



**Final Mitigated Negative Declaration for  
the Imperial Avenue Extension Project  
El Centro, California**

*Prepared for*  
City of El Centro  
Community Development Department  
1275 Main Street  
El Centro, CA 92243

*Prepared by*  
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RECON Number 7972  
October 2018

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- G: Preliminary Drainage Analysis Report
- H: Noise Study Report
- I: Transportation Analysis

# Acronyms

AADT	annual average daily traffic
AB	Assembly Bill
ADT	average daily traffic
APE	Area of Potential Effect
BSA	Biological Study Area
Cal-IPC	California Invasive Plant Council
Caltrans	California Department of Transportation
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of El Centro
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> E	carbon dioxide equivalent
CUP	Conditional Use Permit
dB	decibel
dB(A)	A-weighted decibel
EO	Executive Order
ESA	Environmental Site Assessment
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program
FTIP	Federal Transportation Improvement Program
General Plan	City of El Centro General Plan
GHG	greenhouse gas
I-8	Interstate 8
ICAPCD	Imperial County Air Pollution Control District
IID	Imperial Irrigation District
L <sub>eq</sub>	equivalent noise level
LOS	level of service
MND	Mitigated Negative Declaration
MT	metric-ton
NAF	Naval Air Facility
PIA	Project Impact Area
PM <sub>10</sub>	particulates 10 microns or less in diameter
PM <sub>2.5</sub>	particulates 2.5 microns or less in diameter
ROW	Right-of-Way
RPS	Renewables Portfolio Standard
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SIP	State Implementation Plan
SR 86	State Route 86
v/c	volume to capacity

## **1.0 Introduction**

### **1.1 Project Needs and Objectives**

The purpose of the Imperial Avenue Extension Project (project) is to accommodate existing and planned growth and traffic circulation system improvements within the city of El Centro and local unincorporated Imperial County area south of the Interstate 8 (I-8)/Imperial Avenue interchange. The project would also have beneficial results by resolving existing traffic network deficiencies within the city and reducing congestion on 4th Street (State Route 86 [SR 86]), which is one of the most heavily traveled transportation corridors in the city. Imperial Avenue is a major north-south route through the city, with a southern terminus at the intersection with I-8.

Motorists heading south and east from Imperial Avenue must travel along I-8 and exit one mile away at 4th Street (SR 86), which exacerbates the existing congested traffic condition at the 4th Street (SR 86)/I-8 interchange. Motorists heading west from Imperial Avenue must travel along I-8 and exit three miles away at Forrester Road.

### **1.2 Project Location and Setting**

The City of El Centro (City) proposes to extend Imperial Avenue from I-8 to McCabe Road, within the southern portion of the city of El Centro in Imperial County, California (Figures 1 and 2). The alignment of the proposed roadway extension follows the same linear pathway as the existing portion of Imperial Avenue north of I-8. The project site and surrounding land uses primarily consist of a mix of urban development within the City and agricultural fields within unincorporated Imperial County. The project site is relatively flat and consists primarily of a narrow north-south corridor of vacant land with sparse vegetation. A small portion of land within the southernmost segment of this corridor along the eastern project boundary is currently in agricultural production. The project site also includes a paved segment of Wake Avenue and vacant land with sparse vegetation that would be developed for extensions of Wake Avenue and Danenberg Drive.

The project site is primarily surrounded by existing residential development, active farmland, and agricultural drains. Existing residential development is located northwest of the future intersection of Imperial Avenue and Wake Avenue. All other land west of the project site, south of the future intersection of Imperial Avenue and Wake Avenue to the southern terminus, consists of active farmland. The Date Drain, which consists of an earthen agricultural drain, runs parallel along the entire western edge of the proposed Imperial Avenue extension. Existing residential development is located east of the project site from the northern terminus to Danenberg Drive. A water treatment plant is located east of the project south of the future intersection with Danenberg Drive, followed by additional existing residential development along the eastern project boundary south to Valleyview Avenue. Land east of the project site from Valleyview Avenue to the southern terminus consists of active farmland. The Dahlia Lateral, which consists of a concrete lined agricultural drain, runs

parallel along the eastern edge of the proposed Imperial Avenue extension from Danenberg Drive to McCabe Road. Land north of the project site consists of an elevated roadway berm supporting I-8, while land to the south consists of active farmland.

### **1.3 Project Description**

The City proposes to extend Imperial Avenue from I-8 to McCabe Road. The proposed 1.36-mile roadway extension would function as a 4-lane divided arterial (with left turn lane) from I-8 to Wake Avenue, a 2-lane arterial (with left turn lane) from Wake Avenue to Valleyview Avenue and a 2-lane arterial (without left turn lane) from Valleyview Avenue to McCabe Road. The project would introduce a median varying in width from 12 to 14 feet between I-8 and Danenberg Drive, and then consistently 12 feet in width from Danenberg Drive to McCabe Road. The project would construct a 5.5-foot sidewalk along the entire length of the eastern project boundary and would introduce native backing on both sides of the proposed roadway. It is anticipated the project would be phased, and preliminary phasing consists of the following:

- Phase I: I-8 off-ramp to Wake Avenue intersection
- Phase II: Wake Avenue to Danenberg Drive intersection
- Phase III: Danenberg Drive to Valleyview Avenue intersection
- Phase IV: Valleyview Avenue to McCabe Road intersection

The alignment of the proposed roadway extension follows the same linear pathway as the existing portion of Imperial Avenue north of I-8. The project would also construct a 2-lane collector segment to connect the separated segments of Wake Avenue located west and east of the Imperial Avenue alignment, and would also construct intersections with traffic lights. The project would underground an approximately 100-foot segment of the Date Drain south of the future intersection of Imperial Avenue and Wake Avenue. The project would also underground the Dahlia Canal Lateral 1 that runs parallel along the entire eastern edge of the project site. Both undergrounded canals would continue to convey water beneath the project improvements.

### **1.4 Land Use and Zoning**

Existing land use designations of the project site and surrounding properties are shown in Figure 3, and existing zoning designations of the project site and surrounding properties are shown in Figure 4. Parcels south of the future intersection of Imperial Avenue and Wake Avenue are within the City's sphere of influence, which consists of areas that are currently under the jurisdiction of Imperial County but are anticipated to be incorporated into the City at some time in the future. Consequently, these parcels have City of El Centro General Plan (General Plan) land use designations for residential uses (Figure 3), but County of Imperial zoning designations for agricultural uses (Figure 4). It is anticipated that the zoning designations of these properties would be changed to City residential uses at the time of incorporation.

The project site would be created through partial Right-of-Way (ROW) and Easement acquisitions of portions of properties located within the proposed project boundary. The locations of these partial ROW and Easement acquisitions are shown in Figure 5a and 5b.

## 1.5 Authority to Prepare a Mitigated Negative Declaration

As provided in California Environmental Quality Act (CEQA) Section 21064.5, a Mitigated Negative Declaration (MND) may be prepared for a project “when the Initial Study has identified potentially significant effects on the environment, but revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed Negative Declaration and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.”

The City is the Lead Agency under CEQA. Based on the findings of the Initial Study/Environmental Checklist for this project, the City has determined that preparation of a MND is the appropriate method by which to obtain compliance with CEQA. The Initial Study/Environmental Checklist is included as Section 4.0 of this report.

## 1.6 Results of Public Review

- ( ) No comments were received during the public input period.
- ( ) Comments were received during the public input period, but they do not address the Draft Mitigated Negative Declaration findings or the accuracy or completeness of the Initial Study. No response is necessary. The letters are attached.
- (X) Comments addressing the findings of the Draft Mitigated Negative Declaration and/or accuracy or completeness of the Initial Study were received during the public input period. The letters and responses are presented at the beginning of this Final MND (see Final MND Section 1.7 below).

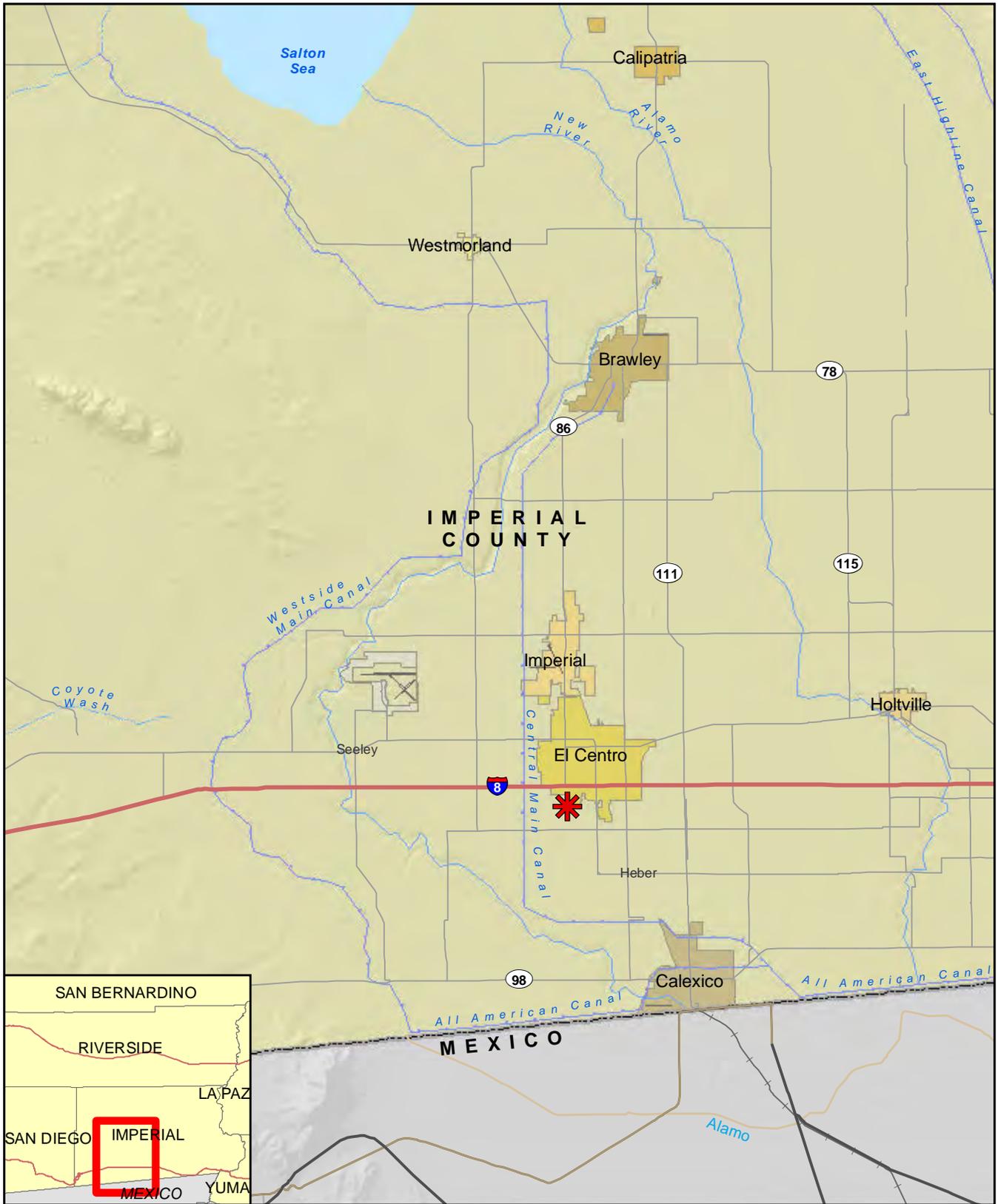
Copies of the Mitigated Negative Declaration and any Initial Study support material are available for review at the City of El Centro, 1275 Main Street, El Centro, California 92243.

  
Signature

October 4, 2018  
Date

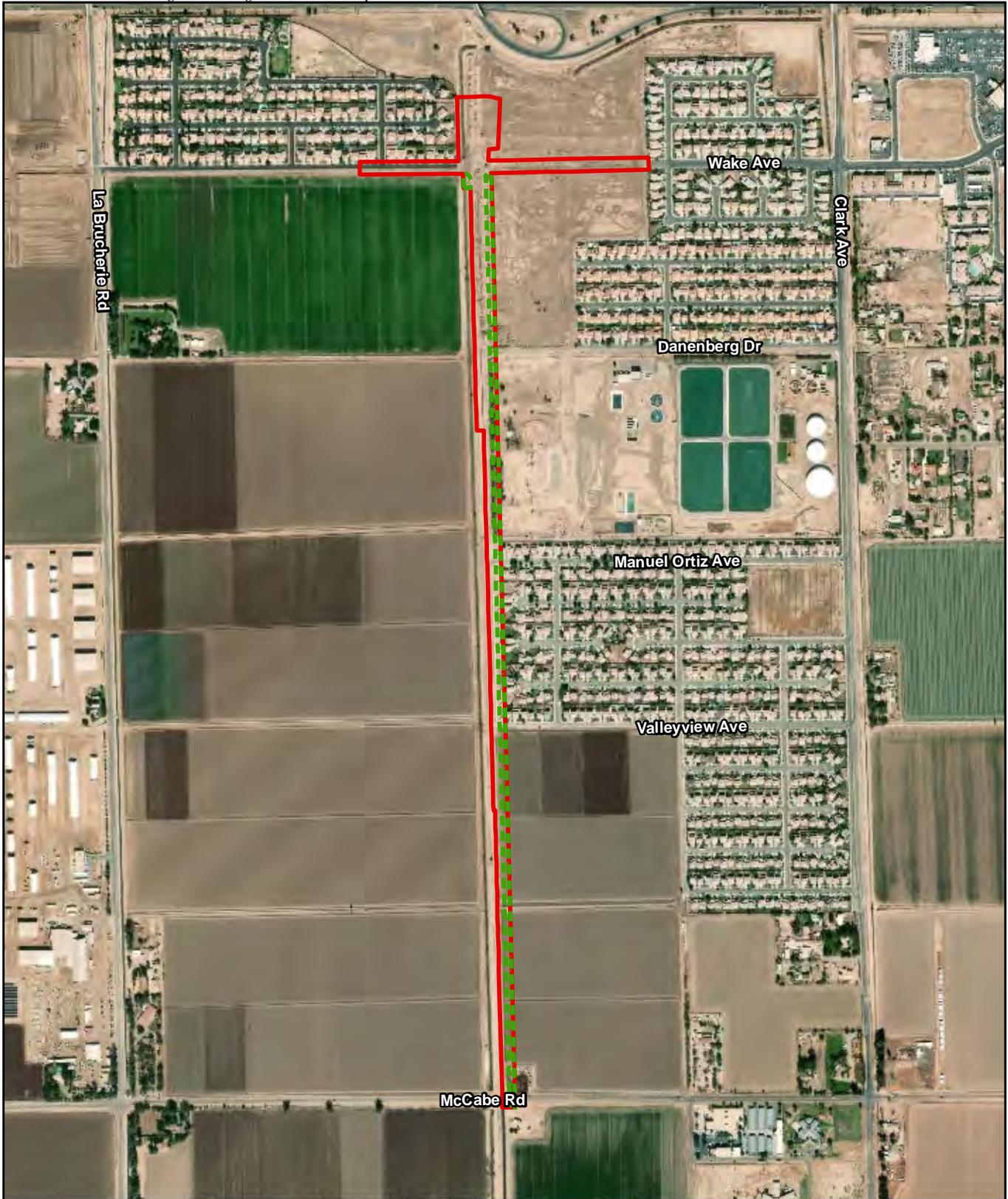
Norma Villicaña, AICP, Community Development Director  
City of El Centro

October 4, 2018  
Date of Final MND



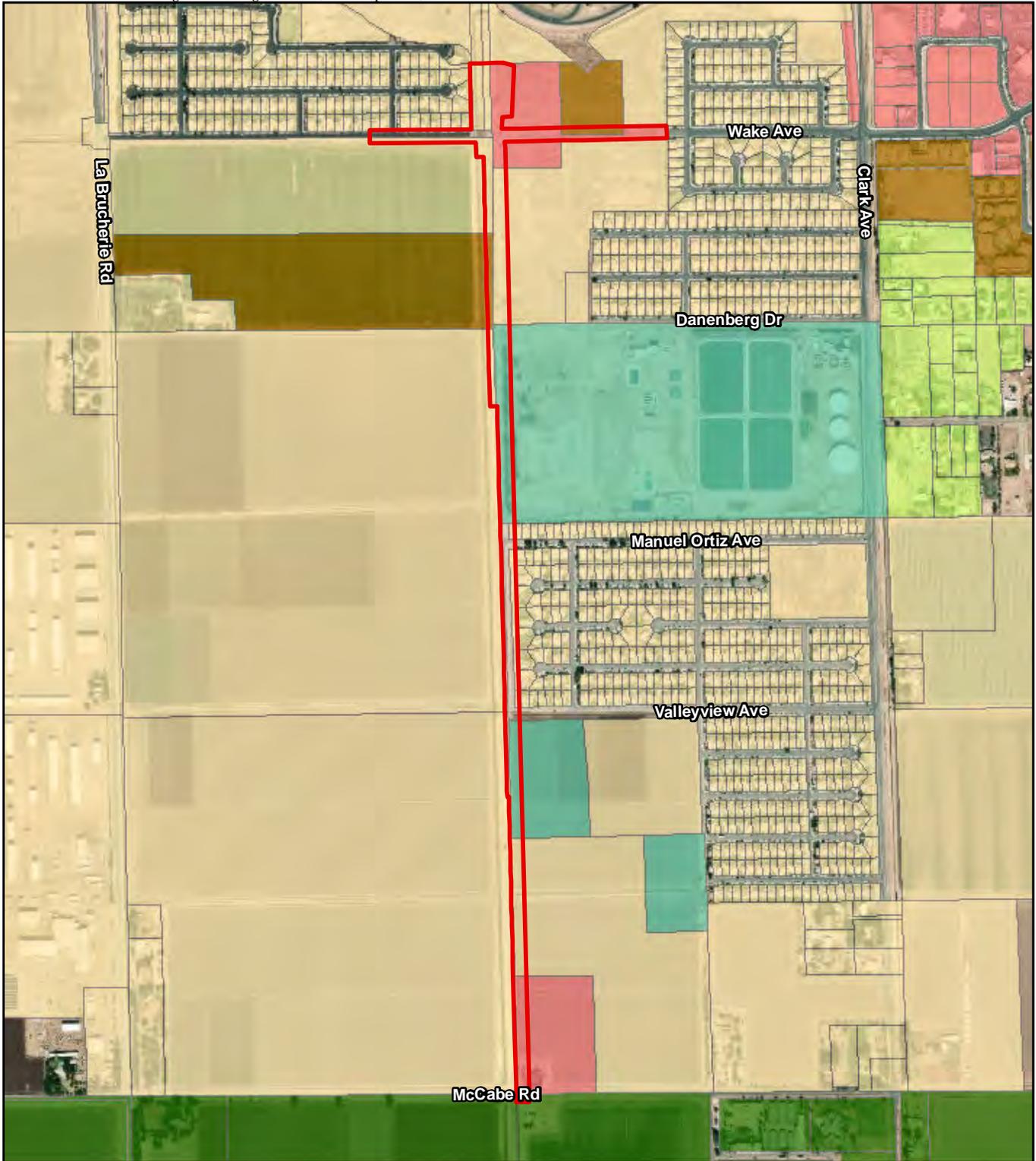
 Project Location

**FIGURE 1**  
Regional Location



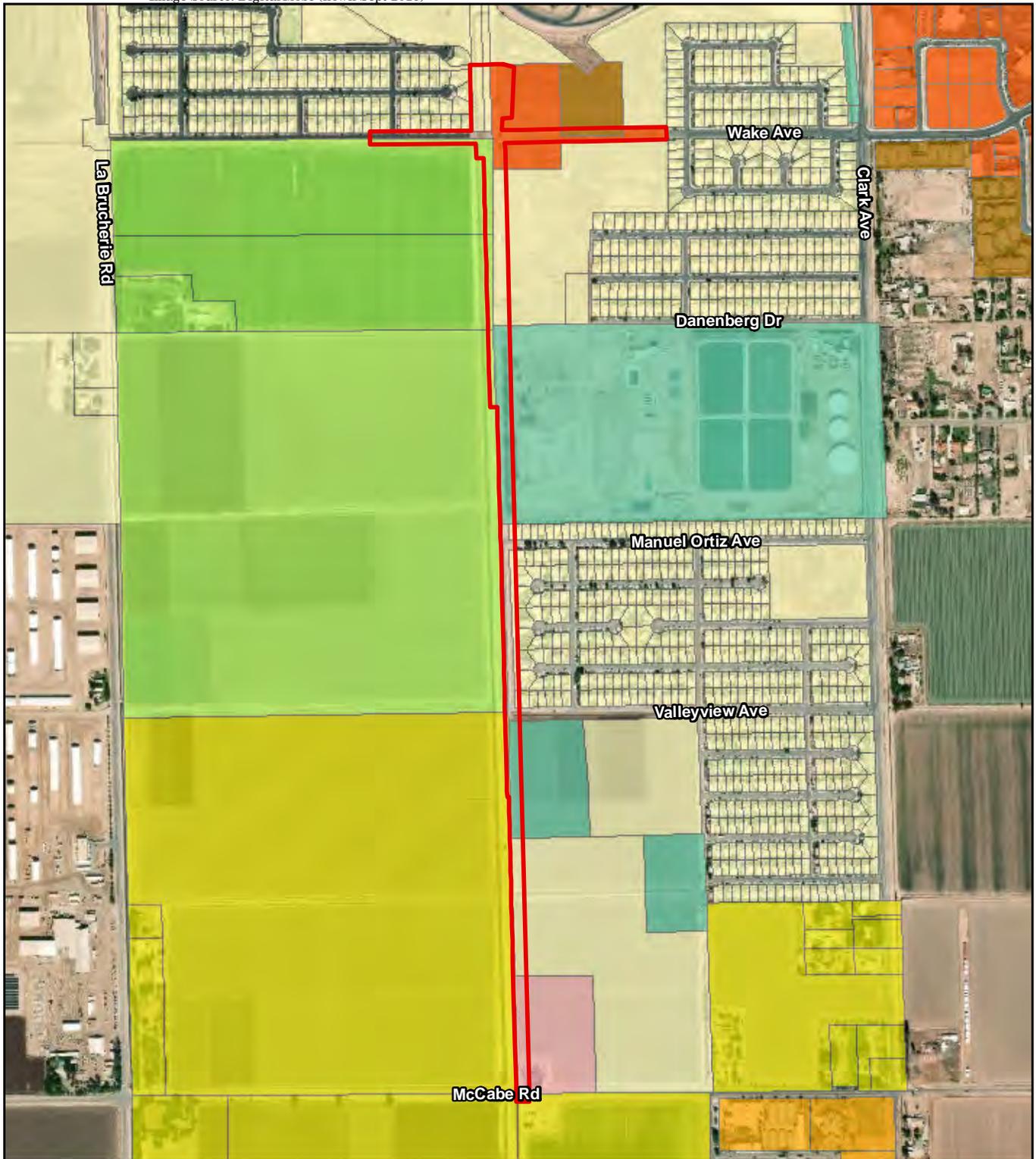
-  Project Boundary
-  Public Utility Easement

FIGURE 2  
Project Location on Aerial Photograph



- |   |   |
|---|---|
|  Project Boundary        |  High-Medium Density Residential |
| <b>El Centro Land Use</b>   |  General Commercial              |
|  Rural Residential       |  Public                          |
|  Low Density Residential |  Agriculture (Imperial County)   |

