-	-	-	50
40X90	3	-	-	-	-	-	-	-	-	-	-	-
40X90	3	-	-	-	-	-	-	-	-	-	-	-
50x90	3	-	-	-	-	-	-	-	-	-	-	-
40X90	3	-	-	-	-	-	-	-	-	-	-	30
75x100	3	-	-	-	-	-	-	-	-	-	-	-
75x100	3	-	-	-	-	-	-	-	-	-	-	36
65x110	3	-	-	-	-	-	-	-	-	-	-	-
65x110	3	-	-	-	-	-	-	-	-	-	-	50
duplex-family	3	-	-	-	-	-	-	-	-	-	-	-
50X100	3	-	-	-	-	-	-	-	-	-	-	30
85X115	3	-	-	-	-	-	-	-	-	-	-	-
Total Residential Absorption		300	342	635	522	606	597	579	583	740	862	1,234
Cumulative Residential Absorption		300	642	1,277	1,799	2,405	3,002	3,581	4,144	4,884	5,746	6,980
Share of Residential Units		3.5%	7.6%	15.0%	21.2%	28.3%	35.4%	42.2%	48.8%	57.5%	67.7%	82.2%

	Table Ref.	Persons per Household											
Total Population	3	1.85	556	633	1,176	987	1,122	1,106	1,072	1,043	1,371	1,596	2,285
Cumulative Population			556	1,189	2,365	3,332	4,454	5,560	6,632	7,675	9,046	10,642	12,928

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

Residential Assessed Value	Table Ref.	Average Value	1	2	3	4	5	6	7	8	9	10	11
Development Area A													
TOWNS	3	$ 349,066	$ 17,453,300	$ 14,660,772	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Stacked flats HHDR	3	271,999	13,599,950	13,599,950	13,599,950	13,599,950	2,991,989	-	-	-	-	-	-
Stacked flats	3	305,999	15,299,950	15,299,950	15,299,950	15,299,950	15,299,950	15,299,950	15,299,950	15,299,950	3,977,987	-	-
55'x100'	3	504,332	25,216,600	25,216,600	7,060,648	-	-	-	-	-	-	-	-
50'X70'	3	356,432	-	17,821,600	13,544,416	-	-	-	-	-	-	-	-
45'X80'	3	362,666	18,133,300	6,165,322	-	-	-	-	-	-	-	-	-
45'X80'	3	362,666	-	11,968,638	9,429,836	-	-	-	-	-	-	-	-
55'X100'	3	504,332	-	-	18,155,952	15,129,960	-	-	-	-	-	-	-
60'X100'	3	509,999	25,499,950	10,199,980	-	-	-	-	-	-	-	-	-
Village 2 (Town Center West)													
60'X100'	3	509,999	-	15,299,970	23,969,953	-	-	-	-	-	-	-	-
50x100	3	473,732	-	-	23,686,600	19,896,744	-	-	-	-	-	-	-
45x80	3	362,666	-	-	8,704,464	18,134,300	9,429,836	-	-	-	-	-	-
50'x100	3	473,732	-	-	-	-	15,159,424	23,686,600	3,316,124	-	-	-	-
50'x100	3	473,732	-	-	23,686,600	23,686,600	8,527,176	-	-	-	-	-	-
Duplex	3	344,532	-	-	17,226,600	17,226,600	9,991,428	-	-	-	-	-	-
40'X62'	3	314,499	-	-	15,724,950	15,724,950	6,918,978	-	-	-	-	-	-
Stacked flats	3	226,666	-	-	11,334,300	11,334,300	11,334,300	11,334,300	11,334,300	11,334,300	11,334,300	11,334,300	4,533,720
Triplex-adult	3	301,466	-	-	15,073,300	3,014,660	-	-	-	-	-	-	-
Triplex-adult	3	301,466	-	-	-	12,058,640	15,073,300	12,058,640	-	-	-	-	-
45X100	3	387,599	-	-	19,379,950	19,379,950	19,379,950	8,527,178	-	-	-	-	-
Village 3 (Casa Activie Adult)													
MIXED USE HHDR	3	271,999	-	-	-	-	-	-	20,399,925	20,399,925	20,399,925	20,399,925	20,399,925
DUPLEX	3	275,399	-	-	-	-	-	-	12,668,354	-	-	-	-
DUPLEX	3	275,399	-	-	-	-	-	-	-	13,769,950	14,045,349	-	-
65x110	3	456,165	-	-	-	-	-	-	22,808,250	16,421,940	-	-	-
75x100	3	515,665	-	-	-	-	-	-	-	25,783,250	12,375,960	-	-
65x110	3	456,165	-	-	-	-	-	-	-	10,491,795	22,808,250	-	-
DUPLEX	3	275,399	-	-	-	-	-	-	-	-	-	13,769,950	13,769,950
50x90	3	362,666	-	-	-	-	-	-	18,133,300	14,506,640	-	-	-
50x70	3	396,666	-	-	-	-	-	-	-	19,833,300	18,643,302	-	-
DUPLEX	3	275,399	-	-	-	-	-	-	-	-	-	13,769,950	13,769,950
40X90	3	335,466	-	-	-	-	-	-	-	-	14,089,572	16,773,300	-
50x90	3	362,666	-	-	-	-	-	-	-	-	18,133,300	15,957,304	-
40x90	3	335,466	-	-	-	-	-	-	16,773,300	16,773,300	5,367,456	-	-
75x100	3	515,665	-	-	-	-	-	-	-	-	13,407,290	12,375,960	25,783,250
85x115	3	632,398	-	-	-	-	-	-	-	-	18,971,940	13,280,358	-
85x115	3	632,398	-	-	-	-	-	-	-	-	-	6,956,378	25,295,920
75x100	3	515,665	-	-	-	-	-	-	-	-	-	13,407,290	20,626,600
Village 4 (North Village)													
Duplex-Adult	3	344,532	-	-	-	-	17,226,600	16,193,004	-	-	-	-	-
Duplex-Adult	3	344,532	-	-	-	-	-	-	19,293,792	-	-	-	-
40X90	3	356,999	-	-	-	-	17,849,950	8,567,976	-	-	-	-	-
50x100	3	473,732	-	-	-	-	23,686,600	23,686,600	7,579,712	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	-	16,773,300	5,367,456	-	-	-	-
Duplex	3	453,332	-	-	-	-	-	-	-	23,119,932	-	-	-
Standard Lot (60' X 100')	3	509,999	-	-	-	-	-	20,399,960	20,399,960	13,769,973	-	-	-
Standard Lot (70' X 100')	3	589,048	-	-	-	-	-	23,561,920	15,315,248	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	12,747,708	-	-	-	-	-	-
Triplex Adult	3	301,466	-	-	-	-	12,058,640	13,264,504	-	-	-	-	-
45x80	3	362,666	-	-	-	-	14,506,640	-	-	-	-	-	-
45x80	3	362,666	-	-	-	-	-	20,309,296	-	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	-	11,405,844	5,702,922	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	-	-	10,063,980	3,690,126	-	-	-
Village 5 (East Village)													
Duplex Family	3	335,466	-	-	-	-	-	-	-	-	16,773,300	16,773,300	16,773,300
40 x 100	3	362,666	-	-	-	-	-	-	-	-	-	18,133,300	18,133,300
70X100	3	589,048	-	-	-	-	-	-	-	-	23,561,920	24,150,968	-
85X115	3	632,398	-	-	-	-	-	-	-	-	29,090,308	-	-
45X100	3	387,599	-	-	-	-	-	-	-	-	-	19,379,950	19,379,950
50X70	3	356,432	-	-	-	-	-	-	-	-	17,821,600	17,821,600	17,821,600
50X90	3	447,665	-	-	-	-	-	-	-	-	-	-	22,383,250
55X100	3	504,332	-	-	-	-	-	-	-	-	-	25,216,600	25,216,600
60X100	3	509,999	-	-	-	-	-	-	-	-	25,499,950	25,499,950	25,499,950
55X100	3	515,665	-	-	-	-	-	-	-	-	15,469,950	20,626,600	14,438,620
55X100	3	504,332	-	-	-	-	-	-	-	-	-	-	19,668,948
70X100	3	589,048	-	-	-	-	-	-	-	-	-	23,561,920	23,561,920
50X100	3	473,732	-	-	-	-	-	-	-	-	-	-	23,686,600
55X100	3	515,665	-	-	-	-	-	-	-	-	-	-	8,250,640
40X90	3	368,332	-	-	-	-	-	-	-	-	-	-	18,416,600
70X100	3	611,998	-	-	-	-	-	-	-	-	-	24,479,920	24,479,920
Village 6 (South Village)													
50X70	3	356,432	-	-	-	-	-	-	-	-	-	-	17,821,600
50x90	3	447,665	-	-	-	-	-	-	-	-	-	-	22,383,250
40X90	3	356,999	-	-	-	-	-	-	-	-	-	-	17,849,950
40X90	3	368,332	-	-	-	-	-	-	-	-	-	-	-
50x90	3	447,665	-	-	-	-	-	-	-	-	-	-	-
40X90	3	356,999	-	-	-	-	-	-	-	-	-	-	18,359,940
75x100	3	611,998	-	-	-	-	-	-	-	-	-	-	-
75x100	3	515,665	-	-	-	-	-	-	-	-	-	-	16,421,940
65x110	3	456,165	-	-	-	-	-	-	-	-	-	-	-
65x110	3	456,165	-	-	-	-	-	-	-	-	-	-	16,773,300
duplex-family	3	335,466	-	-	-	-	-	-	-	-	-	-	-
50X100	3	473,732	-	-	-	-	-	-	-	-	-	-	18,971,940
85X115	3	632,398	-	-	-	-	-	-	-	-	-	-	-
Total Residential Assessed Value			$ 115,203,050	$ 130,232,782	$ 235,877,469	$ 184,486,604	$ 212,182,468	$ 225,089,072	$ 204,456,573	$ 205,194,381	$ 301,771,659	$ 353,668,823	$ 530,472,433
Total Current Period Assessed Value Additions			$ 115,203,050	$ 130,232,782	$ 235,877,469	$ 184,486,604	$ 212,182,468	$ 225,089,072	$ 204,456,573	$ 205,194,381	$ 301,771,659	$ 353,668,823	$ 530,472,433
Current Period Cumulative Assessed Value Additions			$ 115,203,050	$ 245,435,832	$ 481,313,301	$ 665,799,905	$ 877,982,374	$ 1,103,051,446	$ 1,307,508,019	$ 1,512,702,400	$ 1,814,474,059	$ 2,168,142,882	$ 2,698,615,315
Previous Period Adjusted Assessed Value			-	115,203,050	244,959,834	479,825,173	662,329,227	871,775,072	1,093,242,128	1,293,181,623	1,493,032,813	1,788,635,532	2,134,914,038
Deflation Factor @ 0.41%			0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996
Cumulative Residential AV Adj. for Deflation Factor of 0.41%			$ 115,203,050	$ 244,959,834	$ 479,825,173	$ 662,329,227	$ 871,775,072	$ 1,093,242,128	$ 1,293,181,623	$ 1,493,032,813	$ 1,788,635,532	$ 2,134,914,038	$ 2,656,565,394

