

Appendix B. Initial Study

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Environmental Checklist - Initial Study

**El Centro General Plan Update
Land Use Element Update, Mobility Element Update, and
New Environmental Justice Element**

March 2021

Prepared By:



Harris & Associates

Contact: Kristin Blackson, PMP, Senior Project Manager

ENVIRONMENTAL CHECKLIST/INITIAL STUDY

- 1) **Project title:** El Centro General Plan Update (General Plan Update or project)

- 2) **Lead agency name and address:**
City of El Centro,
1275 W. Main Street El Centro, California 92243

- 3) **Contact person and phone number:**
Angel Hernandez, AICP, Associate Planner, (760) 337-4545

- 4) **Project location:**
The City of El Centro (City) is located in southeastern portion of Imperial County. The City is the largest city in the Imperial Valley. It is in the County of Imperial, Southern California, 11 miles north of the United States–Mexico border, is adjacent to the City of Imperial along its northern boundary, and is approximately 120 miles east of the City of San Diego. Interstate 8 provides a regional east–west connection, which leads to north–south connectivity by way of State Route 86 in the City and State Route 111 east of the City. Two geographic areas are within the planning area covered by the City of El Centro General Plan. The City’s corporate limits and its Sphere of Influence (SOI). As defined by the City and the Imperial County Local Agency Formation Commission (LAFCO), the SOI is a plan for the probable physical boundaries and service area that a local governmental agency is expected to serve. The City includes 11 square miles plus an additional 12.5 square miles within the SOI.

- 5) **Project sponsor’s name and address:**
City of El Centro
1275 W. Main Street
El Centro, California 92243

- 6) **Description of project:** See Program Environmental Impact Report (PEIR), Chapter 2, Project Description.

- 7) **Surrounding land uses and setting:** See PEIR, Chapter 2.

- 8) **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement.) None.

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.

	Aesthetics	X	Agriculture & Forestry Resources	X	Air Quality
X	Biological Resources	X	Cultural Resources		Energy
	Geology & Soils	X	Greenhouse Gas Emissions		Hazards & Hazardous Materials
	Hydrology & Water Quality		Land Use & Planning		Mineral Resources
X	Noise		Population & Housing		Public Services
	Recreation	X	Transportation & Traffic	X	Tribal Cultural Resources
	Utilities and Service Systems		Wildfire	X	Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
	I find that 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.
	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
	I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document in accordance with applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
	I find that 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 NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Norma M. Villicaña, AICP, Director of Community Development

Date

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 cited. 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 when 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, and then 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 may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, PEIR, or other California Environmental Quality Act (CEQA) process, an effect has been adequately analyzed in an earlier EIR or 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) Include references to information sources for potential impacts. Reference to a previously prepared or outside document should, where appropriate, include a reference to the page.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) 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 significance.

I. AESTHETICS

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>

Discussion:

- a) **Less than Significant.** Scenic vistas include natural features such as topography, watercourses, rock outcrops, natural vegetation, and human-made alterations to the landscape. There are no designated scenic vistas in the City’s General Plan. The City is generally flat and lacking of natural resources. The most prevalent resources are primarily agricultural land with the remaining natural resources existing along irrigation canal rights-of-way and other lowland areas created by agriculture and irrigation. Implementation of the General Plan Update would allow new development and redevelopment to occur in the central City and SOI. Future development under the General Plan Update would comply with the design recommendations set forth by the City through the development review process, which ensures development projects adhere to the City’s design principles. Therefore, the proposed project would not result in an adverse effect on a scenic vista, and no further discussion is warranted in the PEIR.
- b) **No Impact.** While there are eligible State Scenic Highways, there are no officially designated State Scenic Highways in Imperial County (Caltrans 2019) or within the City or SOI. Eligible highways include Interstate 8 and Highway 98 west of their intersection, Highway 78 to the east of Highway 86, and a portion of Highway 111 north of the Salton Sea. However, no areas of the City or SOI are visible within the viewshed of one of these highways. Therefore, no impact associated with the obstructed views from a scenic highway would occur from the General Plan Update, and no further discussion is warranted in the PEIR.

- c) **Less than Significant.** While no development proposals are being considered at this time, the types of uses allowed under the General Plan Update would not be expected to be out of context with other urban uses in the immediate vicinity, nor would they be of a design quality that would substantially degrade the scenic quality of the area. Future projects would be designed in accordance with design standards codified in the El Centro Municipal Code and be subject to design review for future proposed commercial, manufacturing, residential development of two or more dwelling units, etc. as stated in Section 29-305 of the El Centro Municipal Code. Therefore, the impact would be less than significant, and no further discussion is warranted in the PEIR.
- d) **Less than Significant.** Future development under the General Plan Update may increase the amount of light and glare in the area. In addition, future development may introduce new light sources on currently undeveloped parcels. Nighttime lighting levels would increase over current nonexistent lighting levels and could result in adverse effects to adjacent land uses through the “spilling over” of light into these areas and “sky glow” conditions. However, any development allowed under the General Plan Update would be required to meet the standards in the City’s Lighting Regulations, which are contained in the Zoning Ordinance. These regulations require light fixtures to be shielded from above and designed and adjusted to reflect light away from streets and residences. Therefore, future development impacts associated with light and glare under the General Plan Update would be less than significant, and no further discussion is warranted in the PEIR.