**FIGURE 3**  
City of El Centro Existing  
Land Use Designations



 Project Boundary

**El Centro Zoning**

 General Commercial

 Limited Use

 Multiple Family Residential

 Neighborhood Commercial

 Single Family Residential

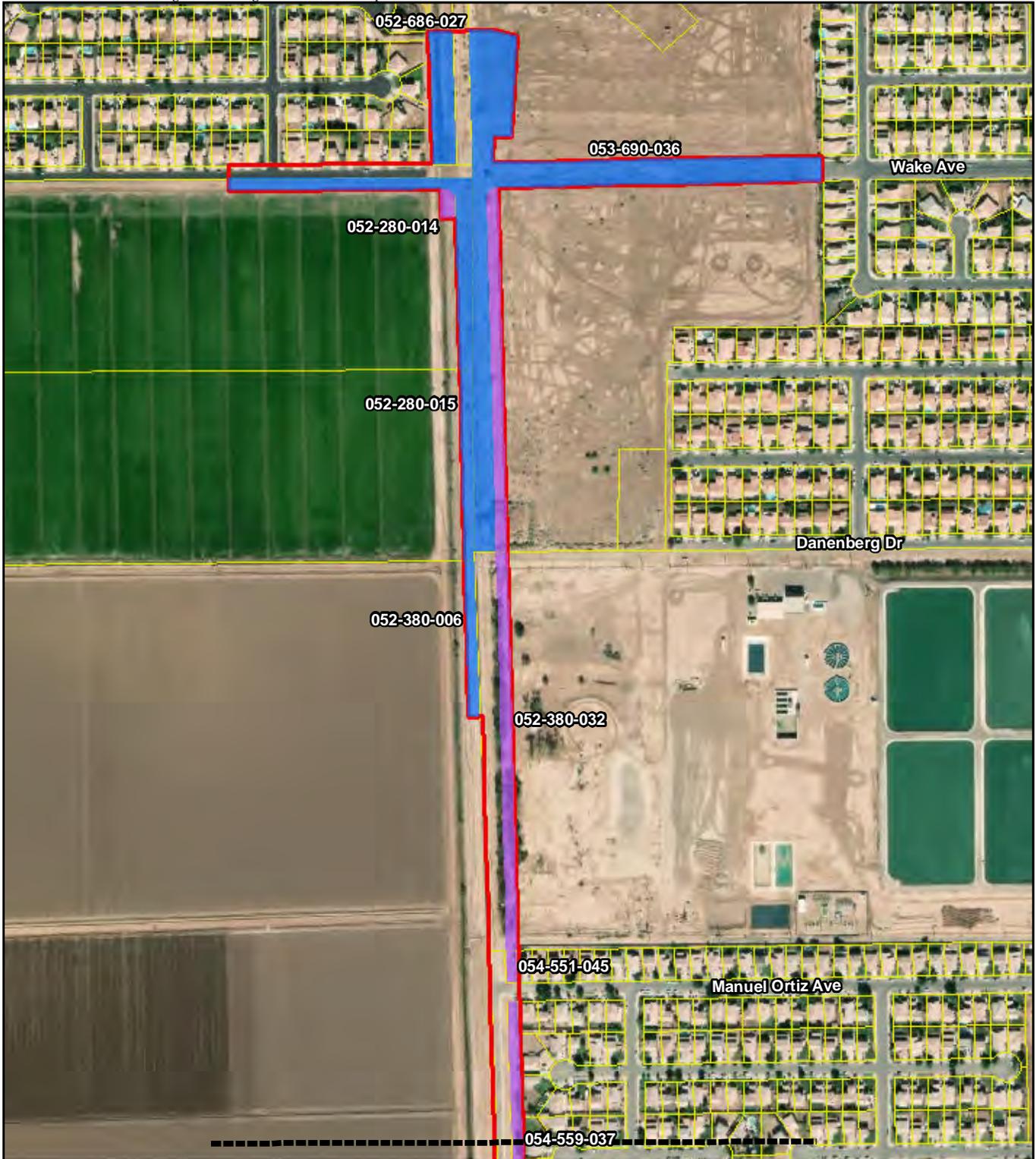
 General Agriculture (Imp. Co.)

 General Agriculture/Urban (Imp. Co.)

 Government/Special (Imp. Co.)



FIGURE 4  
Existing Zoning Designations



- Project Boundary
- ROW Aquisition
- Easement Aquisition
- Parcel Boundaries
- Matchline



FIGURE 5a

ROW and Easement Acquisitions - North



-  Project Boundary
-  ROW Aquisition
-  Easement Aquisition
-  Parcel Boundaries
-  Matchline



FIGURE 5b

ROW and Easement Acquisitions - South

## 1.7 Response to Public Review Comments

The Draft IS/MND was circulated for a 30-day public review comment period, beginning August 23, 2018 and ending September 21, 2018. During that period, the Governor's Office of Planning and Research State Clearinghouse distributed the Draft IS/MND to selected state agencies for review. After the public review period had closed, the State Clearinghouse submitted a letter to the City documenting that none of the state agencies that received the Draft IS/MND provided any comments on the document.

A copy of each comment letter that was received during the 30-day public review comment period, along with corresponding staff responses, is included here. Some of the comments did not address the adequacy of the environmental document; however, staff has attempted to provide appropriate responses to all comments as a courtesy to the commenter. The comments received did not affect the conclusions of the document, and no changes to the text of the Draft IS/MND were required.

Letter	Author	Page Number
A	Governor's Office of Planning and Research	11
B	Imperial Irrigation District	13
C	Imperial County Air Pollution Control District	26

Letter A



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



KEN ALEX  
DIRECTOR

September 24, 2018

Angel Hernandez  
City of El Centro  
1275 Main Street  
El Centro, CA 92243

Subject: Imperial Avenue Extension  
SCH#: 2018081067

Dear Angel Hernandez:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on September 21, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

A-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

RECEIVED  
City of El Centro

SEP 26 2018

Community Development  
Department

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
1-916-322-2318 FAX 1-916-558-3184 www.opr.ca.gov

A-1

This letter acknowledges that the City has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to the CEQA, and that no state agencies provided comments on the Draft IS/MND.

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2018081067  
**Project Title** Imperial Avenue Extension  
**Lead Agency** El Centro, City of

**Type** MND Mitigated Negative Declaration

**Description** The city proposes to extend Imperial Ave from I-8 to McCabe Rd. The proposed 1.36-mi roadway extension would function as a 4-lane divided arterial (with left turn lane) from I-8 to Wake Ave, a 2-lane arterial (with left turn lane) from Wake Ave to Valleyview Ave and a 2-lane arterial (without left turn lane) from Valleyview Ave to McCabe Rd. The project would introduce a median varying in width from 12-14 ft between I-8 and Danenberg Dr, and then consistently 12 ft in width from Danenberg Dr to McCabe Rd. The project would construct a 5.5 ft sidewalk along the entire length of the eastern project boundary and would introduce native backing on both sides of the proposed roadway.

**Lead Agency Contact**

**Name** Angel Hernandez  
**Agency** City of El Centro  
**Phone** (760) 337-3864 **Fax**  
**email**  
**Address** 1275 Main Street  
**City** El Centro **State** CA **Zip** 92243

**Project Location**

**County** Imperial  
**City** El Centro  
**Region**  
**Lat / Long** 32° 45' 51" N / 115° 34' 10" W  
**Cross Streets** Extension of Imperial Ave from I-8 to McCabe Rd  
**Parcel No.**  
**Township** 16S **Range** 14E **Section** 7,18 **Base** SB

**Proximity to:**

**Highways** I-8, SR 86, S80  
**Airports**  
**Railways** UPRR, San Diego/Arizona Eastern  
**Waterways**  
**Schools** Imperial Office of Education, Southwest and Central Union HS, Sa  
**Land Use** The project site would be created through partial ROW and Easement acquisitions of portions of properties.

**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 6; Cal Fire; Department of Parks and Recreation; California Highway Patrol; Caltrans, District 11; Regional Water Quality Control Board, Region 7; Air Resources Board, Transportation Projects; Native American Heritage Commission; Public Utilities Commission

**Date Received** 08/23/2018 **Start of Review** 08/23/2018 **End of Review** 09/21/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.



Letter B

www.iid.com

Since 1911

September 19, 2018

Ms. Norma M. Villicana, AICP  
 Director  
 Community Development Department  
 City of El Centro  
 1275 W. Main Street  
 El Centro, CA 92243

SUBJECT: MND for the Imperial Avenue Extension Project in El Centro, CA

Dear Ms. Villicana:

On August 28, 2018, the Imperial Irrigation District received from the City of El Centro Community Development Department, a request for comments on the Mitigated Negative Declaration for the Imperial Avenue Extension Project. The City proposes to extend Imperial Avenue from I-8 to McCabe Road. The proposed 1.36-mile roadway extension would function as a 4-lane divided arterial (with left turn lane) from I-8 to Wake Ave., a 2-lane arterial (with left turn lane) from Wake Ave. to Valleyview Ave. and a 2-lane arterial (without left turn lane) from Valleyview Ave. to McCabe Rd. The project would establish a median varying in width from 12 to 14 feet between I-8 and Danenberg Drive, and then consistently 12 ft. in width from Danenberg Dr. to McCabe Rd. The project would also include the construction of a 5.5-ft. sidewalk along the entire length of the eastern project boundary and introduce native backing on both sides of the proposed roadway. The project would be phased as follows: Phase I: I-8 off-ramp to Wake Ave. intersection; Phase II: Wake Ave. to Danenberg Dr. intersection; Phase III: Danenberg Dr. to Valleyview Ave. intersection and Phase IV: Valleyview Ave. to McCabe Rd. intersection.

The IID has reviewed the project's Draft MND and in addition to the district's June 8, 2016 letter (attached) has the following comments:

B-1

B-2

B-3

1. The proposed extension of Imperial Avenue would follow the Caltrans Imperial Avenue Bridge Improvement project south of Caltrans south right of way from Interstate 8 to McCabe Rd. Currently the IID Energy Dept. is working with Caltrans on a planned electrical conduit system designed within the proposed new bridge structure. This proposed distribution rated conduit system with future primary-rated cables would continue south into the City of El Centro's Imperial Ave. extension street right of way or city-owned easement and extend south to Wake Ave.
2. IID's "LU" 92kV transmission line (approx. 1400 feet) along with three distribution-rated overhead circuits (L-151, L-155 & L-156) out of the Clark Substation, would be affected by the city's improvements for the future extension of Imperial Avenue. Consequently, IID will require the City of El Centro to provide their latest set of the project's improvement plans to review and comments. These should be in PDF and AutoCAD format and include plan and profile drawings indicating existing and proposed rights of way.

IMPERIAL IRRIGATION DISTRICT • P.O. BOX 937 • IMPERIAL, CA 92251

B-1 This is an introductory comment. No response is required.

B-2 This comment states that the Imperial Irrigation District (IID) Energy Department is working with the California Department of Transportation (Caltrans) on a planned electrical conduit system that would traverse the project ROW or City-owned easement and would extend south to Wake Avenue. Please see response to comment B-7 below regarding the relocation of IID utilities.

B-3 This comment states that the project would affect IID's "LU" 92-kilovolt transmission line and three distribution-rated overhead circuits out of the Clark Substation. Please see response to comment B-7 below regarding the relocation of IID utilities. Per this comment, the City will provide the latest set of the project's improvement plans to IID in PDF and AutoCad format for review.

Norma Villicana  
September 19, 2018  
Page 2

- B-4 3. The IID electrical facilities impacted/affected by project will result in:
- 3.1 The removal and/or relocation of the existing 7.2/12.47 kV L-151 distribution circuit pole line (12-40' poles) and overhead distribution conductors (12-spans of 4 #4 ACSR) located along the west side of proposed southbound Imperial Ave. extension (between I-8 & Manuel Ortiz Ave.) **[Phase 1 & 2]**
  - 3.2 The removal and/or relocation of the existing pole transformer (10 kVA), overhead service conductor (#2 Aluminum-Triplex) and customer meter pole presently providing electrical service for the cathodic protection system to the City's 18" water pipeline. **[Phase 1]**
  - 3.3 The relocation of the existing 92 kV "LU" transmission pole line (2-75' corner poles, 5-65' tangent poles and 2-45' head guy poles) and overhead transmission conductors (8 spans of 3 #795 AAC) located along the east side of proposed Imperial Ave. extension (between Danenberg Dr. & Manuel Ortiz Ave.) to the east side of the new street. **[Phase 3]**
  - 3.4 The relocation of the existing 7.2/12.47 kV L-155 distribution circuit pole line (14-45' poles) and overhead distribution conductors (14-spans of 4 #397.5 AAC) located along the east side of proposed Imperial Ave. extension (between Valleyview Ave. & McCabe Rd.) to the east side of new street. **[Phase 4]**
  - 3.5 The existing distribution system will need to make necessary accommodations for future underground service to the new traffic signal light system.
  - 3.6 The City will need to submit an application to request electrical service for the new traffic signal light system at the intersection of the new South Imperial Ave. & Wake Ave. (Application is available at <http://www.iid.com/home/showdocument?id=12923>.)
- B-5 4. For additional information related to the project impacts to IID electrical infrastructure, be advised to contact the IID Customer Project Development offices at (760) 482-3405 and speak with Mr. Ernesto Benitez, Electric Service Planner Senior, or e-mail Mr. Benitez at [eibenitez@iid.com](mailto:eibenitez@iid.com).
- B-5 5. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at <http://www.iid.com/departments/real-estate>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements. No foundations or buildings will be allowed within IID's right of way.
- B-6 6. Please note that new rights of way will be needed for the new relocated transmission and distribution facilities impacted by the project.
7. The project will cause significant impacts to IID's existing electrical existing facilities however; these impacts are not addressed in the project's Mitigated Negative Declaration.
- B-7 8. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result

- B-4 This comment lists several IID facilities that would be impacted by the project. Please see response to comment B-7 below regarding the relocation of IID utilities.
- B-5 This comment states that encroachment permits would be required for any construction or operational activities within IID property. Per this comment, the City will apply for an encroachment permit for any construction or operational activities within IID property.
- B-6 This comment states that future ROW and easement acquisitions would be required for the project. Future ROW and easement acquisitions required for the project are identified in Appendix B of the Draft IS/MND. The locations of these partial ROW and easement acquisitions are shown in Figures 6a and 6b of the CIA, while a description of these preliminary partial ROW and easement acquisitions are presented in Table 1 of the CIA.
- B-7 This comment states that the IS/MND should address the relocation of any existing utilities. Relocations of existing utilities that would be required are documented in Appendix B of the Draft IS/MND. Section 3.3.2 of the CIA addresses potential impacts associated with utility relocation by stating the following:
- The partial ROW acquisitions needed for the project roadway would not result in any property displacements. The majority of the partial ROW acquisitions would be located in areas that consist of an unofficial dirt road or vacant land and would not affect existing or future uses on the remainders of the properties. The remaining partial ROW acquisitions from existing farmland surrounding the project site would be limited to small strips of land at the parcel boundaries that would not preclude future agricultural production on the properties (see Section 2.3). The project would require several easement acquisitions to develop a 40-foot wide Public Utility Easement (PUE) that would be located parallel to the eastern project boundary. The project would relocate and underground existing overhead electric lines, an existing 18-inch diameter steel domestic potable water pipeline, and existing raw water lines for the water treatment plant within the PUE. The project would also underground a new

Norma Villicana  
September 19, 2018  
Page 3

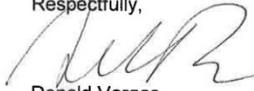
in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully analyzed. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**

B-8

9. Dividing a project into two or more pieces and evaluating each piece in a separate environmental document (Piecemealing or Segmenting), rather than evaluating the whole of the project in one environmental document, is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies. In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. The State CEQA Guidelines define a project under CEQA as "the whole of the action" that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment. CEQA case law has established general principles on project segmentation for different project types. For a project requiring construction of offsite infrastructure, the offsite infrastructure must be included in the project description. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App. 4th 713.

B-9 Should you have any questions, please do not hesitate to contact me at 760-482-3609 or at [dvgargas@iid.com](mailto:dvgargas@iid.com). Thank you for the opportunity to comment on this matter.

Respectfully,



Donald Vargas  
Compliance Administrator II

Enclosure

Kevin Kelley – General Manager  
Mike Pacheco – Manager, Water Dept.  
Enrique B. Martinez – Manager, Energy Dept.  
Jamie Asbury – Deputy Manager, Energy Dept., Operations  
Enrique De Leon – Asst. Mgr., Energy Dept., Distr., Planning, Eng. & Customer Service  
Vance Taylor – Asst. General Counsel  
Robert Laurie – Asst. General Counsel  
Michael P. Kemp – Superintendent, Regulatory & Environmental Compliance  
Randy Gray – ROW Agent II, Real Estate  
Jessica Lovecchio – Environmental Project Mgr. Sr., Water Dept.

B-7 (cont.)

stormwater pipeline for the project within the PUE. The project would also require an easement to underground a 100-foot segment of the Date Drain that would continue to convey water. ROW acquisition procedures will be followed. No impact would occur.

Therefore, no revisions to the Draft IS/MND are required per this comment.

B-8

This comment states that the IS/MND must address the entirety of the project. The Draft IS/MND and associated technical appendices evaluates the entirety of the project, including potential impacts associated with utility relocation (see response to comment B-7 above). Therefore, the Draft IS/MND has not piecemealed or segmented the environmental analysis, and no revisions to the Draft IS/MND are required per this comment.

B-9

These are conclusory remarks. No response is required.



www.iid.com

Since 1911

July 8, 2016

Mr. Abraham Campos, PE  
 City of El Centro  
 1275 West Main Street  
 El Centro, CA 92243

Dear Mr. Campos:

Subject: Imperial Avenue Extension South Project  
 IID Project No. 40287378

B-10

Imperial Irrigation District Water Department completed preliminary review of the Imperial Avenue Extension south project. The proposed project will extend Imperial Avenue from the Interstate 8 – Imperial Avenue interchange, southerly, to McCabe Road. The project is located south of the Interstate 8 – Imperial Avenue Interchange, Tracts 84 and 81, Section 18, T.16.S. R.14.E. The project will impact Dahlia Lateral 1 and Date Drain. The project is within IID's South End Division water service area.

The following project documents were submitted and reviewed:

- Project location and land use maps dated May 19, 2015
- Conceptual design plans, extension of Imperial Avenue south of Interstate 8 to McCabe Road, dated December 10, 2015

Attached please find general comments that are typical requirements for the proposed road development project. There may be some comments that may or may not apply. In addition to these general comments, project specific comments are noted below:

Project Specific Comments:

These project specific comments are based on the aforesaid project documents submitted for IID planning review. Once construction level plans, approved by the City are provided, further detailed comments can be provided.

1. Project Phasing: The conceptual design plans for the Imperial Avenue extension south project indicate the proposed new six-lane road from Interstate 8 south to McCabe Road. The plans also include extension of Wake Avenue and Danenberg Drive to the east. It is IID's understanding that the Imperial Avenue extension south project can be divided into the following three phases:

IMPERIAL IRRIGATION DISTRICT • P.O. BOX 937 • IMPERIAL, CA 92251

B-10 The IID letter submitted on July 8, 2016, attached to this comment letter, does not raise any new issues that have not been address in response to comments B-2 through B-9 above, or otherwise have not been addressed in the Draft IS/MND. No revisions to the Draft IS/MND are required per the IID letter submitted on July 8, 2016.

Mr. Abraham Campos  
July 8, 2016  
Page 2

- A. Phase 1: A potential Phase 1 would consist of construction of Imperial Avenue South from I-8 to Wake Avenue, including the Imperial-Wake Avenue intersection, and connection of Wake Avenue to the east. The proposed improvements are shown on sheets 9, 24, 25, 26 and 27 of the Conceptual Design Plans. Phase 1 would impact IID's Date Drain.
- i. Construction of the Imperial-Wake Avenue intersection will require extension of the Date Drain pipeline crossing Wake Avenue. The pipeline must be extended approximately 40 feet to the south.
- B. Phase 2: A potential Phase 2 would consist of construction of the easterly ½ of Imperial Avenue, from Wake Avenue south to McCabe Road (sheets 10 to 23). Cross sections of the proposed Imperial Avenue south are shown on sheet 34.
- i. Date Drain: Cross sections on sheet 34 indicate the easterly ½ of the proposed Imperial Avenue impact on IID's Date Drain would be minimal. The construction work must not encroach on Date Drain without an approved IID encroachment permit. Removal of earthen material from IID right-of-way is not allowed.
  - ii. Dahlia Lateral 1: The existing IID Dahlia Lateral 1 is in conflict with the proposed easterly ½ of Imperial Avenue.
  - iii. Dahlia Delivery 18 at Danenberg Drive (sheet 3) is inactive and shall be abandoned for this project.
  - iv. Dahlia Delivery 18-A serves the El Centro City water plant, and is to be relocated for Phase 2 of the Imperial Avenue extension south project. Delivery gates 18-A and 15 are the only active delivery gates in Dahlia Lateral 1 north of McCabe Road. Relocation of Delivery 18-A approximately one-mile to the south near McCabe Road, is recommended.
  - v. Relocation of Delivery 18-A to the south will enable IID to abandon Dahlia Lateral 1 from Danenberg Drive to McCabe Road, and quitclaim it to the City. Quitclaim of Dahlia Lateral 1 would allow it to be relocated and pipelined under jurisdiction of the City.
  - vi. Dahlia Delivery 15 serves Tract 81 north of McCabe Road. Tract 81 is proposed to be developed and annexed into the City, at which time Delivery 15 will be abandoned. In the event Tract 81 is still in cultivation for Phase 2, IID will relocate the Dahlia Lateral 1 pipe crossing McCabe Road to Delivery 15.

Mr. Abraham Campos  
 July 8, 2016  
 Page 3

- C. Phase 3: The potential Phase 3 would consist of construction of the westerly half of Imperial Avenue, from Wake Avenue south to McCabe Road (sheets 10 to 23). Cross sections of the proposed Imperial Avenue south are shown on Sheet 34.
- i. The existing IID Date Drain is in conflict with the proposed westerly ½ of Imperial Avenue. Date Drain must be relocated and pipelined for Phase 3 of the project, due to impacts to IID's ability to operate, maintain, and access the facilities.
  - ii. A detailed drainage hydraulic analysis will be required.
  - iii. IID will maintain a sufficient right-of-way for operation and maintenance of Date Drain, and may quitclaim the remainder of its right-of-way to the City. A 40-foot wide right-of-way will be needed for relocation and pipelining of Date Drain. The drain right-of-way shall be clear without overlap of city, or other right-of-way. Additional temporary construction easement will also be required.
2. Hydrology and Drainage Study: The conceptual design plans indicate a storm drainage system that will discharge to a proposed retention basin at the northeast end of the project (sheet 27). There are no surface drainage discharges to IID's Date Drain proposed for the project.
3. Fee Summary:
- A. This planning review resulted in a cost to date of \$7,575. Since a fee amount of \$3,000 was provided with the original planning review request, the difference of \$4,575 shall be provided to IID. Please send a check in the amount of \$4,575 with a copy of this letter to:

Imperial Irrigation District  
 Water Department  
 Engineering Services  
 333 East Barioni Boulevard  
 Imperial, CA 92251

This will end the planning review phase of the conceptual plan submittal. Should more detailed construction plans be available for phases 2 and 3, IID recommends a subsequent planning review for more detailed comments and estimated costs of impacts mentioned above in these comments.

