

# **CEQA Findings of Fact and Statement of Overriding Considerations**

## **El Centro General Plan Update**

**SCH No. 2020070349**

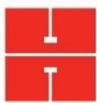
**June 2021**

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Attachment 1. Mitigation Monitoring and Reporting Program

## Introduction

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The City of El Centro (City) hereby makes the following Findings concerning the Final Program Environmental Impact Report (Final PEIR) (SCH No. 2020070349) for the proposed El Centro General Plan Update (project or General Plan Update), pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000 et seq.) and its implementing regulations, the CEQA Guidelines (CEQA Guidelines, Section 15000 et seq.).

The Final PEIR prepared for the proposed project consists of an Errata summarizing corrections and revisions made to the Draft PEIR, comments received on the Draft PEIR and the City's responses to those comments, a Mitigation Monitoring and Reporting Program, and the revised Draft PEIR.

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## Section 1 Project Description

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### 1.1 Project Location

The City is in the southeastern portion of Imperial County, California, 11 miles north of the United States-Mexico border, as shown on Figure 2-1, Regional Location, in the Draft PEIR. The City is the largest city in the Imperial Valley and is adjacent to the City of Imperial along its northern boundary and is approximately 120 miles east of the City of San Diego. Interstate (I-) 8 provides a regional east-west transportation corridor, 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, the City's corporate limits and its Sphere of Influence (SOI), are within the planning area covered by the El Centro General Plan, and are depicted on Figure 2-2, City of El Centro Planning Area, in the Draft PEIR. As defined by the City and the Imperial County Local Agency Formation Commission, an 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. The project does not propose or anticipate annexation of the SOI at this time. Should annexation of one or more areas be considered at a future point in time, applicable procedures from the Imperial County Local Agency Formation Commission would apply.

### 1.2 Project Objectives

The City's project objectives for the proposed project are as follows:

1. Provide well-designed and accessible residential neighborhoods and commercial and industrial districts to provide opportunities for people to live, work, and play
2. Retain and enhance the City's small town character and its neighborhoods to provide a diversity of housing, neighborhoods, and amenities
3. Restore Downtown El Centro as the symbolic, functional, and historic core of the City
4. Ensure that people, goods, and services move safely and efficiently throughout the City and connect to the larger region
5. Ensure the City's long-term commitment to seek out and implement solutions to environmental justice issues
6. Improve sustainability, promote public health, and anticipate future advancements in transportation technology
7. Foster a vibrant community that supports healthy lifestyles, historical resources, arts, education, and culture for all residents

## **1.3 Project Components**

The project proposes updates to the Land Use and Mobility Elements and the creation of a new Environmental Justice Element as a stand-alone chapter in the El Centro General Plan. Each project component is described below.

### **1.3.1 Land Use Element Update**

The proposed update to the Land Use Element in the El Centro General Plan would be based on the City's existing El Centro Vision 2050 Strategic Plan, policy direction from City staff and decision makers, and input from the Community Advisory Committee and the public. The update would designate the proposed general distribution and extent of land uses in the City, focusing on preserving established land uses and accommodating future growth and physical development of the community. It would incorporate policies that integrate land use and transportation strategies to increase the share of bicycle, transit, and pedestrian trips, reducing greenhouse gas (GHG) emissions. Specific topics to be incorporated into the Land Use Element Update include equity, health, sustainability, the economy, and the environment. An overarching objective of the Land Use Element Update would be to promote infill development and encourage efficient development patterns to spur economic revitalization, provide opportunities for innovative lifestyles envisioned by the El Centro Vision 2050 Strategic Plan, and promote environmental justice and equity.

The overall goal of the Land Use Element Update is to create a land use plan that promotes quality of life, health, and safety; meets the needs of the City's residents; supports multiple modes of transportation; fosters economic prosperity; provides a range of affordable housing options; is sustainable and environmentally responsible; encourages social cohesion and equity; and reflects and celebrates the City's unique character, culture, identity, and traditions.

### **1.3.2 Proposed Land Use Designations**

The proposed Land Use Element Update would include changes to the existing land use designations, which establish the general pattern of land uses in the planning area and would identify maximum permitted land use densities and intensities. The Land Use Element Update would establish 19 land use designations (15 primary land use designations and 4 overlay designations) that govern land uses in the planning area as shown in Table 1, Proposed El Centro General Plan Update Land Use Designations. These designations apply density and intensity requirements, use characteristics, and land use policies to individual parcels. These overlay designations provide additional development criteria to supplement the underlying or base land use designation.

**Table 1. Proposed El Centro General Plan Update Land Use Designations**

Land Use Designations	Maximum Density (du)/ Intensity (net acre or FAR)	Purpose and Intent
<b>Residential</b>		
Rural Residential	2 du/acre	This provides for large-lot rural residential uses. A maximum of one detached single-family dwelling unit is permitted as the primary residence with accessory dwelling units.
Low Density Residential	6 du/acre	This provides for the preservation of existing single-family residential neighborhoods and the establishment of new ones.
Medium Density Residential	12 du/acre	This provides for the development of single-family detached and attached dwelling units, duplexes, mobile home parks, and multi-family dwelling units, such as townhouses and condominiums.
High-Medium Density Residential	25 du/acre	This provides for a variety of multi-family housing types, including garden-style units, apartments, condominiums, townhouses, and mobile home parks.
<b>Commercial</b>		
General Commercial	0.40:1 FAR	This provides for general business, light service, and retail uses, as well as large-scale planned shopping districts, serving the local and regional area and population, and where appropriate, motel/hotel and public assembly uses.
Neighborhood Commercial	0.25:1 FAR	This provides for retail and service-oriented business activities serving a neighborhood and local community area to increase convenience and reduce vehicle miles traveled.
Office Commercial	0.40:1 FAR	This provides for the establishment of professional and administrative offices and medical/dental care offices and centers and ancillary services with appropriate landscaping and development standards that provide compatibility for such uses near residential areas.
Heavy Commercial	0.50:1 FAR	This provides for General Commercial uses, business, and consumer services and artisan production/manufacturing with associated retail.

**Table 1. Proposed El Centro General Plan Update Land Use Designations**

Land Use Designations	Maximum Density (du)/ Intensity (net acre or FAR)	Purpose and Intent
Tourist Commercial	1.0:1 FAR	This provides for commercial, service, and amusement uses serving both local and long-distance travelers and tourists, including motels, resort hotels, and related commercial and tourist uses, such as service stations, sit-down restaurants, and fast-food restaurants with drive-in or drive-through service.
Downtown Commercial	3.0:1 FAR	This provides for the urban form and mix of land uses that create an energized, revitalized downtown that is a destination magnet for visitors and residents alike and supports entrepreneurship, innovation, arts, and culture that celebrate the history and spirit of the City.
<b>Industrial</b>		
Light Industrial	0.4:1 FAR	This provides for the development of industrial uses that include the fabrication, manufacturing, assembly, or processing of materials that are in refined form and that do not, in their transformation, create smoke, gas, odor, dust, noise, vibration of earth, soot, or lighting to a degree that is offensive when measured at the property line of subject property, or produce products that pose a danger when in proximity to residential uses (such as explosives).
General Industrial	0.45:1 FAR	This provides for the development of manufacturing process, fabrication, and assembly of goods and materials that do not in their operation or maintenance create offensive, obnoxious, or dangerous conditions that are detectible beyond the boundary of the land use designation borders. It allows the processing of materials that are not in refined form but do not, in their transformation, create smoke, gas, odor, dust, noise, vibration of earth, soot, or lighting to a degree that is offensive when measured at the property line of subject property.

**Table 1. Proposed El Centro General Plan Update Land Use Designations**

Land Use Designations	Maximum Density (du)/ Intensity (net acre or FAR)	Purpose and Intent
Mixed Use		
Mixed Use 1	Maximum Intensity: Stand-Alone Commercial: 0.3:1 FAR Mixed-Use (Including Live/Work): 1.0:1 Maximum Density: Stand-Alone Residential or the Residential Portion of a Mixed-Use Development: Minimum 12 du/net acre to a maximum of 25 du/net acre	This provides for a mix of Missing Middle Housing, multi-family residential, and non-commercial uses to support an active, neighborhood- and local-serving corridor, area, or activity center.
Community Facilities		
Civic	1.5:1 FAR	This provides for the development of public and private facilities within the <b>City's civic center area</b> . It includes major local government offices, state and federal facilities, and privately owned property, including professional offices, financial institutions, and restaurants.
Public	0.40:1	This includes parcels under public or semi-public ownership. The designation most often includes parcels owned by the City, Imperial Irrigation District, school districts, or El Centro Regional Medical Center.
Overlay Designations		
Single-Family Neighborhood Overlay	Base land use designation used for density	This consists of older residential neighborhoods that were developed in the early 1920s. It represents an important example of the historical character of the City. To help preserve these neighborhoods, property designated with the Single-Family Neighborhood Overlay will need to be maintained as single-family units.