II. AGRICULTURE AND FORESTRY RESOURCES

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding state’s inventory of forest land, including the Forest and Range Assessment project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause, rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined, by the Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Governmental Code section 51104(g))?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

a–e) **Potentially Significant.** The proposed project has the potential to impact agriculture and forestry resources due to the potential for the project to result in the conversion of important farmland to non-agricultural uses. Therefore, this subject will be analyzed in Section 3.1, Agriculture and Forestry Resources, of the PEIR. Please refer to this section for a full analysis of the potential impacts on agriculture and forestry resources from implementation of the General Plan Update.

III. AIR QUALITY

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project”				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Expose sensitive receptors to substantial pollutant concentrations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

a–d) **Potentially Significant.** The proposed project has the potential to impact air quality due to the project’s potential to cause a cumulative increase of criteria pollutants. Therefore, this subject will be analyzed in Section 3.2, Air Quality, of the PEIR and the Air Quality Technical Memorandum (PEIR Appendix C). Please refer to this section for a full analysis of the potential impacts on air quality from implementation of the General Plan Update.

IV. BIOLOGICAL RESOURCES

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, 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 Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Issues:	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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

a–f) **Potentially Significant.** The proposed project has the potential to impact biological resources due to the proposed project’s potential to impact candidate, sensitive, or special-status species; sensitive natural communities; and aquatic resources. Therefore, this subject will be analyzed in Section 3.3, Biological Resources, of the PEIR and the Biological Resources Letter Report (PEIR Appendix D). Please refer to this section for a full analysis of the potential impacts on biological resources from implementation of the General Plan Update.

V. CULTURAL RESOURCES

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

a-c) **Potentially Significant.** The proposed project has the potential to impact cultural resources due to its potential to cause a substantial adverse change in significance on historical resources, archaeological resources, human remains, and tribal cultural resources. Therefore, this subject will be analyzed in Section 3.4, Cultural and Tribal Cultural Resources, of the PEIR and the Cultural and Tribal Cultural Resources Technical Report (PEIR Appendix E). Please refer to this section for a full analysis of the potential impacts on cultural resources from implementation of the General Plan Update.

VI. ENERGY

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

a) **Less than Significant.** For the last two decades, the State of California has promoted policies designed to grow the state’s portfolio of renewable energy generation and use. California passed several bills further increasing the state’s commitment to reductions in greenhouse gas (GHG) emissions through reductions in fossil fuels and increases in renewable energy: Senate Bill (SB) 350 requiring retail sellers and publicly owned utilities to procure half of their electricity from renewable sources by 2030. This requirement is known as the Renewable Portfolio Standard or “RPS.” In 2016, the Legislature passed SB 32, which codifies a 2030 GHG emissions reduction target of 40 percent below 1990 levels. In addition, Executive Order S-3-05 was passed in 2005 to reduce greenhouse gas emissions to 80 percent below 1990 levels by 2050. In September 2020, Governor Newsom issued Executive Order N-79-20 setting new statewide goals for phasing out gasoline-powered cars and trucks in California by requiring 100 percent of in-state car sales of medium- and heavy-duty trucks and busses to be zero emission by 2045, but only where feasible, and 100 percent of off-road vehicles and equipment sales to be zero emission by 2035 where feasible. These bills would reduce energy consumption by requiring vehicles

to move to renewable energy sources.

The State of California has adopted efficiency design standards within the Title 24 Building Standards and CALGreen requirements. Title 24 of the California Code of Regulations (CCR), specifically Part 6, is California’s Energy Efficiency Standards for Residential and Non-Residential Buildings. Title 24 was established by the California Energy Commission in 1978 in response to a legislative mandate to create uniform building codes to reduce California’s energy consumption and to provide energy efficiency standards for residential and non-residential buildings. The 2019 Title 24 energy are the currently mandated building standards for projects that obtain their building permits on or after January 1, 2020.

The 2019 CALGreen Standards Code (24 CCR 11), also known as the CALGreen Code, contains mandatory requirements for new residential and non-residential buildings throughout California. The development of the CALGreen Code is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impacts during and after construction.

Construction of future development put forth through implementation of the General Plan Update would result in temporary energy consumption and one-time energy costs associated with construction of structures, utilities, and roadways. Energy consumption as a result of construction of future projects would primarily consist of the consumption of fossil fuels as a result of use of off-road construction equipment, movement of soil, and use of on-road vehicles for worker commuting and vendors. Operation of future projects under the General Plan Update would require energy resources, including electricity, natural gas, and petroleum. Future projects under the General Plan Update would be required to be consistent with the previously stated objectives and policies to minimize wasteful, inefficient, or unnecessary consumption of energy resources during future project construction and operation. Thus, impacts to energy resources would be less than significant, and no further discussion is warranted in the PEIR.