Mr. Abraham Campos  
July 8, 2016  
Page 4

- B. Specific to phase 1, it is also recommended that detailed construction level plans be provided. However it is clear that the extension of the Date Drain crossing Wake Avenue is necessary for Phase 1 of the project. An opinion of cost is therefore provided at this time. The projected size of the pipeline is 48-inch diameter with a preliminary opinion of cost for this work estimated at approximately \$60,000. The opinion of cost includes design, drafting, survey, staking, removal and disposal of structures, material procurement and installation, record drawings, and administrative services. The budget estimate includes backfill of the pipeline trench up to three-feet above the top of the pipe with on-site fill material. The budget amount does not include import backfill material, or any additional backfill of the drain channel. The budget amount does not include removal or relocation of other utilities, acquisition of right-of-way, or additional work due to unforeseen conditions which would be performed on a force account basis and added to the project cost. Design and installation will be performed by IID, per the developer guide, which can be found at the following IID web site address:

<http://www.iid.com/home/showdocument?id=2328>

Opinions of cost are valid for 90 days.

- C. Based on this planning review for the conceptual plan submittal and for Phase 1 only, the estimated fee for design deposit for the Date Drain Wake Avenue crossing extension mentioned above in Item No. 3B is \$15,000. If you wish to proceed with the phase 1 extension of the Date Drain crossing Wake Avenue now, please send payment in the amount of \$15,000 with a copy of this letter and terms and conditions form, the design phase payment form, detailed construction drawings and other pertinent information to:

Imperial Irrigation District  
Water Department  
Engineering Services  
333 East Barioni Boulevard  
Imperial, CA 92251

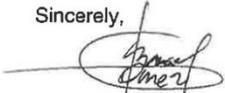
Upon receipt of the required submittals, IID will proceed with design plans and opinion of cost for the construction phase. A response to this deposit request must be received within 90 days or the project will be closed. At a minimum, the balance owed for the planning review of \$4,575 must be paid.

\\Supv5\Engineering\Engineering\Irrigation\Dahlia Lateral 1\Imperial Ave Extension\Planning\Imp Ave Ext Planning Ltr1(2).docx  
07082016.docx

Mr. Abraham Campos  
July 8, 2016  
Page 5

If you have any questions, please contact John Kilps, PE, Senior Engineer at (760) 339-9189 or by e-mail at jrkilps@iid.com.

Sincerely,



Ismael Gomez, P.E.  
Assistant/Manager, Chief Civil Engineer

JK:sm

Attachment

cc: Harold Walk, Supervisor, Real Estate  
Mike Kemp, Environmental Compliance  
Henry Dollente, Asst. Mgr., South End Water Division  
Richard Sinclair, Supt., Drainage  
Alfred Ornelas, Distribution Supervisor, Energy  
James G. Holt, The Holt Group

## GENERAL COMMENTS FOR Imperial Avenue Extension South Project

(With limited project specific information, where identified)

1. Environmental Permitting:

A. Copies of all applicable environmental documents, including Environmental Impact Report and Conditional Use Permits, are to be submitted to IID. Impacts to IID facilities requiring environmental mitigation are the responsibility of the project developer and not the IID. Any IID canal and drain facilities to be improved or reconstructed as a result of the project, including ancillary utility work, are to be included in the scope of the project environmental documents.

B. It is the city's responsibility to monitor and assure that all burrowing owl impacts are mitigated in the project's construction zone including any construction done on IID facilities as a result of this project. For any construction or modification to IID facilities, IID requires a letter from the City advising that all burrowing owl impacts in the construction zone have been mitigated.

2. Encroachment Permitting: IID encroachment permits will be required for the following impacts to IID canals and drains, but not limited to:

- Temporary Permits: construction access, construction water, and surface drainage
- Long-term surface drainage discharges
- Utility crossings and encroachments, including water, sewer, and storm water
- Proposed streets encroaching upon or crossing canals and drains

A. A non-refundable application fee of \$250 must be submitted with each encroachment permit application. Please contact IID's Real Estate Section at (760) 339-9239 for additional information regarding encroachment permits. A copy of the encroachment permit application is included in the Developer Guide or available at IID's website link:

<http://www.iid.com/home/showdocument?id=11541>

B. Additional fees for engineering review, inspection, and as-built/record drawings will be determined upon review of encroachment permit applications.

3. IID Energy Facilities: The Imperial Avenue Extension South Project will impact IID Energy facilities. Please contact IID Energy Customer Service at (760) 482-3400 to address impacts to IID Energy facilities.

-1-

4. Irrigation Facilities – Dahlia Lateral 1

- A. IID's Dahlia Lateral 1 is within the project area. Dahlia Lateral 1 is a concrete lined canal originating from the Dahlia Canal along La Brucherie Road, southwest of the project site. The lateral canal extends east and turns north, crossing McCabe Road along the Imperial Avenue Extension South corridor.
- B. Delivery 15, Tract 81: Dahlia Lateral 1 Delivery 15 is north of McCabe Road and serves Tract 81, which is actively cultivated. Right-of-way for Dahlia Lateral 1 is 25 feet to the east and west of the canal centerline in Tract 81.
- C. Dahlia Lateral 1 discharges to the Date Drain through a 12" operational discharge pipe at the north end of Tract 81.
- D. Buena Vista Subdivision: Dahlia Lateral 1 extends north through Buena Vista subdivision. Buena Vista is a residential subdivision constructed in the southerly ½ of Tract 84 in 2004. Right-of-way for Dahlia Lateral 1 is 25 feet to the east and west of canal centerline in the southerly ½ of Tract 84. The Buena Vista subdivision includes a new 35-foot wide easement along the westerly boundary for relocation of Dahlia Lateral 1. Dahlia Lateral 1 was relocated and pipelined within the new 35-foot easement by the Buena Vista developer. A portion of Imperial Avenue was also constructed along the new Dahlia Lateral 1 easement.
- E. El Centro City Water Plant: The El Centro City Water Plant is in the northerly ½ of Tract 84. Dahlia Lateral 1 transitions into a concrete lined canal in the northerly ½ of Tract 84. Right-of-way for Dahlia Lateral 1 is 35 feet to the east of the canal centerline in the northerly ½ of Tract 84. Dahlia Lateral 1 ends at the north end of Tract 84, where there are two (2) delivery gates:
- i. Delivery 18-A serves the El Centro City Water Plant. The delivery gate discharges to a 48-inch diameter pipeline extending east to the plant.
  - ii. Delivery 18 historically served Tract 86 to the north of Tract 84. Tract 86, however, has not been cultivated and Delivery 18 has been inactive for numerous years.
  - iii. Dahlia Lateral 1 discharges to Date Drain through a 6" operational discharge pipe at the north end of Tract 84.

5. Drainage Facilities – Date Drain

IID's Date Drain is within the project corridor. Date Drain is an agricultural drainage channel originating approximately 2 ¼ miles south of McCabe Road. The Date Drain

-2-

crosses McCabe Road and extends north along the west side of the Imperial Avenue Extension South project corridor. The drain turns east at Interstate along the south boundary of Interstate 8. Right-of-way for Date Drain is 40 feet to the east and west of drain centerline.

6. Surface Drainage

- A. Storm water runoff and surface drainage generated on-site can be discharged to IID drains at existing City discharge locations. A temporary construction permit is required (see No. 2).
- B. The proposed project construction site shall be maintained in compliance with RWQCB requirements for an NPDES Permit for construction activity, including Storm Water Pollution Prevention Plan.
- C. Tract 81: There are two existing surface drainage connections from Tract 81 to Date Drain; one is ¼ mile north of McCabe Road, and the other is at the north end of Tract 81.
- D. Buena Vista Subdivision: There is an existing surface drainage connection to Date Drain at the north end of the field now occupied by the Buena Vista subdivision. The pipe outlet structure still exists in the Date Drain channel, however the discharge was reportedly plugged and disconnected for construction of Buena Vista.
- E. The area west of Date Drain is actively cultivated, from McCabe Road to Wake Avenue. There are a total of five existing surface drainage connections from those fields to Date Drain.

7. Tile Drainage System:

- A. Tract 81: IID records indicate there is an underground tile drainage system in Tract 81 (TD-1303). Tile drainage lines are within the project site and discharge to Date Drain. The tile drainage lines impacted are to be cut and plugged, or relocated with permission by the Tract 81 landowner. Non-agricultural subsurface discharge into the IID drainage system is prohibited.
- B. The area west of Date Drain is actively cultivated, from McCabe Road to Wake Avenue. There are underground tile drainage lines from these fields discharging to Date Drain.

PROJECT DESIGN PHASE PAYMENT  
Imperial Irrigation District

Dear Customer:

To aid us in the completion of the design phase of your project please submit this form.

Estimated Design Phase Cost - Payment Attached \$ \_\_\_\_\_

1. Project Name: \_\_\_\_\_

2. Township \_\_\_\_\_ Range \_\_\_\_\_ Section \_\_\_\_\_

Address: Street \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

APN# (Assessor Parcel No.) \_\_\_\_\_

3. Owner \_\_\_\_\_ Telephone No. (\_\_\_\_\_) \_\_\_\_\_

Address: Street \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

Contact Person \_\_\_\_\_

Address: Street \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

4. Consultant \_\_\_\_\_ Telephone No. (\_\_\_\_\_) \_\_\_\_\_

Address: Street \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

Contact Person \_\_\_\_\_

Address: Street \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

5. Date Planning Information/Alternatives Are Required \_\_\_\_\_

I AGREE AND UNDERSTAND THAT THE DESIGN PHASE AMOUNT APPLIES ONLY TO COSTS UP TO BIDDING/MATERIAL PROCUREMENT AND THAT AN ADDITIONAL DEPOSIT WILL BE REQUIRED FOR THE CONSTRUCTION PHASE WHICH INCLUDES BIDDING/MATERIAL PROCUREMENT. I ALSO UNDERSTAND THAT MY OBLIGATION IS TO PAY FOR ACTUAL PROJECTS COSTS. THUS, AFTER PROJECT CLOSURE I WILL BE BILLED OR REFUNDED BASED UPON ACTUAL PROJECT COSTS. IF THE PROJECT IS CANCELLED, I UNDERSTAND THAT I WILL BE OBLIGATED FOR ACTUAL COSTS THROUGH CLOSURE OF THE PROJECT THROUGH THAT POINT IN TIME.

\_\_\_\_\_  
Signature Date Representing

\_\_\_\_\_  
Print Name

**Imperial Irrigation District  
Terms and Conditions for  
Receipt of Water Department Facility Construction for New Developments**

In consideration of IID's provision of Water Department facility construction for the development project, Applicant agrees to the following:

1) Applicant is fully responsible for meeting and addressing all environmental issues and concerns, safety requirements as well as required modifications, installations, maintenance, repairs and removals as related to all components of irrigation and drainage facilities, on and off the construction or project site, where such systems and facilities are modified, installed, repaired or removed as part of Applicant's project. This responsibility of Applicant will continue until all modifications, installations, repairs and removals for these systems and facilities have been completed by the district or the district's representative.

2) To the fullest extent permitted by law, Applicant shall indemnify and save the District free and harmless of and from all claims, demands, losses, and liability, including cost and legal fees, arising directly or indirectly out of obligations undertaken in connection with this project, excepting only claims arising from the sole negligence or misconduct of the District.

Applicant: \_\_\_\_\_ Date: \_\_\_\_\_

Witness: \_\_\_\_\_ Date: \_\_\_\_\_

Witness: \_\_\_\_\_ Date: \_\_\_\_\_

150 SOUTH NINTH STREET  
EL CENTRO, CA 92243-2850



Letter C

TELEPHONE: (442) 265-1800  
FAX: (442) 265-1799

September 27, 2018

Norma M. Villicaña, AICP  
Director of Community Development  
1275 W. Main Street  
El Centro, CA 92243

Re: Initial Study (IS), Mitigated Negative Declaration (MND) for the Imperial Avenue Extension

Dear Ms Villicaña

C-1

The Air District has finalized its review of the Request for Review and Comments for the Initial Study (IS) and Mitigated Negative Declaration (MND) for the proposed extension of Imperial Avenue from Interstate 8 (I-8) to McCabe Road. The extension encompasses 1.36 miles of roadway as a 4-lane divided arterial (with a left turn lane) from I-8 to Wake Avenue, a 2-lane arterial (with a left turn lane) from Wake Avenue to Valleyview Avenue and a 2-lane arterial (without a left turn lane) from Valleyview Avenue to McCabe Road. In addition, the project would also construct a 2-lane collector segment to connect the separated segments of Wake Avenue located west and east of Imperial Avenue. Generally, the project construction includes four phases.

C-2

After reviewing, the Air District found the analysis adequate with the following caveats. First, the United States Environmental Protection Agency (US EPA) issued its final rulemaking designating the urban portions of Imperial County as "Moderate" non-attainment for PM<sub>2.5</sub> on January 15, 2015 (80 FR 2206). Second, the analysis of the road construction emissions utilized the Road Construction Emissions Model, Version 8.1.0 developed by the Sacramento Metropolitan Air Quality Management District without providing the input and output files. As such, the Air District was unable to determine the changes in default values or any other changes that may have changed the outcome of the emissions calculations. Therefore, the Air District is making the following request to assure compliance and conformance with all identified non-attainment pollutants and their precursors.

IS/MND IMPERIAL AVENUE EXTENSION

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

C-1

This is an introductory comment. No response is required.

C-2

This comment states that the impact analysis provided in the Draft IS/MND was accurate two caveats. Per this comment, the City will comply with the following requests:

1. The submittal of a Construction Notification to the Imperial County Air Pollution Control District (ICAPCD) ten days prior to the beginning of construction activity
2. The implementation of a Dust Control Plan to the ICAPCD to ensure protection of any sensitive receptors and to maintain visibility on adjacent roadways and properties.

LETTER

RESPONSE

CONSTRUCTION

- 1) The submittal of a Construction Notification 10 days prior to any construction activity
- 2) A Dust Control Plan to assure the protection of any sensitive receptors and to maintain visibility on adjacent roadways and properties.

C-3 Finally, the Rules and Regulations are accessible via the web at [www.co.imperial.ca.us/AirPollution](http://www.co.imperial.ca.us/AirPollution). Should the applicant have any additional questions, please contact our office at (442) 265-1800.

Respectfully,



Monica N Soucier  
APC Division Manager

C-3 These are conclusory remarks. No response is required.

## 2.0 Initial Study

1. Project Title: Imperial Avenue Extension Project

2. Lead agency name and address:

City of El Centro  
Community Development Department  
1275 Main Street  
El Centro, California 92243

3. Contact person and phone number:

Norma Villicaña, AICP, Community Development Director  
City of El Centro  
(760) 337-4543

4. Project location:

The City of El Centro proposes to extend Imperial Avenue from I-8 to McCabe Road, within the southern portion of the city of El Centro in Imperial County, California (see Figures 1 and 2). The alignment of the proposed roadway extension follows the same linear pathway as the existing portion of Imperial Avenue north of I-8.

5. Project Applicant/Sponsor's name and address:

City of El Centro  
Community Development Department  
1275 Main Street  
El Centro, California 92243

6. General Plan designation: The project site would be created through partial ROW and Easement acquisitions of portions of properties located within the proposed project boundary with various General Plan designations (see Figure 3).

7. Zoning: The project site would be created through partial ROW and Easement acquisitions of portions of properties located within the proposed project boundary with various zoning designations (see Figure 4).

8. Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

The City proposes to extend Imperial Avenue from I-8 to McCabe Road. The proposed 1.36-mile roadway extension would function as a 4-lane divided arterial (with left turn lane) from I-8 to Wake Avenue, a 2-lane arterial (with left turn lane) from Wake Avenue to Valleyview Avenue and a 2-lane arterial (without left turn lane) from Valleyview Avenue to McCabe Road. The project would introduce a

median varying in width from 12 to 14 feet between I-8 and Danenberg Drive, and then consistently 12 feet in width from Danenberg Drive to McCabe Road. The project would construct a 5.5-foot sidewalk along the entire length of the eastern project boundary and would introduce native backing on both sides of the proposed roadway. It is anticipated the project would be phased, and preliminary phasing consists of the following:

- Phase I: I-8 off-ramp to Wake Avenue intersection
- Phase II: Wake Avenue to Danenberg Drive intersection
- Phase III: Danenberg Drive to Valleyview Avenue intersection
- Phase IV: Valleyview Avenue to McCabe Road intersection

The alignment of the proposed roadway extension follows the same linear pathway as the existing portion of Imperial Avenue north of I-8. The project would also construct a 2-lane collector segment to connect the separated segments of Wake Avenue located west and east of the Imperial Avenue alignment, and would also construct intersections with traffic lights. The project would underground an approximately 100-foot segment of the Date Drain south of the future intersection of Imperial Avenue and Wake Avenue. The project would also underground the Dahlia Canal Lateral 1 that runs parallel along the entire eastern edge of the project site. Both undergrounded canals would continue to convey water beneath the project improvements.

9. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):
- California Department of Transportation
  - Imperial Irrigation District

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Aesthetics                         | <input type="checkbox"/> Greenhouse Gas Emissions      | <input type="checkbox"/> Population/Housing                         |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Public Services                            |
| <input type="checkbox"/> Air Quality                        | <input type="checkbox"/> Hydrology/Water Quality       | <input type="checkbox"/> Recreation                                 |
| <input checked="" type="checkbox"/> Biological Resources    | <input type="checkbox"/> Land Use/Planning             | <input type="checkbox"/> Transportation/Traffic                     |
| <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Mineral Resources             | <input type="checkbox"/> Tribal Cultural Resources                  |
| <input type="checkbox"/> Geology/Soils                      | <input type="checkbox"/> Noise                         | <input type="checkbox"/> Utilities/Service System                   |
|   |  | <input checked="" type="checkbox"/> Mandatory Findings Significance |

**DETERMINATION** (To be completed by Lead Agency):

On the basis of this initial evaluation:

- The proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- The proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- The proposed project **MAY** have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT (EIR)** is required.
- Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **(MITIGATED) NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **(MITIGATED) NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

**EVALUATION OF ENVIRONMENTAL IMPACTS:**

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis.)
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses”, as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other California Environmental Quality Act process, an effect has been adequately analyzed in an earlier EIR or (mitigated) negative declaration. *Section 15063(c)(3)(D)*. In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less than Significant With Mitigation Measures Incorporated”, describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**I. AESTHETICS – Would the project:**

- a. Have a substantial adverse effect on a scenic vista?

**Less Than Significant Impact.** This section is based on the Visual Impact Assessment Memorandum prepared by RECON Environmental, Inc. (RECON) (Appendix A).

As described in Section 1.2, the project site is relatively flat and consists primarily of a narrow north-south corridor of vacant land with sparse vegetation, along with a primarily vacant east-west corridor that would be developed as an extension of Wake Avenue. The project site is primarily surrounded by existing residential development, active farmland, and agricultural drains. Additionally, an elevated roadway berm supporting I-8 is located north of the project site, and a water treatment plant is located east of the project south of the future intersection with Danenberg Drive.

The existing vacant and disturbed character of the majority of the project site is unremarkable and does not possess a strong scenic quality that would qualify as a scenic vista. Similarly, the small portion of the project site in agricultural production and the paved segment of Wake Avenue do not possess a strong scenic quality that would qualify as a scenic vista. Views from most locations within the project site are blocked by existing residential development and the elevated roadway berm supporting I-8. Unobstructed views from the project site face agricultural fields, undeveloped land, and rural residential development that do not qualify as scenic vistas. Therefore, the project would not have a substantial adverse effect on a scenic vista, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

**Less than Significant Impact.** The project site consists primarily of a narrow north-south corridor of vacant land with sparse vegetation, a small amount of active agricultural production, and a small paved segment of Wake Avenue. No significant scenic resources such as trees or rock outcroppings are located on-site, and the segment of I-8 north of the project site is not designated, or considered eligible to be designated, as a state scenic highway. Therefore, the project would not substantially damage scenic resources, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**No Impact.** The existing vacant and disturbed character of the majority of the project site is unremarkable and does not possess a strong scenic quality. The visual character of the project would be compatible with the existing visual character of the project site, which consists primarily of an unofficial north-south dirt road surrounded by residential development, active farmland, and agricultural drains. Although the project would slightly increase the urban character of the project site and surrounding area, viewer response from surrounding properties would be low because the proposed roadway extension would follow the alignment of the existing unofficial north-south dirt road and would not change the surrounding land use pattern. Similarly, viewer response to the slight increase in urban character would also be low due to the presence of existing residential development and other roadways in the immediate area.

The project would not introduce new structures with heights that would block views or otherwise substantially change the scenic character of the area. Viewer response to covering the Date Drain running parallel along the project’s western boundary would be low because the earthen channel does not possess strong scenic quality.