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

	Table Ref.	Factor	1	2	3	4	5	6	7	8	9	10	11
Residential Property Tax													
Basic Tax Paid	4	1.000%	$ 1,152,031	$ 2,449,598	$ 4,798,252	$ 6,623,292	$ 8,717,751	$ 10,932,421	$ 12,931,816	$ 14,930,328	$ 17,886,355	$ 21,349,140	$ 26,565,654
Total Residential Property Tax	4	14.0253%	$ 161,576	$ 343,563	$ 672,969	$ 928,936	$ 1,222,690	$ 1,533,305	$ 1,813,726	$ 2,094,023	$ 2,508,614	$ 2,994,280	$ 3,725,912
Residential Property Tax In-Lieu of Sales Tax													
Off-Site Sales Tax Redirected to Property Tax			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Property Tax From MVLF	**Table Ref.**	**Factor**											
Cumulative Residential AV Adj. for Deflation Factor of 0.41%			$ 115,203,050	$ 244,959,834	$ 479,825,173	$ 662,329,227	$ 871,775,072	$ 1,093,242,128	$ 1,293,181,623	$ 1,493,032,813	$ 1,788,635,532	$ 2,134,914,038	$ 2,656,565,394
Cumulative Non-Residential AV Adj. for Deflation Factor of 0.41%			$ 18,101,947	$ 36,129,099	$ 54,081,767	$ 71,980,257	$ 99,264,877	$ 119,523,097	$ 139,697,613	$ 159,788,772	$ 179,796,918	$ 259,722,394	$ 279,317,632
Total Assessed Valuation			$ 133,304,997	$ 281,088,933	$ 533,906,940	$ 734,289,484	$ 971,039,949	$ 1,212,765,225	$ 1,432,879,236	$ 1,652,821,585	$ 1,968,432,450	$ 2,394,636,432	$ 2,935,883,026
Assessed Valuation / 1,000,000	5	$ 892	$ 133	$ 281	$ 534	$ 734	$ 971	$ 1,213	$ 1,433	$ 1,653	$ 1,968	$ 2,395	$ 2,936
Property Tax From MVLF	5		$ 118,908	$ 250,731	$ 476,245	$ 654,986	$ 866,168	$ 1,081,787	$ 1,278,128	$ 1,474,317	$ 1,755,842	$ 2,136,016	$ 2,618,808
Residential Documentary Transfer Tax	**Ref.**	**Factor**											
Residential Property Turnover Rate	4	14.3%											
Transfer Tax as a % of Price	4	0.11%											
Total Residential Documentary Transfer Tax			$ 18,103	$ 38,494	$ 75,401	$ 104,080	$ 136,993	$ 171,795	$ 203,214	$ 234,619	$ 281,071	$ 335,486	$ 417,460
Off-Site Sales Tax	**Table Ref.**	**Factor**											
Household Income (@ 25% of Assessed Valuation) (d)	5	25.00%	$ 28,800,763	$ 61,239,958	$ 119,956,293	$ 165,582,307	$ 217,943,768	$ 273,310,532	$ 323,295,406	$ 373,258,203	$ 447,158,883	$ 533,728,510	$ 664,141,349
Retail Taxable Sales (@ 32% of Household Income) (e)	5	32.00%	9,216,244	19,596,787	38,386,014	52,986,338	69,742,008	87,459,370	103,454,530	119,442,625	143,090,843	170,793,123	212,525,232
Projected Off-Site Taxable Sales (@ 0% of Retail Taxable Sales) (f)	5	0.00%	-	-	-	-	-	-	-	-	-	-	-
Sales Tax (@ 1.00% of Taxable Sales)	5	1.00%	-	-	-	-	-	-	-	-	-	-	-
Use Tax (@ 10.5% of Sales Tax)	5	10.50%	-	-	-	-	-	-	-	-	-	-	-
Less: 0.25% Reclassified to Property Tax	5	0.00%	-	-	-	-	-	-	-	-	-	-	-
Total Off-Site Sales Tax Passed Through to County			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
NON-RESIDENTIAL FINANCING SOURCES	**Measure**	**Table Ref.**	**Factor**										
Office													
Square Feet		3	450,323	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640	34,640
Cumulative Square Feet				34,640	69,280	103,921	138,561	173,201	207,841	242,482	277,122	311,762	346,402	381,043
Assessed Value Additions	per Sq. Ft.	3	$ 296	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508	$ 10,253,508
Cumulative Employees	per Sq. Ft.	3	175	188	376	564	752	940	1,128	1,316	1,504	1,692	1,880	2,069
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Retail													
Square Feet		3	441,687	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976	33,976
Cumulative Square Feet				33,976	67,952	101,928	135,904	169,880	203,856	237,831	271,807	305,783	339,759	373,735
Assessed Value Additions	per Sq. Ft.	3	$ 231	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438	$ 7,848,438
Cumulative Employees	per Sq. Ft.	3	500	65	129	194	258	323	387	452	516	581	646	710
Taxable Sales	per Sq. Ft.	5	200	6,795,185	13,590,369	20,385,554	27,180,738	33,975,923	40,771,108	47,566,292	54,361,477	61,156,662	67,951,846	74,747,031
Light Industrial													
Square Feet		3	106,380	-	-	-	-	-	13,298	13,298	13,298	13,298	13,298	13,298
Cumulative Square Feet				-	-	-	-	-	13,298	26,595	39,893	53,190	66,488	79,785
Assessed Value Additions	per Sq. Ft.	3	$ 193	$ -	$ -	$ -	$ -	$ -	$ 2,566,418	$ 2,566,418	$ 2,566,418	$ 2,566,418	$ 2,566,418	$ 2,566,418
Cumulative Employees	per Sq. Ft.	3	600	-	-	-	-	-	21	42	63	84	105	126
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Hotel - Business (Limited Service)													
Number of Rooms		3	100	-	-	-	-	100	-	-	-	-	-	-
Cumulative Number of Rooms				-	-	-	-	100	100	100	100	100	100	100
Assessed Value Additions	per room	3	$ 95,000	$ -	$ -	$ -	$ -	$ 9,500,000	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees		3	0.35	-	-	-	-	35	35	35	35	35	35	35
Taxable Sales	per room	5	375	-	-	-	-	37,549	37,549	37,549	37,549	37,549	37,549	37,549
Hotel - Resort													
Number of Rooms		3	300	-	-	-	-	-	-	-	-	300	-	-
Cumulative Number of Rooms				-	-	-	-	-	-	-	-	300	300	300
Assessed Value Additions	per room	3	$ 200,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 60,000,000	$ -
Cumulative Employees		3	1	-	-	-	-	-	-	-	-	300	300	300
Taxable Sales	per room	5	32,800	-	-	-	-	-	-	-	-	9,840,014	9,840,014	9,840,014
Schools													
Square Feet		3	-	-	-	-	-	-	-	-	-	-	-	-
Cumulative Square Feet				-	-	-	-	-	-	-	-	-	-	-
Assessed Value Additions	per Sq. Ft.	3	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees	per Sq. Ft.	3	497	497	497	497	497	497	497	497	497	497	497	497
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Other													
Square Feet		3	-	-	-	-	-	-	-	-	-	-	-	-
Cumulative Square Feet				-	-	-	-	-	-	-	-	-	-	-
Assessed Value Additions	per Sq. Ft.	3	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees	per Sq. Ft.	3	428	15	32	64	91	121	151	181	209	246	280	352
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Total Non-Residential Assessed Value Additions				$ 18,101,947	$ 18,101,947	$ 18,101,947	$ 18,101,947	$ 27,601,947	$ 20,668,364	$ 20,668,364	$ 20,668,364	$ 20,668,364	$ 80,668,364	$ 20,668,364
Current Period Cumulative Assessed Value Additions				$ 18,101,947	$ 36,203,893	$ 54,305,840	$ 72,407,786	$ 100,009,733	$ 120,678,097	$ 141,346,461	$ 162,014,825	$ 182,683,189	$ 263,351,553	$ 284,019,917
Previous Period Adjusted Assessed Value				-	18,101,947	36,129,099	54,081,767	71,980,257	99,264,877	119,523,097	139,697,613	159,788,772	179,796,918	259,722,394
Deflation Factor				0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996
Cumulative Non-Residential AV Adj. for Deflation Factor of 0.41%				$ 18,101,947	$ 36,129,099	$ 54,081,767	$ 71,980,257	$ 99,264,877	$ 119,523,097	$ 139,697,613	$ 159,788,772	$ 179,796,918	$ 259,722,394	$ 279,317,632
Total Non-Residential Cumulative Employees				765	1,035	1,319	1,598	1,916	2,220	2,523	2,825	3,136	3,753	4,089
50% of Cumulative Employees				382	517	660	799	958	1,110	1,261	1,412	1,568	1,876	2,044
Equivalent Residents (Residents & 50% Employees)				938	1,706	3,025	4,131	5,412	6,670	7,894	9,087	10,614	12,519	14,972
Total Taxable Sales				$ 6,795,185	$ 13,590,369	$ 20,385,554	$ 27,180,738	$ 34,013,472	$ 40,808,657	$ 47,603,841	$ 54,399,026	$ 61,194,211	$ 77,829,410	$ 84,624,594