- b) **Less than Significant.** As discussed in Section VI(a), future development under the General Plan Update would be required to comply with the State of California’s Title 24 Building Standards and CALGreen requirements for energy efficiency. As such, the proposed project would be consistent with the energy efficiency and transportation goals established within the City’s Open Space and Conservation Element and Imperial Valley Green Action Plan. Therefore, the General Plan Update would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and impacts would be less than significant. No further discussion is warranted in the PEIR.

VII. GEOLOGY AND SOILS

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
ii) Strong seismic ground-shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>
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"/>
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"/>
f) Directly or destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a) **Less than Significant.** The project is located in Imperial County, a seismically active area of southern California. Several faults are within the vicinity of the City; however, no faults or faults zones are located within the City limits per fault zone maps provided by the California Department of Conservation. According to the U.S. Geological Survey fault maps (2014), the proposed project is not located within a known Alquist-Priolo Earthquake Fault Zone.

Because the City is located in the seismically active Imperial Valley, the City is considered likely to be subjected to moderate to strong ground motion from earthquakes in the region, especially from earthquakes along the Imperial, Brawley, and Superstition Hills faults. Ground motions are dependent primarily on the earthquake magnitude and distance to the rupture zone. Acceleration magnitudes are also dependent upon attenuation by rock and soil deposits, direction of rupture, and type of fault. Liquefaction generally occurs when granular soil below the water table is subjected to vibratory motions, such as those produced by earthquakes. As a result, ground motions and liquefaction may vary considerably in the same general area.

While no specific development is proposed at this time, any future development under the General Plan Update would be required to adhere to the California Building Code, as adopted in the El Centro Municipal Code. A geology and soils study shall be prepared with a clear identification of site-specific measures to ensure geotechnical stability and submitted as part of the building permit process for individual projects pursued as a result of the General Plan Update. Implementation of recommendations from project-specific geotechnical studies would ensure impacts of earthquake fault ruptures, seismic ground-shaking, ground failure, and land landslides would be less than significant, and no further discussion is warranted in the PEIR.

- b) **Less than Significant.** The City is relatively flat and consists of primarily Imperial silty clay, Holtville silty clay, silty clay, Imperial-Glenbar silty clay, and very fine sandy loam according to the U.S. Department of Agriculture Soil Maps (2020). While no development is specifically proposed at this time, future construction activities would temporarily disturb on-site soils, thereby increasing potential for soil erosion to occur. The City's General Plan Implementation Program PF-12 and S-6 require the implementation of BMPs in accordance with the National Pollutant Discharge Elimination System Permit and proper drainage facilities to handle runoff. This program is implemented via the City's Municipal Code grading regulations that require the preparation of an erosion control plan prior to the issuance of a grading permit (Article XIX, Section 7-124) and that any future construction implement BMPs to control soil erosion (Article VII, Division 1, Section 22-707; Ord. No. 15-05, §1, 4-21-15). As compliance with these regulations would ensure that no significant soil erosion impacts would occur and future development under the General Plan Update would be subject to these regulations, the proposed project would have a less than significant impact related to substantial soil erosion, and no further discussion is warranted in the PEIR.
- c) **Less than Significant.** As stated above, the City topography is relatively flat and generally level and would not be susceptible to landslides. To minimize the potential for lateral spreading, subsidence, liquefaction, or collapse, future development under the General Plan Update would be required to conform to the most recent California Building Code, the City's General Plan Implementation Program, and the El Centro Municipal Code, which contain structural requirements for existing and new buildings designed to ensure structural integrity during seismic events. Therefore, mandatory compliance with applicable codes would ensure that future impacts related to unstable soil would be less than significant, and no further discussion is warranted in the PEIR.
- d) **Less than Significant.** As stated above, the City soils consist mainly of silty clay and sandy loam. Clay and silt soils are expected to exhibit a medium to high expansion potential. As specific projects are proposed under the General Plan Update, they would be required to adhere to the California Building Code, as adopted in the El Centro Municipal Code, and comply with recommendations set forth in site-specific geotechnical studies. Therefore, impacts to expansive soils would be less than significant, and no further discussion is warranted in the PEIR.
- e) **No Impact.** Future development under the General Plan Update would connect to the existing sewer system. Septic tanks and alternative wastewater disposal systems are not planned for installation. Therefore, implementation of the General Plan Update would not result in impacts to soils associated with the use of septic tank wastewater treatment systems.