Viewer response for travelers on I-8 would also be low. As described above, the project would be compatible with the existing visual character of the proposed roadway extension corridor. Additionally, views for travelers on I-8 would not be directly focused on the project site and would be short in duration. Therefore, the project would not substantially degrade the existing visual character or quality of the site and its surroundings, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less than Significant Impact.** Light and glare generated by the project would be consistent with other 4-lane and 2-lane roadways throughout the City. Street lighting for the project would comply with the City illumination requirements to shield lighting in a manner that would prevent spillover from impacting adjacent residential development. Additionally, project curbs and gutters, sidewalks, and native shoulder backing would provide adequate distance to prevent car headlights from impacting adjacent residential development. Therefore, the project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**II. AGRICULTURAL/FORESTRY RESOURCES – Would the project:**

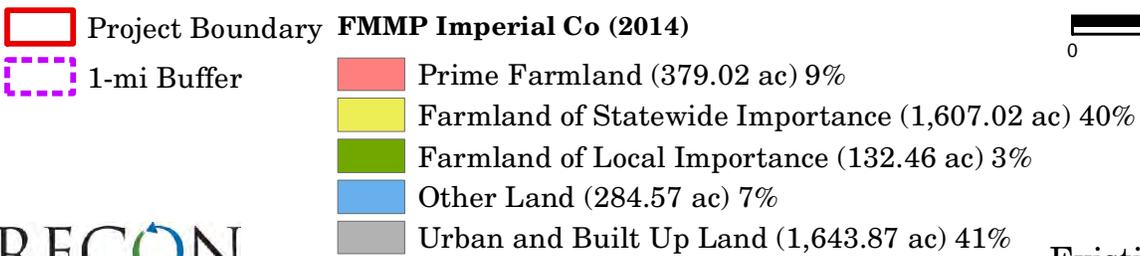
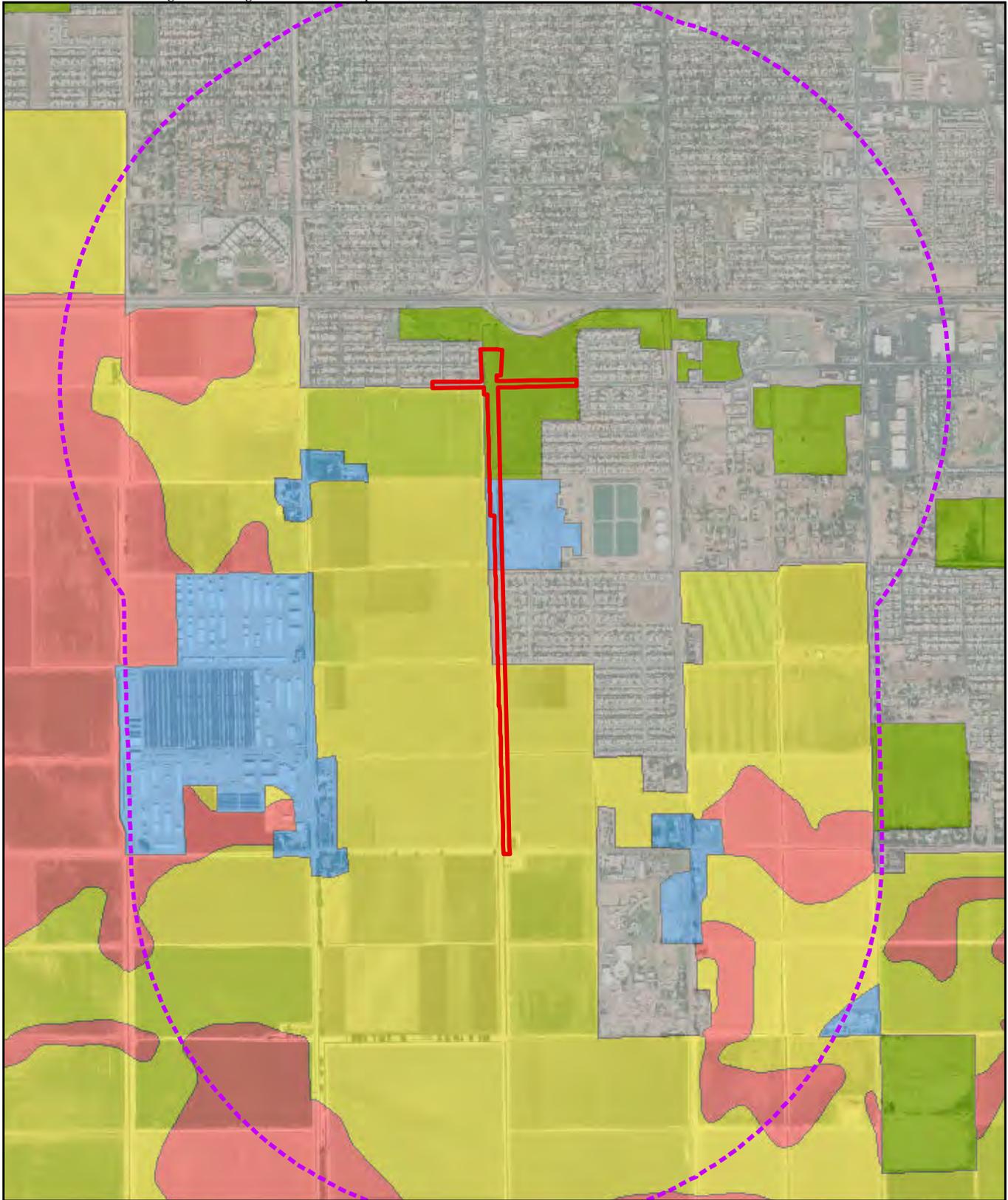
- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

**Less Than Significant Impact.** This section is based on the Community Impact Assessment prepared by RECON (Appendix B).

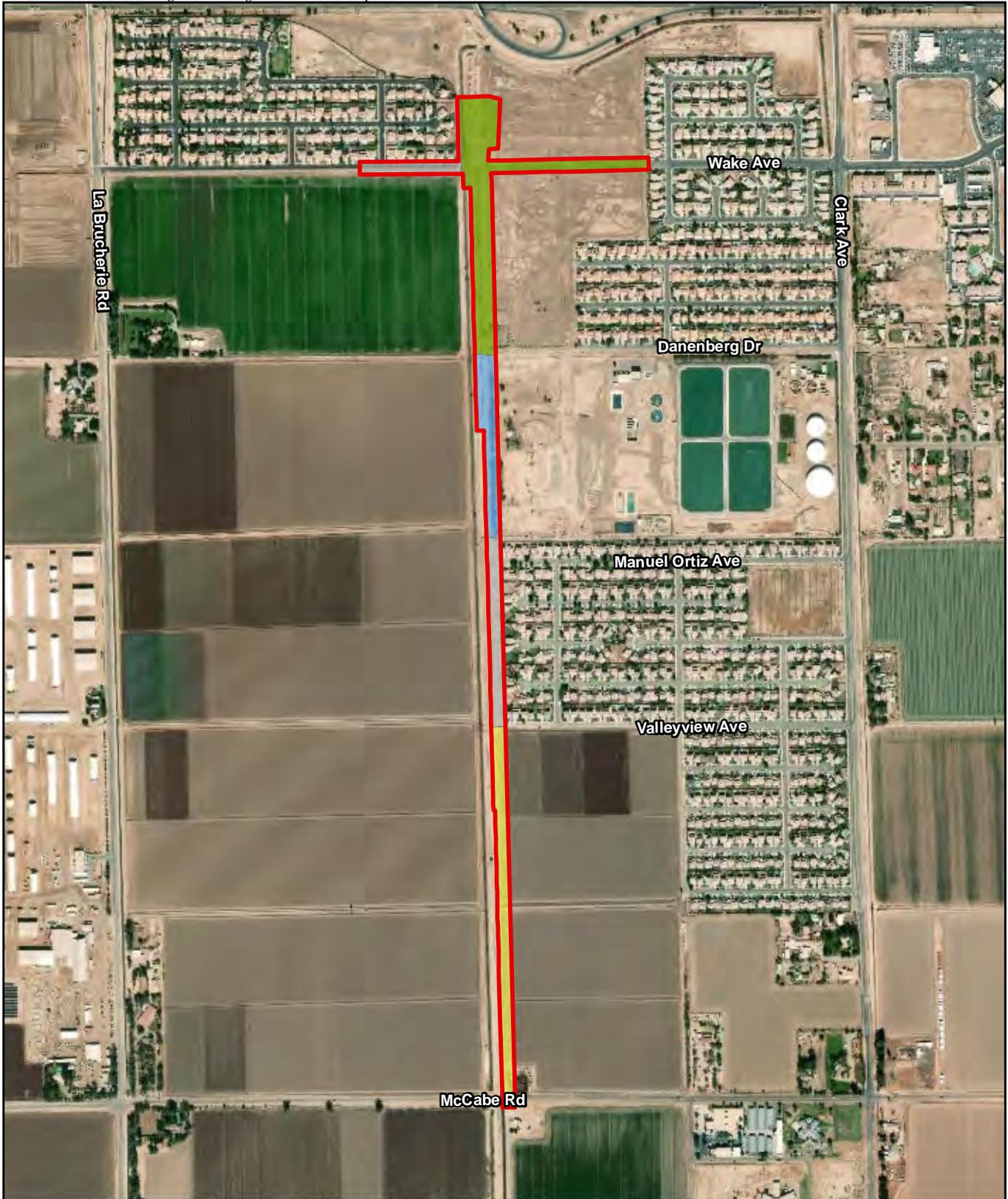
Agricultural production is an important industry within the City and Imperial County. As shown in Figure 6, Important Farmland within a one-mile radius of the project site consist of 379.02 acres of Prime Farmland (9 percent of total), 1,607.02 acres of Farmland of Statewide Importance (40 percent of total), and 132.46 acres of Farmland of Local Importance (3 percent of total) (California Department of Conservation 2017). Land classified under these Farmland Mapping and Monitoring Program (FMMP) Important Farmland categories collectively constitute 52 percent of land within a one-mile radius of the project site.

As shown in Figure 7 and Table 1, the project would convert 5.76 acres of soils classified as Farmland of Statewide Importance and 9.98 acres of soils classified as Farmland of Local Importance to non-farmland uses. This would result in a total conversion of 15.74 acres (66 percent) of the project site from FMMP Important Farmland to non-farmland uses. However, Figure 8 shows that only 3.03 acres of this Important Farmland (Farmland of Statewide Importance) within the project site is currently in agricultural production. The remaining land classified as Important Farmland by the FMMP is currently used as an unofficial dirt road or is vacant land. Furthermore, no Prime Farmland was identified within the project site. Therefore, impacts associated with the conversion of 15.74 acres of Important Farmland, only 3.03 acres of which are in agricultural production, would be less than significant.

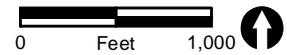
Farmland of Statewide Importance	5.76 acres
Farmland of Local Importance	9.98 acres
Other Land	3.59 acres
Developed Lands	4.66 acres
<b>Total</b>	<b>23.99 acres</b>



**FIGURE 6**  
Existing Farmland



 Project Boundary **Impacted FMMP Imperial Co (2014)**



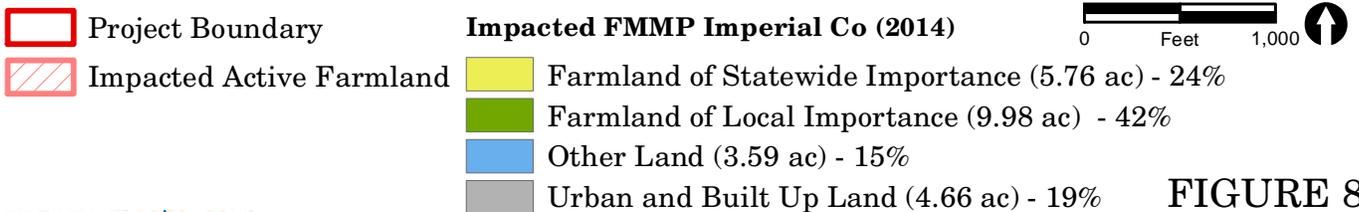
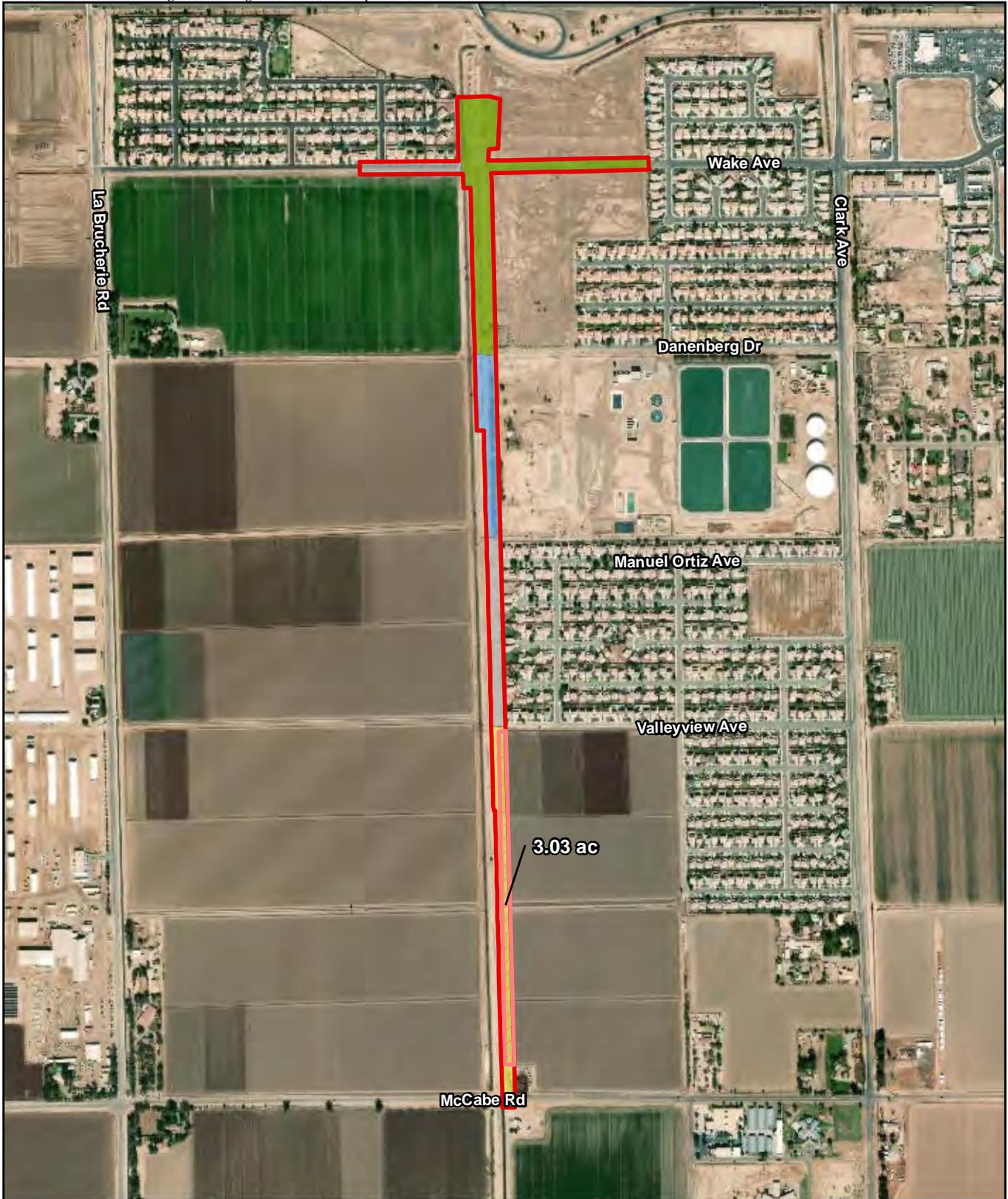
 Farmland of Statewide Importance (5.76 ac) - 24%

 Farmland of Local Importance (9.98 ac) - 42%

 Other Land (3.59 ac) - 15%

 Urban and Built Up Land (4.66 ac) - 19%

**FIGURE 7**  
**Farmland Impacts**



**FIGURE 8**  
Impacted Active Farmland

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

**Less Than Significant Impact.** Neither the project site, nor any of the surrounding properties are subject to Williamson Act Contracts. As shown in Figure 4, the project would require partial ROW acquisitions from properties within the proposed Imperial Avenue Extension alignment that are zoned for agricultural uses. However, the partial ROW acquisitions from existing farmlands surrounding the project site would be limited to small strips of land at the parcel boundaries that would not preclude future agricultural production on the properties. Therefore, impacts associated with agricultural zoning conflicts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

**No Impact.** The project site and surrounding area are not zoned as forest land or timberland. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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d. Result in the loss of forest land or conversion of forest land to non-forest use?

**No Impact.** The project site and surrounding area does not include any forest land. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

**Less Than Significant Impact.** The project site and surrounding area does not include any forest land. As described in Section II(a) above, the partial ROW acquisitions from

existing farmlands surrounding the project site would be limited to small strips of land at the parcel boundaries that would not preclude future agricultural production on the properties. As shown by the presence of active farmland adjacent to major roadways throughout Imperial County, the proposed roadway extension would not adversely affect existing agricultural use. Active farmland is located immediately adjacent to long stretches of I-8 and McCabe Road, which shows that active farmland located east and west of the proposed extension of Imperial Avenue could continue with cultivation adjacent to a major roadway.

As shown in Figure 3, all properties east and west of the project site, including those that would be affected by ROW and Easement acquisitions, are designated for non-agricultural uses in the City General Plan Land Use Map. Consequently, future growth in the surrounding area that would occur independent of the project could convert active farmland to other uses. Implementation of the project would provide improved circulation access that could support development of parcels surrounding the project anticipated in the General Plan. This improved circulation would also help existing agricultural businesses in the City of El Centro and Imperial County to transport equipment and people in a more efficient manner. The project has been designed to resolve existing traffic network deficiencies, and therefore would not create new opportunities for growth beyond what is already anticipated by the General Plan with regard to the City’s sphere of influence, which consists of areas that are currently under the jurisdiction of Imperial County but are anticipated to be incorporated into the City at some time in the future. Therefore, the project would not result in other changes in the existing environment that would convert farmland to non-agricultural uses, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**III. AIR QUALITY**

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied on to make the following determinations - Would the project:

- a. Conflict with or obstruct implementation of the applicable air quality plan?

**Less than Significant Impact.** This section is based on the Air Quality Analysis prepared by RECON (Appendix C).

The Clean Air Act requires a demonstration that federal actions conform to the State Implementation Plan (SIP) and similar approved plans in areas that are designated as non-attainment or have maintenance plans for criteria pollutants. The ICAPCD is the air district responsible for the project area. The project site is in non-attainment areas for federal and/or state air quality standards for ozone, particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>), and particulate matter with an aerodynamic diameter of 2.5 microns or less (PM<sub>2.5</sub>).

Thus, the ICAPCD has developed the following air quality plans to address air quality in the basin:

- *Imperial County 2009 State Implementation Plan for Particulate matter Less than 10 Microns in Aerodynamic Diameter;*
- *Imperial County 2013 State Implementation Plan for the 2006 24-Hour PM<sub>2.5</sub> Moderate Non-attainment Area; and*
- *Imperial County 2017 State Implementation Plan for the 2008 8-Hour Ozone Standard.*

Transportation measures, such as the project, are analyzed for conformity with the SIP as part of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP). If the design concept and scope of a proposed transportation project are consistent with the project description in the applicable RTP and RTIP, and the assumptions in the regional emissions analysis for the RTP and RTIP, then the project would conform to the SIP, and no adverse regional air quality impact would occur as a result of the project.

The Southern California Association of Governments (SCAG), as the area's metropolitan planning organization, and the Federal Highway Administration (FHWA) must make a determination that the applicable RTP and RTIP conform to the applicable SIP. Conformity to the SIP means that transportation activities will not create new air quality violations, worsen existing violations, or delay the attainment of the National Ambient Air Quality Standards. Federal regulations also require SCAG to conduct an air quality conformity analysis of all regionally significant projects that increase the transportation system capacity. All regionally significant capacity-increasing transportation projects, regardless of funding sources, must be included in the RTIP.

The project is included in the 2016 RTP/Sustainable Communities Strategy (SCS) (RTP ID 1161L001) and in the 2017 Federal Transportation Improvement Program (FTIP) Amendment 17-03 (FTIP ID IMP160901, Program CAX66). The project was originally described in the 2016 RTP/SCS as a "new roadway from I-8 to McCabe Road. Phase 1 includes 6 new lanes on Imperial Avenue from I-8 to Wake Avenue; and 2 new lanes on Wake Avenue from Imperial Avenue to Cypress Drive." Amendment 1 of the 2016 RTP/SCS removed the discussion of Phase 1 from the project description and only described the project as a "new roadway from I-8 to McCabe Road."

The project has subsequently been down-scoped to four new lanes on Imperial Avenue from I-8 to Wake Avenue. Although the project is inconsistent with the description in the 2016 RTP/SCS, the project is conforming because it would build fewer lanes than originally anticipated, would not exceed the emissions budget for the project, and is consistent with the 2017 FTIP (see below). Additionally, it is anticipated that 2016 RTP/SCS Amendment 3 will receive Federal approval in December 2018, which will include a revised description of Phase 1 of the project as four new lanes on Imperial Avenue from I-8 to Wake Avenue, consistent with the 2017 FTIP.

The project has the following description in the 2017 “FTIP: Imperial Avenue Extension South–New roadway from I-8 to McCabe Road. Phase 1 includes four new lanes on Imperial Avenue from I-8 to Wake Avenue; and two new lanes on Wake Avenue from Imperial Avenue to Cypress Drive.” On April 6, 2017, SCAG adopted the 2016 RTP/SCS Amendment 1 and the 2017 FTIP Amendment 17-03 via Resolution No. 17-588-2, and the conformity analysis indicated that all air quality conformity requirements have been met. The FHWA also made a finding of conformity on the 2016 RTP/SCS Amendment 1 and the 2017 FTIP Amendment 17-03 on May 12, 2017 (FHWA 2017).

The design concept and scope of the project are consistent with the scope of the project description that will be included in the 2016 RTP/SCS Amendment 3 anticipated to receive Federal approval in December 2018, as well as the project description in the 2017 FTIP, and the assumptions in the SCAG regional emissions analysis. Therefore, the project is assumed to conform to the SIP and no adverse regional or local air quality impact would occur as a result of the project. Furthermore, implementation of the project would ensure that the City would be consistent with the 2016 SCAG RTP/SCS and 2017 FTIP. Therefore, the project would not obstruct or conflict with implementation of the SIP, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less than Significant Impact.**

**Construction**

The principal criteria pollutants emitted during construction would be PM<sub>10</sub> and PM<sub>2.5</sub>. The source of the pollutants would be fugitive<sup>1</sup> dust created during clearing, grubbing, excavation, and grading; vehicle travel on paved and unpaved roads; and material blown from unprotected graded areas, stockpiles, and haul trucks. Generally, the distance that particles drift from their source depends on their size, emission height, and wind speed.

A secondary source of pollutants during construction would be the engine exhaust from construction equipment during all construction activities. The principal pollutants of concern would be oxides of nitrogen and volatile organic compounds emissions that would contribute to the formation of ozone, which is a regional non-attainment pollutant, as well as PM<sub>2.5</sub>.

Project construction would begin in 2020, and construction of each of the four phases would last one year. Emissions due to construction of the project were quantified and compared to

<sup>1</sup> “Fugitive” is a term used in air quality analysis to denote emission sources that are not confined to stacks, vents, or similar paths.

the ICAPCD construction thresholds. Construction emissions were calculated using the Sacramento Metropolitan Air Quality Management District's 2016 Road Construction Emissions Model, Version 8.1.0. The Road Construction Emissions Model calculates fugitive particulate matter dust, exhaust, and off-gas emissions from grubbing/land clearing, grading/excavation, drainage/utilities/sub-grade, and paving activities associated with construction projects that are linear in nature (e.g., road or levee construction, pipeline installation, transmission lines). The results are summarized in Table 2.

	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Max Daily Emissions	6	65	47	0	53	13
<i>APCD Significance Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	--	<i>100</i>	--
Significant Impact?	No	No	No	--	No	--
ROG = reactive organic gases; NO <sub>x</sub> = nitrous oxide; CO = carbon monoxide; PM <sub>10</sub> = particulate matter less than 10 microns; PM <sub>2.5</sub> = particulate matter less than 2.5 microns						

As shown in Table 2, worst-case emissions are projected to be less than the thresholds for all criteria pollutants. Therefore, project construction would not violate any air quality standard or contribute substantially to an existing or projected air quality violation, and impacts would be less than significant. However, ICAPCD requires standard mitigation measures for construction equipment and fugitive PM<sub>10</sub> be implemented on construction sites that are 5 acres or more for non-residential developments. Because the project site is non-residential development larger than 5 acres, the project is required to implement all standard and discretionary measures (AQ-1). Therefore, implementation of MM-AQ-1a through MM-AQ-1c would further reduce construction emissions below levels presented in Table 2 above.

#### MM-AQ-1a: Standard Mitigation Measures for Construction Equipment

- Use alternative fueled or catalyst-equipped diesel-construction equipment, including all off-road and portable diesel-powered equipment.
- Minimize idling time either by shutting equipment off when not in use or reduce the time idling to five minutes as a maximum.
- Limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use.
- Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set).

#### MM-AQ-1b: Enhanced Mitigation Measures for Construction Equipment

- Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak hour vehicular traffic on adjacent roadways.

- Implement activity management (e.g., reschedule activities to reduce short-term impacts).