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

	Table Ref.	Factor	1	2	3	4	5	6	7	8	9	10	11
Non-Residential Property Tax													
Basic Tax Paid	4	1.00%	$ 181,019	$ 361,291	$ 540,818	$ 719,603	$ 992,649	$ 1,195,231	$ 1,396,976	$ 1,597,888	$ 1,797,969	$ 2,597,224	$ 2,793,176
Non-Residential Unsecured Property Tax as a % of Secured	4	10.00%	18,102	36,129	54,052	71,960	99,265	119,523	139,698	159,789	179,797	259,722	279,318
Total Non-Residential Property Tax	4	14.03%	$ 27,927	$ 55,739	$ 83,436	$ 111,019	$ 153,144	$ 184,398	$ 215,523	$ 246,519	$ 277,388	$ 400,695	$ 430,926
Non-Residential Property Tax In-Lieu of Sales Tax													
On-Site Sales Tax Redirected to Property Tax			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Non-Residential Documentary Transfer Tax	Table Ref.	Factor											
Non-Residential Property Turnover Rate	4	10.00%											
Transfer Tax as a % of Price	4	0.11%											
Total Non-Residential Documentary Transfer Tax			$ 1,991	$ 3,974	$ 5,949	$ 7,916	$ 10,919	$ 13,148	$ 15,367	$ 17,577	$ 19,778	$ 28,569	$ 30,725
On-Site Sales Tax	Table Ref.	Factor											
Sales Tax (@ 1.00% of Taxable Sales)	5	1.00%	$ 67,952	$ 135,904	$ 203,856	$ 271,807	$ 340,135	$ 408,087	$ 476,038	$ 543,990	$ 611,942	$ 778,294	$ 846,246
Use Tax (@ 10.5% of Sales Tax)	5	10.50%	7,135	14,270	21,405	28,540	35,714	42,849	49,984	57,119	64,254	81,721	88,856
Less: 0.25% Reclassified to Property Tax	5	0.00%	-	-	-	-	-	-	-	-	-	-	-
Total On-Site Sales Tax Allocated to County			$ 75,087	$ 150,174	$ 225,260	$ 300,347	$ 375,849	$ 450,936	$ 526,022	$ 601,109	$ 676,196	$ 860,015	$ 935,102
Proposition 172 - Half Cent Sales Tax	5		$ 32,026	$ 64,051	$ 96,077	$ 128,103	$ 160,305	$ 192,331	$ 224,357	$ 256,383	$ 288,408	$ 366,810	$ 398,836
Transient Occupancy Tax	Table Ref.	Factor											
Hotel - Business Rental Revenue Subject to TOT	5	10.00%	$ -	$ -	$ -	$ -	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184
Hotel - Resort Revenue Subject to TOT	5	10.00%	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,169,460	$ 1,169,460
Total Transient Occupancy Tax Allocated to County			$ -	$ -	$ -	$ -	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 1,352,644	$ 1,352,644
Interest Earnings	Table Ref.	Factor											
County Share of Residential and Non-Residential Property Tax	4		$ 189,503	$ 399,303	$ 756,405	$ 1,039,955	$ 1,375,835	$ 1,717,703	$ 2,029,249	$ 2,340,542	$ 2,786,002	$ 3,384,976	$ 4,156,838
Documentary Transfer Tax	4		20,095	42,468	81,350	111,996	147,912	184,943	218,581	252,196	300,849	364,056	448,185
Net Off-Site Sales and Use Tax	5		-	-	-	-	-	-	-	-	-	-	-
Net On-Site Sales and Use Tax	5		75,087	150,174	225,260	300,347	375,849	450,936	526,022	601,109	676,196	860,015	935,102
Total Revenue Generating Interest Earnings			$ 284,684	$ 591,944	$ 1,063,016	$ 1,452,299	$ 1,899,596	$ 2,353,581	$ 2,773,852	$ 3,193,848	$ 3,763,047	$ 4,619,048	$ 5,540,125
Total Interest Earnings	5	1.13%	$ 3,217	$ 6,689	$ 12,012	$ 16,411	$ 21,465	$ 26,595	$ 31,345	$ 36,090	$ 42,522	$ 52,195	$ 62,603
Other General Fund Discretionary Revenue	Table Ref.	Factor											
Franchises	6	$ 10.06	$ 9,435	$ 17,163	$ 30,425	$ 41,552	$ 54,442	$ 67,091	$ 79,401	$ 91,408	$ 106,758	$ 125,920	$ 150,598
Fines and Penalties	6	8.31	7,795	14,180	25,136	34,329	44,978	55,428	65,598	75,518	88,200	104,031	124,419
Miscellaneous Federal and State	6	1.30	722	1,545	3,074	4,330	5,789	7,228	8,619	9,974	11,755	13,830	16,800
Miscellaneous Revenue	6	0.17	164	298	529	722	946	1,166	1,380	1,589	1,856	2,189	2,618
Criminal-Co. 25%	6	-	-	-	-	-	-	-	-	-	-	-	-
Penalties & Int On Del Taxes	6	-	-	-	-	-	-	-	-	-	-	-	-
Court Fees & Costs	6	-	-	-	-	-	-	-	-	-	-	-	-
Superior Court Fees	6	-	-	-	-	-	-	-	-	-	-	-	-
Rebates & Refunds	6	-	-	-	-	-	-	-	-	-	-	-	-
Total Other General Fund Discretionary Revenue			$ 18,116	$ 33,187	$ 59,163	$ 80,933	$ 106,154	$ 130,911	$ 154,998	$ 178,490	$ 208,569	$ 245,970	$ 294,436