- f) **Less than significant.** 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 surface soils within the General Plan Update area consist primarily of silty clay and silty clay loams, including Imperial silty clay, Holtville silty clay, and Imperial-Glenbar silty clay, which have a low potential to yield significant paleontological resources. Overall, the potential for significant paleontological resources to be present in the City and SOI is considered low, and future development under the General Plan Update would have a less than significant impact to paleontological resources, and no further discussion is warranted in the PEIR.

VIII. GREENHOUSE GAS EMISSIONS

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a–b) **Potentially Significant.** The proposed project has the potential to impact greenhouse gas emissions due to the project’s potential to generate greenhouse gas emissions. Therefore, this subject will be analyzed in Section 3.5, Greenhouse Gas Emissions, of the PEIR and the Greenhouse Gas Emissions Technical Memorandum (PEIR Appendix F). Please refer to this section for a full analysis of the potential impacts on greenhouse gas emissions from implementation of the General Plan Update.

IX. HAZARDS AND HAZARDOUS MATERIALS

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issues:	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"/>
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"/>
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"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a–b) **Less than Significant.** The proposed project is a General Plan Update, which involves changes in land use designations for various parcels throughout the City. When future projects consistent with the General Plan Update are brought forward, construction would likely involve small amounts of hazardous materials such as fuels, lubricants, solvents, and architectural coating materials. During operation, hazardous materials may be used for cleaning and maintenance, as well as manufacturing activities. Hazardous materials and wastes would be managed and used in accordance with all applicable federal, state, and local laws and regulations. This includes handling of any soils with potential for asbestos-containing materials and lead-based paint contamination in accordance with California Occupational Safety and Health Administration requirements. In addition, disposal of any

contaminated material would be in accordance with state and County's regulations including the Imperial County Certified Unified Program Agency requirements. These regulations are intended to address proper transport of hazardous materials, as well as methods to address accidental spills, in order to avoid impacts to people and the environment. With regulatory compliance, hazards impacts to the public and the environment would be less than significant, and no further discussion is warranted in the PEIR.

- c) **Less than Significant.** The El Centro Elementary School District operates nine elementary and middle schools within the City while the Central Union High School District oversees three high schools in the City. The eventual buildout of the General Plan would require additional schools, one or more of which may be located in the vicinity of a use which may handle or emit hazardous materials. In addition, school sites themselves contain hazardous materials of various types (such as pesticides, paints, cleaners and other commonly used substances). The use of such materials is governed by the schools and various regulations. The General Plan Public Facilities Element (2004) contains policies designed to protect the public and properties against hazardous material risks. However, the siting of school facilities is determined by individual school districts, based on criteria established by the California Department of Education (CDOE). The City cannot control the actions of individual school districts or the CDOE in siting new schools. School siting is also subject to review and approval by the California Department of Toxic Substances Control to help ensure school sites are not located on or near identified hazmat sites. Implementation of regulations and General Plan policies would ensure that future development consistent with the General Plan Update would have less than significant hazardous materials impacts on schools, and no further discussion is warranted in the PEIR.
- d) **Less than Significant.** According to the California Department of Toxic Substances Control database, there one active hazardous waste site on the Cortese List that are located within the City and SOI. The site is located within the confines of the City Water Treatment Plant on 8th Street and is considered an active voluntary cleanup site with potential lead contamination in the soil. The remaining sites identified are either inactive, no action required, or closed (DTSC 2020). Compliance with applicable federal, state, and County regulations regarding hazardous materials sites includes the Superfund Amendments and Reauthorization Act, Resource Conservation and Recovery Act (1986), California Emergency Services Act (1970), and Titles 22 and 24 of the California Code of Regulations (2019, 2020) and complying with the Certified Unified Program Agency requirements for the City. Compliance with these regulations and agencies would reduce the potential risks of public exposure to hazardous materials to less than significant levels, and no further discussion is warranted in the PEIR.
- e) **Less than Significant.** There are two airports located within the vicinity of the City. The Imperial County Airport is located approximately 1.2 miles to the north of the City within the City of Imperial. Naval Air Facility (NAF) El Centro is located approximately 4.6 miles west of the City and primarily serves as a training facility for naval air squadrons. The Imperial County Airport Land Use Commission has established a set of land use compatibility criteria for lands surrounding the County's airports. Portions of the City are located within the Imperial County Land Use Compatibility Plan. Areas of the northern portion of the City are located within the D zone, representing negligible risk from airport activity. A very small portion of land is located within the extended approach and departure zone (B2), which are subjected to significant risk and noise exposure. Under the General Plan Update, this area is slated for Public (P) and Light Industrial (LI) which are not considered prohibited uses in the B2 zone according to the Airport Land Use Compatibility Plan for Imperial County Airports (1996). The proposed project is not located within the compatibility zones for NAF El Centro. Therefore, the General Plan Update would not result in airport safety hazards, and impacts would be less than significant. No further discussion is warranted in the PEIR.
- f) **Less than Significant.** The City's Standardized Emergency Management System (SEMS) Multihazard Functional Plan addresses the City's planned response. The proposed project would not impair implementation of this plan. As part of the General Plan Update, the City is undertaking an update to

its Mobility Element with a goal of providing an interconnected, multimodal, transportation network that allows for the efficient and safe movement of people and goods and accommodates future growth for the City. This includes policies in support of safe evacuation and access for emergency vehicles. The project would not interfere with the implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. The future development under the General Plan Update would be subject to City regulations regarding street design, site access, and internal emergency access. Therefore, impacts associated with the physical interference of an emergency evacuation plan would be less than significant, and no further discussion is warranted in the PEIR.

