

LETTER 1

wittwer / parkin

April 16, 2018

VIA EMAIL

Members of the City Council
City of Desert Hot Springs
65-950 Pierson Blvd
Desert Hot Springs, CA 92240
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Re: Desert Land Ventures Specific Plan EIR

Dear Members of the City Council of the City of Desert Hot Springs:

This law firm represents the Southwest Regional Council of Carpenters (Southwest Carpenters) and submits this letter on the above-referenced project on its behalf.

Southwest Carpenters represents 50,000 union carpenters in six states, including in Southern California, and has a strong interest in reducing the environmental impacts of development project such as the Desert Land Ventures Specific Plan EIR (Project). The City of Desert Hot Springs (City) released a Draft Environmental Impact Report (DEIR) for the Project on January 5, 2018, and provided notification that it issued its Final EIR (FEIR) on April 5, 2018.

The Project would comprise approximately 123.4 acres of mixed uses, including industrial warehouse, residential, agricultural, retail, restaurant, and hotel, as well as 38.7 acres of Open Space Conservation land. The Project will be centered upon cannabis production and sale and will attempt to attract I-10 traffic. In total, the Project Description states the Project will develop 1,987,799 square feet of mixed-use industrial and commercial space. The Project will require several approvals, including the following:

- Adoption of a General Plan Amendment
- Adoption of a Zoning Map Amendment
- Adoption of the Desert Land Ventures Specific Plan
- Approval of Vesting Tentative Tract Map

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- Approval of a Development Agreement
- Clean Water Act section 404 Permit

These comments are submitted in addition to Southwest Carpenters' comments on the DEIR, which are incorporated herein by reference. In these comments, we submit replies to the City's responses to comments.

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Aesthetics

In claiming the Project will have no aesthetic impacts, the City attempts to straddle two extremes. The City claims aesthetic impacts in relation to I-10 motorists will be less than significant because, I-10 "is not listed as a scenic highway," and that, "due to the fast moving vehicles on the freeway, future development of the site would not significantly impact the views of the mountains . . ." (FEIR, p. F.2-61). However, two pages later, the FEIR touts the siting of the Project to "take advantage of . . . direct visibility from and convenient access to I-10," and that the Project was so sited "to provide visible development near the freeway that would entice travelers along the freeway to visit the City." (FEIR, p. F.2-63).

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How can the Project be designed to have less than significant aesthetic impacts, while at the same time attempting to provide visible development near the freeway? Further, while the City has stated the Project will be subject to limitations on its lighting, the City has not stated whether any bulk, height, or lighting limitations will apply to Project signs. Absent enforceable limitations, there is nothing stopping the erection of tall, large, brightly lit signs, to make the Project more visible to I-10 traffic both during the day and at night. Although not mentioned in the City's discussion of the Project, the surrounding terrain is flat and punctuated in the distance by mountains, so any tall signs permitted by the City could be visible for miles, especially if these signs are lit at night. This has the potential to create significant aesthetic impacts, especially considering the currently undeveloped nature of the Project site. If large, well-lit signs are allowed, the City has a responsibility to disclose and address these aesthetic impacts.

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Air Quality

The City found the Project conflicts with the goals and policies of the regional Air Quality Management Plan (AQMP). However, the City found the Project did not conflict with Criterion 2 of the AQMP. (EIR p. 4.3-20).

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Criterion 2 asks "Whether the project will exceed the assumptions in the AQMP in 2016." The City responded the Project would not exceed these assumptions because the City's General Plan amendment will ensure Project "consistency with the land use designation in the City's General Plan." (EIR p. 4.3-20).

In its response to comments, the City argues, “If the General Plan Elements are consistent, then a project's consistency with the General Plan land use element would by default be consistent with the AQMP.” (FEIR, p. F.2-66). The City’s analysis of Criterion 2 is illogical and its conclusions regarding Project consistency with this criterion are not based on substantial evidence. This reasoning is circular, and akin to using a measuring stick to measure itself. According the City’s reasoning, no General Plan amendment could ever exceed the assumptions of the AQMP, because a General Plan amendment will always be consistent with itself.