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

	Table Ref.	Factor	1	2	3	4	5	6	7	8	9	10	11
POLICE PHASING													
Cumulative Residents			556	1,189	2,365	3,332	4,454	5,560	6,632	7,675	9,046	10,642	12,928
Staffing Service Standard Sworn Officer per 1,000 residents	9	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20
Number of Sworn Officers Required			0.67	1.43	2.84	4.00	5.35	6.67	7.96	9.21	10.85	12.77	15.51
Police Costs	9	$ 128,055	$ 85,381	$ 182,714	$ 363,437	$ 511,999	$ 684,467	$ 854,375	$ 1,019,159	$ 1,179,390	$ 1,389,995	$ 1,635,322	$ 1,986,521
FISCAL IMPACT TO OTHER COUNTY FUNDS													
Fiscal Impact to Library Fund	**Table Ref.**	**Factor**											
Financing Sources													
Library Fund Ad Valorem Tax													
Basic Tax Adj. for Deflation			$ 1,333,050	$ 2,810,889	$ 5,339,069	$ 7,342,895	$ 9,710,399	$ 12,127,652	$ 14,328,792	$ 16,528,216	$ 19,684,324	$ 23,946,364	$ 29,358,830
Total County Library Tax	11	1.43%	$ 19,079	$ 40,231	$ 76,415	$ 105,095	$ 138,980	$ 173,577	$ 205,081	$ 236,560	$ 281,732	$ 342,732	$ 420,198
Fines, Forfeitures & Penalties													
Library Fines and Fees	11	$ 0.14	$ 135	$ 245	$ 434	$ 592	$ 776	$ 957	$ 1,132	$ 1,303	$ 1,522	$ 1,795	$ 2,147
Revenue from Use of Money and Property													
Rents	11	$ 0.01	$ 6	$ 12	$ 21	$ 28	$ 37	$ 46	$ 54	$ 62	$ 73	$ 86	$ 103
Total Financing Sources			$ 19,220	$ 40,487	$ 76,870	$ 105,716	$ 139,793	$ 174,579	$ 206,267	$ 237,926	$ 283,327	$ 344,614	$ 422,448
Financing Requirements													
Library Services	11	$ 8.68	$ 8,142	$ 14,811	$ 26,254	$ 35,856	$ 46,979	$ 57,894	$ 68,517	$ 78,878	$ 92,124	$ 108,659	$ 129,955
Total Financing Requirements			$ 8,142	$ 14,811	$ 26,254	$ 35,856	$ 46,979	$ 57,894	$ 68,517	$ 78,878	$ 92,124	$ 108,659	$ 129,955
Net Annual Surplus/ (Deficit)			$ 11,079	$ 25,677	$ 50,616	$ 69,860	$ 92,815	$ 116,685	$ 137,751	$ 159,048	$ 191,203	$ 235,954	$ 292,494

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

	Table Ref.	Factor	12	13	14	15	16	17	18	19	20	21	30	31
General Fund Financing Sources														
Property Tax	4		$ 4,743,717	$ 5,103,843	$ 5,082,755	$ 5,061,754	$ 5,040,839	$ 5,020,012	$ 4,999,270	$ 4,978,614	$ 4,958,043	$ 4,937,557	$ 4,835,391	$ 4,737,298
Property Tax In-Lieu of Sales-Tax	4		-	-	-	-	-	-	-	-	-	-	-	-
Documentary Transfer Tax	4		512,714	551,842	549,562	547,291	545,030	542,778	540,535	538,302	536,077	533,863	522,924	512,210
Property Tax In-Lieu of MVLF	5		2,990,318	3,217,622	3,204,328	3,191,088	3,177,803	3,164,773	3,151,696	3,138,674	3,125,706	3,112,791	3,049,013	2,986,541
On-Site Retail Sales and Use Tax	5		1,010,189	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275
Off-Site Retail Sales and Use Tax	5		-	-	-	-	-	-	-	-	-	-	-	-
Transient Occupancy Tax	5		1,352,644	1,352,644	1,352,644	1,352,644	1,352,644	1,352,644	1,352,644	1,352,644	1,352,644	1,352,644	1,352,644	1,352,644
Interest Earnings	5		70,813	76,173	75,909	75,646	75,384	75,123	74,863	74,605	74,347	74,091	72,824	71,583
Other Discretionary Revenue	6		332,852	355,711	355,711	355,711	355,711	355,711	355,711	355,711	355,711	355,711	355,711	355,711
Total Financing Sources			$ 11,013,247	$ 11,743,110	$ 11,706,183	$ 11,669,409	$ 11,632,786	$ 11,596,315	$ 11,559,995	$ 11,523,824	$ 11,487,803	$ 11,451,931	$ 11,374,782	$ 11,101,262
General Fund Financing Requirements														
General Financing Requirements	8	$ 30.28	$ 512,289	$ 547,469	$ 547,469	$ 547,469	$ 547,469	$ 547,469	$ 547,469	$ 547,469	$ 547,469	$ 547,469	$ 547,469	$ 547,469
Public Protection														
Judicial	8	12.53	211,952	226,507	226,507	226,507	226,507	226,507	226,507	226,507	226,507	226,507	226,507	226,507
Police Protection	9		2,260,877	2,416,270	2,416,270	2,416,270	2,416,270	2,416,270	2,416,270	2,416,270	2,416,270	2,416,270	2,416,270	2,416,270
Detention and Correction	8	28.72	485,934	519,304	519,304	519,304	519,304	519,304	519,304	519,304	519,304	519,304	519,304	519,304
Fire Protection (Transfers to the Fire Fund)	8	-	743,980	540,270	548,992	557,877	566,926	574,939	583,517	592,060	600,567	609,039	650,877	691,858
Protection/Inspection	8	0.15	2,556	2,731	2,731	2,731	2,731	2,731	2,731	2,731	2,731	2,731	2,731	2,731
Other Protection	8	6.43	108,752	116,220	116,220	116,220	116,220	116,220	116,220	116,220	116,220	116,220	116,220	116,220
Transfers to the Transportation Fund	12	-	470,898	503,275	503,275	503,275	503,275	503,275	503,275	503,275	503,275	503,275	503,275	503,275
Public Ways & Facilities	8	-	-	-	-	-	-	-	-	-	-	-	-	-
Health and Sanitation	8	41.48	610,267	652,211	652,211	652,211	652,211	652,211	652,211	652,211	652,211	652,211	652,211	652,211
Public Assistance	8	2.34	34,404	36,769	36,769	36,769	36,769	36,769	36,769	36,769	36,769	36,769	36,769	36,769
Education	8	0.27	3,914	4,183	4,183	4,183	4,183	4,183	4,183	4,183	4,183	4,183	4,183	4,183
Recreation & Cultural Services	8	0.03	468	500	500	500	500	500	500	500	500	500	500	500
Debt Service	8	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Financing Requirements			$ 5,446,289	$ 5,565,709	$ 5,574,430	$ 5,583,116	$ 5,591,765	$ 5,600,378	$ 5,608,956	$ 5,617,499	$ 5,626,008	$ 5,634,478	$ 5,676,316	$ 5,717,296
General Fund Fiscal Impact														
Ongoing Surplus/(Deficit)			$ 5,566,957	$ 6,177,401	$ 6,131,753	$ 6,086,293	$ 6,041,022	$ 5,995,937	$ 5,951,039	$ 5,906,326	$ 5,861,795	$ 5,817,454	$ 5,698,466	$ 5,383,966
Surplus/(Deficit) per Unit			$ 701	$ 728	$ 722	$ 717	$ 712	$ 706	$ 701	$ 696	$ 690	$ 685	$ 659	$ 634
Revenue/Cost Ratio			2.02	2.11	2.10	2.09	2.08	2.07	2.06	2.05	2.04	2.03	1.99	1.94
Fiscal Impact to Fire Fund														
Financing Sources	10, Exhibit B		$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000	$ 3,500,000
Financing Requirements	10, Exhibit B		3,500,000	3,500,000	3,500,000	3,500,000	3,500,000	3,500,000	3,500,000	3,500,000	3,500,000	3,500,000	3,500,000	3,500,000
Net Annual Surplus / (Deficit)			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Fiscal Impact to Library Fund														
Financing Sources	11		$ 482,351	$ 518,998	$ 518,865	$ 514,740	$ 512,625	$ 510,518	$ 508,420	$ 506,330	$ 504,249	$ 502,177	$ 491,944	$ 481,920
Financing Requirements	11		146,850	156,935	156,935	156,935	156,935	156,935	156,935	156,935	156,935	156,935	156,935	156,935
Net Annual Surplus / (Deficit)			$ 335,501	$ 362,063	$ 359,930	$ 357,805	$ 355,690	$ 353,583	$ 351,485	$ 349,395	$ 347,315	$ 345,242	$ 335,009	$ 324,985
Fiscal Impact to Transportation Fund														
Financing Sources	12		$ 675,412	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834	$ 721,834
Financing Requirements	12		675,412	721,834	721,834	721,834	721,834	721,834	721,834	721,834	721,834	721,834	721,834	721,834
Net Annual Surplus / (Deficit)			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Net Fiscal Impact of Project														
Financing Sources			$ 15,671,010	$ 16,483,942	$ 16,444,881	$ 16,405,983	$ 16,367,245	$ 16,328,667	$ 16,290,248	$ 16,251,988	$ 16,213,887	$ 16,175,942	$ 15,988,560	$ 15,805,016
Financing Requirements			9,768,552	9,944,478	9,953,199	9,961,884	9,970,533	9,979,147	9,987,725	9,996,267	10,004,774	10,013,246	10,055,084	10,096,085
Net Annual Surplus / (Deficit)			$ 5,902,458	$ 6,539,464	$ 6,491,683	$ 6,444,099	$ 6,396,711	$ 6,349,520	$ 6,302,523	$ 6,255,721	$ 6,209,112	$ 6,162,698	$ 5,933,475	$ 5,708,931