- g) **No Impact.** Refer to Section XX, Wildfire. The proposed project is not located on or near to a designated high fire area associated with any designated wildland area. Future development would not expose people or structure to an increased risk of wildland fires. Therefore, no impact would occur, and no further analysis is warranted in the PEIR.

X. HYDROLOGY AND WATER QUALITY

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of the existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a) **Less than Significant.** While no specific development is proposed at this time, future development under the General Plan Update would be required to comply with all applicable water quality standards. Any future development within the project planning area would be subject to 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 proposed project would be required to comply with the City's stormwater requirements (Ordinance Chapter 22, Article VII), which consist of the City's Jurisdictional Runoff Management Plan (City of El Centro 2015) and the associated City Post-Construction Stormwater Best Management Practice Standards Manual for Development Projects. More specifically, any future development allowed by the General Plan Update would be required to implement Best Management Practices (BMPs) in accordance with the El Centro Municipal Code (Article VII, Division 1, Section 22-707). As future development would be required to comply with City and state regulations, the General Plan Update would not violate any water quality standards or waste discharge requirements, and no further discussion is warranted in the PEIR.
- b) **No Impact.** While no specific development is proposed at this time, future development within the planning area would not require the construction of wells or the use of groundwater as a water source. According to the City General Plan Conservation and Open Space Element (2004), groundwater quality is poor in the Imperial Valley and little use is made of the existing groundwater resource. Water service to future development under the General Plan Update would be provided by the City. Therefore, no impact would occur, and no further discussion is warranted in the PEIR.
- c) **Less than Significant.** Any proposed future construction and development activities under the General Plan Update would be required to comply with City and state regulations [see X(a) above], which include runoff controls to prevent substantial erosion and siltation. Future development would be required to prepare a project-specific hydrology and stormwater quality report and a stormwater pollution prevention plan (SWPPP) and adhere to all City stormwater requirements. With adherence to these measures and City stormwater requirements, no adverse impacts to the downstream conveyance system would occur. Therefore, the impact would be less than significant, and no further discussion is warranted in the PEIR.
- d) **No Impact.** There would be no risk associated with tsunami due to the City'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 proposed project. The project and surrounding area is generally flat and there are no steep slopes or other features surrounding the planning area that could create mudflows. No impact would occur, and no further discussion is warranted in the PEIR.

- e) **Less than Significant.** See Section X(a). Future development under the General Plan Update would be required to comply with all applicable water quality control plans or sustainable management plans including the City’s Stormwater Management Plan (2013). Impacts would be less than significant, and no further discussion is warranted in the PEIR.

XI. LAND USE AND PLANNING

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a–b) **Less than Significant.** The proposed project includes an update to the City’s General Plan including updates to the Land Use Element and Mobility Element, and the creation of an Environmental Justice Element. Implementation of the General Plan Update would not disrupt or physically divide an established community. The primary focus of the update to the Land Use Element is to preserve established land uses and accommodate future growth and development of the community. In addition, the proposed General Plan Update would be required to be consistent with several adopted land use plans for the region, including the Imperial County Airport Land Use Compatibility Plan, the Water Quality Control Plan for Colorado River Basin Region 7, and the Southern California Association of Governments Regional Transportation Plan. Other land use plans that apply to the City and SOI are being updated as a part of the proposed project, and include the El Centro General Plan and Zoning Ordinance. A discussion of General Plan Update compliance with habitat conservation plans can be found in PEIR Section 3.3, Biological Resources. Proposed project consistency with the State Implementation Plan can be found in PEIR Section 3.2, Air Quality. Therefore, the General Plan Update would not physically divide an established community or cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation, and impacts would be less than significant. No further discussion is warranted in the PEIR.

XII. MINERAL RESOURCES

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
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"/>

Discussion:

a-b) **No Impact.** No mineral resources that would be of value to the region or residents of the state have been identified within the City and SOI. In addition, the proposed project is not within a mineral resource zone as designated by the California Department of Conservation's Division of Miner Reclamation, Mineral land classification map. The proposed project is located within an urban area and is not identified in the El Centro General Plan Conservation and Open Space Element (2004) as having any known mineral resource value or as being located within any mineral resource recovery site. Therefore, no impacts would occur, and no further discussion is warranted in the PEIR.