**Table 1. Proposed El Centro General Plan Update Land Use Designations**

Land Use Designations	Maximum Density (du)/ Intensity (net acre or FAR)	Purpose and Intent
El Centro Regional Medical Center Overlay	Pursuant to proposed Master Plan	The El Centro Regional Medical Center, located in the City, is a 161-bed, acute-care medical center serving the health care needs of the Imperial Valley. Because the El Centro Regional Medical Center has grown over the years, its campus has expanded to accommodate new services and facilities and associated parking. The constraints of the existing location have necessitated the expansion of the campus into the residential neighborhood to the east, which requires redesignation and rezoning of property to allow the change in use. This land use anticipates continued expansion during this planning period and provides an overlay to guide the growth. The underlying land use designations remain the same.
Medical Office Overlay	Maximum Intensity: Stand-Alone Medical Office: 0.5:1 FAR Live/Work: 1.0:1 Maximum Density: Single-Family Residential or Live/Work: 6 du/acre	This provides options for property to transition to medical office or remain single-family residential or allows a combination of both uses in a live/work project.
Mixed Use 2 Overlay	Maximum Intensity: Stand-Alone Commercial: 0.4:1 FAR Mixed-Use (Including Live/Work): 1.2:1 Maximum Density: Stand-Alone Residential or the Residential Portion of a Mixed-Use Development: Minimum 21 du/net acre to a maximum of 30 du/net acre	This provides for a mix of Missing Middle Housing, multi-family residential, and non-commercial uses to support an active, community- or regional-serving serving corridor, area, or activity center. A variety of housing options along a continuum of high-medium to higher densities are encouraged to provide affordable housing for a range of household types. It provides for medium- to large-scale commercial uses that serve local, community, and regional needs, consistent with General and Tourist Commercial uses.

**Notes:** City = City of El Centro; du = dwelling unit; FAR = floor area ratio; VMT = vehicle miles traveled

Table 2, Proposed El Centro General Plan Update Development Capacity, details the proposed densities of residential development and the intensity of non-residential development that would occur with implementation of the land use policies in the General Plan Update.

**Table 2. Proposed El Centro General Plan Update Development Capacity**

Land Use Designations	Number of Dwelling Units <sup>1</sup>		Non-Residential Square Feet (thousands) <sup>2</sup>	
	City	SOI	City	SOI
Residential				
Rural Residential	12	531	—	—
Low Density Residential	9,079	28,004	—	—
Medium Density Residential	2,509	481	—	—
High Density Residential	6,552	302	—	—
Commercial				
General Commercial	—	—	5,337	570
Neighborhood Commercial	—	—	440	—
Office Commercial	—	—	254	—
Heavy Commercial	—	—	1,585	—
Tourist Commercial	—	—	2,838	—
Downtown Commercial	—	—	See OA-2	—
Industrial				
Light Industrial	—	—	5,831	3,545
General Industrial	—	—	5,272	4,801
Mixed Use				
Mixed Use 1	See OA-1 and OA-5	—	See OA-1 and OA-5	—
Community Facilities				
Civic	—	—	1,857	—
Public	—	—	10,087	1,264
Overlays				
Single-Family Neighborhood Overlay <sup>3</sup>	NA	NA	NA	NA
El Centro Regional Medical Center Overlay	—	—	275	—
Medical Office Overlay <sup>4</sup>	4	—	17	—
Mixed Use 2 Overlay (not in Opportunity Areas)	598	—	104	—
Opportunity Areas				
OA-1	166	—	227	—
OA-2	—	—	1,565	—
OA-3	—	—	5,543	—
OA-4	1,021	—	2,718	—
OA-5	829	1,739	488	743
Total	20,770	31,057	44,438	10,923

**Source:** Bluman, pers comm. 2020.

**Notes:** City = City of El Centro; NA = not applicable; SOI = Sphere of Influence

<sup>1</sup> The number of dwelling units is based on average density at buildout, not maximum density.

<sup>2</sup> Shown in thousands of square feet. The non-residential development square footage is based on average intensity (average FAR) at buildout, not maximum intensity.

<sup>3</sup> Single-Family Neighborhood Overlay is for design purposes only and is not a factor in buildout projections.

<sup>4</sup> Per buildout assumptions.

### 1.3.3 Proposed Opportunity Areas

The centerpiece of the General Plan Land Use Element Update consists of five Opportunity Areas (OAs) where the City wants or anticipates land use change or growth to occur during the planning period. OAs are larger, specific areas where targeted change is anticipated (Figure 2-4, Opportunity Areas, in the Draft PEIR). Several OAs are areas of existing development that can benefit from targeted plans and policies to help guide transformation, while others are proposed where growth is expected or proposed to occur.

Each OA has a vision and policies to guide future planning that emphasize the principles of Smart Growth, sustainability, community identity, and placemaking and the creation of physical and social connections. A key element of each OA is the correlation of land use and site design with proposed improvements to the mobility infrastructure, including providing right-sizing existing roadways, adding new roadways, improving sidewalks, adding multi-use trails and bicycle facilities, and facilitating transit.

The proposed project recommends that the existing land use designations in OA-3 change from General Industrial and Planned Industrial to Tourist Commercial with the idea that its location on the northern side of I-8 would bring a variety of regionally serving commercial, recreational, and entertainment uses and provide the potential for recreational vehicle parks and housing to encourage tourism. After additional consideration, the City recommends the following proposed revision to OA-3 in the proposed project:

- **Proposed Revision to the Proposed Project for OA-3 (North Dogwood):** The existing General Industrial and Planned Industrial land use designations would be revised to General Commercial along Dogwood Avenue, while the remaining properties east and west of the property redesignated to General Commercial would be redesignated to Light Industrial (see Figure 1, Opportunity Area 3 Alternative). This proposed revision to the land uses in OA-3, coupled with the OA's size, easy freeway access, and proximity to the Union Pacific Railroad, offers many opportunities to develop OA-3 in a manner that provides employment opportunities while also supporting regional and tourist-serving commercial demands. Motels, fuel stations, restaurants, big-box retail, and similar general commercial uses are appropriate for Dogwood Avenue, whereas warehouse and distribution facilities and other light industrial uses are ideally suited for the industrially designated areas east and west of the commercially designated properties. The proposed revision to OA-3 would reduce the amount of land designated as retail that would be assumed under the proposed project, which would reduce traffic and the associated impacts.

### **1.3.4 Mobility Element Update**

The California Complete Streets Act of 2008 requires that General Plans demonstrate how cities will provide for the routine accommodation of all users of a road or street, including pedestrians, bicyclists, public transportation users, motorists, children, older adults, and those with disabilities. The El Centro General Plan Mobility Element addresses this requirement with policies and programs that consider all modes of travel, with the goal of making streets safer, accessible, and more convenient to walk, ride a bicycle, or use public transportation.

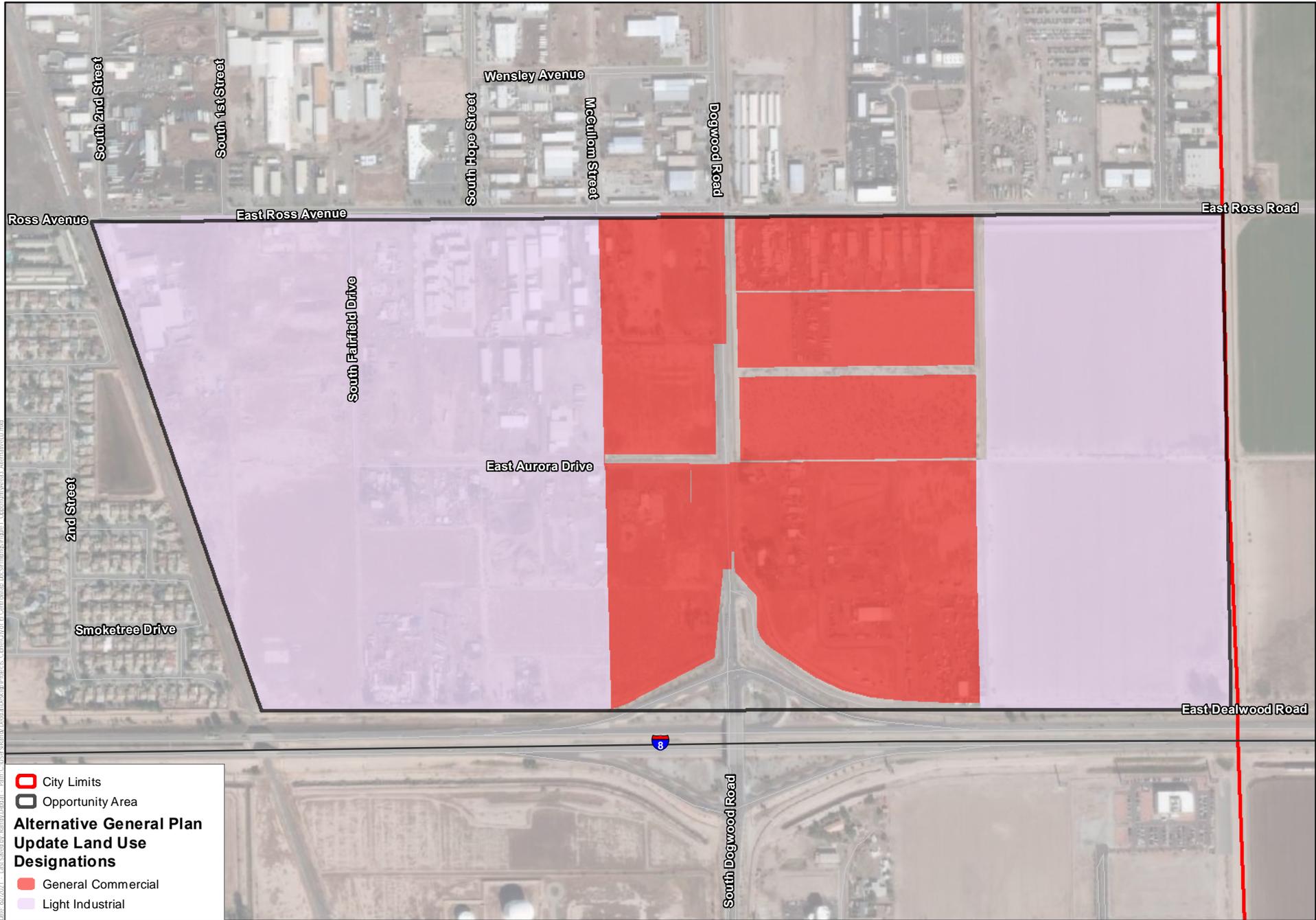
The City's transition from low-density to higher-density land use patterns under the proposed Land Use Element Update would require equally supportive mobility infrastructure, public improvements, and policies focused on better serving pedestrians, bicyclists, and public transportation users in addition to motorists. To supplement these land use changes, the proposed Mobility Element Update would include transportation network and policy improvements to address existing and forecasted mobility needs and deficiencies. Specific objectives of the proposed Mobility Element Update include adopting Complete Streets policies that are accessible to all ages, supporting a safe pedestrian and bicycle transportation network, promoting a public transportation network that allows convenient access to major destinations, offering appropriate vehicle circulation, and providing a safe and efficient mobility system.