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
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RESIDENTIAL FINANCING SOURCES Residential Absorption	Table Ref.	12	13	14	15	16	17	18	19	20	21	26	31
Village 1 (Town Center)													
TOWNS	3	-	-	-	-	-	-	-	-	-	-	-	-
Stacked flats HHDR	3	-	-	-	-	-	-	-	-	-	-	-	-
Stacked flats	3	-	-	-	-	-	-	-	-	-	-	-	-
55'x100'	3	-	-	-	-	-	-	-	-	-	-	-	-
50'X70'	3	-	-	-	-	-	-	-	-	-	-	-	-
45'X80'	3	-	-	-	-	-	-	-	-	-	-	-	-
45'X80'	3	-	-	-	-	-	-	-	-	-	-	-	-
55'X100'	3	-	-	-	-	-	-	-	-	-	-	-	-
60'X100'	3	-	-	-	-	-	-	-	-	-	-	-	-
Village 2 (Town Center West)													
60'X100'	3	-	-	-	-	-	-	-	-	-	-	-	-
50x100	3	-	-	-	-	-	-	-	-	-	-	-	-
45x80	3	-	-	-	-	-	-	-	-	-	-	-	-
50'x100	3	-	-	-	-	-	-	-	-	-	-	-	-
50'x100	3	-	-	-	-	-	-	-	-	-	-	-	-
Duplex	3	-	-	-	-	-	-	-	-	-	-	-	-
40'X62'	3	-	-	-	-	-	-	-	-	-	-	-	-
Stacked flats	3	-	-	-	-	-	-	-	-	-	-	-	-
Triplex-adult	3	-	-	-	-	-	-	-	-	-	-	-	-
Triplex-adult	3	-	-	-	-	-	-	-	-	-	-	-	-
45X100	3	-	-	-	-	-	-	-	-	-	-	-	-
Village 3 (Casa Activie Adult)													
MIXED USE HHDR	3	43	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	-	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	-	-	-	-	-	-	-	-	-	-	-	-
65x110	3	-	-	-	-	-	-	-	-	-	-	-	-
75x100	3	-	-	-	-	-	-	-	-	-	-	-	-
65x110	3	-	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	14	-	-	-	-	-	-	-	-	-	-	-
50x90	3	-	-	-	-	-	-	-	-	-	-	-	-
50x70	3	-	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	46	-	-	-	-	-	-	-	-	-	-	-
40X90	3	-	-	-	-	-	-	-	-	-	-	-	-
50x90	3	-	-	-	-	-	-	-	-	-	-	-	-
40x90	3	-	-	-	-	-	-	-	-	-	-	-	-
75x100	3	-	-	-	-	-	-	-	-	-	-	-	-
85x115	3	-	-	-	-	-	-	-	-	-	-	-	-
85x115	3	-	-	-	-	-	-	-	-	-	-	-	-
75x100	3	36	-	-	-	-	-	-	-	-	-	-	-
Village 4 (North Village)													
Duplex-Adult	3	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Adult	3	-	-	-	-	-	-	-	-	-	-	-	-
40X90	3	-	-	-	-	-	-	-	-	-	-	-	-
50x100	3	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	-	-	-	-	-	-	-	-	-	-	-	-
Duplex	3	-	-	-	-	-	-	-	-	-	-	-	-
Standard Lot (60' X 100')	3	-	-	-	-	-	-	-	-	-	-	-	-
Standard Lot (70' X 100')	3	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	-	-	-	-	-	-	-	-	-	-	-	-
Triplex Adult	3	-	-	-	-	-	-	-	-	-	-	-	-
45x80	3	-	-	-	-	-	-	-	-	-	-	-	-
45x80	3	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	-	-	-	-	-	-	-	-	-	-	-	-
Village 5 (East Village)													
Duplex Family	3	41	-	-	-	-	-	-	-	-	-	-	-
40 x 100	3	-	34	-	-	-	-	-	-	-	-	-	-
70X100	3	-	-	-	-	-	-	-	-	-	-	-	-
85X115	3	-	-	-	-	-	-	-	-	-	-	-	-
45X100	3	50	22	-	-	-	-	-	-	-	-	-	-
50X70	3	57	-	-	-	-	-	-	-	-	-	-	-
50X90	3	59	-	-	-	-	-	-	-	-	-	-	-
55X100	3	21	-	-	-	-	-	-	-	-	-	-	-
60X100	3	12	-	-	-	-	-	-	-	-	-	-	-
55X100	3	-	-	-	-	-	-	-	-	-	-	-	-
55X100	3	50	50	-	-	-	-	-	-	-	-	-	-
70X100	3	8	-	-	-	-	-	-	-	-	-	-	-
50X100	3	50	40	-	-	-	-	-	-	-	-	-	-
55X100	3	40	-	-	-	-	-	-	-	-	-	-	-
40X90	3	36	-	-	-	-	-	-	-	-	-	-	-
70X100	3	40	36	-	-	-	-	-	-	-	-	-	-
Village 6 (South Village)													
50X70	3	50	56	-	-	-	-	-	-	-	-	-	-
50x90	3	12	-	-	-	-	-	-	-	-	-	-	-
40X90	3	40	-	-	-	-	-	-	-	-	-	-	-
40X90	3	30	25	-	-	-	-	-	-	-	-	-	-
50x90	3	39	58	-	-	-	-	-	-	-	-	-	-
40X90	3	40	30	-	-	-	-	-	-	-	-	-	-
75x100	3	30	27	-	-	-	-	-	-	-	-	-	-
75x100	3	-	30	-	-	-	-	-	-	-	-	-	-
65x110	3	-	-	-	-	-	-	-	-	-	-	-	-
85x110	3	40	25	-	-	-	-	-	-	-	-	-	-
duplex-family	3	50	43	-	-	-	-	-	-	-	-	-	-
50X100	3	-	44	-	-	-	-	-	-	-	-	-	-
85X115	3	30	26	-	-	-	-	-	-	-	-	-	-
Total Residential Absorption		964	546	-	-	-	-	-	-	-	-	-	-
Cumulative Residential Absorption		7,944	8,490	8,490	8,490	8,490	8,490	8,490	8,490	8,490	8,490	8,490	8,490
Share of Residential Units		93.6%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
	Table Ref.	Persons per Household											
Total Population	3	1.85	1,785	1,011	-	-	-	-	-	-	-	-	-
Cumulative Population			14,713	15,724	15,724	15,724	15,724	15,724	15,724	15,724	15,724	15,724	15,724