#### MM-AQ-1c: Standard Mitigation Measures for Fugitive PM<sub>10</sub> Control

- All disturbed areas, including bulk material storage which is not being actively utilized, shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps, or other suitable material such as vegetative ground cover.
- All on-site and off-site unpaved roads shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering.
- All unpaved areas of one acre or more with 75 or more average vehicle trips per day shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering.
- The transport of bulk material shall be completely covered, unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks is to be cleaned and/or washed at delivery site after removal of bulk material.
- All track-out or carry-out shall be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.
- Movement of bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with the application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line.
- The construction of any new unpaved road is prohibited within any area with a population of 500 or more, unless the road meets the definition of a temporary unpaved road. Any temporary unpaved road shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emission by paving, chemical stabilizers, dust suppressants, and/or watering.

#### **Operation**

The proposed extension of Imperial Avenue would not generate any new vehicle trips and would improve traffic operations on the roadway network in the vicinity of the project. Consequently, the project would only result in a future redistribution of vehicles on the roadway network in the vicinity of the project and would not generate any new emissions. Therefore, operation of the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less than Significant Impact.**

**Construction**

As described in Section III(b), construction emissions would be less than the ICAPCD thresholds of significance, and implementation of MM-AQ-1a through MM-AQ-1c would further reduce construction emissions below levels presented in Table 2 above. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant, and impacts would be less than significant.

**Operation**

As described in Section III(b), the proposed extension of Imperial Avenue would not generate any new vehicle trips and would not generate any new emissions. As described in Section III(a), the project would be consistent with the 2016 SCAG RTP/SCS and 2017 FTIP and consistent with local land use plans and growth projections. Therefore, operation of the project would not result in a cumulatively considerable net increase of any criteria pollutant, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less than Significant Impact.** To help protect public health and welfare, the state and federal governments established Ambient Air Quality Standards for criteria pollutants. Construction-related impacts may occur due to release of diesel particulate matter, while operational impacts may result from carbon monoxide hot spots, which are areas of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. CO hot spots have the potential to violate state and federal CO standards at intersections, even if the broader basin is in attainment for federal and state levels. CO hot spots typically occur nearly exclusively at signalized intersections operating at Level of Service (LOS) E or F. Impacts would be less than significant.

## **Construction**

Diesel particulate emissions are pollutants of concern. While there is no formal guidance for impact analysis, potential adverse impacts would be increased if construction equipment and truck staging areas were to be located near schools, active recreation areas, or areas of higher population density. There are residences along the project alignment, which would qualify as sensitive receptors. However, the health risks associated with diesel particulate matter are those related to long-term exposures (i.e., cancer and chronic effects) (Office of Environmental Health Hazard Assessment 2015). Long-term health risk effects to residents are generally evaluated for an exposure period of 30 years (i.e., lifetime exposure) (Office of Environmental Health Hazard Assessment 2015). Since construction would last approximately 4 years, diesel particulate matter emissions would not result in long-term exposure to surrounding residences, and impacts would be less than significant. Additionally, the project would further reduce potential impacts associated with exposure of sensitive receptors to diesel particulate matter through implementation of MM-AQ-1a through MM-AQ-1c.

## **Operation**

A significant volume for a new highway or expressway is defined as an annual average daily traffic (AADT) volume of 125,000 or more, and a significant number of diesel vehicles is defined as 8 percent or more of that total AADT or more than 10,000 truck AADT. A significant increase in diesel truck traffic is normally considered to be approximately 10 percent.

The proposed extension of Imperial Avenue would improve traffic operations on the roadway network in the vicinity of the project. The extension would be a 4-lane arterial and 2-lane arterial with General Plan capacities of 36,000 average daily traffic (ADT) and 18,000 ADT, respectively (City of El Centro 2004), and long-term (year 2040) projected traffic volumes ranging from 8,200 to 24,000 ADT (Linscott, Law & Greenspan [LLG] 2018). Additionally, the project would not result in an increase in the number of diesel vehicles utilizing the project area. Imperial Avenue would carry 6.3 percent trucks (Caltrans 2015). This is the current truck volume for SR 86 at I-8, and is appropriate for evaluation of the project as it is a cross-street of I-8 and runs parallel to the future extension of Imperial Avenue. While the project would create a new roadway segment, the estimated maximum ADT would be substantially less than the volume significance criteria of 125,000 AADT. Additionally, the project is not a trip generator. Implementation of the project would resolve the existing traffic network deficiencies within the City and provide improved access to residences and other properties south of I-8. Travelers would no longer need to travel the additional distance required under the existing condition and would have improved direct access south of I-8. Additionally, the proposed roadway improvements would not reduce levels of service below what would occur under the Near-Term Without Project scenario, and no signalized intersections are projected to operate at LOS E or F. Therefore, impacts associated with CO hot spots would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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e. Create objectionable odors affecting a substantial number of people?

**Less than Significant Impact.** Diesel equipment used during construction may generate some nuisance odors that would be noticeable at adjacent residential uses. However, exposure to odors associated with construction would be short term and temporary in nature. Furthermore, the project does not include heavy industrial or agricultural uses that are typically associated with odor complaints. Therefore, impacts associated with objectionable odors would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**IV. BIOLOGICAL RESOURCES**

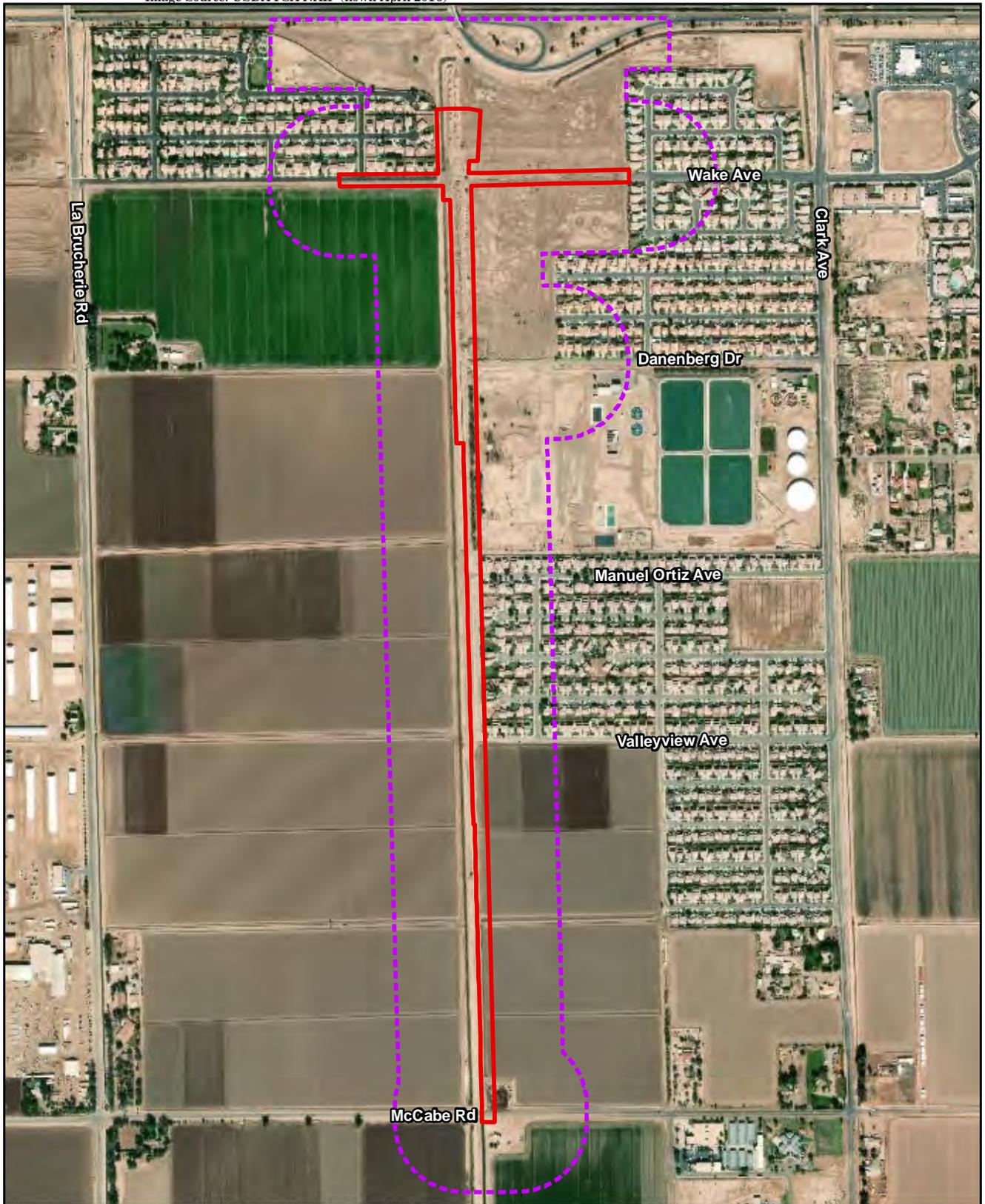
Would the project:

a. Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Service (USFWS)?

**Less Than Significant With Mitigation Incorporated.** This section is based on the Natural Environment Study–Minimal Impacts (NES-MI) prepared by Caltrans District 11, which is incorporated by reference (Caltrans 2018). Figure 9 shows the Biological Study Area (BSA) that was developed for the project, which consists of the area that would be directly impacted by the project (project impact area [PIA]), as well as an approximate 150-meter buffer to account for indirect impacts. A review of existing literature and databases relevant to the biological resources known from the vicinity of the BSA was conducted to determine special status species historically reported or with potential to occur within the BSA.

Literature reviewed included, but was not limited to, the following:

- Staff Report on Burrowing Owl Mitigation (California Department of Fish and Wildlife [CDFW] 2012),
- California Natural Diversity Database (CNDDDB; CDFW 2017),
- All Species Occurrences Database (USFWS 2017a),
- The California Native Plant Society (CNPS) database (CNPS 2017), and
- The USFWS project-specific list of threatened and endangered species (USFWS 2017b).



-  Project Impact Area
-  Biological Study Area

**FIGURE 9**  
Project Biological Study Area

Additional maps, imagery, databases, and references reviewed included USGS topographic maps (USGS 1976a and 1976b), soils maps (U.S. Department of Agriculture [USDA] 1975), and aerial photographs.

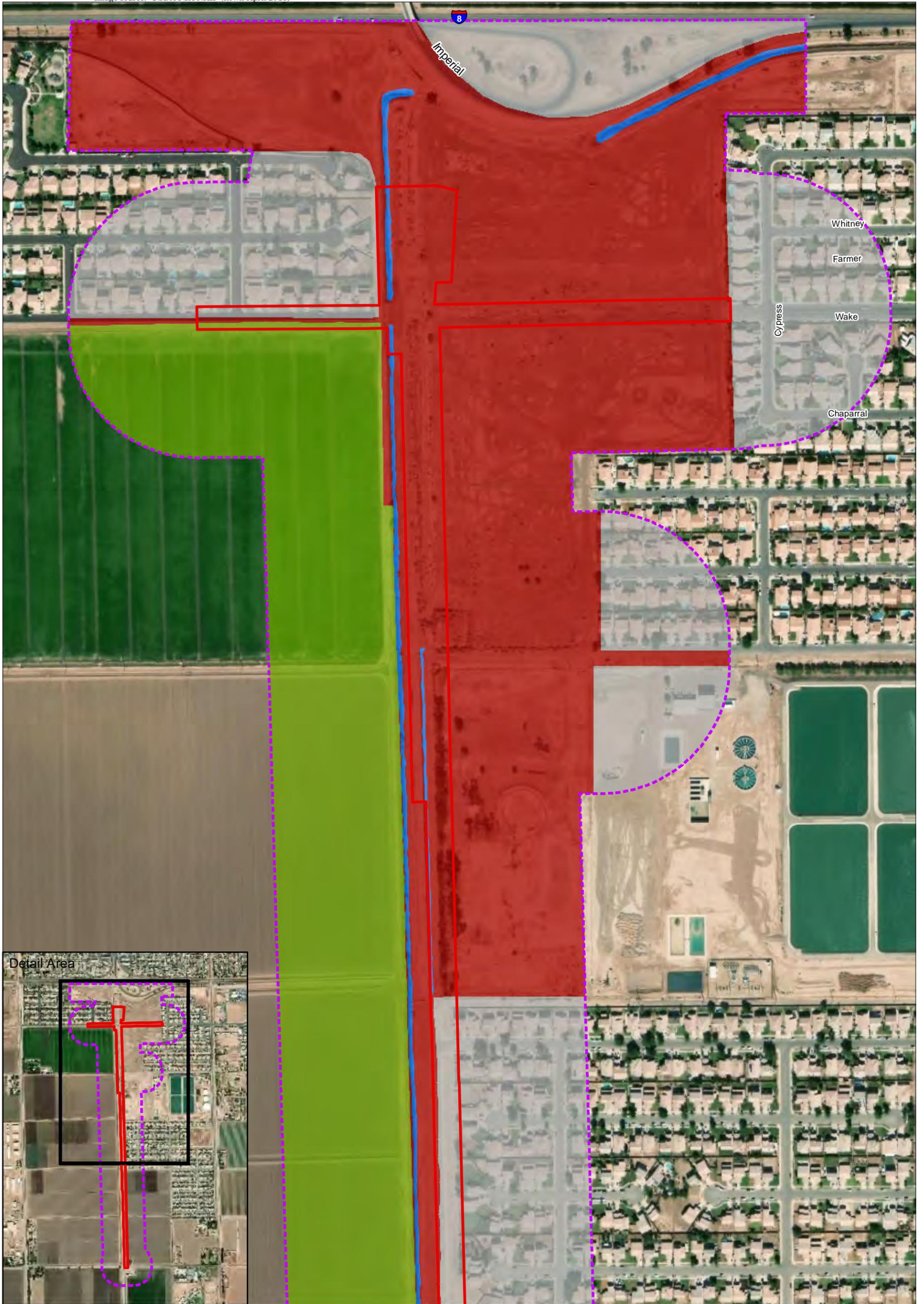
A general biological survey was conducted within the BSA to map vegetation communities and land cover types, document observed plant and wildlife species, and assess the potential for special status species to occur on-site. A habitat assessment and breeding season burrowing owl surveys in accordance with the guidelines developed by the CDFW in the Staff Report on Burrowing Owl Mitigation (CDFW 2012) were also conducted. Wildlife databases, including the CNDDDB, were consulted and available information of known burrowing owl observations was gathered and compared to the location of the BSA prior to the start of surveys. For the habitat assessment, the entire BSA was evaluated for the presence of suitable habitat. Four breeding season burrowing owl surveys were then conducted within areas determined to support potentially suitable habitat for the species.

The habitat assessment area included the entire BSA, which includes the PIA and a buffer generally extending 150 meters outside of the PIA. The 150-meter buffer was expanded to include portions of vacant lots containing suitable habitat in the northern portion of the site. It should be noted that the BSA was originally developed based on a larger project footprint that assumed four lanes on Imperial Avenue from I-8 to McCabe Road. The project subsequently down-scoped to two lanes on Imperial Avenue from Wake Avenue to McCabe Road. Consequently, the BSA includes a larger amount of land than would be required for the revised project footprint.

### Vegetation Communities and Land Cover Types

Four vegetation communities and land cover types were mapped within the BSA: disturbed habitat, non-vegetated channel, agriculture, and urban/developed. The locations of these vegetation communities and land cover types are shown in Figures 10a and 10b, while Table 3 summarizes the acreage of each community within the PIA, as well as the entire BSA.

Vegetation Community/ Land Cover Type	Existing Acreage within Biological Study Area	Existing Acreage within Project Impact Area
Disturbed Habitat	141.41	16.35
Non-vegetated channel	3.51	0.52
Agriculture	124.00	3.61
Urban/Developed	67.72	3.50
<b>Total</b>	<b>336.64</b>	<b>23.98</b>



- Project Impact Area
- Biological Study Area
- Vegetation Communities and Land Cover**
- Non-vegetated Channel
- Agriculture
- Disturbed
- Urban/Developed

0 Feet 350

**FIGURE 10a**  
Vegetation Communities/Land Cover  
Types within the BSA - North



- |  |   |
|--|---|
| <span style="border: 1px solid red; display: inline-block; width: 15px; height: 10px;"></span> Project Impact Area       | <b>Vegetation Communities and Land Cover</b>  |
| <span style="border: 1px dashed purple; display: inline-block; width: 15px; height: 10px;"></span> Biological Study Area | <span style="display: inline-block; width: 15px; height: 10px; background-color: blue;"></span> Non-vegetated Channel |
|  | <span style="display: inline-block; width: 15px; height: 10px; background-color: green;"></span> Agriculture          |
|  | <span style="display: inline-block; width: 15px; height: 10px; background-color: red;"></span> Disturbed              |
|  | <span style="display: inline-block; width: 15px; height: 10px; background-color: gray;"></span> Urban/Developed       |



**FIGURE 10b**  
Vegetation Communities/Land Cover  
Types within the BSA - South

### *Disturbed Habitat*

Disturbed habitat refers to areas that have been physically disturbed by previous legal human activity and are no longer recognizable as a native or naturalized vegetation association. This includes areas that have experienced repeated use that prevents natural revegetation such as dirt parking lots, construction staging areas, and off-road-vehicle trails (Oberbauer et al. 2008).

The disturbed habitat within the BSA consists primarily of dirt access roads associated with IID and agricultural operations, as well as several vacant lots in the eastern portion of the BSA. The dirt access roads are predominantly devoid of vegetation, with some scattered big saltbush (*Atriplex lentiformis*), common sow thistle (*Sonchus oleraceus*), and horehound (*Marrubium vulgare*). In the northern portion of the BSA, the disturbed habitat also includes portions of several vacant lots, containing an abandoned house and other trash and debris. The vacant lots are sparsely vegetated and include patches of big saltbush and stands of gum tree (*Eucalyptus* spp.).

### *Non-Vegetated Channel*

Non-vegetated channel refers to waterways or flood channels that are unvegetated on a relatively permanent basis. Variable water lines inhibit the growth of vegetation, although some weedy species of grasses may grow along the outer edges at usually less than 10 percent cover (Oberbauer et al. 2008).

The non-vegetated channel within the BSA consists of the Dahlia Lateral and Date Drain. The Dahlia Lateral is concrete-lined and devoid of vegetation, and was observed to support hydrologic flows at the time of the surveys. The Date Drain is earthen-lined and supports sparse vegetation in some areas with common species including Bermuda grass (*Cynodon dactylon*), alkali heliotrope (*Heliotropium curassavicum*), annual beard grass (*Polypogon monspeliensis*), tamarisk (*Tamarix* sp.), pitseed goosefoot (*Chenopodium berlandieri*), and tumbleweed (*Amaranthus albus*). The Date Drain had varying levels of water during the surveys.

### *Agriculture*

General agriculture refers to lands that support an active agricultural operation (Oberbauer et al. 2008). Agriculture within the BSA consists of active agricultural fields used for row crops as well as areas that have been recently disked and are currently devoid of vegetation. The agriculture also includes equipment staging areas and dry irrigation ditches.

### *Urban/Developed*

Urban/developed areas have been constructed or otherwise physically altered to an extent that native vegetation is no longer supported. Developed land is characterized by permanent or semi-permanent structures, pavement or hardscape, and landscaped areas

that often require irrigation (Oberbauer et al. 2008). The urban/developed areas within the BSA include residential development, sidewalks, and paved roads.

None of these vegetation communities and land cover types are considered sensitive. Although wetlands and non-wetland waters qualify as vegetation communities of special concern, the NES-MI prepared by Caltrans determined that non-vegetated channel within the project site did not qualify as jurisdictional resources (Caltrans 2018). Therefore, no impacts to sensitive vegetation communities would occur.

### **Plant Species**

The NES-MI prepared by Caltrans determined that no special status plant species were observed within the BSA, and none are expected to occur. Therefore, no impacts to special status plant species would occur.

### **Wildlife Species**

#### *Western Burrowing Owl*

The NES-MI prepared by Caltrans determined that one special status animal species was observed within the BSA at the time of the surveys: western burrowing owl (*Athene cunicularia*). The western burrowing owl is a CDFW species of special concern. Species of special concern include species that meet the state definition of threatened or endangered but have not been formally listed, or could qualify for state threatened or endangered status if the species experiences further population declines. The total number of western burrowing owls observed in the BSA during the general biological survey, western burrowing owl habitat assessment, and breeding season surveys ranged from three to nine individuals (Figure 11). The owls were observed in the southern portion of the site. Occupied burrows were observed within the banks of the Date Drain and along the upper berm of the Dahlia Lateral. With the sign detected, it is apparent that the BSA contains occupied burrows and supports up to nine western burrowing owl individuals.

The project has the potential to result in direct and indirect impacts to western burrowing owl (see Figure 11). Western burrowing owls could be impacted during grading activities either directly or through removal of occupied burrows within the PIA. Noise associated with construction activities involving heavy equipment operation that occurs during the breeding season (February 1 to August 31) could disturb nesting western burrowing if an active burrow is located near these activities. Noise associated within construction activities could also disturb western burrowing owls foraging within the BSA.



- |                     |                                   |
|---------------------|-----------------------------------|
| Project Impact Area | <b>Burrowing Owl Observations</b> |
| Survey Area         | 4/11/2017                         |
| Burrow (Occupied)   | 4/12/2017                         |
| Burrow (with Sign)  | 5/11/2017                         |
| Suitable Burrow     | 6/1/2017                          |
|                     | 6/22/2017                         |

0 Feet 250

**FIGURE 11**  
Special Status Species within  
the Biological Study Area

Impacts to western burrowing owl would be considered significant. Implementation of MM-BIO-1 would reduce impacts to a level less than significant.

- BIO-1 Prior to issuance of any grading or development permits, formal consultation with CDFW will be required in order to develop the appropriate mitigation plans for the project. Take-avoidance surveys will be required, along with one or more mitigation measures, such as translocation of western burrowing owls, artificial burrow construction, avoidance, burrow exclusion and closure, and/or habitat preservation, may be required. Take-avoidance (Pre-construction) Surveys will be required at least 14 days prior to ground disturbance to detect the presence of western burrowing owls and inform necessary take avoidance actions (CDFW 2012).

#### *Nesting and migratory birds*

A variety of common and special status resident and migratory bird species have been observed and have potential to nest within the BSA. Common bird species observed during surveys include red-winged blackbird (*Agelaius phoeniceus*), black phoebe (*Sayornis nigricans semiatra*), killdeer (*Charadrius vociferus vociferous*), and mallards (*Anas platyrhynchos platyrhynchos*).

The Migratory Bird Treaty Act, which is enforced by the USFWS, makes it unlawful “by any means or in any manner, to pursue, hunt, take, capture, [or] kill” any migratory bird, or attempt such actions, except as permitted by regulation. The take, possession, import, export, transport, sale, purchase, barter, or offering of these activities is prohibited, except under a valid permit or as permitted in the implementing regulations (50 Code of Federal Regulations [CFR] 21.11). Raptors (birds of prey) and active raptor nests are protected by the California Fish and Game Code (CFGC) Section 3503.5, which states that it is “unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird” unless authorized (CDFW 1991).

The project has the potential to result in direct impacts to nesting birds through the removal of vegetation and/or grading activities during the nesting season (January 1 through September 30). Additionally, noise associated with construction activities involving heavy equipment operation that occurs during the breeding season (generally between March 1 and August 31) could disturb nesting migratory birds and raptors if an active nest is located near these activities. Any disturbance that causes migratory bird or raptor nest abandonment and subsequent loss of eggs or developing young at active nests located at or near the construction work area would violate CFGC Sections 3503 or 3503.5 and the Migratory Bird Treaty Act.