### **1.3.5 Environmental Justice Element**

The City is preparing an Environmental Justice Element as a new chapter of the El Centro General Plan. Preparation of an Environmental Justice Element is required under Senate Bill 1000 for jurisdictions with disadvantaged communities. The purpose of preparing an Environmental Justice Element is to develop objectives and policies to minimize pollution and its effects on all communities and to ensure residents have the opportunity to provide input in decisions that affect their quality of life. While state requirements specify the topic areas that must be included in the Environmental Justice Element, the specific policies would be customized to the City. The Environmental Justice Element would critically examine the disproportionate impact negative environmental factors have on the City. The following concerns would be addressed in the Environmental Justice Element:

- Pollution exposure, including access to clean air and water
- Access to public facilities and services, including access to transit, healthcare, childcare, parks, and other civic facilities
- Access to healthy food
- Access to safe and sanitary homes
- Access to physical activity and recreational opportunities
- Unique or compounded health risks, including climate exposure

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Source: Maxar Imagery 2019.

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## Section 2 Environmental Procedures

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### 2.1 Lead Agency

Pursuant to CEQA Guidelines, Section 15367, the City is the lead agency for preparing the environmental review required by CEQA. The environmental review prepared by the City will be used by the City Council regarding its decisions to certify the PEIR and approve the proposed project.

### 2.2 Environmental Impact Report

Pursuant to CEQA Guidelines, Section 15080 et seq., the City prepared a PEIR to analyze the potential impacts of the proposed project on the environment. The Final PEIR contains the information required by CEQA Guidelines, Section 15132, including the Draft PEIR and the appendices to the Draft PEIR.

### 2.3 Public Participation

Environmental review of the proposed project began on July 17, 2020, with the publication of the Notice of Preparation of the PEIR and a minimum 30-day public review period. The City held a public scoping meeting on July 30, 2020. The Notice of Preparation public comment period ended on August 16, 2020. The Draft PEIR was completed, and the Notice of Availability for public review was posted on March 9, 2021. A 45-day public review period for the Draft PEIR began on March 9, 2021, and ended on April 23, 2021. Two comment letters were received.

These comments and the City's responses to them are included in the Final PEIR as required by CEQA Guidelines, Sections 15088 and 15132. The Final PEIR, including an Errata and the City's responses to comments, was completed. A public hearing concerning the certification of the Final PEIR will be held by City Council on June 15, 2021, at which time interested agencies, organizations, and individuals will be given an opportunity to comment on the Final PEIR and the proposed project.

### 2.4 Record of Proceedings

For the purposes of CEQA and the Findings as follows, the administrative record of the City's decision concerning certification of the Final PEIR for the proposed project includes the following:

- Draft PEIR (March 2021)
- Final PEIR, including the Errata (June 2021)
- Appendices to the Draft PEIR and the Final PEIR
- All documents and other materials listed as references or incorporated by reference in the Draft PEIR and Final PEIR, including but not limited to the materials identified in the Chapter 7, References, of the Draft PEIR

- All reports, applications, memoranda, maps, letters, and other documents prepared by the City's staff and consultants for the proposed project, which are before the City Council as determined by the County Clerk
- All notices issued by the City to comply with CEQA, the CEQA Guidelines, or any other law governing the processing and approval of the project
- Mitigation Monitoring and Reporting Program for the project
- All documents or other materials submitted by interested people and public agencies in connection with the Draft PEIR and the Final PEIR
- Minutes, recordings, and verbatim transcripts, if any, of the public hearing to be held on June 15, 2021, concerning the Final PEIR and the proposed project
- All Findings and resolutions adopted by City Council in connection with the project (including these Findings) and all documents cited or referred to therein
- Any documentary or other evidence submitted to the City at information sessions, public meetings, and public hearings concerning the Final PEIR and the project
- Any other materials required to be in the record of proceedings by California Public Resources Code, Section 21167.6(e)
- Any other written materials relevant to the City's compliance with CEQA and its decision on the merits of the project, including documents that have been released for public review and copies of reports, studies, or other documents relied on in any environmental documentation for the project and either made available to the public during the public comment period or included in the City's files

The custodian of the documents and other materials composing the administrative record of the City's decision concerning certification of the Final PEIR is the City Clerk. The location of the administrative record is El Centro City Hall, 1275 W. Main Street, El Centro, California 92243 (California Public Resources Code, Section 21081.6[a][2]).

## Section 3 Findings Under CEQA

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### 3.1 Purpose

California Public Resources Code, Section 21002, states that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” The same section states that the procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.” Section 21002 also states that “in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects.”

California Public Resources Code, Section 21002, is implemented, in part, through the requirement that agencies adopt written Findings before approving projects (California Public Resources Code, Section 21081; CEQA Guidelines, Section 15091). Specifically, CEQA requires the City to make written Findings of Fact for each significant environmental impact identified in the Final PEIR (CEQA Guidelines, Sections 15091, 21081).

In accordance with CEQA, the purpose of the Findings is to systematically restate the significant effects of the proposed project on the environment and to determine the feasibility of mitigation measures and alternatives identified in the Final PEIR that would avoid or substantially lessen the significant effects. These Findings set forth the reasons and evidence in support of the City’s determinations.

### 3.2 Terminology

A “Finding” is a written statement made by the City that explains how the City dealt with each significant impact and alternative identified in the Final PEIR. Each Finding contains a conclusion regarding each significant impact, substantial evidence supporting the conclusion, and an explanation of how the substantial evidence supports the conclusion.

For each significant effect identified in the Final PEIR, the City is required by CEQA Guidelines, Section 15091(a), to make a written Finding reaching one or more of the following conclusions:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the Finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

A mitigation measure or an alternative is considered “feasible” if it is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (California Public Resources Code, Section 21061.1; CEQA Guidelines, Section 15364; see also *Citizens of Goleta Valley v. Board of Supervisors* [Goleta II] [1990] 52 Cal.3d 553, 565). The concept of “feasibility” also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project (*City of Del Mar v. City of San Diego* [1982] 133 Cal.App.3d 410, 417). “Feasibility under CEQA encompasses ‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors” (*City of Del Mar v. City of San Diego* [1982] 133 Cal.App.3d 410, 417; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* [1993] 23 Cal.App.4th 704, 715).

CEQA also requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. The CEQA Guidelines do not define the difference between “avoiding” a significant environmental effect and “substantially lessening” such an effect. Therefore, the City must glean the meaning of these terms from other contexts in which the terms are used. California Public Resources Code, Section 21081, on which CEQA Guidelines, Section 15091, is based, uses the term “mitigate” rather than “substantially lessen.” Therefore, the CEQA Guidelines equate “mitigating” with “substantially lessening.” Such an understanding of the statutory term is consistent with the policies underlying CEQA, which include the policy that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects” (California Public Resources Code, Section 21002). For the purposes of these Findings, the term “avoid” refers to the effectiveness of one or more mitigation measures to reduce an otherwise significant effect to a less than significant level.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or a feasible alternative, a public agency, after adopting proper Findings, may nevertheless approve the project if the agency adopts a Statement of Overriding Considerations setting forth the specific reasons why the agency found that the project’s benefits rendered acceptable its unavoidable adverse environmental effects (CEQA Guidelines, Sections 15093 and 15043(b); California Public Resources Code, Section 21081[b]). The California Supreme Court has stated that “the wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced” (*Citizens of Goleta Valley v. Board of Supervisors* [1990] 52 Cal.3d 553, 576).

A Statement of Overriding Considerations is required for the approved project because, despite implementation of all feasible mitigation measures, the project as approved would have significant impacts on a historical resource that could not be avoided or reduced to a less than significant level.

### **3.3 Legal Effect**

To the extent these Findings conclude that mitigation measures identified in the Final PEIR are feasible and have not been modified, superseded, or withdrawn, the City hereby binds itself and any other responsible parties to implement these mitigation measures. These Findings are not merely informational but constitute a binding set of obligations for the City and responsible parties, which will take effect if and when the City adopts a resolution certifying the Final PEIR and the City adopts resolutions approving the project.

### **3.4 Mitigation Monitoring and Reporting Program**

In adopting these Findings, the City also adopts a Mitigation Monitoring and Reporting Program pursuant to California Public Resources Code, Section 21081.6, and CEQA Guidelines, Section 15097. This program is designed to ensure that the project complies with the feasible mitigation measures identified below during implementation of the project. The program is set forth in the El Centro General Plan Update Mitigation Monitoring and Reporting Program, which is adopted by the City concurrently with these Findings, is incorporated herein by reference, and is included as Attachment 1 to these Findings.

### **3.5 Certification of the Final PEIR**

Pursuant to CEQA Guidelines, Section 15090, the City further finds and certifies that:

- The Final PEIR has been completed in compliance with CEQA.
- The Final PEIR has been presented to the City Council, which constitutes the decision-making body of the lead agency, and the City Council has reviewed and considered the information contained in the Final PEIR before approving the project.
- The Final PEIR reflects the City's independent judgment and analysis.