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
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Residential Assessed Value	Table Ref.	Average Value	12	13	14	15	16	17	18	19	20	21	29	31
Development Area A														
TOWNS	3	$ 349,066	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Stacked flats HHDR	3	271,999	-	-	-	-	-	-	-	-	-	-	-	-
Stacked flats	3	305,999	-	-	-	-	-	-	-	-	-	-	-	-
55'x100'	3	504,332	-	-	-	-	-	-	-	-	-	-	-	-
50'X70'	3	356,432	-	-	-	-	-	-	-	-	-	-	-	-
45'X80'	3	362,666	-	-	-	-	-	-	-	-	-	-	-	-
45'X80'	3	362,686	-	-	-	-	-	-	-	-	-	-	-	-
55'X100'	3	504,332	-	-	-	-	-	-	-	-	-	-	-	-
60'X100'	3	509,999	-	-	-	-	-	-	-	-	-	-	-	-
Village 2 (Town Center West)														
60'X100'	3	509,999	-	-	-	-	-	-	-	-	-	-	-	-
50x100	3	473,732	-	-	-	-	-	-	-	-	-	-	-	-
45x80	3	362,686	-	-	-	-	-	-	-	-	-	-	-	-
50'x100	3	473,732	-	-	-	-	-	-	-	-	-	-	-	-
50'x100	3	473,732	-	-	-	-	-	-	-	-	-	-	-	-
Duplex	3	344,532	-	-	-	-	-	-	-	-	-	-	-	-
40'X62'	3	314,499	-	-	-	-	-	-	-	-	-	-	-	-
Stacked flats	3	226,686	-	-	-	-	-	-	-	-	-	-	-	-
Triplex-adult	3	301,466	-	-	-	-	-	-	-	-	-	-	-	-
Triplex-adult	3	301,466	-	-	-	-	-	-	-	-	-	-	-	-
45X100	3	387,599	-	-	-	-	-	-	-	-	-	-	-	-
Village 3 (Casa Activie Adult)														
MIXED USE HHDR	3	271,999	11,695,857	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	275,399	-	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	275,399	-	-	-	-	-	-	-	-	-	-	-	-
65x110	3	456,165	-	-	-	-	-	-	-	-	-	-	-	-
75x100	3	515,665	-	-	-	-	-	-	-	-	-	-	-	-
65x110	3	456,165	-	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	275,399	3,855,586	-	-	-	-	-	-	-	-	-	-	-
50x90	3	362,686	-	-	-	-	-	-	-	-	-	-	-	-
50x70	3	396,666	-	-	-	-	-	-	-	-	-	-	-	-
DUPLEX	3	275,399	12,668,354	-	-	-	-	-	-	-	-	-	-	-
40X90	3	335,466	-	-	-	-	-	-	-	-	-	-	-	-
50x90	3	362,666	-	-	-	-	-	-	-	-	-	-	-	-
40x90	3	335,466	-	-	-	-	-	-	-	-	-	-	-	-
75x100	3	515,665	-	-	-	-	-	-	-	-	-	-	-	-
85x115	3	632,398	-	-	-	-	-	-	-	-	-	-	-	-
85x115	3	632,398	-	-	-	-	-	-	-	-	-	-	-	-
75x100	3	515,665	18,563,940	-	-	-	-	-	-	-	-	-	-	-
Village 4 (North Village)														
Duplex-Adult	3	344,532	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Adult	3	344,532	-	-	-	-	-	-	-	-	-	-	-	-
40X90	3	356,999	-	-	-	-	-	-	-	-	-	-	-	-
50x100	3	473,732	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	-	-	-	-	-	-	-	-
Duplex	3	453,332	-	-	-	-	-	-	-	-	-	-	-	-
Standard Lot (60' X 100')	3	509,999	-	-	-	-	-	-	-	-	-	-	-	-
Standard Lot (70' X 100')	3	589,048	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	-	-	-	-	-	-	-	-
Triplex Adult	3	301,466	-	-	-	-	-	-	-	-	-	-	-	-
45x80	3	362,666	-	-	-	-	-	-	-	-	-	-	-	-
45x80	3	362,666	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	-	-	-	-	-	-	-	-
Duplex-Family	3	335,466	-	-	-	-	-	-	-	-	-	-	-	-
Village 5 (East Village)														
Duplex Family	3	335,466	13,754,106	-	-	-	-	-	-	-	-	-	-	-
40 x 100	3	362,666	-	12,330,644	-	-	-	-	-	-	-	-	-	-
70X100	3	589,048	-	-	-	-	-	-	-	-	-	-	-	-
85X115	3	632,398	-	-	-	-	-	-	-	-	-	-	-	-
45X100	3	387,599	19,379,950	8,527,178	-	-	-	-	-	-	-	-	-	-
50X70	3	356,432	20,316,624	-	-	-	-	-	-	-	-	-	-	-
50X90	3	447,665	26,412,235	-	-	-	-	-	-	-	-	-	-	-
55X100	3	504,332	10,590,972	-	-	-	-	-	-	-	-	-	-	-
60X100	3	509,999	6,119,988	-	-	-	-	-	-	-	-	-	-	-
55X100	3	515,665	-	-	-	-	-	-	-	-	-	-	-	-
55X100	3	504,332	25,216,600	25,216,600	-	-	-	-	-	-	-	-	-	-
55X100	3	589,048	4,712,384	-	-	-	-	-	-	-	-	-	-	-
70X100	3	473,732	23,686,600	18,949,280	-	-	-	-	-	-	-	-	-	-
50X100	3	515,665	20,626,600	-	-	-	-	-	-	-	-	-	-	-
55X100	3	368,332	13,259,952	-	-	-	-	-	-	-	-	-	-	-
40X90	3	611,998	24,479,920	22,031,928	-	-	-	-	-	-	-	-	-	-
70X100														
Village 6 (South Village)														
50X70	3	356,432	17,821,600	19,960,192	-	-	-	-	-	-	-	-	-	-
50x90	3	447,665	5,371,980	-	-	-	-	-	-	-	-	-	-	-
40X90	3	356,999	14,279,960	-	-	-	-	-	-	-	-	-	-	-
40X90	3	368,332	11,049,960	9,208,300	-	-	-	-	-	-	-	-	-	-
50x90	3	447,665	17,458,935	25,964,570	-	-	-	-	-	-	-	-	-	-
40X90	3	356,999	14,279,960	10,709,970	-	-	-	-	-	-	-	-	-	-
75x100	3	611,998	18,359,940	16,523,946	-	-	-	-	-	-	-	-	-	-
75x100	3	515,665	-	15,469,950	-	-	-	-	-	-	-	-	-	-
65x110	3	456,165	-	-	-	-	-	-	-	-	-	-	-	-
65x110	3	456,165	18,246,600	11,404,125	-	-	-	-	-	-	-	-	-	-
duplex-family	3	335,466	16,773,300	14,425,038	-	-	-	-	-	-	-	-	-	-
50X100	3	473,732	-	20,844,208	-	-	-	-	-	-	-	-	-	-
85X115	3	632,398	18,971,940	16,442,348	-	-	-	-	-	-	-	-	-	-
Total Residential Assessed Value			$ 407,953,943	$ 248,008,277	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Current Period Assessed Value Additions			$ 407,953,943	$ 248,008,277	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Current Period Cumulative Assessed Value Additions			$ 3,106,569,258	$ 3,354,577,535	$ 3,354,577,535	$ 3,354,577,535	$ 3,354,577,535	$ 3,354,577,535	$ 3,354,577,535	$ 3,354,577,535	$ 3,354,577,535	$ 3,354,577,535		
Previous Period Adjusted Assessed Value			2,656,585,394	3,053,542,892	3,288,934,485	3,275,345,206	3,261,812,075	3,248,334,861	3,234,913,332	3,221,547,258	3,208,236,410	3,194,980,561	3,181,779,482	3,116,587,762
Deflation Factor @ 0.41%			0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.980	0.980
Cumulative Residential AV Adj. for Deflation Factor of 0.41%			$ 3,053,542,892	$ 3,288,934,485	$ 3,275,345,206	$ 3,261,812,075	$ 3,248,334,861	$ 3,234,913,332	$ 3,221,547,258	$ 3,208,236,410	$ 3,194,980,561	$ 3,181,779,482	$ 3,116,587,762	$ 3,052,731,759