XIII. NOISE

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive ground borne vibration or ground borne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or 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 project area to excessive noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

a–c). **Potentially Significant.** The proposed project has the potential to impact noise due to its potential to generate substantial temporary and permanent increases in ambient noise levels and groundborne vibration. Therefore, this subject will be analyzed in Section 3.6, Noise, of the PEIR and the Noise Technical Memorandum (PEIR Appendix G). Please refer to this section for a full analysis of the potential impacts on noise from implementation of the General Plan Update.

XIV. POPULATION AND HOUSING

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a) **Less than Significant.** See Section 4.2, Growth Inducement, in the PEIR for a discussion of the growth-inducing impacts of the General Plan Update. The project proposes planned growth and, therefore, would not result in unplanned population growth in the City or SOI.

b) **No Impact.** The proposed project includes updating the Land Use Element and Mobility Element of the City’s General Plan and the creation of a new Environmental Justice Element. The General Plan Update would not constitute the displacement of a substantial number of existing housing or people, necessitating the construction of replacement housing elsewhere. The proposed General Plan Update

would not change residential land uses to non-residential land uses. The goal of the update to the Land Use Element is to facilitate and encourage growth, specifically within the proposed Opportunity Areas. Therefore, no impact would occur, and no further discussion is warranted in the PEIR.

XV. PUBLIC SERVICES

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision 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:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a) **Less than Significant.** Future development under the General Plan Update would be serviced by the El Centro Fire Department (ECFD). ECFD has three fire stations staffed 24 hours a day, 7 days a week. The ECFD also maintains a staffing standard providing that nine sworn and uniformed personnel will be available to respond to calls at any given time throughout the day or night. There is currently no standard that dictates the total number of personnel on staff relative to city population. Although the proposed project would not alter the ECFD's ability to provide fire protection services to the City, future development projects may. Future proposed development would be required to pay development impact fees in proportion to the development proposed to fund fire services in the City so that they maintain acceptable service ratios. The proposed project would therefore not result in significant impacts to fire protection services, and no further discussion is warranted in the PEIR.
- b) **Less than Significant.** The City Police Department (ECPD) is the primary law enforcement agency that serves the citizens of the City and land within the City boundaries and would serve future development under the General Plan Update. The Police Department has a main police station, located at 150 North 11th Street. The ECPD has an average emergency response time of 7 to 10 minutes. The proposed project does not include any development and would therefore not increase demand on ECPD personnel and resources. Concerning future development projects as a result of the General Plan Update, to compensate for an increase in law enforcement costs resulting from increased service demand generated by each project, the project applicants would be required to pay development impact fees. In addition, the police department attended General Plan Update meetings and provided input on the project during that time. The proposed project would not result in significant impacts to law enforcement services, and no further discussion is warranted in the PEIR.

- c) **Less than Significant.** The City is served by three school districts: El Centro Elementary School District, McCabe Union Elementary School District, and Central Union High School District. Representatives from the school districts made up some of the project’s community advisory committee and had the opportunity to provide input on the General Plan Update during this time. The General Plan Update proposes land use changes that would allow for residential uses, though no specific housing units are proposed at this time that would require the provision of new or altered school facilities. Future development as a result of the General Plan Update would be required to pay school fees to offset the potential impact of new development on the school system. The City would work with the school districts to determine the most appropriate locations and funding sources for new school facilities, if there is need in the future. Therefore, the proposed project would not result in significant impacts to public school facilities, and no further discussion is warranted in the PEIR.
- d) **Less than Significant.** Please refer to Section XVI, Recreation, for a discussion on impacts to recreation facilities as a result of the proposed project.
- e) **Less than Significant.** Future development associated with the General Plan Update may result in a slight increase in the demand for other governmental and community support services, such as libraries, due to the population growth expected over a 20-year period through 2040. However, any increased demand is expected to be offset by development impact fees and sales tax revenues from future development. Therefore, this impact would be less than significant.

XVI. RECREATION

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a–b) **Less than Significant.** The project consists of updates to the Land Use Element and Mobility Element of the City’s General Plan and the creation of a new Environmental Justice Element. Implementation of the proposed General Plan Update would increase residential development in the planning area and accommodate a greater population than under existing conditions. Increases in population and development would result in an increased use of recreational facilities, which would have the potential to result in the deterioration of existing facilities. However, implementation of existing regulations and proposed General Plan Update policies would reduce potential impacts to existing parks. Therefore, the project would not result in substantial impacts to existing facilities. In addition, the project does not

directly propose recreational facilities or require the expansion of recreational facilities. However, proposed land uses and identified Opportunity Areas do not preclude opportunities for future recreational facilities or parks. In addition, updates to the Land Use Element would include policies (Policy 1.2, 1.19, 1.20, and 1.22) for creative and innovative methods to provide parks, recreation, open space, and public gathering spaces to more than double the existing amount of parks and recreational space in the City by 2040, consistent with the Parks and Recreation Master Plan (2008). Any increased demand on facilities would be expected to be offset by development impact fees and sales tax revenues from future development that could be directed toward improved recreational opportunities in the City. Therefore, impacts would be less than significant, and no further discussion is warranted in the PEIR.