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## Section 4 Findings Regarding Direct, Indirect, or Cumulative Significant or Potentially Significant Effects

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The proposed project would result in direct and indirect significant and potentially significant environmental effects regarding agriculture and forestry resources, air quality, biological resources, cultural resources and tribal cultural resources (TCRs), GHG emissions, noise, and transportation. These significant environmental effects and the mitigation measures identified to avoid or substantially lessen them are discussed in detail in the Draft PEIR Section 3.1, Agriculture and Forestry Resources; Section 3.2, Air Quality; Section 3.3, Biological Resources; Section 3.4, Cultural and Tribal Cultural Resources; Section 3.5, Greenhouse Gas Emissions; Section 3.6, Noise; and Section 3.7, Transportation. A summary of significant impacts and mitigation measures for the project is included in the Executive Summary of the Draft PEIR.

Below are the Findings regarding the potential direct, indirect, or cumulative significant environmental effects of the project. The Findings incorporate by reference the discussion of potentially significant impacts and mitigation measures in the Final PEIR. The Final PEIR, which includes the Draft PEIR and appendices, is referred to below as the “PEIR.”

### 4.1 Agriculture and Forestry Resources

#### 4.1.1 Threshold 1: Conversion of Farmland

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact on Agriculture and Forestry Resources Threshold 1 associated with the conversion of Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Natural Resources Agency, to non-agricultural use. Detailed information and analysis regarding the potentially significant impact are provided in PEIR Section 3.1.5.1.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on agriculture and forestry resources identified as an impact on Agriculture and Forestry Resources Threshold 1 in the PEIR, and pursuant to CEQA Guidelines, Section 15091(a)(3), specific legal, economic, social, technological, or other considerations make other mitigation measures or project alternatives identified in the PEIR infeasible.

**Fact in Support of Finding:** The potentially significant impacts of the proposed project on agriculture and forestry resources are analyzed in PEIR Section 3.1.5.1. Future development in the City and SOI pursuant to the land uses in the proposed General Plan Update would result in the conversion of currently Farmland Mapping and Monitoring Program-designated agriculture land to urban uses.

Potentially significant impacts on Agriculture and Forestry Resources Threshold 1 would be mitigated by implementation of Mitigation Measure AG-1. Mitigation Measure AG-1 is set forth in full in Table ES-5, Summary of Impacts of the Proposed Project, of the PEIR Executive Summary. Mitigation Measure AG-1 requires the individual projects to prepare a project-specific Agricultural Study. The analysis in the Agricultural Study would be conducted pursuant to the State Land Evaluation and Site Assessment model to determine the importance and to incorporate mitigation (if required) to identified agriculture and forestry resources. Implementation of Mitigation Measure AG-1 would reduce impacts on important farmland but not to a less than significant level. Impacts on agriculture and forestry resources can only be determined once a specific project has been proposed because the effects are highly dependent on both the individual resource (type of farmland) and the characteristics of the proposed activity. The precise extent and nature of impacts that could result from implementation of the project would be determined when specific project details are developed. Therefore, despite the incorporation of Mitigation Measure AG-1, the impact on Agriculture and Forestry Resources Threshold 1 is considered significant and unavoidable, and a Statement of Overriding Considerations pursuant to CEQA Guidelines, Section 15093, is required.

#### **4.1.2 Threshold 5: Other Changes to the Existing Environment**

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact on Agriculture and Forestry Resources Threshold 5 associated with changes in land use designations that that could result in changes in the existing environment that could result in conversion of farmland to non-agricultural uses. Detailed information and analysis regarding the potentially significant impact is provided in PEIR Section 3.1.5.5.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on agriculture and forestry resources identified as an impact on Agriculture and Forestry Resources Threshold 5 in the PEIR, and pursuant to CEQA Guidelines, Section 15091(a)(3), specific legal, economic, social, technological, or other considerations make other mitigation measures or project alternatives identified in the PEIR infeasible.

**Fact in Support of Finding:** The potentially significant impacts of the proposed project on Agriculture and Forestry Resources Threshold 5 are analyzed in PEIR Section 3.1.5.5. Impacts would result in conversion of farmland to non-agricultural uses from changes to the existing environment.

The potentially significant impacts on Agriculture and Forestry Resources Threshold 5 would be mitigated by implementation of Mitigation Measure AG-1. Mitigation Measure AG-1 is set forth in full in Table ES-5 of the PEIR Executive Summary. Mitigation Measure AG-1 requires individual development projects to prepare a project-specific Agricultural Study. The analysis in the Agricultural Study would be conducted pursuant to the State Land Evaluation and Site Assessment model to determine the importance and to incorporate mitigation (if required) to

identified agriculture and forestry resources. Implementation of Mitigation Measure AG-1 would reduce impacts involving other changes in the existing environment that could result in conversion of farmland to non-agricultural uses, although not to a less than significant level. Impacts on agriculture and forestry resources can only be determined once a specific project has been proposed because the effects are highly dependent on both the individual resource (type of farmland) and the characteristics of the proposed activity. The precise extent and nature of impacts that could result from implementation of the project would be determined when specific project details are developed. Therefore, despite the incorporation of Mitigation Measure AG-1, the impact on Agriculture and Forestry Resources Threshold 1 is considered significant and unavoidable, and a Statement of Overriding Considerations pursuant to CEQA Guidelines, Section 15093, is required.

#### 4.1.3 Cumulative Conversion of Farmland

**Potentially Significant Impact:** The PEIR identifies a potentially significant cumulative impact on agriculture and forestry resources associated with the direct and indirect conversion of agricultural lands in combination with other cumulative projects, such as development projects allowable under surrounding jurisdictions' General Plans. Detailed information and analysis regarding this potentially significant impact are provided in PEIR Section 3.1.6, Cumulative Impacts.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on cumulative conversion of agriculture and forestry resources in the PEIR, and pursuant to CEQA Guidelines, Section 15091(a)(3), specific legal, economic, social, technological, or other considerations make other mitigation measures or project alternatives identified in the PEIR infeasible.

**Fact in Support of Finding:** The potential cumulatively considerable impact of the proposed project on agriculture and forestry resources is analyzed in the PEIR Section 3.1.6. The proposed project would have a cumulatively considerable contribution to a regionally significant impact on the direct and indirect conversion of agricultural land in combination with future development projects allowable under surrounding jurisdictions' General Plans.

The potential cumulatively considerable impact on agriculture and forestry resources would be reduced through implementation of Mitigation Measure AG-1. Mitigation Measure AG-1 is set forth in full in Table ES-5 in the PEIR Executive Summary.

Mitigation Measure AG-1 would require individual development projects with important farmland proposed under the General Plan Update to complete a project-specific Agricultural Study and apply mitigation measures as required. While this mitigation measure would reduce the General Plan Update's incremental contribution to the cumulative impact, the General Plan Update would have a cumulatively considerable contribution to a cumulatively significant impact because no

actions or policies exist to fully replace the loss of important farmland. Despite the incorporation of Mitigation Measure AG-1, the cumulative impact on agriculture and forestry resources is considered significant and unavoidable, and a Statement of Overriding Considerations pursuant to CEQA Guidelines, Section 15093, is required.

## 4.2 Air Quality

### 4.2.1 Threshold 2: Cumulative Increase in Criteria Pollutant

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact and a cumulatively considerable contribution to a cumulatively significant impact on Air Quality Threshold 2 associated with emissions from construction activities and project operation that would potentially exceed the Imperial County Air Pollution Control District (ICAPCD) thresholds. Detailed information and analysis regarding the potentially significant impact is provided in PEIR Section 3.2.5.2.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on air quality identified as an impact on Air Quality Threshold 2 in the PEIR, and pursuant to CEQA Guidelines, Section 15091(a)(3), specific legal, economic, social, technological, or other considerations make other mitigation measures or project alternatives identified in the PEIR infeasible.

**Fact in Support of Finding:** The potentially significant impacts of the proposed project on Air Quality Threshold 2 are analyzed in PEIR Section 3.2.5.2. Impacts would result in significant increases in criteria pollutant emissions during construction and operation.

The potentially significant impacts on Air Quality Threshold 2 would be mitigated by implementation of Mitigation Measures AIR-1 and AIR-2. Mitigation Measures AIR-1 and AIR-2 are set forth in full in Table ES-5 of the PEIR Executive Summary. Mitigation Measure AIR-1 requires future development projects pursuant to the General Plan Update to demonstrate compliance with the ICAPCD thresholds and to implement emissions reduction measures to the extent necessary to reduce emissions. Mitigation Measure AIR-2 requires future development projects to comply with the discretionary measures in the ICAPCD CEQA Air Quality Handbook. If the project would exceed the screening criteria, the project applicant shall demonstrate that performance criteria for residential, commercial, and industrial projects have been incorporated into the site-specific entitlements issued for the project as applicable and to the extent necessary to reduce project emissions. Implementation of Mitigation Measures AIR-1 and AIR-2 would reduce criteria pollutant emissions related to construction activities and operation.

In addition, Mitigation Measures GHG-2 and GHG-3 would reduce criteria pollutant emissions during construction and operation by requiring future projects to implement the California Air

Resources Board's 2017 Climate Change Scoping Plan GHG emissions reduction strategies. However, because site-specific emissions have not been quantified, it cannot be guaranteed that compliance with the reduction measures would fully reduce impacts.

Therefore, despite the incorporation of Mitigation Measures AIR-1, AIR-2, GHG-2, and GHG-3, the impact on Air Quality Threshold 2 is considered significant and unavoidable, and a Statement of Overriding Considerations pursuant to CEQA Guidelines, Section 15093, is required.

#### **4.2.2 Threshold 3: Sensitive Receptors**

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact on Air Quality Threshold 3 related to the potential to expose sensitive receptors to substantial pollutant concentrations as a result of exposure to a carbon dioxide (CO) hotspot and toxic air contaminants during project operation. Detailed information and analysis regarding the potentially significant impact is provided in PEIR Section 3.2.5.3.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on air quality resources identified as an impact on Air Quality Threshold 3 in the PEIR, and pursuant to CEQA Guidelines, Section 15091(a)(3), specific legal, economic, social, technological, or other considerations make other mitigation measures or project alternatives identified in the PEIR infeasible.