Exhibit C - Phasing Analysis, Constant Dollars
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	Table Ref.	Factor	12	13	14	15	16	17	18	19	20	21	30	31
Residential Property Tax														
Basic Tax Paid	4	1.000%	$ 30,535,429	$ 32,889,345	$ 32,753,452	$ 32,618,121	$ 32,483,349	$ 32,349,133	$ 32,215,473	$ 32,082,364	$ 31,949,808	$ 31,817,795	$ 31,186,878	$ 30,527,318
Total Residential Property Tax	4	14.0253%	$ 4,282,685	$ 4,612,828	$ 4,593,769	$ 4,574,788	$ 4,555,886	$ 4,537,062	$ 4,518,316	$ 4,499,647	$ 4,481,055	$ 4,462,540	$ 4,371,107	$ 4,281,547
Residential Property Tax In-Lieu of Sales Tax														
Off-Site Sales Tax Redirected to Property Tax			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Property Tax From MVLF	Table Ref.	Factor												
Cumulative Residential AV Adj. for Deflation Factor of 0.41%			$ 3,053,542,892	$ 3,288,934,485	$ 3,275,345,206	$ 3,261,812,075	$ 3,248,334,861	$ 3,234,913,332	$ 3,221,547,258	$ 3,208,236,410	$ 3,194,980,561	$ 3,181,779,482	$ 3,116,587,762	$ 3,052,731,759
Cumulative Non-Residential AV Adj. for Deflation Factor of 0.41%			$ 298,831,908	$ 318,265,551	$ 316,950,536	$ 315,640,954	$ 314,336,783	$ 313,038,001	$ 311,744,584	$ 310,456,512	$ 309,173,763	$ 307,896,313	$ 301,587,802	$ 295,408,547
Total Assessed Valuation			$ 3,352,374,799	$ 3,607,200,037	$ 3,592,295,742	$ 3,577,453,029	$ 3,562,671,644	$ 3,547,951,332	$ 3,533,291,842	$ 3,518,692,923	$ 3,504,154,323	$ 3,489,675,795	$ 3,418,175,564	$ 3,348,140,306
Assessed Valuation / 1,000,000	5	$ 892	$ 3,352	$ 3,607	$ 3,592	$ 3,577	$ 3,563	$ 3,548	$ 3,533	$ 3,519	$ 3,504	$ 3,490	$ 3,418	$ 3,348
Property Tax From MVLF	5		$ 2,990,318	$ 3,217,822	$ 3,204,328	$ 3,191,088	$ 3,177,903	$ 3,164,773	$ 3,151,696	$ 3,138,674	$ 3,125,706	$ 3,112,791	$ 3,049,013	$ 2,986,541
Residential Documentary Transfer Tax	Ref.	Factor												
Residential Property Turnover Rate	4	14.3%												
Transfer Tax as a % of Price	4	0.11%												
Total Residential Documentary Transfer Tax			$ 479,842	$ 516,833	$ 514,897	$ 512,570	$ 510,453	$ 508,344	$ 506,243	$ 504,151	$ 502,068	$ 499,994	$ 489,750	$ 479,715
Off-Site Sales Tax	Table Ref.	Factor												
Household Income (@ 25% of Assessed Valuation) (d)	5	25.00%	$ 763,385,723	$ 822,233,621	$ 818,836,301	$ 815,453,019	$ 812,083,715	$ 808,728,333	$ 805,386,814	$ 802,058,103	$ 798,745,140	$ 795,444,870	$ 779,146,940	$ 763,182,940
Retail Taxable Sales (@ 32% of Household Income) (e)	5	32.00%	244,283,431	263,114,759	262,027,616	260,944,966	259,866,789	258,793,067	257,723,781	256,658,913	255,598,445	254,542,359	249,327,021	244,218,541
Projected Off-Site Taxable Sales (@ 0% of Retail Taxable Sales) (f)	5	0.00%	-	-	-	-	-	-	-	-	-	-	-	-
Sales Tax (@ 1.00% of Taxable Sales)	5	1.00%	-	-	-	-	-	-	-	-	-	-	-	-
Use Tax (@ 10.5% of Sales Tax)	5	10.50%	-	-	-	-	-	-	-	-	-	-	-	-
Less: 0.25% Reclassified to Property Tax	5	0.00%	-	-	-	-	-	-	-	-	-	-	-	-
Total Off-Site Sales Tax Passed Through to County			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
NON-RESIDENTIAL FINANCING SOURCES	Measure	Table Ref.	Factor											
Office														
Square Feet		3	450,323	34,640	34,640	-	-	-	-	-	-	-	-	-
Cumulative Square Feet				415,683	450,323	450,323	450,323	450,323	450,323	450,323	450,323	450,323	450,323	450,323
Assessed Value Additions	per Sq. Ft.	3	$ 298	$ 10,253,508	$ 10,253,508	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees	per Sq. Ft.	3	175	2,257	2,445	2,445	2,445	2,445	2,445	2,445	2,445	2,445	2,445	2,445
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Retail														
Square Feet		3	441,687	33,976	33,976	-	-	-	-	-	-	-	-	-
Cumulative Square Feet				407,711	441,687	441,687	441,687	441,687	441,687	441,687	441,687	441,687	441,687	441,687
Assessed Value Additions	per Sq. Ft.	3	$ 231	$ 7,848,438	$ 7,848,438	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees	per Sq. Ft.	3	500	775	839	839	839	839	839	839	839	839	839	839
Taxable Sales	per Sq. Ft.	5	200	81,542,215	88,337,400	88,337,400	88,337,400	88,337,400	88,337,400	88,337,400	88,337,400	88,337,400	88,337,400	88,337,400
Light Industrial														
Square Feet		3	106,380	13,298	13,298	-	-	-	-	-	-	-	-	-
Cumulative Square Feet				93,083	106,380	106,380	106,380	106,380	106,380	106,380	106,380	106,380	106,380	106,380
Assessed Value Additions	per Sq. Ft.	3	$ 193	$ 2,566,418	$ 2,566,418	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees	per Sq. Ft.	3	600	147	168	168	168	168	168	168	168	168	168	168
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Hotel - Business (Limited Service)														
Number of Rooms		3	100	-	-	-	-	-	-	-	-	-	-	-
Cumulative Number of Rooms				100	100	100	100	100	100	100	100	100	100	100
Assessed Value Additions	per room	3	$ 95,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees		3	0.35	35	35	35	35	35	35	35	35	35	35	35
Taxable Sales	per room	5	375	37,549	37,549	37,549	37,549	37,549	37,549	37,549	37,549	37,549	37,549	37,549
Hotel - Resort														
Number of Rooms		3	300	-	-	-	-	-	-	-	-	-	-	-
Cumulative Number of Rooms				300	300	300	300	300	300	300	300	300	300	300
Assessed Value Additions	per room	3	$ 200,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees		3	1	300	300	300	300	300	300	300	300	300	300	300
Taxable Sales	per room	5	32,800	9,840,014	9,840,014	9,840,014	9,840,014	9,840,014	9,840,014	9,840,014	9,840,014	9,840,014	9,840,014	9,840,014
Schools														
Square Feet		3	-	-	-	-	-	-	-	-	-	-	-	-
Cumulative Square Feet				-	-	-	-	-	-	-	-	-	-	-
Assessed Value Additions	per Sq. Ft.	3	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees	per Sq. Ft.	3	497	497	497	497	497	497	497	497	497	497	497	497
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Other														
Square Feet		3	-	-	-	-	-	-	-	-	-	-	-	-
Cumulative Square Feet				-	-	-	-	-	-	-	-	-	-	-
Assessed Value Additions	per Sq. Ft.	3	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Cumulative Employees	per Sq. Ft.	3	428	400	428	428	428	428	428	428	428	428	428	428
Taxable Sales	per Sq. Ft.	5	-	-	-	-	-	-	-	-	-	-	-	-
Total Non-Residential Assessed Value Additions				$ 20,668,364	$ 20,668,364	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Current Period Cumulative Assessed Value Additions				$ 304,688,281	$ 325,356,645	$ 325,356,645	$ 325,356,645	$ 325,356,645	$ 325,356,645	$ 325,356,645	$ 325,356,645	$ 325,356,645		
Previous Period Adjusted Assessed Value				279,317,632	298,831,908	318,265,551	316,950,536	315,640,954	314,336,783	313,038,001	311,744,584	310,456,512	307,896,313	301,587,802
Deflation Factor				0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996	0.996
Cumulative Non-Residential AV Adj. for Deflation Factor of 0.41%				$ 298,831,908	$ 318,265,551	$ 316,950,536	$ 315,640,954	$ 314,336,783	$ 313,038,001	$ 311,744,584	$ 310,456,512	$ 309,173,763	$ 307,896,313	$ 301,587,802	$ 295,408,547
Total Non-Residential Cumulative Employees				4,411	4,712	4,712	4,712	4,712	4,712	4,712	4,712	4,712	4,712	4,712
50% of Cumulative Employees				2,206	2,356	2,356	2,356	2,356	2,356	2,356	2,356	2,356	2,356	2,356
Equivalent Residents (Residents & 50% Employees)				16,919	18,080	18,080	18,080	18,080	18,080	18,080	18,080	18,080	18,080	18,080
Total Taxable Sales				$ 91,419,779	$ 98,214,964	$ 98,214,964	$ 98,214,964	$ 98,214,964	$ 98,214,964	$ 98,214,964	$ 98,214,964	$ 98,214,964	$ 98,214,964	$ 98,214,964