XVII. TRANSPORTATION

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

a–d) **Potentially Significant.** The proposed project has the potential to impact transportation due to its potential to cause an increase in vehicle miles traveled. Therefore, this subject will be analyzed in Section 3.7, Transportation, of the PEIR and the Transportation Impact Study (PEIR Appendix H1). Please refer to this section for a full analysis of the potential impacts on transportation from implementation of the General Plan Update.

XVIII. TRIBAL CULTURAL RESOURCES

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) 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:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a) **Potentially Significant.** The proposed project has the potential to impact tribal cultural resources due to its potential to uncover known or unknown tribal cultural resources. Therefore, this subject will be analyzed in Section 3.4 of the PEIR and the Cultural and Tribal Cultural Resources Technical Report (PEIR Appendix E). Please refer to this section for a full analysis of the potential impacts on cultural resources from implementation of the General Plan Update.

XIX. UTILITIES AND SERVICE SYSTEMS

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

a–c) **Less than Significant.** As stated in the City's Sewer Master Plan (Carollo Engineers 2008a), the City treats its own wastewater at the El Centro Wastewater Facility, which has a capacity to accommodate 8 million gallons of wastewater per day (MGD). The maximum month flow according to the City's Sewer Master Plan was 3.63 MGD. In addition, the City's wastewater demand has been decreasing despite continued growth in the City, and the City is anticipated to continue to have increased connections at a rate of 1 percent per year. Therefore, with the planned population growth as a result of the General Plan Update, the El Centro Wastewater Facility would have enough capacity to serve the project. The project is not anticipated to result in an exceedance of treated wastewater amounts that would go back into the City's wastewater system and necessitate the need for new or expanded facilities. In addition, the City's Sewer Master Plan identifies recommended upgrades to better serve the City.

The City receives its water supply from the Imperial Irrigation District (IID). The Waster System Master Plan (Carollo Engineers 2008b) states that the water demand with buildout of the existing General Plan is 44.7 MGD. The IID has adopted an Interim Water Supply Policy (IWSP; IID 2009) for new non-agricultural projects. The IWSP sets aside 25,000 acre-feet of water per year of Colorado River water supply to serve IWSP. Per the Water System Master Plan, the Colorado River Water Delivery Agreement of October 2003 allows the IID to receive 3.1 million acre-feet of water per year. The City is currently receiving approximately 35,755 acre-feet per year (Carollo Engineers 2008b). In addition, the Water System Master Plan conducted a future system analysis to identify needed infrastructure with planned buildout of the City and SOI. The existing and future system improvements are combined in the Capital Improvement Program (CIP).

In addition, the General Plan Public Facilities Element's (2004) purpose is to plan for the necessary expansion of public services and infrastructure to coincide with new development. To ensure a sufficient level of public services, the City would work with service providing agencies to ensure that service to existing residents does not diminish with any future development and the resulting increase in population. There are several goals and policies in the Public Facilities Element (Goal 9, Policies 9.1–9.4; Goal 10, Policies 10.1–10.2) that would include providing new sewer and water facilities to provide adequate capacity to serve new growth in the planning area. In addition, any future development under the General Plan Update would be required to provide payment of capacity fees prior to issuance of Certificate of Occupancy. Future development would be required to work with the City to provide adequate capacity and facilities related to water, sewer, stormwater, electric, and telecommunications to future occupants. The utility providers under the General Plan Update have been notified of the project and certain agencies attended several General Plan Update meetings with opportunities to provide input during that time. Therefore, impacts would be less than significant, and no further discussion is warranted in the PEIR.

d–e) **Less than Significant.** The City contracts with CR&R Waste Services to provide solid waste services to City residents. CR&R has a material recovery, transfer, and disposal center located in the City (599 East Main Street). CR&R owns and operates the South Yuma County Landfill (SYCL) in Arizona and currently transports all waste from El Centro to the SYCL. No waste is disposed in Imperial County. The City has renewed its contract with CR&R through 2027. The total design/permitted capacity for the SYCL is 46,825,430 cubic yards. Currently, the landfill is operating in Phase I of its development, which has a design/permitted capacity of 19,305,000 cubic yards. The SYCL under Phase I of its development has more than 14 million cubic yards of remaining capacity (RECON 2020).

In an effort to address landfill capacity and solid waste concerns, the California Legislature passed the Integrated Waste Management Act in 1989 (AB 939), which mandated that all cities reduce waste disposed of in landfills from generators within their borders by 50 percent by the year 2000. Recently chaptered AB 341 has increased the diversion target to 75 percent (CalRecycle 2015). The City has Municipal Code regulations to ensure compliance with these targets. These regulations include Municipal Code, Chapter 12, Articles I and II, and require collection, transportation, and disposal of solid waste and green waste. Future development under the General Plan Update would be required to comply with these regulations While future development would increase the solid waste generated by the City, future development would be required to comply with recycling regulations and CR&R would continue to transport solid waste to the SYCL, which has capacity to accept the waste generated by the proposed project. Impacts would be less than significant, and no further discussion is warranted in the PEIR.