The City’s reasoning is irreparably flawed. As the City recognizes elsewhere, “The assumptions of the AQMP *are based on the projected growth and development within the area.*” (FEIR, p. F.2-66). However, when the AQMP was drafted in 2015 and approved in 2016, the Project site was slated for much lower intensity use at full build-out of the City’s General Plan. The City has only proposed to intensify land use on the Project site in 2018, two years after SCAQMD’s adoption of the AQMP. The 2016 AQMP did not, and could not, account for this intensified land use.

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The primary purpose of an EIR is to provide accurate information to members of the public and decisionmakers. Pub. Resources Code § 21005; 14 Cal. Code Regs. § 15121(a). Contrary to the assertions of the City, the City’s General Plan amendment’s consistency with itself is irrelevant and unhelpful. Furthermore, the City has provided no evidence that would suggest that SCAQMD could have possibly been aware of, or accounted for, the increased intensity of land use proposed by the Project. The City’s flawed analysis fails to serve the informational purposes of CEQA.

Biological Resources

The EIR states the Project applicant must undergo later Joint Project Review to ensure MSHCP implementation. (DEIR, p. 4.4-44). After the Project applicant submits its application to relevant agencies, “impacts to covered species within the Conservation Area would be discussed.” (DEIR p. 4.4-44).

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In its response to comments, the City has confirmed concerns that the Project is illegally deferring mitigation, in violation of CEQA. In relation to the Joint Project Review, the City states that “the applicant will work with appropriate authorities during design so that the Project design specifics will be compatible with the intent of the CVMSHCP.” (FEIR F.2-71). The City believes deferral of mitigation is appropriate, because “the specific design elements (such as lighting, landscaping, drainage patterns) of the project have not been fully developed.” (FEIR F.2-71).

‘Deferral of the specifics of mitigation is permissible where the local entity commits itself to mitigation and lists the alternatives to be considered, analyzed and possibly incorporated in the mitigation plan. [Citation.] On the other hand, an agency goes too far when it simply requires a project applicant to obtain a biological report and then comply with any recommendations that may be made in the report.’ [Citations.] If mitigation is feasible but impractical at the time of a general plan or zoning amendment, it is sufficient to articulate specific performance criteria and make further approvals contingent on finding a way to meet them.”

Endangered Habitats League, Inc. v. County of Orange (2005) 131 Cal.App.4th 777, 793 (quoting *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1275-1276).

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In the EIR, the City has articulated no such performance criteria for any future mitigation that may (or may not) be required for the Project. Instead, all that the City requires is that the applicant discuss “any impacts to covered species within the Conservation Area.” The City cannot hide behind the uncertainty of lighting and drainage to avoid formulating mitigation measures or requiring standards with which future mitigation measures may be crafted. The DEIR contains several maps detailing the locations of the various land uses, as well as their sizes and intensities. Although there may be some details left to the imagination, the City has enough information now to understand the types of species impacts that will very likely occur due to the Project. It must formulate and require binding mitigation measures accordingly.

Greenhouse Gas Emissions

The City did not provide Section 4.7 in the copy of the DEIR circulated to the Public in January 2018. Although the City claims all information within this section was addressed elsewhere, this is untrue. For instance, all that was contained in the introduction to the EIR was a conclusory discussion of impacts and mitigation, which did not contain a full, reasoned analysis. The City must recirculate the DEIR and provide members of the public additional time to review and comment on the additional content contained in Section 4.7. In addition, it was impossible to know how the City would address the environmental baseline for greenhouse gases on the site, which appears to be one of the most deficient portions of the entire EIR.

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In these comments, we respond to the first time to the contents of the Greenhouse Gas section of the EIR. Of primary concern is the adequacy of the baseline. The environmental setting, or baseline, is “a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published.” 14 Cal. Code Regs. § 15125(a). Here, the City provided no such baseline. The City spends four pages discussing the

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science behind global warming, while providing no information of baseline conditions relevant to the Project. Specifically, the City provides no discussion of the current greenhouse gas emissions of the Project site, of the City, or of the region, with which commenters could review to understand the relative impacts of the Project on existing conditions.

Furthermore, as discussed previously, the City's determination that the Project is consistent with its Climate Action Plan is not supported by substantial evidence. In its response to comments, the City takes a "forest for the trees" approach, claiming that the Project's compliance with several Climate Action Plan guidelines ensures the Project's consistency with the Climate Action Plan.