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

	Table Ref.	Factor	12	13	14	15	16	17	18	19	20	21	30	31
Non-Residential Property Tax														
Basic Tax Paid	4	1.00%	$ 2,988,319	$ 3,182,656	$ 3,169,505	$ 3,156,410	$ 3,143,368	$ 3,130,380	$ 3,117,446	$ 3,104,565	$ 3,091,738	$ 3,078,963	$ 3,016,878	$ 2,954,085
Non-Residential Unsecured Property Tax as a % of Secured	4	10.00%	298,832	318,266	316,951	315,641	314,337	313,038	311,745	310,457	309,174	307,896	301,688	295,409
Total Non-Residential Property Tax	4	14.03%	$ 461,033	$ 491,015	$ 488,988	$ 486,965	$ 484,953	$ 482,950	$ 480,954	$ 478,967	$ 476,988	$ 475,017	$ 465,284	$ 455,751
Non-Residential Property Tax In-Lieu of Sales Tax														
On-Site Sales Tax Redirected to Property Tax			$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Non-Residential Documentary Transfer Tax	Table Ref.	Factor												
Non-Residential Property Turnover Rate	4	10.00%												
Transfer Tax as a % of Price	4	0.11%												
Total Non-Residential Documentary Transfer Tax			$ 32,872	$ 35,009	$ 34,865	$ 34,721	$ 34,577	$ 34,434	$ 34,292	$ 34,150	$ 34,009	$ 33,869	$ 33,175	$ 32,495
On-Site Sales Tax	Table Ref.	Factor												
Sales Tax (@ 1.00% of Taxable Sales)	5	1.00%	$ 914,198	$ 982,150	$ 982,150	$ 982,150	$ 982,150	$ 982,150	$ 982,150	$ 982,150	$ 982,150	$ 982,150	$ 982,150	$ 982,150
Use Tax (@ 10.5% of Sales Tax)	5	10.50%	95,991	103,126	103,126	103,126	103,126	103,126	103,126	103,126	103,126	103,126	103,126	103,126
Less: 0.25% Reclassified to Property Tax	5	0.00%	-	-	-	-	-	-	-	-	-	-	-	-
Total On-Site Sales Tax Allocated to County			$ 1,010,189	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275	$ 1,085,275
Proposition 172 - Half Cent Sales Tax	5		$ 430,861	$ 462,887	$ 462,887	$ 462,887	$ 462,887	$ 462,887	$ 462,887	$ 462,887	$ 462,887	$ 462,887	$ 462,887	$ 462,887
Transient Occupancy Tax	Table Ref.	Factor												
Hotel - Business Rental Revenue Subject to TOT	5	10.00%	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184	$ 183,184
Hotel - Resort Revenue Subject to TOT	5	10.00%	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460	$ 1,169,460
Total Transient Occupancy Tax Allocated to County			$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644	$ 1,352,644
Interest Earnings	Table Ref.	Factor												
County Share of Residential and Non-Residential Property Tax	4		$ 4,743,717	$ 5,103,843	$ 5,082,755	$ 5,061,754	$ 5,040,839	$ 5,020,012	$ 4,999,270	$ 4,978,614	$ 4,958,043	$ 4,937,557	$ 4,838,391	$ 4,737,298
Documentary Transfer Tax	4		512,714	551,842	549,562	547,291	545,030	542,778	540,535	538,302	536,077	533,863	522,924	512,210
Net Off-Site Sales and Use Tax	5		-	-	-	-	-	-	-	-	-	-	-	-
Net On-Site Sales and Use Tax	5		1,010,189	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275	1,085,275
Total Revenue Generating Interest Earnings			$ 6,266,620	$ 6,740,960	$ 6,717,592	$ 6,694,320	$ 6,671,144	$ 6,648,065	$ 6,625,080	$ 6,602,191	$ 6,579,396	$ 6,556,695	$ 6,444,591	$ 6,334,783
Total Interest Earnings	5	1.13%	$ 70,813	$ 76,173	$ 75,909	$ 75,646	$ 75,384	$ 75,123	$ 74,863	$ 74,605	$ 74,347	$ 74,091	$ 72,824	$ 71,583
Other General Fund Discretionary Revenue	Table Ref.	Factor												
Franchises	6	$ 10.06	$ 170,178	$ 181,864	$ 181,864	$ 181,864	$ 181,864	$ 181,864	$ 181,864	$ 181,864	$ 181,864	$ 181,864	$ 181,864	$ 181,864
Fines and Penalties	6	8.31	140,595	150,250	150,250	150,250	150,250	150,250	150,250	150,250	150,250	150,250	150,250	150,250
Miscellaneous Federal and State	6	1.30	19,121	20,435	20,435	20,435	20,435	20,435	20,435	20,435	20,435	20,435	20,435	20,435
Miscellaneous Revenue	6	0.17	2,958	3,161	3,161	3,161	3,161	3,161	3,161	3,161	3,161	3,161	3,161	3,161
Criminal-Co. 25%	6	-	-	-	-	-	-	-	-	-	-	-	-	-
Penalties & Int On Del Taxes	6	-	-	-	-	-	-	-	-	-	-	-	-	-
Court Fees & Costs	6	-	-	-	-	-	-	-	-	-	-	-	-	-
Superior Court Fees	6	-	-	-	-	-	-	-	-	-	-	-	-	-
Rebates & Refunds	6	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Other General Fund Discretionary Revenue			$ 332,852	$ 355,711	$ 355,711	$ 355,711	$ 355,711	$ 355,711	$ 355,711	$ 355,711	$ 355,711	$ 355,711	$ 355,711	$ 355,711

Exhibit C - Phasing Analysis, Constant Dollars
Paradise Valley
February 15, 2017

	Table Ref.	Factor	12	13	14	15	16	17	18	19	20	21	30	31
POLICE PHASING														
Cumulative Residents			14,713	15,724	15,724	15,724	15,724	15,724	15,724	15,724	15,724	15,724	15,724	15,724
Staffing Service Standard Sworn Officer per 1,000 residents	9	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20
Number of Sworn Officers Required			17.66	18.87	18.87	18.87	18.87	18.87	18.87	18.87	18.87	18.87	18.87	18.87
Police Costs	9	$ 128,055	$ 2,260,877	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270	$ 2,416,270
FISCAL IMPACT TO OTHER COUNTY FUNDS														
Fiscal Impact to Library Fund	**Table Ref.**	**Factor**												
Financing Sources														
Library Fund Ad Valorem Tax			$ 33,523,748	$ 38,072,000	$ 35,922,957	$ 35,774,530	$ 35,626,716	$ 35,479,513	$ 35,332,918	$ 35,186,929	$ 35,041,543	$ 34,896,756	$ 34,181,756	$ 33,481,403
Basic Tax Adj. for Deflation	11	1.43%	$ 479,808	$ 516,280	$ 514,147	$ 512,023	$ 509,907	$ 507,800	$ 505,702	$ 503,613	$ 501,532	$ 499,460	$ 489,226	$ 479,202
Total County Library Tax														
Fines, Forfeitures & Penalties	11	$ 0.14	$ 2,426	$ 2,593	$ 2,593	$ 2,593	$ 2,593	$ 2,593	$ 2,593	$ 2,593	$ 2,593	$ 2,593	$ 2,593	$ 2,593
Library Fines and Fees														
Revenue from Use of Money and Property	11	$ 0.01	$ 116	$ 124	$ 124	$ 124	$ 124	$ 124	$ 124	$ 124	$ 124	$ 124	$ 124	$ 124
Rents														
Total Financing Sources			$ 482,351	$ 518,998	$ 516,865	$ 514,740	$ 512,625	$ 510,518	$ 508,420	$ 506,330	$ 504,249	$ 502,177	$ 491,944	$ 481,920
Financing Requirements														
Library Services	11	$ 8.66	$ 146,850	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935
Total Financing Requirements			$ 146,850	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935	$ 156,935
Net Annual Surplus/ (Deficit)			$ 335,501	$ 362,063	$ 359,930	$ 357,805	$ 355,690	$ 353,583	$ 351,485	$ 349,395	$ 347,315	$ 345,242	$ 335,009	$ 324,985