**Fact in Support of Finding:** The potentially significant impacts of the proposed project on Air Quality Threshold 3 are analyzed in PEIR Section 3.2.5.3. Impacts would result in exposure of sensitive receptors to substantial pollution concentrations.

The potentially significant impacts on Air Quality Threshold 3 would be mitigated by implementation of Mitigation Measures AIR-3 and AIR-4. Mitigation Measures AIR-3 and AIR-4 are set forth in full in Table ES-5 of the PEIR Executive Summary. Mitigation Measure AIR-3 would require future projects that would locate new sensitive receptors within 500 feet of the intersections of Imperial Avenue and Ocotillo Drive or Imperial Avenue and the I-8 westbound ramps intersection or that would significantly increase traffic volumes at either intersection complete a CO Hotspot Analysis and implement mitigation measures as necessary. With implementation of Mitigation Measure AIR-3, impacts from CO exposure would be reduced to less than significant.

Mitigation Measure AIR-4 would require the preparation of a Health Risk Assessment for future projects that would generate toxic air contaminants (such as diesel particulate matter) in the General Plan Update planning area or that would locate a new sensitive receptor within the applicable screening level distance identified in the ICAPCD CEQA Air Quality Handbook. The Health Risk Assessment would demonstrate that the project would not pose a significant health

risk to nearby sensitive receptors. If a potentially significant health risk is identified, the Health Risk Assessment shall identify appropriate measures, such as upgrading building ventilation systems, to reduce the potential health risk to below a significant level, or the sensitive receptor or proposed facility shall be sited in another location. However, impacts from siting new receptors near existing facilities would remain significant because not all potential sources of toxic air contaminants emissions would be subject to new source review. Therefore, despite the incorporation of Mitigation Measures AIR-3 and AIR-4, the impact on Air Quality Threshold 2, exposure to toxic air contaminants emissions, is considered significant and unavoidable, and a Statement of Overriding Considerations pursuant to CEQA Guidelines, Section 15093, is required.

#### **4.2.3 Threshold 4: Odors**

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact on Air Quality Threshold 4 associated with new industrial land uses that would have the potential to produce objectionable odors during industrial processes and manufacturing or places sensitive receptor development near an existing odor source. Detailed information and analysis regarding the potentially significant impact is provided in PEIR Section 3.2.5.4.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on Air Quality Threshold 4 as identified in the PEIR.

**Fact in Support of Finding:** The potentially significant impacts of the proposed project on Air Quality Threshold 4 are analyzed in PEIR Section 3.2.5.4. Impacts would have the potential to result in odor emissions during operation of future projects.

The potentially significant impacts on Air Quality Threshold 4 would be mitigated by implementation of Mitigation Measure AIR-5. Mitigation Measure AIR-5 is set forth in full in Table ES-5 of the PEIR Executive Summary. Mitigation Measure AIR-5 requires future projects that involve new receptors located near an existing odor source to submit a public information request to the ICAPCD for review of any existing odor complaints at the nearest odor-emitting facility. If necessary, odor reduction measures recommended by the ICAPCD shall be implemented as applicable. With implementation of Mitigation Measure AIR-5, the impact related to objectionable odors would be reduced to less than significant.

### **4.3 Biological Resources**

#### **4.3.1 Threshold 1: Candidate, Sensitive, or Special-Status Species**

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact on Biological Resources Threshold 1 associated with the construction of future development that could result in the loss or destruction of plant and wildlife species and nesting birds identified as candidate,

sensitive, or special-status species. Detailed information and analysis regarding the potentially significant impact is provided in PEIR Section 3.3.5.1.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on Biological Resources Threshold 1 as identified in the PEIR.

**Fact in Support of Finding:** The potentially significant impacts of the proposed project on Biological Resources Threshold 1 are analyzed in PEIR Section 3.3.5.1. Impacts would result in the direct and indirect physical impacts on sensitive plants species, burrowing owl and other sensitive wildlife species, and nesting birds and raptors.

The potentially significant impacts on Biological Resources Threshold 1 would be mitigated by implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-7, and BIO-8. These mitigation measures are set forth in full in Table ES-5 of the Executive Summary in the PEIR. Mitigation Measure BIO-1 requires that a qualified biologist be retained to implement the project mitigation measures in areas designated as biologically sensitive. The qualified biologist shall be responsible for implementing project mitigation measures, coordinating and communicating requirements to the project proponents and the City, and facilitating consultation with the wildlife and resource agencies as required. Mitigation Measure BIO-2 requires a project-specific contractor training program that would educate contractors about the sensitive biological resources on and adjacent to the planning area and the measures being implemented to avoid or minimize impacts on these resources. Mitigation Measure BIO-3 requires the designation of the limits of the construction area, where accessible, in City rights-of-way in the field and review of fencing, signage, or stake placement with the contractors in accordance with the construction plans. Aquatic resources within 50 feet of the construction area, where accessible and feasible, shall also be demarcated in the field and avoided by construction personnel and activity. Mitigation Measure BIO-4 requires that a site-specific biological resources survey be conducted during the project design phase for project on undeveloped land. The biological survey letter report would include the analysis of available literature and biological databases; a review of current land use and land ownership within the project vicinity; an assessment and mapping of vegetation communities present within the project vicinity; a general assessment of the potential for aquatic resources, including wetlands and riparian habitats, to occur on site; an evaluation of potential local and regional wildlife movement corridors; and if necessary, a focused habitat assessment to determine the potential for sensitive plant or wildlife species. In addition, Mitigation Measure BIO-4 requires weed control methods to minimize the establishment and spread of non-native and invasive weed species during construction activities and the revegetation of temporarily impacted non-native grasslands. Mitigation Measure BIO-5 requires that a sensitive plant species survey be conducted in areas in the planning area identified to have suitable habitat during implementation of Mitigation Measure BIO-4. Mitigation Measure BIO-6 requires that burrowing owl clearance

surveys be conducted before any ground-disturbing activities occur in areas with disturbed land. Mitigation Measure BIO-7 requires a preconstruction nesting bird survey before the start of construction in the areas in the planning area with vegetation supporting nesting birds. Mitigation Measure BIO-8 requires that nighttime lighting be directed away from sensitive vegetation communities and shielded to minimize temporary lighting of the surrounding habitat and be the lowest illumination necessary for human safety. With implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-7, and BIO-8, impacts on candidate, sensitive, or special-status species would be less than significant.

#### 4.3.2 Threshold 2: Riparian Habitat or Other Sensitive Natural Communities

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact on Biological Resources Threshold 2 associated with the construction of future development projects. Detailed information and analysis regarding the potentially significant impact is provided in PEIR Section 3.3.5.2.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on Biological Resources Threshold 2 as identified in the PEIR.

**Fact in Support of Finding:** The potentially significant impacts of the proposed project on Biological Resources Threshold 2 are analyzed in PEIR Section 3.3.5.2. Impacts would result in the direct physical impacts on sensitive vegetation communities, including non-native grassland.

The potentially significant impacts on Biological Resources Threshold 2 would be mitigated by implementation of Mitigation Measures BIO-4, BIO-9, and BIO-10. Mitigation Measures BIO-4, BIO-9, and BIO-10 are set forth in full in Table ES-5 in the Executive Summary in the PEIR. Mitigation Measure BIO-4 requires that a site-specific biological resources survey be conducted during the project design phase for project located on undeveloped land. The biological survey letter report would include an analysis of available literature and biological databases; a review of current land use and land ownership within the project vicinity; an assessment and mapping of vegetation communities present within the project vicinity; a general assessment of the potential for aquatic resources, including wetlands and riparian habitats, to occur on site; an evaluation of potential local and regional wildlife movement corridors; and if necessary, a focused habitat assessment to determine the potential for sensitive plant or wildlife species. In addition, Mitigation Measure BIO-4 requires weed control methods to minimize the establishment and spread of non-native and invasive weed species during construction activities and the revegetation of temporarily impacted non-native grasslands.

Mitigation Measure BIO-9 requires that permanent impacts on sensitive non-native grassland be mitigated at a ratio of 1:1 through the preservation of habitat, habitat creation, or enhancement, or a combination thereof, in the City or off site through habitat acquisition and preservation or

purchase of credits from an approved conservation bank. For on-site mitigation, a detailed Mitigation Plan shall be prepared before the start of construction (not applicable to mitigation met through the purchase of credits from an approved wetland mitigation bank). Mitigation Measure BIO-10 requires that temporary impacts on non-native grassland be restored in place or elsewhere in the planning area at a 1:1 replacement ratio using native grass species. A Revegetation Plan shall be prepared that includes site preparation specifications, a plant palette, installation procedures, development of reasonable success criteria, appropriate monitoring and reporting protocols, implementation timelines, and contingency measures in the event of restoration failure. With implementation of Mitigation Measures BIO-4, BIO-9, and BIO-10, impacts on sensitive vegetation communities, including non-native grassland, would be less than significant.

### 4.3.3 Threshold 3: Wetlands

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact on Biological Resources Threshold 3 associated with the construction of future development projects. Detailed information and analysis regarding the potentially significant impact is provided in PEIR Section 3.3.5.3.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on Biological Resources Threshold 3 as identified in the PEIR.

**Fact in Support of Finding:** The potentially significant impact of the proposed project on Biological Resources Threshold 3 is analyzed in PEIR Section 3.3.5.3. Impacts would result in the direct physical impacts on jurisdictional aquatic resources from construction activities.