XX. WILDFIRE

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a–d) **No Impact.** The City is not located within or near state responsibility areas or lands classified as very high hazard severity zones according to CAL FIRE’s California Fire Hazard Severity Zone maps (2020). Therefore, no impact would occur, and no further analysis is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

Issues:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a) **Potentially Significant.** As determined by this Initial Study, the proposed project would have the potential to impact biological resources, cultural resources, and tribal cultural resources. Therefore, further discussion is warranted of these areas in the PEIR.
- b) **Potentially Significant.** CEQA Guidelines, Section 15130, requires a discussion of the cumulative impacts of a project when the project’s incremental effect is “cumulatively considerable,” meaning that the project’s incremental effects are considerable when viewed in connection with the effects of past, current, and probable future projects. The cumulative impacts discussion does not need to provide as much detail as is provided in the analysis of project-specific impacts and should be guided by the standards of practicality and reasonableness.

As determined by this Initial Study, there may be potentially significant effects related to agriculture and forestry resources, air quality, biological resources, cultural resources, GHG emissions, noise, transportation, and tribal cultural resources. Therefore, the project’s potential contribution to cumulative impacts related to these resources will be discussed in the PEIR.

Because the project would have less than significant or no impact on aesthetics, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, utilities and service systems, or wildfire, it was determined that the proposed project would have no potential to result in cumulative impacts related to these resource areas. Further discussion of the cumulative effect on these resource areas is not warranted in the PEIR.

- c) **Potentially Significant.** Based on the analysis above, the proposed project has the potential to result in significant impacts on agriculture and forestry resources, air quality, biological resources, cultural resources, GHG emissions, noise, transportation, and tribal cultural resources. As such, the project has the potential to result in environmental impacts that could cause substantial adverse effects on human beings, either directly or indirectly. Therefore, further discussion is warranted in the PEIR.

FINDINGS

The environmental analysis of this Initial Study indicates that the proposed project would have the potential for significant adverse environmental impacts related to agriculture and forestry resources, air quality, biological resources, cultural resources, GHG emissions, noise, transportation, and tribal cultural resources. Therefore, the preparation of a PEIR is required.

SOURCE REFERENCES

The following is a list of references used in the preparation of this environmental document. Unless attached herein, copies of all referenced reports, memorandums and letters are on file with the City Community Development Department – Planning & Zoning Division. References to Publications prepared by Federal or State agencies may be found with the agency responsible for providing such information.

- 1) CAL FIRE (California Department of Forestry and Fire Protection), California Fire Hazard Severity Zone Maps, 2020. <https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414>.
- 2) CalRecycle (California Department of Resources Recycling and Recovery), AB 341 Report to the Legislature, 2015.
- 3) Caltrans (California Department of Transportation), Designated and Eligible State Scenic Highways spreadsheet, August 2019.
- 4) City of El Centro General Plan, adopted February 2004. <http://www.cityofelcentro.org/communitydevelopment/plans-documents>.
- 5) City of El Centro Jurisdictional Runoff Management Plan, 2015.
- 6) City of El Centro and City of Imperial, Stormwater Management Plan, 2013.
- 7) City of El Centro Parks and Recreation Master Plan, 2008. <http://www.cityofelcentro.org/userfiles/file/Planning/Parks%20&%20Rec%20Master%20Plan.pdf>.
- 8) Carollo Engineers, City of El Centro Sewer Master Plan, 2008a. <http://www.cityofelcentro.org/pworks/index.asp?m=1&page=63&subpage=14>.
- 9) Carollo Engineers, City of El Centro Water Master Plan, 2008b. <http://www.cityofelcentro.org/pworks/index.asp?m=1&page=63&subpage=15>.

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- 10) Imperial County Airports, Airport Land Use Compatibility Plan, June 1996. <http://www.icpds.com/?pid=2202>.
 - 11) IID (Imperial Irrigation District), Interim Water Supply Policy, 2009.
 - 12) RECON, Final Mitigated Negative Declaration for the South Dogwood Annexation Project, El Centro, California, May 8, 2020. http://www.cityofelcentro.org/userfiles/file/Planning/Environmental%20Documents/S_%20Dogwood%20Annexation/South%20Dogwood_Final%20SMND_050820.pdf.
 - 13) DTSC (California Department of Toxic Substance Control), EnviroStor Database, 2020. <https://www.envirostor.dtsc.ca.gov/public/>.
 - 14) U.S. Department of Agriculture, Web Soil Survey, 2020. <https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>.
 - 15) U.S. Geological Survey, USGS Fault Maps, 2014.

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