The City claims the Project, which will generate nearly 30,000 MTCO₂e, is consistent with the Climate Action Plan so long as the Project checks various boxes in the Climate Action Plan. However, this analysis ignores the purpose of the Climate Action Plan and fails to address that approval of the Project almost single-handedly defeats the purpose of this plan.

According to the City, "[t]he purpose of the . . . Climate Action Plan is to reduce greenhouse gas emissions within the City to help contribute to global efforts to reduce the effects of climate change." (Climate Action Plan Negative Declaration, pp. 4, 11 ("the overarching goal of the CAP is to reduce GHG emissions pursuant to the directives in AB 32 and Executive Order S-3-05")). To this end, the City has proposed to reduce its greenhouse gas emissions by roughly 51,000 metric tons of CO₂-equivalent each year. (Climate Action Plan Negative Declaration, p. 26). Thus, the Project's proposed addition of approximately 30,000 tons of CO₂ emissions annually, effectively negates the majority of the City's planned reductions. The City's interpretation that Project can simultaneously be consistent with the Climate Action Plan while also defeating its entire purpose renders the Climate Action Plan, and the City's consistency determination, meaningless. 14 Cal. Code Regs. §15064 (h)(3) (emphasis added).

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Instead of maintaining a constant rate of GHG emissions reductions after 2020, as required by Executive Order No. S-3-05, the County admits that GHG emissions will instead increase after 2020. Thus, the County's own documents demonstrate that the CAP and Thresholds project will not meet the requirements of Assembly Bill No. 32 and Executive Order No. S-3-05 and thus will have significant impacts that had not previously been addressed in the general plan update PEIR.

Sierra Club v. County of San Diego (2014) 231 Cal.App.4th 1152, 1175.

In addition, the City provides an insufficient discussion of mitigation measures. For instance, the City states that the Project is consistent with the Climate Action Plan policies but

provides no evidence that the Project will comply with several of these measures. The City has yet to determine whether certain mitigation measures that are a part of the Climate Action Plan will apply to the Project, such as the energy efficiency and demand response program, the temperature club, and integrated lighting systems. The City simply states, without evidence, that the Project will comply with these mitigation measures *if* it is selected to participate in these mitigation measures. However, the City must disclose whether the Project will, or will not, be required to comply with these mitigation measures now, not at some later date; otherwise decisionmakers and members of the public have no ability to tell whether these mitigation measures will apply. Now is the time to disclose this, not after Project approval.

Other mitigation measures seem entirely unrelated to addressing the greenhouse gas impacts of the Project, such as the installation of low-flow faucets, toilets, and showers. Another mitigation measure involves the installation of sidewalks. The City provides no reasoning to suggest any of these mitigation measures will do anything to mitigate greenhouse gas impacts. Also, the City states that “No regulatory requirements [are] required.” Throughout the Greenhouse Gas Section, the City seems to indicate that various local and state laws will apply to the Project to reduce its greenhouse gas impact. Thus, Section 4.7 provides conflicting information.

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The City’s insistence that the Project is consistent with its Climate Action Plan is not supported by substantial evidence and fails to provide members of the public with accurate information. The City must provide additional analysis of baseline emissions, and assess whether the Project could, under any circumstances, be made to be consistent with the purpose of the City’s Climate Action Plan. See *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 217.

Hazards and Hazardous Materials

In its response to comments, the City insists that the Project is still too indefinite to provide binding mitigation. Thus, the City unacceptably defers the formulation of much of this mitigation to a later date.

CEQA advances a policy of requiring an agency to evaluate the environmental effects of a project at the *earliest possible stage in the planning process*. We conclude that, by failing to accurately describe the agency action and by deferring full environmental assessment of the consequences of such action, the County has failed to comply with CEQA’s policy and requirements.

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City of Redlands v. County of San Bernardino (2002) 96 Cal.App.4th 398, 410 (emphasis added). “By deferring environmental assessment to a future date, the conditions run counter to that policy of CEQA which requires environmental review at the earliest feasible stage in the planning process. [Citations].” *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 307. “A study conducted after approval of a project will inevitably have a diminished influence on decisionmaking. Even if the study is subject to administrative approval, it is analogous to the sort of *post hoc* rationalization of agency actions that has been repeatedly condemned in decisions construing CEQA. [Citations].” *Id.* at 307; *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 92.