Impacts to nesting and migratory birds would be considered significant. Implementation of MM-BIO-2 would reduce impacts to a level less than significant.

- BIO-2 All vegetation removal shall take place between October 1 and December 31, outside the avian nesting season. A qualified biologist shall conduct a nesting bird survey prior to removal of vegetation if vegetation removal is required

during the avian nesting season (January 1 through September 30). If active nests are found, appropriate avoidance buffers would be established as determined by a qualified biologist based on the species involved, site conditions, and type of work to be conducted. No construction activities would occur within the buffer area until the nest is no longer active.

## Invasive Species

Non-native invasive plant species are non-native plants that can spread into native ecosystems. These species also displace native species, hybridize with native species, alter biological communities, or alter ecosystem processes. The California Invasive Plant Council (Cal-IPC) provides an overall rating for all plants listed in the Invasive Plant Inventory for California (Cal-IPC 2017). The BSA was surveyed for non-native invasive plant species listed by Cal-IPC. A total of 11 non-native invasive plant species listed in the Invasive Plant Inventory (Cal-IPC 2017) were documented within the BSA. Most of these species are widespread throughout Imperial County. The general location of each of the nonnative invasive plants found in the BSA along with their Cal-IPC rating is provided below in Table 4.

Scientific Name	Common Name	Cal-IPC Rating	Location
<i>Washingtonia</i> sp.	fan palm	Moderate; alert	Non-vegetated channel (Date Drain) in PIA
<i>Avena</i> sp.	oats	Moderate	Disturbed habitat in PIA
<i>Cynodon dactylon</i>	Bermuda grass	Moderate	Non-vegetated channel (Date Drain) in PIA
<i>Polypogon monspeliensis</i>	annual beard grass, rabbitfoot grass	Limited	Non-vegetated channel (Date Drain) in PIA
<i>Schismus barbatus</i>	Mediterranean schismus	Limited	Disturbed habitat in PIA
<i>Salsola tragus</i>	Russian thistle, tumbleweed	Limited	Disturbed habitat in PIA and buffer outside of PIA
<i>Marrubium vulgare</i>	horehound	Limited	Disturbed habitat in PIA
<i>Eucalyptus</i> sp.	gum tree	Limited	Disturbed habitat in buffer outside of PIA
<i>Tamarix ramosissima</i>	saltcedar	High	Non-vegetated channel (Date Drain) in PIA
Cal-IPC = California Invasive Plant Council; PIA = Project Impact Area			

Road construction would occur along a heavily disturbed corridor between agricultural fields, roads, and residential development. Though some invasive species are present within the BSA, these species provide limited vegetative cover and similar to the species composition observed in the surrounding areas. Thus, implementation of the project is not expected to result in the introduction, establishment, and spread of new invasive weeds, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** None of the vegetation communities and land cover types described in Section IV(a) qualify as riparian habitat. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** As described in Section IV(a), the NES-MI prepared by Caltrans determined that non-vegetated channel within the project site did not qualify as a jurisdictional resource (Caltrans 2018). Therefore, no impacts to wetlands would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** The BSA is heavily influenced by human activity, and consists of land cover types such as urban/developed, disturbed habitat, non-vegetated channel, and agriculture. The BSA is further surrounded by residential neighborhoods, active agricultural fields, and roads, which ultimately restrict its use for terrestrial wildlife movement. Though these areas may support urban-acclimated species, the terrestrial habitats within the BSA do not connect large expanses of natural communities and do not function as a regional wildlife movement corridor. Additionally, undergrounding of a 100-foot segment of the Date Drain adjacent to the segment of this resource that is already undergrounded within the BSA would not result in new restrictions of movement of aquatic species. Therefore, the project would not substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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e. Conflict with any local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**No Impact.** The City does not have any ordinance or policies protecting biological resources. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

**No Impact.** The project site is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**V. CULTURAL RESOURCES**

Would the project:

a. Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Less Than Significant Impact.** This section is based on the Historic Property Survey Report prepared by RECON (Appendix D).

A records search was requested from the California Historical Resources Information System South Coastal Information Center for the project area with a one-mile radius search buffer that was completed on April 17, 2017, by South Coastal Information Center personnel. The search included a review of the National Register of Historic Places for Imperial County, National Historic Landmarks, California Register of Historical Resources, California Registered Historical Landmarks, California Points of Historical Interest, historic resources inventory files, archaeological inventory files, a bibliography of previous cultural resources investigations, and various historic maps. The record search identified one previously documented and recorded historic structure within the Area of Potential Effect (APE) boundary. P-13-008655 was identified and recorded in 2001 as a portion of the Date Drain, which extends the length of the project APE. The record search did not identify any prehistoric or historical archaeological deposits.

Additionally, RECON archaeologist Richard Shultz conducted an on-foot pedestrian survey of the project area on April 25, 2017. Because much of the project area consisted of graded and elevated dirt roads and developed water infrastructure, the survey was focused on open fields, built environment features, and possible buried deposits. The on-foot survey resulted in the identification of one previously undocumented cultural resource: Dahlia Canal Lateral 1. No prehistoric or historical archaeological deposits were identified within the project area during the on-foot survey.

Both the Date Drain (P-13-008655) and Dahlia Canal Lateral 1 are owned by the IID and are located outside of the Caltrans ROW. On September 18, 2017, the Caltrans Cultural Studies Office approved an assumption of National Register of Historic Places eligibility for both the Date Drain and Dahlia Canal Lateral 1 in consideration of the current project. An evaluation of potential impacts to both resources based on the Finding of No Adverse Effect that was prepared for the project is presented below.

### **Date Drain**

The project would underground an approximately 100-foot segment of the Date Drain south of the future intersection of Imperial Avenue and Wake Avenue. However, undergrounding this segment of the Date Drain would not affect the integrity of the overall resource. Undergrounding this segment would not adversely affect the integrity of the Date Drain's design, materials, or workmanship, nor would it change the drain's function or the intent of the original design. In its original configuration as an open dirt walled drainage ditch, there are no associated construction materials, beyond the existing native soil, that would be affected by the project. The affected segment of the Date Drain would remain within the same alignment and maintain its current use and function. Therefore, undergrounding is not considered an adverse effect to the larger resource. Other resources with character similar to the Date Drain are commonly found and are ubiquitous throughout the IID system. Therefore, undergrounding this segment of the Date Drain is not considered an adverse effect or a cumulative effect to the larger resource, and impacts would be less than significant.

### **Dahlia Canal Lateral 1**

The project would underground the portion of the Dahlia Canal Lateral 1 that runs parallel along the entire eastern edge of the project site. However, undergrounding of the Dahlia Canal Lateral 1 under the project would not affect the integrity of the lateral because the resource would maintain its current use and function. It is important to note that approximately 1,400 feet of the Dahlia Canal Lateral 1 was undergrounded within the project footprint between Valleyview Avenue and just north of Manual Ortiz Avenue during the construction of the Buena Vista Park Division in 2005. Undergrounding of this segment did not affect the integrity of the resource because it did not affect the canal's current use and function. Therefore, undergrounding this segment of the Dahlia Canal Lateral 1 is not considered an adverse effect or a cumulative effect to the larger resource, and impacts would be less than significant.

Additionally, the project would remove the Dahlia Canal Lateral 1 turnout gate and abandoned underground pipeline serving the parcel of property at the termination of the lateral, along the northeast corner of Danenberg Drive and Imperial Avenue. However, removal of the turnout gate and the abandonment of the underground pipeline under the project would have minimal effect on the integrity of the lateral because the larger resource would maintain its current use and function. It is important to note that past maintenance truncated a turnout gate and abandoned an open ditch north of Danenberg Drive, which had minimal effect on the integrity of the lateral that did not constitute an adverse effect to the larger resource. Therefore, removal of the Dahlia Canal Lateral 1 turnout gate and abandoned underground pipeline is not considered an adverse effect or a cumulative effect to the larger resource, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** As described in Section V(a), the record search and on-foot pedestrian survey conducted for the project did not identify any prehistoric or historical archaeological deposits. The integrity of the project site has been compromised through agricultural operations and the installation and maintenance of the Date Drain and Dahlia Canal Lateral 1. Consequently, it is considered unlikely that unknown archaeological resources would be encountered during project construction. Therefore, the project would not cause a substantial adverse change in the significance of an archaeological resource, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** The significance of paleontological resources is based on the potential to yield fossils that can provide research information regarding earth's chronology and history. The project site is underlain by Holocene (0–11,000 years before present) Cahuilla Lake Sediments, which consist of interbedded lenticular and tabular sand, silt, and clay (GS Lyon 2017), which have a high potential to yield significant paleontological resources. However, the integrity of the project site has been compromised through agricultural operations and the installation and maintenance of the Date Drain and Dahlia Canal Lateral 1. Similarly, it is not anticipated that project excavation would reach depths that could encounter paleontological resources. Therefore, the project would not directly or indirectly destroy a unique paleontological resource, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d. Disturb human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

**Less Than Significant Impact:** No cemeteries, formal or informal, have been identified on-site or within the project vicinity. In the unlikely event that remains are located on-site, the project would be required to comply with California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) that require proper handling of human remains. Compliance with these regulations would ensure any unforeseen impacts related to human remains would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**VI. GEOLOGY/SOILS**

Would the project:

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:   |                          |                          |                                     |                          |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Less Than Significant Impact.** The site is located in the seismically active southern California region, and fault zones in the area include the San Andreas, San Jacinto, and Elsinore Zones. Review of Figure S-1 of the General Plan Safety Element determined that the project site is not located within a known Alquist-Priolo Earthquake Fault Zone, and there are no known faults located beneath the project site. Therefore, the risk of earthquake ground rupture is low, and impacts related to the exposure of people or structures to rupture of a known earthquake fault would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- |                                    |                          |                          |                                     |                          |
|------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| ii) Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|

**Less than Significant Impact.** As indicated above, the site is located in the seismically active southern California region. However, the project is limited to a roadway extension and would not construct any residential, commercial, or other structures that could be

affected by seismic activity. Additionally, the proposed roadway extension and future intersections would be designed consistent with all applicable safety regulations. Therefore, impacts associated with strong seismic ground shaking would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Less Than Significant Impact.** The Geotechnical Investigation for Pavement Improvements (Appendix E-1) and Geotechnical Investigation Addendum (Appendix E-2) did not identify any potential impacts related to liquefaction. Both the Geotechnical Investigation and Addendum determined that adherence to proposed recommendations and appropriate construction practices would ensure that the project would be feasible from a geotechnical perspective. Therefore, impacts related to seismic-related ground failure, including liquefaction, would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**No Impact.** The project site and surrounding area is generally flat and there are no steep slopes or other features surrounding the project site that could be subject to a landslide. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Less than Significant Impact.** The project site is relatively flat, and consists primarily of a narrow north-south corridor of vacant land with sparse vegetation. Construction of the proposed roadway extension would temporarily disturb on-site soils, thereby increasing the potential for soil erosion to occur. However, the project would be required to adhere to City Municipal Code requirements (Article VII, Division 1, Section 22-707), regarding implementation of best management practices to control soil erosion (Ord. No. 15-05, §1, 4-21-15). Adherence to these requirements would ensure that impacts related to substantial soil erosion or the loss of topsoil would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less than Significant Impact.** The Geotechnical Investigation for Pavement Improvements (see Appendix E-1) determined that the project site was underlain by lacustrine deposits and fill. The composition and characteristics of the fill and lacustrine deposits are similar, and therefore were not differentiated from each other in the report. The lacustrine deposits vary from lean clay (Unified Soil Classification CL), to low plasticity sandy silt (ML). The clays are moderate brown, moist, and stiff. The silts are moderate, fine-grained, moist, and stiff in consistency. The Geotechnical Investigation did not identify the subsoil conditions as unstable, and determined that adherence to proposed recommendations and appropriate construction practices would ensure that the project would be feasible from a geotechnical perspective. Therefore, the project site is not located on a geologic unit or soil that is unstable, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less than Significant Impact.** The Geotechnical Investigation for Pavement Improvements (see Appendix E-1) did not identify any expansive soils, and determined that adherence to proposed recommendations and appropriate construction practices would ensure that the project would be feasible from a geotechnical perspective. Therefore, the project site is not located on any expansive soils, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** No septic tanks are proposed for the project site. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**VII. GREENHOUSE GAS EMISSIONS**

Would the project:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

**Less than Significant Impact.**

**Construction**

The City and ICAPCD have not established any greenhouse gas (GHG) emissions thresholds. However, the City is a member of the SCAG, and in the absence of a threshold of significance for GHG emissions, the project is evaluated based on the South Coast Air Quality Management District’s (SCAQMD’s) recommended/preferred option threshold of 3,000 metric tons (MT) of carbon dioxide equivalent (CO<sub>2</sub>E) year (SCAQMD 2008). This threshold is appropriate for addressing potential impacts associated with climate change. According to the SCAQMD, this is the primary threshold used for determining significance. It should be noted that this threshold is applied to development projects and is used to evaluate GHG emissions associated with construction and operation. As a roadway extension that is not generating any new trips, project GHG emissions would be limited to construction activities.

Total GHG emissions were calculated to emit 3,152 MT CO<sub>2</sub>E during project construction. However, project construction would last approximately 4 years, which would result in emissions of approximately 788 MT CO<sub>2</sub>E per year, which is well below the SCAQMD threshold of significance. Under typical impact analyses, construction GHG emissions are amortized over the lifetime of a project (usually 30 years) and then compared to the SCAQMD threshold. Consequently, this impact evaluation limited to four years of construction activities represents a conservative estimate. Additionally, once construction activities are complete, the project would no longer be a source of construction-related GHG emissions. Therefore, construction impacts associated with GHG emissions would be less than significant.

**Operation**

The proposed extension of Imperial Avenue would not generate any new vehicle trips and would improve traffic operations on the roadway network in the vicinity of the project. Consequently, the project would only result in a future redistribution of vehicles on the roadway network in the vicinity of the project and would not generate any emissions. Therefore, operation of the project would not generate any new GHG emissions, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less than Significant Impact.**

As described in Section VII(a), the City and ICAPCD have not established any GHG emissions thresholds, and GHG construction emissions would be less than the applicable SCAQMD threshold. Once construction activities are complete, the project would no longer be a source of construction-related GHG emissions. Once operational, the proposed extension of Imperial Avenue would not generate any new vehicle trips and would not generate any new GHG emissions. Therefore, the project would not conflict with any local or state plan, policy, or regulation aimed at reducing GHG emissions, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**VIII. HAZARDS/HAZARDOUS MATERIALS**

Would the project:

a. Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Less than Significant Impact.** Construction activities and operational maintenance of the proposed roadway would require the use of lubricating oils, paints, solvents, and other materials that may be hazardous. However, all construction activities and operational maintenance would be conducted consistent with applicable federal, state, and local regulations pertaining to the proper use, transport, and disposal of hazardous materials. Therefore, impacts would be would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less than Significant Impact.** The project, including proposed roadways and the connection point with the future Caltrans bridge connecting to I-8, would be designed consistent with applicable federal, state, and local roadway safety standards. This would include preparation of a traffic control plan to ensure roadway safety during construction.

Compliance with applicable federal, state, and local roadway safety standards would ensure that the project would not create reasonably foreseeable upset and accident conditions during construction or operation of the project, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less than Significant Impact.** The southern terminus of the project site is located approximately 0.25 mile west of the Imperial County Office of Education, which may at times have children present. However, as described in Section VIII(a), all construction activities and operational maintenance would be conducted consistent with applicable federal, state, and local regulations pertaining to the proper use, transport, and disposal of hazardous materials. Therefore, impacts would be would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**No Impact.** The hazardous materials site database search conducted under the Phase I Environmental Site Assessment (ESA) (Appendix F) completed for the project determined the project site is not listed as a hazardous materials site. Additionally, the Phase I ESA did not identify any recognized environmental conditions of a hazardous substance or petroleum product that indicate an existing release, a past release, or a material threat of release that would warrant further environmental study (Phase II). Therefore, impacts related to hazardous materials sites would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** The project site is located approximately 3.8 miles south of Imperial County Airport. The project site is located approximately 5.6 miles southeast of Naval Air Facility (NAF) El Centro and is located under approach and departure flight paths for this airfield. The project site is not located within the land use compatibility zones of either facility and

would not create a safety hazard. Although the project site is located under approach and departure flight paths for NAF El Centro, the future roadway would not create a safety hazard since it would not construct any structures and the height of aircraft over the project site due to the distance from the airfield. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**No Impact.** The project site is located approximately 2.5 miles southwest of Douthitt Strip, which is not within the vicinity of the project. Therefore, the project would not create a safety hazard associated with airport operations of a private airstrip. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**No Impact.** The project would construct a new roadway that would improve access to areas that currently under served by the existing roadway network, which would improve emergency response and emergency evacuation. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**No Impact.** The project site is located in a desert environment surrounded by urban and agricultural uses. The site is not proximate to large areas of wildland, and thus people would not be exposed to wildland fires. Although some fire risks exists with agricultural lands, the project is limited to a roadway extension and would not construct any residential, commercial, or other uses that could expose people or structures to fire. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**IX. HYDROLOGY/WATER QUALITY**

Would the project:

- a. Violate any water quality standards or waste discharge requirements?

**Less Than Significant Impact.** Project construction would be required to comply with the federal and state Clean Water Act, which is established through compliance with the requirements of the National Pollutant Discharge Elimination System General Permit for the City (Municipal Permit), State Water Resources Control Board Order No. 2013-0001-DWG. The project would also be required to comply with the City’s storm water requirements (Ordinance Chapter 22, Article VII) and implement best management practices in accordance with City Municipal Code (Article VII, Division 1, Section 22-707). Therefore, the project would not violate any water quality standards or waste discharge requirements, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

**Less Than Significant Impact.** The project is limited to a roadway extension and would not construct any residential, commercial, or other uses that would require the use of groundwater. The conversion of vacant pervious land to roadway uses would incrementally reduce groundwater recharge; however, this would have negligible effects to the groundwater levels. Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** As described in Section IX(a), project construction would comply with the National Pollutant Discharge Elimination System Municipal Permit and the City’s storm water requirements (Ordinance Chapter 22, Article VII). No streams or rivers are located on or adjacent to the project site. Undergrounding of an approximately 100-foot segment of the Date Drain and the segment of the Dahlia Canal Lateral 1 that runs parallel along the entire eastern edge of the project site would not affect alter the course of either feature, and both undergrounded canals would continue to convey water beneath the project improvements. The Preliminary Drainage Analysis Report (Appendix G) documented that the project would be designed to convey stormwater east of the proposed roadway extension and would implement the following drainage improvements to adequately control storm water flows under the post-project condition:

- An 18-foot-wide triangular/trapezoidal swale/retention basin along the east pavement edge of Imperial Avenue.
- An 18-foot wide triangular native earthen swale along both sides of Wake Avenue.
- A 1,200-foot long x 36-foot wide x 3-foot deep retention basin at the City of El Centro Water Treatment Plant.
- Installation of curb inlets at low grade break points and along the length of the curb and gutter at a constant interval, designed to maintain a minimum two (2) travel lanes dry at all times.

Implementation of these drainage improvements would ensure that the project would not result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** As described in Section IX(c), the project would not alter a stream or river, and would implement drainage improvements to adequately control storm water flows under the post-project condition. Therefore, the project would not

substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less than Significant Impact.** As described in Section IX(c), the project would be required to comply with the City’s storm water regulations during construction and after construction, including measures to control runoff rates and control pollution in runoff. The project would also implement drainage improvements to adequately control storm water flows under the post-project condition. Therefore, the project would not would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** As described in Sections IX(a) and (c), the project would comply with all applicable City storm water quality standards, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** Review of Figure S-2 of the General Plan Safety Element determined that the project site is not located within a 100-year flood hazard area. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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h. Place within a 100-year flood hazard area, structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**No Impact.** Review of Figure S-2 of the General Plan Safety Element determined that the project site is not located within a 100-year flood hazard area. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**No Impact.** The project site is not located within a 100-year flood hazard area and is not located near a levee or dam that could fail and result in flooding. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**No Impact.** There would be no risk associated with tsunami due to the project site's distance of approximately 100 miles east of the Pacific Ocean. Similarly, there would be no risk associated with seiche because there are no lakes or other large bodies of water near the project site. The project site and surrounding area is generally flat and there are no steep slopes or other features surrounding the project site that could create mudflows. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**X. LAND USE/PLANNING**

Would the project:

a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Less than Significant Impact.**

This section is based on the Community Impact Assessment prepared by RECON (see Appendix B).

The project site is primarily surrounded by existing residential development, active farmland, and agricultural drains. Existing residential development is located northwest of the future intersection of Imperial Avenue and Wake Avenue. All other land west of the project site, south of the future intersection of Imperial Avenue and Wake Avenue to the southern terminus, consists of active farmland. The Date Drain, which consists of an earthen agricultural drain, runs parallel along the entire western edge of the proposed Imperial Avenue extension. Existing residential development is located east of the project site from the northern terminus to Danenberg Drive. A water treatment plant is located east of the project south of the future intersection with Danenberg Drive, followed by additional existing residential development along the eastern project boundary south to Valleyview Avenue. Land east of the project site from Valleyview Avenue to the southern terminus consists of active farmland. The Dahlia Lateral, which consists of a concrete lined agricultural drain, runs parallel along the eastern edge of the proposed Imperial Avenue extension from Danenberg Drive to McCabe Road. Land north of the project site consists of an elevated roadway berm supporting I-8, while land to the south consists of active farmland. Existing land use designations of the project site and surrounding properties are shown in Figure 3, and existing zoning designations of the project site and surrounding properties are shown in Figure 4. Parcels south of the future intersection of Imperial Avenue and Wake Avenue are within the City's sphere of influence, which consists of areas that are currently under the jurisdiction of Imperial County but are anticipated to be incorporated into the City at some time in the future. Consequently, these parcels have City General Plan land use designations for residential uses (Figure 3), but County of Imperial zoning designations for agricultural uses (see Figure 4). It is anticipated that the zoning designations of these properties would be changed to City residential uses at the time of incorporation.

The project site would be created through partial ROW and Easement acquisitions of portions of properties located within the proposed project boundary. The locations of these partial ROW and Easement acquisitions are shown in Figures 5a and 5b. The partial ROW acquisitions needed for the project would not result in any property displacements. Similarly, the partial ROW acquisitions from existing farmlands surrounding the project site would be limited to small strips of land at the parcel boundaries that would not preclude future agricultural production on the properties.

The project would improve circulation and access within the surrounding community by resolving existing traffic network deficiencies within the City. Motorists heading south and east from Imperial Avenue must travel along I-8 and exit one mile away at 4th Street (SR 86), which exacerbates the existing congested traffic condition at the 4th Street (SR 86)/I-8 interchange. Motorists heading west from Imperial Avenue must travel along I-8 and exit three miles away at Forrester Road. Implementation of the project would resolve the existing traffic network deficiencies within the City and provide improved access to residences and other properties south of I-8. Travelers would no longer need to travel the additional distance required under the existing condition and would have improved direct access south of I-8. This improved access to areas south of I-8 would allow travelers to reach destinations by shorter and more direct routes. The improved access would also provide for greater connectivity and improve emergency access to areas located south of I-8. Therefore,

the project would not physically divide an established community, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** The project would be subject to the 2016 SCAG RTP/SCS, 2017 FTIP, as well as the goals and policies of the City General Plan (2004) and County of Imperial General Plan (2015). The project’s consistency with SCAG and the City and County general plans is presented below.