The potentially significant impacts on Biological Resources Threshold 3 would be mitigated by implementation of Mitigation Measures BIO-4, BIO-11, and BIO-12. Mitigation Measures BIO-4, BIO-11, and BIO-12 are set forth in full in Table ES-5 in the PEIR Executive Summary. Mitigation Measure BIO-4 requires that a site-specific biological resources survey be conducted during the project design phase for project located on undeveloped land. The biological survey letter report would include an analysis of available literature and biological databases; a review of current land use and land ownership within the project vicinity; an assessment and mapping of vegetation communities present within the project vicinity; a general assessment of the potential for aquatic resources, including wetlands and riparian habitats, to occur on site; an evaluation of potential local and regional wildlife movement corridors; and if necessary, a focused habitat assessment to determine the potential for sensitive plant or wildlife species. In addition, Mitigation Measure BIO-4 requires weed control methods to minimize the establishment and spread of non-native and invasive weed species during construction activities and the revegetation of temporarily impacted non-native grasslands.

Mitigation Measure BIO-11 requires the preparation of an Aquatic Resources Delineation Report if sensitive aquatic resources are identified on a future development project site. If impacts were to occur, Mitigation Measure BIO-12 requires that permits and authorizations be obtained from the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board before the start of construction. The regulatory agencies' authorizations would include specific avoidance and minimization measures and mitigation measures for impacts on jurisdictional resources and may include monetary contributions to a mitigation bank or habitat creation, restoration, or enhancement. With implementation of Mitigation Measures BIO-4, BIO-10, and BIO-11, impacts on jurisdictional aquatic resources would be less than significant.

## 4.4 Cultural and Tribal Cultural Resources

### 4.4.1 Threshold 1: Historical Resources

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact on Cultural Resources and TCR Threshold 1 associated with the physical demolition, destruction, relocation, or alteration of a historical resource or its immediate surroundings such that a substantial adverse change to the historical resource would result pursuant to CEQA Guidelines, Section 21084. Detailed information and analysis regarding the potentially significant impact is provided in PEIR Section 3.4.5.1.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on cultural resources identified as an impact on Cultural Resources and TCR Threshold 1 in the PEIR, and pursuant to CEQA Guidelines, Section 15091(a)(3), specific legal, economic, social, technological, or other considerations make other mitigation measures or project alternatives identified in the PEIR infeasible.

**Fact in Support of Finding:** The potentially significant impact of the proposed project to Cultural Resources and TCR Threshold 1 is analyzed in PEIR Section 3.4.5.1. An impact on Cultural Resources and TCR Threshold 1 would occur because future development or redevelopment activity that would be accommodated by the General Plan Update could result in the physical demolition, destruction, relocation, or alteration of a historical resource; therefore, the impact would be potentially significant.

Potentially significant impacts on Cultural Resources and TCR Threshold 1 would be mitigated by implementation of Mitigation Measures CUL-1, CUL-2, and CUL-3. Mitigation Measures CUL-1, CUL-2, and CUL-3 are set forth in full in Table ES-5 in the PEIR Executive Summary. Mitigation Measure CUL-1 would require the identification and evaluation of built environment resources if built environment resources that meet the age threshold for eligibility would be located

on a future development site. If needed, the resource shall be evaluated in accordance with the California Office of Historic Preservation guidelines to identify any previously unrecorded potential historical resources. If avoidance or preservation in place of a built environment resource is not possible, Mitigation Measure CUL-2 requires that the Secretary of the Interior's Standards for the Treatment of Historic Properties shall be used to the maximum extent possible. The application of the standards shall be overseen by a qualified architectural historian or historic architect meeting the Secretary of the Interior's Professional Qualified Standards. Before any construction activities that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the City. If a proposed project would result in the demolition or significant alteration of a historical resource, Mitigation Measure CUL-3 would require the preparation of a Historic American Buildings Survey, Historic American Engineering Record, or Historic American Landscape Survey documentation. Documentation shall include an architectural and historical narrative, photographs, and supplementary information, such as building plans and elevations, and/or historical photographs.

Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce potential impacts associated with historical resources. However, if a proposed project would result in the demolition or significant alteration of a historical resource, implementation of Mitigation Measure CUL-3 would not adequately replace the demolished structures and would not reasonably mitigate the impacts of the demolition to less than significant because it would no longer convey its historical significance. Therefore, despite the incorporation of Mitigation Measures CUL-1, CUL-2, and CUL-3, the impact on Cultural Resources and TCR Threshold 1 is considered significant and unavoidable, and a Statement of Overriding Considerations pursuant to CEQA Guidelines, Section 15093, is required.

#### **4.4.2 Threshold 2: Archaeological Resources**

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact on Cultural Resources and TCR Threshold 2 associated with construction activities that could result in the damage or destruction of previously unknown subsurface archaeological resources. Detailed information and analysis regarding the potentially significant impact is provided in PEIR Section 3.4.5.2.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on Cultural Resources and TCR Threshold 2 as identified in the PEIR.

**Fact in Support of Finding:** The potentially significant impact of the proposed project to Cultural Resources and TCR Threshold 2 is analyzed in PEIR Section 3.4.5.2. An impact on Cultural Resources and TCR Threshold 2 would occur because construction activities associated with

future development proposed under General Plan Update could damage to or destruction of previously unknown subsurface archaeological resources; therefore, impacts would be significant.

Potentially significant impacts on Cultural Resources and TCR Threshold 2 would be mitigated by implementation of Mitigation Measures CUL-4, CUL-5, and CUL-6. Mitigation Measures CUL-4, CUL-5, and CUL-6 are set forth in full in Table ES-5 in the PEIR Executive Summary. Mitigation Measure CUL-4 would require a Cultural Resources Study and evaluation of resources. If resources are identified during the site-specific archaeological survey, a Phase II evaluation of the resources to the California Register of Historical Resources would be conducted to determine if the resources are significant under the CEQA and would be adversely impacted by the project. If potentially significant archaeological resources are identified during the Phase I or Phase II assessments, and impacts on these resources cannot be avoided as described in Mitigation Measure CUL-5, then appropriate site-specific mitigation measures shall be established and undertaken. If no significant resources are found, but if there is a potential for unknown archaeological resources or TCRs to be uncovered during specific project activities, an archaeological and Native American monitoring program, is recommended. Mitigation Measure CUL-5 requires the avoidance and preservation of cultural resources. Avoidance of cultural resources and TCRs can be accomplished through a project redesign. Preservation in place can include planning construction to avoid significant resources; planning parks, green space, or other open space to preserve cultural resources; or “capping” or covering archaeological sites with a layer of soil before building. Mitigation Measure CUL-6 would require the creation of an archaeological and Native American monitoring program for future development that would conduct new ground disturbance in areas identified as having a potential for unknown archaeological resources or TCRs. The archaeological and Native American monitoring program shall consist of the full-time presence of a qualified archaeologist and traditionally and culturally affiliated Native American monitor during ground-disturbing activities. With implementation of Mitigation Measures CUL-4, CUL-5, and CUL-6, impacts on archaeological resources would be less than significant.

#### 4.4.3 Threshold 3: Human Remains

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact on Cultural Resources and TCR Threshold 3 associated with construction activities including excavation, which could disturb unknown human remains. Detailed information and analysis regarding the potentially significant impact is provided in PEIR Section 3.4.5.3.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on Cultural Resources and TCR Threshold 3 as identified in the PEIR.

**Fact in Support of Finding:** The potentially significant impact of the proposed project to Cultural Resources and TCRs Threshold 3 is analyzed in PEIR Section 3.4.5.3. An impact on Cultural

Resource Threshold 3 would occur because construction activities including excavation could result in the disturbance of unknown human remains, and therefore, impacts would be significant.

Potentially significant impacts on Cultural Resources and TCR Threshold 3 would be mitigated by implementation of Mitigation Measures CUL-4, CUL-5, CUL-6, and CUL-7. Mitigation Measures CUL-4, CUL-5, CUL-6, and CUL-7 are set forth in full in Table ES-5 in the PEIR Executive Summary. To reduce potential impacts on human remains from the construction activities, Mitigation Measures CUL-4, CUL-5, and CUL-6 would be required, as detailed under Threshold 2. In addition, Mitigation Measure CUL-7 would require that construction activities be immediately halted in the event that human remains, possible human remains, and/or grave goods are encountered within 100 feet of the remains. The project proponent shall then inform the County Coroner and the City. If human remains are determined to be of Native American origin, the applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the Native American Heritage Commission (California Public Resources Code, Section 5097). The County Medical Examiner shall contact the Native American Heritage Commission to determine the most likely descendant. The most likely descendant shall inspect the site as needed and make recommendations or preferences for treatment of the remains within 48 hours of being granted access to the site. The disposition of the remains shall be overseen by the most likely descendant to determine the most appropriate means of treating the human remains and any associated grave artifacts. The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. With implementation of Mitigation Measures CUL-4, CUL-5, CUL-6, and CUL-7, impacts on human remains would be less than significant.

#### 4.4.4 Threshold 4: Tribal Cultural Resources

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact on Cultural Resources and TCR Threshold 4 associated with grading and construction activities of undeveloped areas or redevelopment that requires more intensive soil excavation than in the past could potentially cause disturbance to TCRs. Detailed information and analysis regarding the potentially significant impact is provided in PEIR Section 3.4.5.4.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on cultural resources and TCRs as identified in the PEIR.

**Fact in Support of Finding:** The potentially significant impact of the proposed project to Cultural Resources and TCR Threshold 4 is analyzed in PEIR Section 3.4.5.4. Impacts on Cultural Resources and TCR Threshold 4 would result because of the potentially disturbance to TCRs.