Here, while the City states hazardous waste management may be required, the City defers the formulation of this waste management mitigation to a later date. This is true for any proposal to recycle onsite water, to dispose of toxic cannabis production byproducts, for the creation of a Storm Water Pollution Prevention Plan, the Hazardous Materials Business Emergency Plan, and the Spill Prevention Countermeasures Contingency Plan.

Specifically, the City touts the adoption of HAZ-1 and HAZ-2 mitigation measures, which provide no mitigation. Instead, these would-be mitigation measures require the Project applicant to, *inter alia*, “provide the City . . . with a detailed description of the project’s proposed treatment for wastewater . . .” (DEIR, p. 4.8-15). This permits the City to agree on these mitigation measures at a later date, effectively evading public review of these mitigation measures now. Furthermore, the City entirely ignores the potential impacts of other hazardous materials that may be handled on site, such as pesticides and flammable materials. The DEIR does not disclose or otherwise address the potential for these other hazardous substances to be handled on-site, and City’s mitigation measures do not attempt to address these concerns.

Although the minutiae of the Project have yet to be formulated, the City knows what uses are proposed for the Project, and which toxic materials the Project may produce, transport, and manage. The City must disclose these potential hazards and provide binding mitigation now, and not wait until after Project approval.

Hydrology and Water Quality

As referenced in our previous comments, the EIR does not provide an adequate discussion of cumulative impacts in relation to hydrology and water quality. In place of a discussion that would provide the scope and potential for cumulative impacts, the City summarily states, “the project would contribute to a cumulative increase in groundwater demand that could result in overdraft if no countermeasures are enforced.” (EIR p. 4.9-17). In its response to comments, the City shifts its reliance to the 2015 Urban Water Management Plan

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(UWMP) prepared by MSWD. (FEIR, p. F.2-78). Reliance on the MSWD is unfounded for two reasons: the Project is not within the MSWD service area, and, even if it were, the 2015 UWMP would not have included the City's proposed Specific Plan and General Plan Amendment.

First, the UWMP explicitly states it did not consider impacts from development outside of its service area: "MSWD has developed an individual UWMP (as opposed to a Regional UWMP) that reports solely on its service area." (MSWD UWMP, p. 2-1). In 2015, as well as today, the Project falls outside of MSWD's service area. Thus, the 2016 UWMP does not discuss the cumulative impacts of this and other projects permitted by the City.

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In addition, the 2015 UWMP envisioned build-out of its service area circa 2016. In 2016, as today, the Project site and areas surrounding it are zoned for very low density uscs. The UWMP could not have predicted this proposed General Plan Amendment, and the City provides no evidence that the UWMP did.

Furthermore, MSWD's proposed service to the Project site is of questionable legality. The City proposes allowing MSWD serving the Project site on one hand, while allowing CVWD to regulate the Project's use of well water. This proposed "shared jurisdiction" approach may not be permitted by state law or the LAFCo.

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Finally, the City still assumes, without evidence, that 30% of the water the Project uses for cannabis cultivation would be recycled as a "standard practice in medical marijuana cultivation." However, the City does not require water recycling as mitigation. Because this will not be required as mitigation, the City cannot rely on this water savings. In the City's response to concerns regarding its reliance on this 30% water savings, it states without evidence, "If a potential applicant proposes a cannabis cultivation development without inclusion of water recycling technology, the applicant will be required to prepare supplemental CEQA documentation." (FEIR, p. F.2-79). This statement is unfounded conjecture absent binding mitigation measures. The City cannot rely on these water savings as evidence of the Project's reduced impacts on water supply.

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Population and Housing

The City determined the Project will not contribute significantly to population and housing impacts. The City has an estimated population of 29,111. The Project, alone, is projected to increase this population by almost 7,000, which would account for a 25-percent increase from the City's baseline population. (EIR, p. 4.13-3). Yet, the City determined the Project would have a less than significant impact to population and housing prior to mitigation.