**2016 SCAG RTP/SCS and 2017 FTIP**

The project is included in the 2016 RTP/SCS (RTP ID 1161L001) and in the 2017 FTIP Amendment 17-03 (FTIP ID IMP160901, Program CAX66). The project was originally described in the 2016 RTP/SCS as a “new roadway from I-8 to McCabe Road. Phase 1 includes 6 new lanes on Imperial Avenue from I-8 to Wake Avenue; and 2 new lanes on Wake Avenue from Imperial Avenue to Cypress Drive.” The 2016 RTP/SCS Amendment 1 removed the discussion of Phase 1 from the project description and only described the project as a “new roadway from I-8 to McCabe Road.”

The project has subsequently been down-scoped to four new lanes on Imperial Avenue from I-8 to Wake Avenue. Although the project is inconsistent with the description in the 2016 RTP/SCS, the project is conforming because it would build fewer lanes than originally anticipated, would not exceed the emissions budget for the project, and is consistent with the 2017 FTIP (see below). Additionally, it is anticipated that 2016 RTP/SCS Amendment 3 will receive Federal approval in December 2018, which will include a revised description of Phase 1 of the project as four new lanes on Imperial Avenue from I-8 to Wake Avenue, consistent with the 2017 FTIP.

The project has the following description in the 2017 FTIP: Imperial Avenue Extension South–New roadway from I-8 to McCabe Road. Phase 1 includes four new lanes on Imperial Avenue from I-8 to Wake Avenue; and two new lanes on Wake Avenue from Imperial Avenue to Cypress Drive. On April 6, 2017, SCAG adopted the 2016 RTP/SCS Amendment 1 and the 2017 FTIP Amendment 17-03 via Resolution No. 17-588-2, and the conformity analysis indicated that all air quality conformity requirements have been met. The FHWA also made a finding of conformity on the 2016 RTP/SCS Amendment 1 and the 2017 FTIP Amendment 17-03 on May 12, 2017 (FHWA 2017).

The design concept and scope of the project are consistent within the scope of the project description that will be included in the 2016 RTP/SCS Amendment 3 anticipated to receive

Federal approval in December 2018, as well as the project description in the 2017 FTIP, and the assumptions in the SCAG regional emissions analysis. Therefore, the project is assumed to conform to the SIP and no adverse regional or local air quality impact would occur as a result of the project. Furthermore, implementation of the project would ensure that the City would be consistent with the 2016 SCAG RTP/SCS and 2017 FTIP. No impact would occur.

**El Centro General Plan**

Table 5 presents an evaluation of the project’s consistency with applicable goals in the El Centro General Plan. As presented in Table 5, the project would be consistent with the majority of the applicable goals, and any conflicts would be minimal. Therefore, impacts would be less than significant.

<b>Table 5 Summary of Project Consistency with Goals of the City of El Centro General Plan</b>	
General Plan Goals	Consistency Evaluation
Circulation Element Goal 1: Provide a system of roadways that meet the needs of the community.	The project would be consistent with the El Centro Circulation Element, which identifies Imperial Avenue as a four-lane arterial from I-8 to McCabe Road. Implementation of the project would meet the transportation needs of the community by improving vehicular to areas south of I-8.
Circulation Element Goal 3: Provide for adequate bicycle and pedestrian access throughout the community.	The project would improve pedestrian access by constructing a 5.5-foot sidewalk along the entire length of northbound Imperial Avenue. The project segment of Imperial Avenue is not identified for future bicycle lanes in the El Centro Circulation Element Transit and Bicycle Routes Map (Figure C-4). However, bicyclists would still be able to use the roadway.
Conservation/Open Space Element Goal 1: Conserve and maintain farmland and prime soil areas surrounding El Centro so that agriculture remains a viable and dominant part of the community’s character and local economy	The project would have the potential to conflict with Conservation/Open Space Goal 1, to conserve and maintain farmland and prime soil areas surrounding El Centro so that agriculture remains a viable and dominant part of the community’s character and local economy. The project site and surrounding properties are not classified as Prime Farmland (impacts on farmland are discussed in greater detail in Section 2.3, Farmlands). The project would result in the conversion of 5.76 acres of soils classified as Farmland of Statewide Importance and 9.98 acres of soils classified as Farmland of Local Importance. However, only 3.03 acres of Farmland of Statewide Importance within the project site is currently in agricultural production, which represents .000032 percent of the 94,033 acres of farmland within Imperial County. The remaining land classified as Important Farmland by the Farmland by the Farmland Mapping and Monitoring Program is currently used as an unofficial dirt road or is vacant land. Similarly, the partial right-of-way acquisitions from existing farmlands surrounding the project site would be limited to small strips of land at the parcel boundaries that would not preclude future agricultural production on the properties. Therefore, conflicts with Conservation/Open Space Goal 1 would be minimal.

**County of Imperial General Plan**

Table 6 presents an evaluation of the project’s consistency with applicable goals of the Imperial County General Plan. As presented in Table 6, the project would be consistent with the majority of the applicable goals, and any conflicts would be minimal. Therefore, impacts would be less than significant.

<b>Table 6 Summary of Project Consistency with Goals of the Imperial County General Plan</b>	
General Plan Goals	Consistency Evaluation
Agricultural Element Goal 1: All Important Farmland, including the categories of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance, as defined by Federal and State agencies, should be reserved for agricultural uses.	Partial acquisitions within Imperial County would be limited to an easement to underground a 100-foot segment of the Date Drain that would continue to convey water and right-of-way (ROW) acquisitions from areas consisting of an unofficial dirt road or vacant land. Although land within these ROW and Easement acquisitions is classified as Important Farmland by the Farmland Mapping and Monitoring Program (FMMP), these areas are not in agricultural production. The partial ROW acquisitions from these County parcels would be limited to small strips of land at the parcel boundaries that would not preclude future agricultural production on the remainder of the properties. Furthermore, the project site and surrounding properties are not classified as Prime Farmland (impacts on farmland are discussed in greater detail in Section 2.3 Farmlands). Consequently, the project would not reduce the amount of active farmland within Imperial County, and conflicts with Agricultural Element Goal 1 would be minimal.
Land Use Goal 3: Achieve balanced economic and residential growth while preserving the unique natural, scenic, and agricultural resources of Imperial County.	The project would support future economic and residential growth within Imperial County by improving access to unincorporated County land south of I-8. Partial ROW acquisitions from County parcels would be limited to small strips of land at the parcel boundaries that would not preclude future agricultural production on the remainder of the properties, nor would the ROW acquisitions impact unique natural or scenic resources. Therefore, conflicts with Land Use Goal 3 would be minimal. To resolve this inconsistency, the City will work with the County to update the zoning designations.
Circulation Element Goal 1: The County will provide and require an integrated transportation system for the safe and efficient movement of people and goods within and through the County of Imperial with minimum disruption to the environment.	Upon acquiring partial ROW acquisitions from land within Imperial County, the project would be located entirely within the jurisdiction of the City of El Centro and would not be subject to the Imperial County General Plan. The project would expand the safe and efficient movement of people and goods within Imperial County by improving access to unincorporated County land south of I-8.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c. Conflict with any applicable habitat conservation plan or natural community conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

**No Impact.** The project is not located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**XI. MINERAL RESOURCES**

Would the project?

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

**No Impact.** The project site is surrounded by residential, agricultural, public, and roadway uses. No known mineral resources exist on the project site or surrounding properties. Therefore, implementation of the project would not result in loss of availability of a known mineral resource. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

**No Impact.** The project site and surrounding properties are not designated or zoned for mineral extraction uses in the El Centro General Plan. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**XII. NOISE**

Would the project result in:

- a. Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

**Less than Significant Impact.**

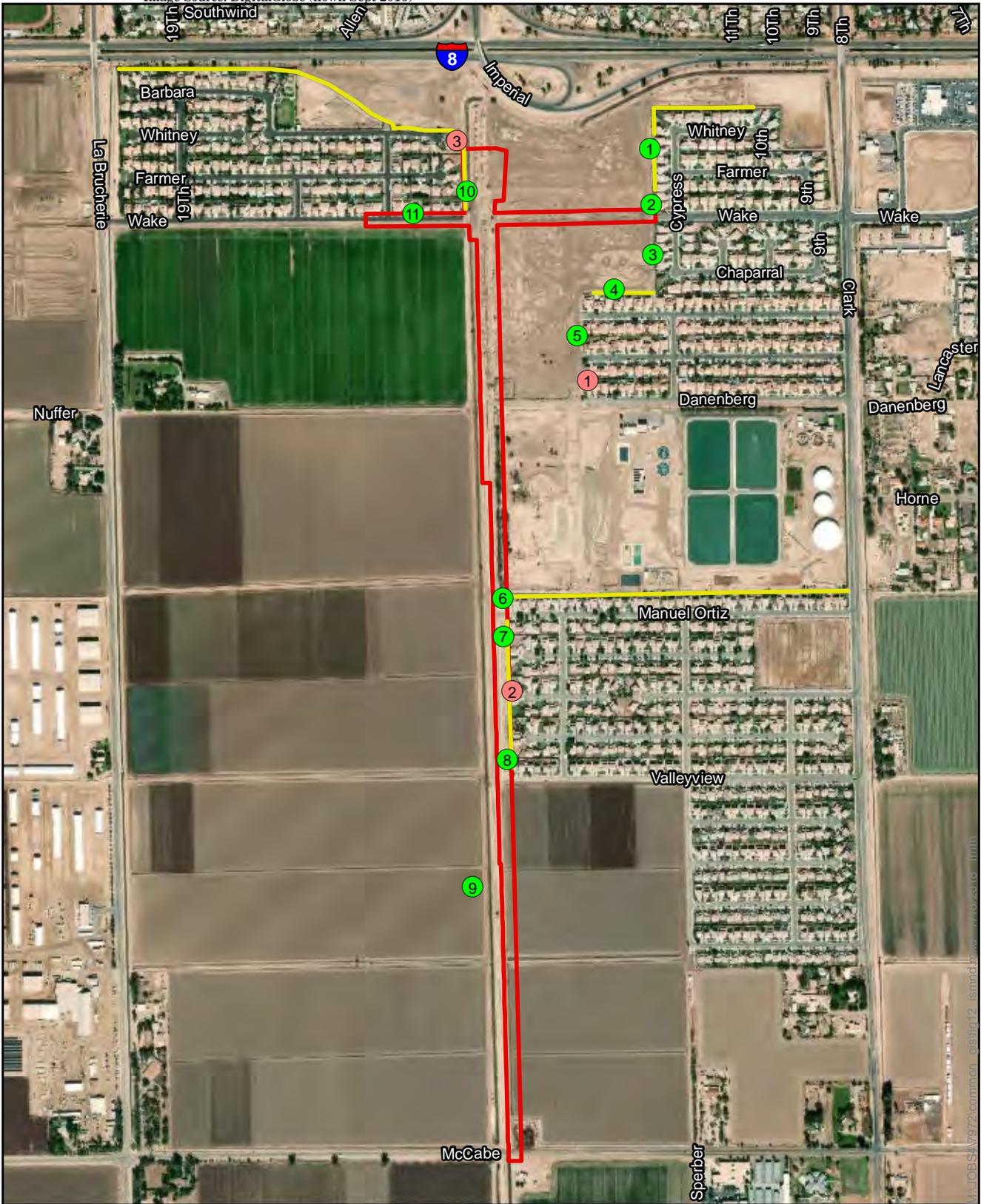
This section is based on the Noise Study Report prepared by RECON (Appendix H).

A field investigation was conducted in accordance with recommended procedures in the Caltrans’ Technical Noise Supplement to identify land uses that could be subject to traffic and construction noise associated with the project. Long-term monitoring was conducted at three locations and short-term monitoring was conducted at eleven locations, which are shown in Figure 12.

**Construction**

Construction noise is regulated by Section 17.1-8 of the City’s Noise Abatement and Control Ordinance, which states it would be unlawful for any person to operate construction equipment at any construction site on Sundays and public holidays, and that operation of construction equipment at any construction site must occur on Mondays through Saturdays between the hours of 6:00 a.m. and 7:00 p.m. The City’s Noise Abatement and Control Ordinance also states that no such equipment, or combination of equipment regardless of age or date of acquisition, shall be operated so as to cause noise at a level in excess of seventy-five (75) decibels (dB) for more than eight (8) hours during any twenty-four (24) hour period when measured at or within the property lines of any property which is developed and used either in part or in whole for residential purposes.

Construction noise would be associated with the use of heavy-duty construction equipment used for clearing and grading, trenching and installing underground utilities, spreading and compacting materials, and paving. Additional construction activities may occur at the north end of the alignment where the project site abuts the rapid grade change associated with the I-8/Imperial Avenue interchange.



- Project Boundary
- Long Term Measurement Location
- Short Term Measurement Location
- Existing Masonry Block Walls



**FIGURE 12**

Noise Monitoring Positions  
and Noise Barriers

Construction equipment with heavy-duty diesel engines typically generate maximum noise levels from 80 to 90 A-weighted dB [dB(A)] at a distance of 50 feet (FHWA 2006). Table 7 summarizes typical construction equipment noise levels. Equipment goes through varying load cycles, and there are breaks for the operators and for non-equipment tasks, such as measurement. Thus, average hourly noise levels would be less than maximum noise levels. Typical noise levels from earthworks activities reach 82 dB(A) equivalent sound level [ $L_{eq(1)}$ ] at 50 feet from the center of construction activity when assessing the loudest pieces of equipment working simultaneously.

<b>Table 7 Typical Construction Equipment Noise Levels</b>		
<b>Equipment</b>	<b>Noise Level at 50 Feet dB(A) <math>L_{eq(1)}</math></b>	<b>Typical Duty Cycle</b>
Auger Drill Rig	85	20%
Backhoe	80	40%
Blasting	94	1%
Chain Saw	85	20%
Clam Shovel	93	20%
Compactor (ground)	80	20%
Compressor (air)	80	40%
Concrete Mixer Truck	85	40%
Concrete Pump	82	20%
Concrete Saw	90	20%
Crane (mobile or stationary)	85	20%
Dozer	85	40%
Dump Truck	84	40%
Excavator	85	40%
Front End Loader	80	40%
Generator (25 kilovolt amps or less)	70	50%
Generator (more than 25 kilovolt amps)	82	50%
Grader	85	40%
Hydra Break Ram	90	10%
Impact Pile Driver (diesel or drop)	95	20%
In situ Soil Sampling Rig	84	20%
Jackhammer	85	20%
Mounted Impact Hammer (hoe ram)	90	20%
Paver	85	50%
Pneumatic Tools	85	50%
Pumps	77	50%
Rock Drill	85	20%
Roller	74	40%
Scraper	85	40%
Tractor	84	40%
Vacuum Excavator (vac-truck)	85	40%
Vibratory Concrete Mixer	80	20%
Vibratory Pile Driver	95	20%
dB(A) = A-weighted decibels; $L_{eq(1)}$ = equivalent sound level over one hour Source: Federal Highway Administration 2006		

Maximum noise levels would occur when the loudest construction equipment is nearest to a noise sensitive receiver. Due to the linear nature of roadway construction, noise levels

would be intermittent and the intensity of construction activities in a given area would vary substantially. Although construction equipment may temporarily be located at the point on the alignment nearest to a receiver, over time equipment would move along the alignment. Therefore, the distance from a receiver to the centerline of the alignment is not the same as the average distance during a given day from the receiver to construction equipment. Thus, average noise levels correlate to the area of active construction.

Based on typical linear roadway projects, construction activities would progress at a rate of approximately 100 feet per day and would include an active work area of approximately 300 feet. Due to the length of the active work area, 300 feet, when the active work area is directly adjacent to a given receiver, construction activities throughout the day would be an average distance of 150 feet along an active portion of the alignment from the receiver. For example, the average distance from construction equipment to a receiver that is 50 feet from the centerline of alignment would be 158 feet.

Construction along the proposed Imperial Avenue alignment would be characterized by hard site attenuation rate of 6 dB(A) per doubling of distance. This analysis conservatively assumes no attenuation from barriers and topography. The nearest residences are approximately 90 feet from the proposed Imperial Avenue alignment and are approximately 50 feet from connecting east-west roads (e.g., Wake Avenue). Thus, when assessing the loudest pieces of equipment working simultaneously on the proposed Imperial Avenue alignment, average construction noise levels would attenuate to roughly 71 dB(A)  $L_{eq(1)}$  at the nearest residences, and when the construction area includes connecting segments of east-west roads, average construction noise levels would attenuate to roughly 72 dB(A)  $L_{eq(1)}$  at the nearest residences.

Although construction activities may be heard above ambient conditions, the exposure would be temporary. Additionally, project construction would not generate noise levels in excess of the standards established in the City's Noise Abatement and Control Ordinance. Therefore, impacts would be less than significant.

## **Operation**

The Noise Element of the General Plan states that the State of California is responsible for regulating traffic noise. Caltrans utilizes a the threshold of 67 dB(A)  $L_{eq(1)}$  as the residential noise abatement criterion. Traffic noise levels were predicted using the FHWA Traffic Noise Model Version 2.5. Traffic noise was evaluated under existing conditions and design-year conditions with the project. Table 8 shows estimated design-year conditions. As shown in Table 8, the loudest hour noise level at all surrounding residential land uses would be 62 dB(A), which is below the Caltrans residential noise abatement criterion of 67 dB(A). Therefore, future traffic operations would not generate noise levels in excess of the applicable Caltrans transportation noise standard, and impacts would be less than significant.

Table 8 Summary of Noise Modeling			
Receiver Number	Activity Category (NAC)	Address	Design Year Loudest Hour Noise Level dB(A) $L_{eq(1)}$
1	B (67)	1503 Whitney Way	62
2		1503 Farmer Dr.	61
3		1502 Wake Ave.	61
4	B (67)	2226 South Cypress Dr.	62
5		2398 South Cypress Dr.	62
6		2456 South Cypress Dr.	56
7		1282 Manzanita Dr.	53
8		1334 Manzanita Dr.	55
9		1334 Jacaranda Dr.	55
10		1334 Danenberg Dr.	61
11	B (67)	1498 Manuel Ortiz Ave.	62
12		1499 Manuel Ortiz Ave.	61
13		1499 Riverview Ave.	59
14		1498 Meadowview Ave.	59
15		1498 Valleyview Ave.	61
16		1198 Desertview Ave.	48

NAC = noise abatement criteria; dB(A) = A-weighted decibels;  
 $L_{eq(1)}$  = equivalent sound level at one hour.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- b. Exposure of persons to, or generation of, excessive ground borne vibration or ground borne noise levels?

**Less than Significant Impact.** Construction of the project would generate groundborne vibration and noise. However, construction of the project would not require blasting or other activities that would generate high levels of groundborne vibration and noise, and groundborne vibration and noise would dissipate to imperceptible levels prior to reaching adjacent residential structures. Operation of the project would not generate substantial groundborne vibration and noise. Therefore, the project would not result in the exposure of persons to, or generation of, excessive ground borne vibration or groundborne noise levels, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

**Less than Significant Impact.** Existing sources of ambient noise in the project area include heating, ventilation, and air conditioning units, landscape maintenance machinery, pumps and filters associated with swimming pools, animal vocalizations (e.g., dogs barking), heavy agricultural equipment, and irrigation pumps. Additional traffic noise is

associated with existing roads such as I-8 and West McCabe Road. Additionally, the project site is located under approach and departure flight paths NAF El Centro. Based on the Noise Study Report prepared for the project, noise levels at modeled receivers range from 44 to 63 dB(A)  $L_{eq(1)}$  for existing conditions and range from 48 to 62 dB(A)  $L_{eq(1)}$  for design-year conditions. The permanent increase in ambient noise levels, including noise associated with aircraft operations at NAF El Centro, would be 2 dB(A) or less at residences in the vicinity of the proposed Imperial Avenue Alignment. Changes in noise levels are generally perceived by the average human ear as follows: 3 dB(A) is barely perceptible, 5 dB(A) is readily perceptible, and 10 dB(A) is perceived as a doubling or halving of noise (Caltrans 2013). Therefore, the project would result in less than barely perceptible noise level increases. The project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less than Significant Impact.** As described in Section XII(a), project construction would not generate noise levels in excess of the standards established in the City’s Noise Abatement and Control Ordinance, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** The project site is located approximately 3.8 miles south of Imperial County Airport. The project site is located approximately 5.6 miles southeast of NAF El Centro and is located under approach and departure flight paths for this airfield. The project site is not located within the land use compatibility zones of either facility and the project does not include the construction of any structures that could expose sensitive receptors to excessive noise levels associated with airport operations. Although the project site is located under approach and departure flight paths for NAF El Centro, the project would not expose people to excessive noise levels since it would not construct any structures and the height of aircraft over the project site due to the distance from the airfield. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

**No Impact.** The project site is located approximately 2.5 miles southwest of Douthitt Strip. The project does not include the construction of any structures that could expose sensitive receptors to excessive noise levels associated with airport operations. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**XIII. POPULATION/HOUSING**

Would the project:

Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

**Less than Significant Impact.**

The project is limited to a roadway extension and would not construct any residential, commercial, or other uses that would induce growth. The project has been designed to redress existing traffic network deficiencies by providing motorists direct access to areas surrounding the project site. Consequently, the project would not create new opportunities for population growth, but would improve circulation and access for existing development and planned growth that is already anticipated in the General Plan. Therefore, the project would not directly or indirectly result in substantial population growth within the City, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

**No Impact.** The partial ROW acquisitions needed for the project would not result in any property displacements. Therefore, the project would not displace any existing housing or people. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**No Impact.** See response to XIII(b). No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**XIV. PUBLIC SERVICES**

Would the project result in substantial adverse physical impacts associated with the provisions of new or physically altered governmental facilities, 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 times or other performance objectives for any of the public services:

i) Fire Protection	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Less than Significant Impact.** The majority of the project site and surrounding properties are currently served by the City Fire Department. The portions of the project site and surrounding properties outside of the City limits are currently served by the Imperial County Fire Department. As described in response to XIII(a), the project would not result in an increase in population that would require additional fire protection services. Furthermore, the project would redress existing traffic network deficiencies that would provide direct emergency access to areas surrounding the project site and potentially improve fire protection response times. Therefore, the project would not increase demand for fire protection services, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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ii) Police Protection	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Less than Significant Impact.** The majority of the project site and surrounding properties are currently served by the City Police Department. The portions of the project site and surrounding properties outside of the City limits are currently served by the Imperial County Sheriff’s Office. As described in response to XIII(a), the project would not result in an increase in population that would require additional police protection services. Furthermore, the project would redress existing traffic network deficiencies that would provide direct emergency access to areas surrounding the project site and potentially improve police protection response times. Therefore, the project would not increase demand for police protection services, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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iii) Schools

**No Impact.** As described in response to XIII(a), the project would not result in an increase in population that would increase demand for schools. Therefore, the project would not require new or expanded school facilities. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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iv) Parks

**No Impact.** As described in response to XIII(a), the project would not result in an increase in population that would increase demand for parks. Therefore, the project would not require new or expanded park facilities. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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v) Other public facilities

**No Impact.** As described in response to XIII(a), the project would not result in an increase in population that would increase demand for other public facilities. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**XV. RECREATION**

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

**No Impact.** As described in response to XIII(a), the project would not result in an increase in population that would cause substantial physical deterioration of recreational facilities through increased use. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** The project is limited to a roadway extension and does not include construction of any recreational facilities. As described in response to XIII(a), the project would not result in an increase in population that would necessitate construction or expansion of recreational facilities. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**XVI. TRANSPORTATION/TRAFFIC**

Would the project?