Potentially significant impacts on Cultural Resources and TCR Threshold 4 would be mitigated by implementation of Mitigation Measures CUL-4, CUL-5, CUL-6, and CUL-7. These mitigation measures are set forth in full in Table ES-5 in the PEIR Executive Summary. Mitigation Measures CUL-4, CUL-5, and CUL-6 would be required as detailed under Cultural Resources and TCR Threshold 2. Mitigation Measure CUL-7 would be required as detailed under Cultural Resources and TCR Threshold 3. With implementation of Mitigation Measures CUL-4, CUL-5, CUL-6, and CUL-7, impacts associated with TCRs would be less than significant.

#### 4.4.5 Cumulative Loss of Historical Resources

**Potentially Significant Impact:** The PEIR identifies a potentially significant cumulative impact on cultural resources and TCR associated with impact on historical resources due to the increase in growth from cumulative development, which would contribute to the regional loss of historical resources. Detailed information and analysis is provided in PEIR Section 3.4.6, Cumulative Impacts.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on cumulative loss of historical resources in the PEIR, and pursuant to CEQA Guidelines, Section 15091(a)(3), specific legal, economic, social, technological, or other considerations make other mitigation measures or project alternatives identified in the PEIR infeasible.

**Facts in Support of Finding:** The potentially significant cumulative impact of the proposed project on cultural resources and TCRs is analyzed in PEIR Section 3.4.6. The General Plan Update has the potential to contribute to a cumulatively considerable impact on historical resources due to an increase in development, which would contribute to the regional loss of historical resources.

The potentially significant cumulative impact on historical resources would be mitigated to a less than significant level through implementation of Mitigation Measures CUL-1, CUL-2, and CUL-3. These mitigation measures are set forth in full Table ES-5 in the PEIR Executive Summary. Mitigation Measure CUL-1 would require the identification and evaluation of built environment resources if built environment resources that meet the age threshold for eligibility would be located on a future development site. If needed, the resource shall be evaluated in accordance with the California Office of Historic Preservation guidelines to identify any previously unrecorded potential historical resources. If avoidance or preservation in place of a built environment resource is not possible, Mitigation Measure CUL-2 requires that the Secretary of the Interior's Standards for the Treatment of Historic Properties shall be used to the maximum extent possible. The application of the standards shall be overseen by a qualified architectural historian or historic architect meeting the Secretary of the Interior's Professional Qualified Standards. Prior to any construction activities that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the City. If a proposed project would result in the demolition or significant alteration of a historical

resource, Mitigation Measure CUL-3 would require the preparation of a Historic American Buildings Survey, Historic American Engineering Record, or Historic American Landscape Survey documentation. Documentation shall include an architectural and historical narrative, photographs, and supplementary information, such as building plans and elevations, and/or historical photographs.

Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce potential impacts associated with historical resources. However, if a proposed project would result in the demolition or significant alteration of a historical resource, implementation of Mitigation Measure CUL-3 would not adequately replace the demolished structures and would not reasonably mitigate the impacts of the demolition to less than significant because it would no longer convey its historical significance. Therefore, despite the incorporation of Mitigation Measures CUL-1, CUL-2, and CUL-3, the cumulative impacts related to historical resources is considered significant and unavoidable, and a Statement of Overriding Considerations pursuant to CEQA Guidelines, Section 15093, is required.

## 4.5 Greenhouse Gas Emissions

### 4.5.1 Threshold 1: Greenhouse Gas Emissions Generation and Threshold 2: Conflict with Applicable Plan

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact on GHG Emissions Threshold 1 and Threshold 2 associated with the exceedance of the 2017 Scoping Plan per-capita emissions targets and inconsistencies with applicable reduction measures in the 2017 Scoping Plan. In addition, GHG emissions are cumulative by nature as emissions contribute, on a cumulative basis, to global climate change. The General Plan Update would also have a cumulatively considerable contribution to a significant cumulative GHG impact. Detailed information and analysis regarding the potentially significant impact is provided in PEIR Section 3.5.5.1.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on GHG emissions identified as an impact on GHG Emissions Threshold 1 and Threshold 2 in the PEIR, and pursuant to CEQA Guidelines, Section 15091(a)(3), specific legal, economic, social, technological, or other considerations make other mitigation measures or project alternatives identified in the PEIR infeasible.

**Fact in Support of Finding:** The potentially significant impact of the proposed project to GHG Emissions Threshold 1 and Threshold 2 is analyzed in PEIR Section 3.5.5.1. Impacts on GHG Emissions Threshold 1 and Threshold 2 would result in exceedance of the 2017 Scoping Plan per-capita emissions targets and inconsistencies with applicable reduction measures in the 2017 Scoping Plan.

Potentially significant impacts on GHG Emissions Threshold 1 and Threshold 2 would be mitigated by implementation of Mitigation Measures GHG-1, GHG-2, GHG-3, TRA-1, and AG-1. Mitigation Measures GHG-1, GHG-2, GHG-3, TRA-1, and AG-1 are set forth in full in Table ES-5 in the PEIR Executive Summary. Mitigation Measure GHG-1 would require the City to continue to participate in the preparation of the Imperial County Regional Climate Action Plan. It is assumed that the adopted Climate Action Plan will demonstrate how the City shall implement its fair share of GHG emissions reductions to achieve statewide emissions reduction goals. The program shall include an inventory of existing community GHG emissions, establish GHG emissions reduction targets consistent with Senate Bill 32 and Executive Order S-03-05, and identify GHG emissions reduction measures to achieve reduction targets. In the event that the Imperial County Regional Climate Action Plan is not adopted, the City shall prepare a local Climate Action Plan or Sustainability Program that demonstrates reduction measures necessary at a local level to achieve reduction targets. Mitigation Measure GHG-2 would require future development projects pursuant to the General Plan Update to demonstrate compliance with the ICAPCD thresholds and to implement construction GHG emission reduction measures to the extent feasible during construction to reduce GHG emissions. Mitigation Measure GHG-3 would require future development projects to comply with the discretionary measures in the ICAPCD CEQA Air Quality Handbook. If future projects under the General Plan Update would exceed the screening criteria, a project-specific GHG emissions analysis shall be prepared that demonstrates implementation of the California Air Resources Board California's 2017 Climate Change Scoping Plan Key Sector Actions and Local Measures to the extent feasible to minimize ongoing annual project GHG emissions. Mitigation Measure TRA-1 would require the use Transportation Demand Management measures to reduce single-occupancy vehicles and to encourage alternative modes of transportation, such as biking, walking, or taking public transit. Mitigation Measure AG-1 would require individual development projects to prepare a project-specific Agricultural Study. The analysis in the Agricultural Study would be conducted pursuant to the State Land Evaluation and Site Assessment model to determine the importance and to incorporate mitigation (if required) to reduce impacts on agriculture and forestry resources. Mitigation Measure AG-1 would reduce GHG impacts by protecting current land from conversion to more intensified GHG-emitting uses.

Implementation of Mitigation Measures GHG-1, GHG-2, GHG-3, TRA-1, and AG-1 would reduce GHG emissions compared to business-as-usual conditions; however, emissions reductions cannot be quantified at this time due to the uncertainty of future projects under the General Plan Update. The level of effectiveness of measures would vary from project to project and depend on the individual project site, including location, size of development, access to transit, type of development, and existing site characteristics. Additionally, it is currently unknown what proportion of existing development would be replaced with new development that would implement reduction features. It cannot be ensured that Transportation Demand Management, agricultural conservation, and GHG sustainability measures would be effective in reducing GHG

emissions to recommended per-capita thresholds. Therefore, despite the incorporation of Mitigation Measures GHG-1, GHG-2, GHG-3, TRA-1, and AG-1, the impact on GHG Emissions Threshold 1 and Threshold 2 is considered significant and unavoidable, and a Statement of Overriding Considerations pursuant to CEQA Guidelines, Section 15093, is required.

## 4.6 Noise

### 4.6.1 Threshold 1: Excessive Noise Levels

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact on Noise Threshold 1 associated with the permanent increase in vehicle noise and the exposure of new sensitive receptors to excessive vehicle noise. Detailed information and analysis is provided in PEIR Section 3.6.5.1.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on noise identified as an impact on Noise Threshold 1 in the PEIR, and pursuant to CEQA Guidelines, Section 15091(a)(3), specific legal, economic, social, technological, or other considerations make other mitigation measures or project alternatives identified in the PEIR infeasible.

**Fact in Support of Finding:** The potentially significant impact of the proposed project to Noise Threshold 1 is analyzed in PEIR Section 3.6.5.1. Impacts on Noise Threshold 1 would result from permanent increases in vehicle noise and the exposure of new sensitive receptors to excessive vehicle noise.

Potentially significant impacts on Noise Threshold 1 would be mitigated by implementation of Mitigation Measures NOI-1 and NOI-2. Mitigation Measures NOI-1 and NOI-2 are set forth in full in Table ES-5 in the PEIR Executive Summary. Mitigation Measure NOI-1 would require future development or redevelopment to implement noise reduction measures where feasible. This measure would be required for projects with the potential to generate 700 average daily trips or greater. This screening level was determined to be the maximum project-level average daily trips that would not trigger a direct project impact on any representative project segment. Reduction measures would include but are not limited to alternative road design, reduced speeds, alternative paving, building retrofits to provide additional noise attenuation, and setbacks or buffers before berms and walls. Mitigation Measure NOI-2 would require new development demonstrate consistency with the El Centro General Plan Noise Element Noise Compatibility Standards through the preparation of a Site-Specific Acoustical Analysis. If noise levels would exceed the exterior limits in the El Centro General Plan Noise Element for sensitive receptors, the future development would be required to include design measures such as acoustical paneling or walls to ensure that interior noise levels do

not exceed the City's interior noise standards. Final project design shall incorporate special design measures in the construction of the residential units.