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It is difficult to imagine a scenario where a 25-percent increase in a City's population based on the creation of one project would *not* have a significant impact on population and housing. Regardless, the analysis in the EIR is fundamentally lacking because it fails to assess cumulative impacts from other present and reasonably foreseeable development projects in the City and nearby. The City has provided no evidence to suggest the Project, in conjunction with other permitted and future projects, would have no cumulatively significant impact on population and housing in the City. As the City is well aware, its permissive stance towards cannabis cultivation and its attempts to become a tourist destination have attracted cannabis-related businesses to the City in droves. The City's statement that there are no cumulative growth-inducing impacts from these other projects cannot be supported by substantial evidence, as all evidence suggests the opposite. (See, *e.g.*, EIR p. 4-3).

The City uses fuzzy math to attempt to downplay its conclusion that the Project would have no significant impact on population and housing. The City assumes that (1) 100% of the City's unemployed would be employed by the Project, thereby reducing the City's unemployment rate to zero, and (2) the City's vacancy rate of 19.3 percent, or approximately 2221 units, would be sufficient to accommodate the increased population. First, the City appears to have included its entire population, from infants to retirees, to calculate the number of unemployed individuals in the City. The City claims it has an unemployment rate of 6.7 percent, equating to 1,950 individuals. However, 6.7 percent of the City's *entire population* of 29,111 is 1,950. The City has not accurately disclosed the number of unemployed *employable* individuals that live within the City; this alone invalidates the City's conclusions regarding the Project's impacts on housing. Assuming 100 percent of the City's unemployed would go to work for the Project is extreme conjecture, which the City cannot support by substantial evidence.

The City dances between assumptions to arrive at its desired conclusion. The City cites a "worst-case" scenario of the Project adding almost 7,000 new residents to the City, but then chooses to ignore this calculation when doing so suits it. Instead of using one consistent approach to discussing impacts on population and housing, the City instead switches to a "best-case" scenario, wherein 100% of the Project's jobs will go to the locally unemployed, and 100% of new residents will choose to occupy one of the City's vacant dwelling units. Thus, the City attempts to mask the true impacts of the Project.

According to labor statistics compiled by the California Employment Development Department, the unemployment rate in Desert Hot Springs as of February 2018 was 5.6%, amounting to 600 individuals. (Attachment 1). By comparison, the unemployment rate in Riverside County averages 4.6%, with the lowest unemployment rate at 2.8%. Thus, all evidence suggests that, at best, the City can expect to fill 100 to 300 of the Project's forecasted

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2,212 jobs with City residents. The City's reliance on unsupported assumptions that find it can, and will, absorb all employment demand generated by the Project are erroneous.

Possibly as a result of the City's efforts to mask the impacts of the Project on population and housing, it fails to address the cumulative impacts of the Project in relation to past, present, and foreseeable future development. The City failed to adequately respond to these concerns in its response to comments, instead choosing to insist the Project would have no impact to population and housing because the Project would not construct this housing, itself. This reasoning ignores one of the basic tenets of CEQA:

Effects include: (1) Direct or primary effects which are caused by the project and occur at the same time and place. (2) ***Indirect or secondary effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate,*** and related effects on air and water and other natural systems, including ecosystems.

14 Cal. Code Regs. § 15358(a). The City has insisted on taking an overly narrow approach regarding the impacts analysis required by CEQA, only focusing on the direct impacts of the Project.

The City's response to concerns raised in the DEIR comment period is surprising: "growth-inducing aspects of the DLVSP project are considered by the City to be a beneficial/positive impact and would result in the creation of new residential development opportunities." (FEIR F.2-80). In disclosing the environmental impacts of the Project, CEQA does not ask the City to weigh the economic and social benefits or impacts of a Project—these are irrelevant to the City's duty to disclose *environmental* impacts. A great many projects are approved in California that create an economic boon but cause severe environmental impacts. The creation of new residential units is an indirect and cumulative impact of the Project that the City ignores.

In its EIR, the City is required to disclose the direct, indirect, and cumulative impacts of the Project on population and housing, and it failed to do so. This violates CEQA. 14 Cal. Code Regs. § 15358(a). Even worse, this faulty reasoning infects the entirety of the City's analysis of the Project's impacts on utilities and public services.

Utilities and Public Services

Finally, the City states impacts to utilities and public services will be less than significant prior to mitigation. In the Public Services section, the City states the Project would not impact public services because it “would not substantially impact population growth in the City because there is no residential development proposed within the DLVSP.” (DEIR pp. 4.14-7—4.14-8). As stated above, this logic is fatally flawed and cannot be used to support a conclusion that the Project will have reduced impacts on utilities and public services.