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking 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, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Less than Significant Impact.**

This section is based on Traffic Analysis prepared by LLG (Appendix I).

**Methodology**

As described in Section 1.3, is anticipated the project would be phased, and preliminary phasing consists of the following:

- Phase I: I-8 off-ramp to Wake Avenue intersection
- Phase II: Wake Avenue to Danenberg Drive intersection
- Phase III: Danenberg Drive to Valleyview Avenue intersection
- Phase IV: Valleyview Avenue to McCabe Road intersection

It is anticipated that construction would begin in 2020, and the following assumptions were used for modeling of all four phases of the project.

Phase 1 (Year 2020): Imperial Avenue would be extended as a 4-lane divided arterial (with a left turn lane) from the updated I-8 interchange to Wake Avenue. The project would also construct a 2-lane collector segment to connect the separated pieces of Wake Avenue located

west and east of the Imperial Avenue alignment. The Imperial Avenue/Wake Avenue intersection would be a three-leg intersection, and Imperial Avenue would act as the minor street and would have STOP control.

Phase 2 (Year 2022): Imperial Avenue would be extended as a 2-lane arterial (with a left turn lane) from Wake Avenue to Danenberg Drive. The missing section of Danenberg Drive east of Imperial Avenue would be built by another entity to connect to Imperial Avenue, but is not a part of this project. During this phase, the Imperial Avenue/Wake Avenue intersection would be improved to a four-leg intersection with a traffic signal.

Phase 3 (Year 2024): Imperial Avenue would be extended as a 2-lane Arterial (with a left turn lane) from Danenberg Drive to Valley View Avenue. The Imperial Avenue/Danenberg Drive and Imperial Avenue/Manuel Ortiz Avenue intersections would be constructed, while the Imperial Avenue/Valleyview Avenue intersection would be built partially. Both of these new three-legged intersections would include a STOP control on the westbound approach.

Phase 4 (Year 2026): Imperial Avenue would be constructed as a 2-lane road (without a left turn lane) from Valley View Avenue to McCabe Road. The Imperial Avenue/McCabe Road intersection would be constructed. This new three-leg intersection would include a STOP control on the southbound approach.

Volume forecasting for each development phase was based on the following three components:

1. Rerouting of existing traffic within project study area. For instance, a portion of the existing volumes along La Brucherie Road and Clark Avenue would reroute to the Imperial Avenue extension.
2. Construction of planned development within the project study area, and
3. Ambient growth of traffic volumes. Ambient traffic volume growth is intended to account for phenomena such as induced traffic and/or traffic rerouted from outside the study area due to the additional capacity and connectivity provided by the project, unforeseen future developments, including from outside the study area, and general population and economic growth over time.

Street segments operations were analyzed in phases to determine the minimum geometry and cross section that would be required in each respective phase. Level of service designations ranging from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions, were used to determine the significance of impacts. Generally, LOS A to C represent acceptable traffic conditions and LOS D to F represent unacceptable conditions. To determine if the project would result in a significant traffic operations impact, the City of El Centro thresholds were utilized. Per these impact thresholds, a significant direct impact would occur if the project causes a LOS C or better facility to degrade to LOS D or worse.

## Near-term Analysis

### *Street Segments*

Phase 1 (Year 2020): Table 9 compares year 2020 street segment operations without the project to Phase 1 improvements. As shown in Table 9, Clark Avenue between I-8 and Wake Avenue operates at LOS F without the project, but improves to LOS E with the project. Clark Avenue between Valleyview Avenue and McCabe Road operates at LOS D under both scenarios. However, the project would reduce ADT and the volume to capacity (V/C) ratio on this street segment, and thereby improve operations. The remaining segments are calculated to operate at LOS A without and with the project. Therefore, Phase 1 improvements would not result in any significant impacts to street segment operations.

Phase 2 (Year 2022): Table 10 compares year 2022 street segment operations without the project to Phase 2 improvements. As shown in Table 10, Clark Avenue between I-8 and Wake Avenue and between Valleyview Avenue and McCabe Road operates at LOS E under both scenarios. However, the project would reduce ADT and the V/C ratio on these street segments, and thereby improve operations. The remaining segments are calculated to operate at LOS A without and with project. Therefore, Phase 2 improvements would not result in any significant impacts to street segment operations.

Phase 3 (Year 2024): Table 11 compares year 2024 street segment operations without the project to Phase 3 improvements. As shown in Table 11, Clark Avenue between I-8 and Wake Avenue operates at LOS E without the project, but improves to LOS D with the project. Clark Avenue between Valleyview Avenue and McCabe Road operates at LOS E under both scenarios. However, the project would reduce ADT and the V/C ratio on these street segments, and thereby improve operations. The remaining segments are calculated to operate at LOS A without and with the project. Therefore, Phase 3 improvements would not result in any significant impacts to street segment operations.

Phase 4 (Year 2026): Table 12 compares year 2026 street segment operations without the project to Phase 4 improvements. As shown in Table 12, Clark Avenue between I-8 and Wake Avenue operates at LOS F without the project, but improves to LOS B with the project. Clark Avenue between Valleyview Avenue and McCabe Road operates at LOS D under both scenarios. However, the project would reduce ADT and the V/C ratio on this street segment, and thereby improve operations. The remaining segments are calculated to operate at LOS C or better, without and with the project. Therefore, Phase 4 improvements would not result in any significant impacts to street segment operations.

Table 9 Project Phase 1 Segment Analysis							
Street Segment	Functional Capacity (LOS E)	Without Project			With Project		
		ADT	LOS	V/C	ADT	LOS	V/C
<b>La Brucherie Road</b>							
I-8 to Wake Ave.	12,000	5,440	A	0.453	4,380	A	0.408
Wake Ave to W. McCabe Rd.	12,000	3,820	A	0.318	3,720	A	0.250
<b>Imperial Avenue</b>							
I-8 to Wake Ave.	36,000	DNE	DNE	DNE	1,760	A	0.142
Wake Ave. to Danenberg Dr.	18,000	DNE	DNE	DNE	DNE	DNE	DNE
Danenberg Dr. to Manuel Ortiz Ave.	18,000	DNE	DNE	DNE	DNE	DNE	DNE
Manuel Ortiz Ave. to Valleyview Ave.	18,000	DNE	DNE	DNE	DNE	DNE	DNE
Valley View Ave. to W. McCabe Rd.	18,000	DNE	DNE	DNE	DNE	DNE	DNE
<b>Clark Avenue</b>							
I-8 to Wake Ave.	16,200	11,310	E	0.698	10,640	E	0.630
Wake Ave. to Danenberg Dr.	37,000	9,120	A	0.246	9,120	A	0.243
Danenberg Dr. to Manuel Ortiz Ave.	37,000	9,120	A	0.246	9,120	A	0.243
Manuel Ortiz Ave. to Valleyview Ave.	37,000	9,120	A	0.246	9,120	A	0.243
Valley View Ave. to W. McCabe Rd.	12,000	9,120	D	0.760	9,120	D	0.750

LOS = Level of Service; ADT = Average Daily Traffic; V/C = Volume to Capacity ratio; DNE = Does not exist.

Table 10 Project Phase 2 Segment Analysis							
Street Segment	Functional Capacity (LOS E)	Without Project			With Project		
		ADT	LOS	V/C	ADT	LOS	V/C
<b>La Brucherie Road</b>							
I-8 to Wake Ave.	12,000	9,100	D	0.758	8,020	C	0.668
Wake Ave. to W. McCabe Rd.	12,000	6,590	B	0.549	6,460	B	0.538
<b>Imperial Avenue</b>							
I-8 to Wake Ave.	36,000	DNE	DNE	DNE	13,930	A	0.387
Wake Ave. to Danenberg Dr.	18,000	DNE	DNE	DNE	3,490	A	0.194
Danenberg Dr. to Manuel Ortiz Ave.	18,000	DNE	DNE	DNE	DNE	DNE	DNE
Manuel Ortiz Ave. to Valleyview Ave.	18,000	DNE	DNE	DNE	DNE	DNE	DNE
Valley View Ave. to W. McCabe Rd.	18,000	DNE	DNE	DNE	DNE	DNE	DNE
<b>Clark Avenue</b>							
I-8 to Wake Ave.	16,200	11,779	E	0.727	10,990	E	0.678
Wake Ave. to Danenberg Dr.	37,000	10,489	A	0.283	10,380	A	0.281
Danenberg Dr. to Manuel Ortiz Ave.	37,000	12,179	A	0.329	12,070	A	0.326
Manuel Ortiz Ave. to Valleyview Ave.	37,000	12,179	A	0.329	12,070	A	0.326
Valley View Ave. to W. McCabe Rd.	12,000	12,179	E	1.015	12,070	E	1.006

LOS = Level of Service; ADT = Average Daily Traffic; V/C = Volume to Capacity ratio; DNE = Does not exist.

**Table 11**  
**Project Phase 3 Segment Analysis**

Street Segment	Functional Capacity (LOS E)	Without Project			With Project		
		ADT	LOS	V/C	ADT	LOS	V/C
<b>La Brucherie Road</b>							
I-8 to Wake Ave.	12,000	9,890	D	0.824	7,790	C	0.649
Wake Ave. to W. McCabe Rd.	12,000	6,690	B	0.558	6,530	B	0.544
<b>Imperial Avenue</b>							
I-8 to Wake Ave.	36,000	DNE	DNE	DNE	20,580	A	0.572
Wake Ave. to Danenberg Dr.	18,000	DNE	DNE	DNE	9,680	A	0.538
Danenberg Dr. to Manuel Ortiz Ave.	18,000	DNE	DNE	DNE	6,770	A	0.376
Manuel Ortiz Ave. to Valleyview Ave.	18,000	DNE	DNE	DNE	6,010	A	0.334
Valley View Ave. to W. McCabe Rd.	18,000	DNE	DNE	DNE	DNE	DNE	DNE
<b>Clark Avenue</b>							
I-8 to Wake Ave.	16,200	11,990	E	0.740	9,190	D	0.567
Wake Ave. to Danenberg Dr.	37,000	10,150	A	0.274	8,680	A	0.235
Danenberg Dr. to Manuel Ortiz Ave.	37,000	12,360	A	0.334	11,100	A	0.300
Manuel Ortiz Ave. to Valleyview Ave.	37,000	12,020	A	0.325	11,180	A	0.302
Valley View Ave. to W. McCabe Rd.	12,000	12,370	E	1.031	11,530	E	0.961
LOS = Level of Service; ADT = Average Daily Traffic; V/C = Volume to Capacity ratio; DNE = Does not exist.							

**Table 12**  
**Project Phase 4 Segment Analysis**

Street Segment	Functional Capacity (LOS E)	Without Project			With Project		
		ADT	LOS	V/C	ADT	LOS	V/C
<b>La Brucherie Road</b>							
I-8 to Wake Ave.	12,000	10,000	D	0.833	7,660	C	0.638
Wake Ave. to W. McCabe Rd.	12,000	7,150	B	0.596	5,470	A	0.456
<b>Imperial Avenue</b>							
I-8 to Wake Ave.	36,000	DNE	DNE	DNE	21,690	A	0.603
Wake Ave. to Danenberg Dr.	18,000	DNE	DNE	DNE	12,890	C	0.716
Danenberg Dr. to Manuel Ortiz Ave.	18,000	DNE	DNE	DNE	10,700	A	0.594
Manuel Ortiz Ave. to Valleyview Ave.	18,000	DNE	DNE	DNE	10,360	A	0.576
Valley View Ave. to W. McCabe Rd.	18,000	DNE	DNE	DNE	8,770	A	0.487
<b>Clark Avenue</b>							
I-8 to Wake Ave.	16,200	12,190	F	0.752	6,470	B	0.399
Wake Ave. to Danenberg Dr.	37,000	11,020	A	0.298	7,630	A	0.206
Danenberg Dr. to Manuel Ortiz Ave.	37,000	11,520	A	0.311	8,130	A	0.220
Manuel Ortiz Ave. to Valleyview Ave.	37,000	11,190	A	0.302	7,800	A	0.211
Valley View Ave. to W. McCabe Rd.	12,000	10,850	D	0.904	7,670	D	0.639
LOS = Level of Service; ADT = Average Daily Traffic; V/C = Volume to Capacity ratio; DNE = Does not exist.							

## Intersections

Intersections associated with the roadway extension do not exist under current conditions. Consequently, there are no operations under the without project scenario to compare with the project. Additionally, redistribution of traffic that transfers vehicle trips from existing roads to Imperial Avenue would reduce volumes at intersections of existing roadways. Therefore, the project would not result in any significant impacts to intersection operations during the Near-Term, and a comparison of intersection operations without the project to proposed improvements is not warranted.

## Design Year Analysis (2040)

Year 2040 traffic volumes were forecast by applying a growth factor of 10 percent to the Near-Term Phase 4 traffic volumes. This growth factor of 10 percent is based on historic counts in the El Centro area. The Year 2040 analysis assumes full buildout of the City General Plan Mobility Element, which would include the following improvements to the surrounding roadway network:

- La Brucherie is improved from a 2-lane road to a 4-lane Arterial
- Imperial Avenue is built as a 4-lane Arterial between I-8 and Wake Avenue and as a 2-lane Arterial from Wake Avenue to McCabe Road, with an intersection at McCabe Road.
- Clark Avenue is improved as follows:
  - From a 2-lane road to a 6-lane Arterial between I-8 and Wake Avenue
  - From a 4-lane road to a 6-Lane Arterial between Wake Avenue and Palmview Avenue.
  - From a 2-lane road to a 6-Lane Arterial between Palmview Avenue and McCabe Road.

## Street Segments

Table 13 presents Design Year street segment operations. As shown in Table 13, all street segments are calculated to operate at LOS C or better. Consequently, a comparison of street segment operations without the project to proposed improvements was not warranted, since all segments would operate at acceptable levels in the post-project condition.

<b>Table 13</b>					
<b>Design Year Street Segment Operations</b>					
Street Segment	General Plan Classification	General Plan Capacity (LOS E)	ADT	LOS	V/C
<b>La Brucherie Road</b>					
I-8 to Wake Ave.	4-lane Arterial	36,000	11,100	A	0.308
Wake Ave to W. McCabe Rd.	4-lane Arterial	36,000	7,800	A	0.217
<b>Imperial Avenue</b>					
I-8 to Wake Ave.	4-lane Arterial	36,000	24,000	B	0.667
Wake Ave to Danenberg Dr.	2-lane Arterial	18,000	13,400	C	0.744
Danenberg Dr. to Manuel Ortiz Ave.	2-lane Arterial	18,000	10,500	A	0.583
Manuel Ortiz Ave. to Valley View Ave.	2-lane Arterial	18,000	10,100	A	0.561
Valley View Ave. to W. McCabe Rd.	2-lane Arterial	18,000	8,200	A	0.456
<b>Clark Avenue</b>					
I-8 to Wake Ave.	6-lane Arterial	54,000	11,000	A	0.204
Wake Ave. to Danenberg Dr.	6-lane Arterial	54,000	11,100	A	0.206
Danenberg Dr. to Manuel Ortiz Ave.	4-lane Arterial	36,000	11,700	A	0.325
Manuel Ortiz Ave. to Valley View Ave.	4-lane Arterial	36,000	11,300	A	0.314
Valley View Ave. to W. McCabe Rd.	4-lane Arterial	36,000	11,000	A	0.306
LOS = Level of Service; ADT = Average Daily Traffic; V/C = Volume to Capacity ratio					

**Intersections**

Intersections associated with the Imperial Avenue extension do not exist under current conditions. Consequently, there are no operations under the without project scenario to compare with the project. However, Design Year intersection operations for future and existing intersections were calculated to determine if additional traffic under 2040 traffic volumes would cause unacceptable LOS. As shown in Table 14, all intersections would operate at LOS C or better. Additionally, redistribution of traffic that transfers vehicle trips from existing roads to Imperial Avenue would reduce volumes at intersections of existing roadways. Therefore, the project would not result in any significant impacts to intersection operations during the Design Year, and a comparison of intersection operations without the project to proposed improvements is not warranted.

Intersection	North	East	South	West	Level of Service
1. Imperial Ave./Wake Ave.	24,000	9,540	13,400	3,270	C
2. Imperial Ave./Danenberg Dr.	13,400	4,790	10,500	0	B
3. Imperial Ave./Manuel Ortiz Ave.	10,500	3,930	10,100	0	B
4. Imperial Ave./Valley View Ave.	10,100	3,350	8,200	0	B
5. Imperial Ave./McCabe Rd.	8,200	9,840	0	11,510	B

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** As described in Section XVI(a), the project would either improve or maintain levels of service for all street segments compared to what would occur without the project, and all new intersections would operate at LOS C or better. Therefore, the project would not conflict with an applicable congestion management program, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** The project site is located approximately 3.8 miles south of Imperial County Airport. The project site is located approximately 5.6 miles southeast of NAF El Centro and is located under approach and departure flight paths for this airfield. The project site is not

located within the land use compatibility zones of either facility and would not create a safety hazard. Although the project site is located under approach and departure flight paths for NAF El Centro, the future roadway would not interfere with air traffic patterns since it would not construct any structures and the distance from the airfield. Additionally, the project would not generate any population growth, and therefore would not increase air traffic levels. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** The proposed roadway extension and future intersections would be designed consistent with all applicable safety regulations. Therefore, the project would not substantially increase hazards related to a design feature. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** The project would construct a new roadway that would improve access to areas that currently under served by the existing roadway network, which would improve emergency response and emergency evacuation. As described in Section XVI(a), the project would either improve or maintain levels of service for all street segments and intersections compared to what would occur without the project, and therefore would not generate congestion that could delay emergency access. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** The project would improve pedestrian access by constructing a 5.5-foot sidewalk along the entire length of northbound Imperial Avenue. The project segment of Imperial Avenue is not identified for future bicycle lanes in the El Centro Circulation Element Transit and Bicycle Routes Map (Figure C-4). However, bicyclists would still be able to use the roadway. Therefore, the project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**XVII. TRIBAL CULTURAL RESOURCES**

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <p>a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</p>  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p>b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Less Than Significant Impact.** The City is required to initiate consultation with the Native American Tribes who are traditionally and culturally affiliated with the project area pursuant to Assembly Bill 52 under CEQA and Section 106 of the National Historic Preservation Act under the National Environmental Policy Act. On behalf of the City, RECON sent a letter to the Native American Heritage Commission requesting a list of tribes culturally affiliated with the project area and a Sacred Lands File Search. The Native American Heritage Commission responded with a letter stating that the Sacred Lands File Search of the project’s APE was negative, and provided a list of tribes who are traditionally and culturally affiliated with the geographic area of the project site. On August 8, 2017, the City sent a formal notification letter to the authorized representative of these traditionally and culturally affiliated tribes containing a written description of the project and lead agency contact information. Viejas Band of the Kumeyaay Nation responded requesting Assembly Bill 52 consultation. However, the City contacted the Viejas Band of the Kumeyaay Nation on May 21, 2018 and confirmed that no known sacred sites were identified at the project site or surrounding vicinity. The City subsequently sent the Viejas Band of the Kumeyaay Nation a letter on May 23, 2018 stating that a tribal cultural resources monitor would not be required from the project. The Viejas Band of the Kumeyaay Nation did not respond to this letter. No other tribes requested consultation.

As described in Section V(a), the record search and on-foot pedestrian survey conducted for the project did not identify any prehistoric or historical archaeological deposits. The integrity of the project site has been compromised through agricultural operations and the

installation and maintenance of the Date Drain and Dahlia Canal Lateral 1. Consequently, it is considered unlikely that unknown archaeological resources would be encountered during project construction. Therefore, the project would not cause a substantial adverse change in the significance of a tribal cultural resource, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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**XVIII. UTILITIES/SERVICE SYSTEMS**

Would the project:

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

**No Impact.** The project is limited to a roadway extension and would not construct any residential, commercial, or other uses that would generate wastewater. Similarly, the project would not create new opportunities for population growth that would generate wastewater. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

**No Impact.** The project is limited to a roadway extension and would not construct any residential, commercial, or other uses that would require water or wastewater services, nor create new opportunities for population growth and corresponding demand for water or wastewater services beyond what is already anticipated in the General Plan. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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- c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

**No Impact.** As described in Section IX(a), the project would be required to adhere to the City's stormwater requirements (Ordinance Chapter 22, Article VII). These requirements include the City Post-Construction Storm Water Best Management Practice Standards Manual for Development Projects. Per the City requirements, the proposed roadway

extension would be required to include storm drain facilities to control runoff rates to existing levels. Therefore, the project would not result in the need for new or expanded storm drain facilities that could lead to additional significant environmental effects. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** Water services in the project area are provided by the IID. Per the Water System Master Plan (Carollo 2008), the Colorado River Water Delivery Agreement of October 2003 allows the IID to receive 3.1 million acre-feet of water per year. The project is limited to a roadway extension and would not construct any residential, commercial, or other uses that would increase demand for water supply, nor create new opportunities for population growth and corresponding demand for water supply beyond what is already anticipated in the General Plan. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**No Impact.** See Section XVII(a). No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** Construction of the roadway extension would generate limited amounts of solid waste that would require disposal at regional landfills. Construction would primarily consist of site clearing, grading, and installation of pavement that would not generate large amounts of solid waste compared to development projects, and construction waste requiring disposal would be minimized through recycling when feasible. The project would not construct any residential, commercial, or other uses that would generate solid waste, nor create new opportunities for population growth and corresponding solid waste generation beyond what is already anticipated in the General

Plan. Therefore, the project would not exceed the capacity of existing landfills, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g. Comply with federal, state, and local statutes and regulation related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** Disposal of solid waste generated during construction would comply with all applicable federal, state, and local statutes and regulations pertaining to solid waste. The project would not construct any residential, commercial, or other uses that would generate solid waste, nor create new opportunities for population growth and corresponding solid waste generation beyond what is already anticipated in the General Plan. Therefore, the project would comply with all federal, state, and local statutes and regulation related to solid waste, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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***XIX. MANDATORY FINDINGS OF SIGNIFICANCE***

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**Less Than Significant with Mitigation Incorporated.** As described in Section IV(a), implementation of MM-BIO-1 and MM-BIO-2 would reduce impacts to western burrowing owl and nesting and migratory birds to a level less than significant. As described in Section V(a), impacts on historical resources would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable futures projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant with Mitigation Incorporated.** Impacts associated with biological resources would be mitigated to a level less than significant. All other project impacts would be less than significant without mitigation. Consequently, the project would not result in any cumulative impacts on the environment, and impacts would be less than significant with mitigation incorporated.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** As described in Sections III, VIII, and XII, the project would not result in any substantial adverse direct or indirect impacts to human beings related to air quality, hazards and hazardous materials, and noise. Therefore, impacts would be less than significant.

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1976a El Centro 7.5-minute Topographic Map.

1976b Heber 7.5-minute Topographic Map.

**APPENDICES**  
(Under Separate Cover)