The Project is noteworthy for its relative distance from public services. Police and fire stations are miles away from the Project, yet the Project would add an approximate 2,212 workers on-site, not counting any cannabis tourism. The staffing of the Project, alone, would represent over seven percent of the entire population of the City today. Because the Project will provide a hub for marijuana purchase and consumption, the Project has the potential to require higher than normal public service use.

Furthermore, the City’s reasoning does not coincide with the City’s own threshold of significance:

Development of the DLVSP would have a significant effect to public services if it is determined that the project would:

- a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or create a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response time or other performance objectives for fire protection, police protection, schools, parks, and other public facilities.

The City admits the Project will require the expansion and construction of additional public facilities, but otherwise entirely ignores this threshold of significance. Instead, the City focuses on the sufficiency of response times from various public services. While response times are also important, the City provides no evidence to suggest the construction of new public facilities will have a less than significant impact on the environment.

As to the effect of the Project on public services, the City erroneously reasons, “the proposed project would not substantially impact population growth in the City because there is no residential development proposed within the DLVSP.” (DEIR, p. 4.14-7—4.14-8). Again,

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CEQA requires that the City consider direct, indirect, and cumulative impacts, which the City seems to ignore.

The City's analysis regarding increased police staffing seems incorrect. The City states that "the desirable ratio of officers to population would be 1.06 officers per 1,000 persons." (DEIR, p. 4.14-2). However, the City determined the Project, which would add nearly 7,000 new residents to the City, would only require the addition of one new police officer, instead of over 7, as the City's standards suggest. The addition of seven or more new officers, to a current staff of 41, represents a substantial increase in staffing. Nonetheless, the City fails to address to what size and extent new facilities would be needed.

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Finally, in the EIR, the City concludes that impacts to public services would be less than significant "with implementation of Mitigation Measures PS-1 through PS-8." (DEIR, p. 4.14-8). However, the City does not disclose the contents of these mitigation measures in the EIR. Thus, the City appears to have relied upon mitigation measures it was required to disclose in its EIR, but it failed to do so. This invalidates the EIR.

Conclusion

Southwest Carpenters thanks the City for the opportunity to comment on its FEIR and look forward to commenting on the City's subsequent environmental review documents when these documents are released for public review. Please continue to send all future notices relating to this Project to Nicholas Whipps at nwhipps@wittwerparkin.com. Thank you for your consideration of these comments.

Very truly yours,
WITTWER PARKIN LLP



Nicholas Whipps

Attachment: February 2018 Labor Force and Unemployment Rate of Riverside County

State of California
 March 23, 2018
 March 2017 Benchmark

Employment Development Department
 Labor Market Information Division
<http://www.labormarketinfo.edd.ca.gov>
 (916) 262-2162

**Monthly Labor Force Data for Cities and Census Designated Places (CDP)
 February 2018 - Preliminary
 Data Not Seasonally Adjusted**

Area Name	Labor Force	Employment	Unemployment Number	Unemployment Rate	Census Ratios Emp	Census Ratios Unemp
Riverside County	1,087,800	1,038,300	49,500	4.6%	1.000000	1.000000
Banning city	11,300	10,700	700	5.8%	N/A	N/A
Beaumont city	21,400	20,700	800	3.7%	N/A	N/A
Bermuda Dunes CDP	26,030	25,150	890	3.4%	0.003776	0.003175
Blythe city	6,100	5,800	300	5.3%	0.005602	0.006549
Cabazon CDP	1,300	1,200	200	11.8%	0.001111	0.003117
Calimesa city	3,200	3,000	200	5.5%	0.002888	0.003496
Canyon Lake city	5,600	5,400	200	2.9%	0.005222	0.003266
Cathedral City city	26,000	25,200	900	3.4%	N/A	N/A
Cherry Valley CDP	3,200	3,100	100	3.6%	0.002943	0.002282
Coachella city	19,700	17,900	1,800	9.4%	N/A	N/A
Corona city	84,600	81,700	3,000	3.5%	N/A	N/A
Desert Hot Springs city	11,600	10,900	600	5.6%	N/A	N/A
East Hemet CDP	7,800	7,400	500	6.2%	0.007091	0.009780
Eastvale City city	31,300	30,200	1,100	3.4%	N/A	N/A
El Cerrito CDP	2,700	2,600	100	2.8%	0.002491	0.001505
Hemet city	29,800	27,900	1,900	6.4%	N/A	N/A
Highgrove CDP	2,100	1,900	100	7.2%	0.001852	0.003009
Home Gardens CDP	5,200	5,000	200	3.6%	0.004822	0.003729
Homeland CDP	2,700	2,500	100	5.1%	0.002423	0.002745
Idyllwild Pine Cove CDP	1,400	1,300	0	3.3%	0.001269	0.000918
Indian Wells city	1,700	1,700	100	3.5%	0.001607	0.001205
Indio city	40,000	38,100	1,900	4.8%	N/A	N/A
Jurupa Valley city	47,500	45,400	2,000	4.3%	N/A	N/A
La Quinta city	19,000	18,300	700	3.9%	N/A	N/A
Lake Elsinore city	29,400	28,100	1,300	4.5%	N/A	N/A
Lakeland Village CDP	5,300	4,900	400	7.7%	0.004741	0.008292
Lakeview CDP	1,000	1,000	0	4.8%	0.000923	0.000976
March AFB CDP	400	300	0	6.6%	0.000315	0.000455
Mecca CDP	3,700	3,500	200	5.3%	0.003359	0.003952
Menifee city	38,400	36,600	1,800	4.6%	N/A	N/A
Moreno Valley city	95,000	90,400	4,600	4.8%	N/A	N/A
Murrieta city	55,200	53,100	2,100	3.8%	N/A	N/A
Norco city	11,800	11,400	400	3.6%	N/A	N/A
Nuevo CDP	3,400	3,200	200	4.8%	0.003090	0.003249
Palm Desert city	24,500	23,600	1,000	3.9%	N/A	N/A
Palm Springs city	22,900	22,000	800	3.7%	N/A	N/A
Perris city	30,300	28,800	1,500	5.0%	N/A	N/A
Rancho Mirage city	6,100	5,900	200	2.8%	0.005672	0.003457

Data Not Seasonally Adjusted

Area Name	Labor Force	Employment	Unemployment		Census Ratios	
			Number	Rate	Emp	Unemp
Riverside city	154,600	148,000	6,500	4.2%	N/A	N/A
Romoland CDP	700	700	0	4.9%	0.000655	0.000711
San Jacinto city	18,700	17,600	1,100	5.7%	N/A	N/A
Temecula city	55,400	53,300	2,100	3.8%	N/A	N/A
Thousand Palms CDP	3,200	3,100	100	3.4%	0.002968	0.002232
Valle Vista CDP	6,300	6,000	400	5.7%	0.005767	0.007275
Wildomar CDP	17,300	16,600	700	4.1%	N/A	N/A
Winchester CDP	1,100	1,000	100	7.9%	0.000949	0.001720
Woodcrest CDP	8,400	8,000	400	4.8%	0.007728	0.008168

CDP is "Census Designated Place" - a recognized community that was unincorporated at the time of the 2011-2015 5-Year American Community Survey (ACS).

Notes:

- 1) Data may not add due to rounding. All unemployment rates shown are calculated on unrounded data.
- 2) These data are not seasonally adjusted.
- 3) N/A = Estimate created by Bureau of Labor Statistics

Methodology:

Monthly city labor force data are derived by multiplying current estimates of county employment and unemployment by the relative employment and unemployment shares (ratios) of each city at the time of the 2009-2013 American Community Survey. Ratios for cities were developed from special tabulations based on ACS employment, unemployment, and population and Census population from the Bureau of Labor Statistics. For smaller cities and CDPs, ratios were calculated from published census data.

Monthly CDP's labor force data are derived by multiplying current estimates of county employment and unemployment by the relative employment and unemployment shares (ratios) of each CDP at the time of the 2011-2015 ACS survey. Ratios for CDPs' were developed from special tabulations based on ACS employment and unemployment from the Bureau of Labor Statistics.

This method assumes that the rates of change in employment and unemployment since the 2009-2013/2011-2015 American Community Survey are exactly the same in each city and CDP as at county level (i.e., that the shares are still accurate). If this assumption is not true for a specific city or CDP, then the estimates for that area may not represent the current economic conditions. Since this assumption is untested, caution should be employed when using these data.