Implementation of Mitigation Measure NOI-1 would reduce impacts from vehicle noise by implementing noise reduction measures where feasible. However, roadway noise buffers and additional noise reduction measures would not necessarily be feasible in all circumstances throughout the City and SOI. For example, for a permanent noise barrier to be effective, the barriers would need to be continuous across multiple properties. Because multiple City roadways include existing cross streets and driveways, noise walls would not necessarily be effective to reduce traffic noise. Implementation of retrofits of existing residences would require approval from private homeowners. Future projects put forward through implementation of the General Plan Update would continue to be subject to results according to the noise standards under CEQA and the El Centro General Plan Noise Element but cannot be determined to be less than significant at this time.

Implementation of Mitigation Measure NOI-2 would reduce exposure of new sensitive receptors to excessive vehicle noise to a less than significant level because modern construction practices are capable of achieving high levels of interior noise reductions that would reduce exposure of noise levels to be within interior standards, even at the highest exterior levels. Therefore, noise impacts on new sensitive receptors would be reduced to less than significant.

Therefore, despite the incorporation of Mitigation Measures NOI-1, the impact on permanent increases in vehicle noise is considered significant and unavoidable, and a Statement of Overriding Considerations pursuant to CEQA Guidelines, Section 15093, is required.

#### **4.6.2 Threshold 2: Excessive Groundborne Vibration or Noise**

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact on Noise Threshold 2 associated with the generation of excessive groundborne vibration levels during construction activities. Detailed information and analysis is provided in PEIR Section 3.6.5.2.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on Noise Threshold 2 as identified in the PEIR.

**Fact in Support of Finding:** The potentially significant impact of the proposed project to Noise Threshold 2 is analyzed in PEIR Section 3.6.5.2. Impacts on Noise Threshold 2 would result from the exposure of people to or generation of excessive groundborne vibration or groundborne noise levels generated during construction activities.

Potentially significant impacts on Noise Threshold 2 would be mitigated by implementation of Mitigation Measure NOI-3. Mitigation Measure NOI-3 is set forth in full in Table ES-5 in the Executive Summary in the PEIR. Mitigation Measure NOI-3 would require future development

projects to demonstrate that vibration would not exceed the applicable Federal Transit Administration threshold (65 vibration decibels for vibration-sensitive land uses of 75 vibration decibels for other daytime land uses) or to identify best management practices to be implemented by the construction contractor to reduce vibration levels to below the applicable threshold. The best management practices may include but not be limited to the use of only properly maintained equipment with vibratory isolators, operation of equipment as far from sensitive receptors as possible, and use of rubber-tired vehicles as opposed to tracked vehicles. With implementation of Mitigation Measure NOI-3, groundborne vibration impacts during construction would be reduced to less than significant.

#### **4.6.3 Cumulative Considerable Excessive Noise Levels**

**Potentially Significant Impact:** The PEIR identifies a potentially significant cumulative impact on noise associated with increases in traffic that would cumulatively increase traffic noise from the buildout of the General Plan Update in combination with future regional growth. Detailed information and analysis is provided in PEIR Section 3.6.6, Cumulative Impacts.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on cumulative traffic noise in the PEIR, and pursuant to CEQA Guidelines, Section 15091(a)(3), specific legal, economic, social, technological, or other considerations make other mitigation measures or project alternatives identified in the PEIR infeasible.

**Facts in Support of Findings:** The potentially significant cumulative impact of the proposed project on noise is analyzed in PEIR Section 3.6.6. Buildout of the General Plan Update, along with future regional growth, would result in increases in traffic that would cumulatively increase traffic noise.

The potentially significant cumulative impact associated with traffic noise would be reduced with implementation of Mitigation Measures NOI-1 and NOI-2. Mitigation Measures NOI-1 and NOI-2 are set forth in Table ES-5 in the PEIR Executive Summary. Mitigation Measures NOI-1 and NOI-2 are previously described in PEIR Section 4.6.1. While these mitigation measures would reduce the General Plan Update's incremental contribution to the cumulative impact on the extent feasible, the General Plan Update would have the potential to result in a cumulatively considerable contribution to a cumulatively significant impact related to traffic noise. Despite the incorporation of Mitigation Measures NOI-1 and NOI-2, the cumulative impact associated with traffic noise is considered significant and unavoidable, and a Statement of Overriding Considerations pursuant to CEQA Guidelines, Section 15093, is required.

## 4.7 Transportation

### 4.7.1 Threshold 2: Vehicle Miles Traveled

**Potentially Significant Impact:** The PEIR identifies a potentially significant impact on Transportation Threshold 2 associated with future planned and proposed retail and commercial uses that would be regionally serving and transportation projects which would conflict or be inconsistent with CEQA Guidelines, Section 15064.3(b). Detailed information and analysis is provided in PEIR Section 3.7.5.2.

**Finding:** Pursuant to CEQA Guidelines, Section 15091(a)(1), changes or alterations have been required or incorporated into the approved project that avoid or substantially lessen the significant environmental effect on transportation identified in Transportation Threshold 2 in the PEIR, and pursuant to CEQA Guidelines, Section 15091(a)(3), specific legal, economic, social, technological, or other considerations make other mitigation measures or project alternatives identified in the PEIR infeasible.

**Fact in Support of Finding:** The potentially significant impact of the proposed project to Transportation Threshold 2 is analyzed in PEIR Section 3.7.5.2. Impacts on Transportation Threshold 2 associated with future planned and proposed retail and commercial uses that would be regionally serving and transportation projects would result in a net total increase in regional vehicle miles traveled (VMT).

Potentially significant impacts on Transportation Threshold 2 would be reduced by implementation of Mitigation Measure TRA-1. Mitigation Measure TRA-1 is set forth in full in Table ES-5 in the Executive Summary in the PEIR. Mitigation Measure TRA-1 would require the use Transportation Demand Management measures to reduce single-occupancy vehicles and to encourage alternative modes of transportation, such as biking, walking, or taking public transit. Implementation of Mitigation Measure TRA-1 would potentially reduce VMT related to future development in accordance with the proposed project. However, because Transportation Demand Management level of effectiveness varies from project to project and would vary depending on the individual project site, such as the location, size of development, access to transit, and type of development, it cannot be ensured that Transportation Demand Management measures would be effective at reducing the regional VMT to baseline conditions. This mitigation measure, while potentially feasible for some projects, may not be feasible for all projects. Therefore, despite the incorporation of Mitigation Measures TRA-1, the impact on Transportation Threshold 2 is considered significant and unavoidable, and a Statement of Overriding Considerations pursuant to CEQA Guidelines, Section 15093, is required.

## Section 5 Findings Regarding Project Alternatives

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In preparing and adopting Findings, a lead agency need not necessarily address the feasibility of both mitigation measures and environmentally superior alternatives when contemplating the approval of a project with significant environmental impacts. Where the significant impacts can be mitigated to a level below significance solely by the adoption of mitigation measures, the lead agency has no obligation in drafting its Findings to consider the feasibility of environmentally superior alternatives, even if their impacts would be less severe than those of the project as mitigated. Accordingly, in adopting the Findings concerning alternatives for the proposed project, the City considers only those significant environmental impacts that cannot be avoided or substantially lessened through mitigation.

Where a project would result in some unavoidable, significant environmental impacts even after application of all feasible mitigation measures identified in a PEIR, the lead agency must evaluate the project alternatives identified in the PEIR. Under such circumstances, the lead agency must consider the feasibility of alternatives to the project that could avoid or substantially lessen the unavoidable, significant environmental impacts. “Feasible” means capable of being accomplished in a successful manner within a reasonable time, taking into account economic, environmental, legal, social, and technological factors (CEQA Guidelines, Section 15364).

If there are no feasible project alternatives, the lead agency must adopt a Statement of Overriding Considerations with regard to the project pursuant to CEQA Guidelines, Section 15093. If there is a feasible alternative to the project, the lead agency must decide whether it is environmentally superior to the proposed project. The lead agency must consider in detail only those alternatives that could feasibly attain most of the basic objectives of the project; however, the lead agency must consider alternatives capable of eliminating significant environmental impacts even if these alternatives would impede to some degree the attainment of project objectives (CEQA Guidelines, Section 15126.6[f]).

These Findings contrast and compare the alternatives where appropriate to demonstrate that the selection of the preferred alternative as the project has substantial environmental, planning, fiscal, and other benefits. In rejecting certain alternatives, the City has examined the project objectives and weighed the ability of the various alternatives to meet the objectives. The objectives considered by the City are set forth in Section 1.2, Project Objectives, in this Findings and in PEIR Section 2.4, Project Objectives.

The PEIR examined a range of reasonable alternatives to determine whether they could meet the project objectives while avoiding or substantially lessening one or more of the proposed project’s significant impacts. These Findings also considered the feasibility of each alternative. In determining the feasibility of alternatives, the City considered whether the alternatives could be accomplished in a successful manner within a reasonable period of time in light of economic, environmental, social, and technological factors (CEQA Guidelines, Sections 15126(d)(5)(A), 15364).

The PEIR analyzed three alternatives to the proposed project: (1) No Project/Existing 2004 General Plan Alternative, (2) Traditional Land Use Plan Alternative, and (3) Reduced Retail Alternative. Detailed information and analysis concerning these alternatives is in PEIR Chapter 5, Alternatives to the Proposed Project.

This section of the Findings summarizes these alternatives and their feasibility and effectiveness in avoiding or substantially lessening any of the significant impacts associated with the proposed project.

### a. Alternative 1: No Project/Existing 2004 General Plan Alternative

Pursuant to CEQA Guidelines Section 15126(e)(1), a No Project Alternative (Existing 2004 General Plan) was addressed in the PEIR. The No Project/Existing 2004 General Plan Alternative would leave the existing General Plan Land Use Element in place and assumes development would occur as designated in the City’s existing General Plan land use map. This alternative would also not update the Mobility Element and would not include the creation of the new Environmental Justice Element. Table 3, Comparison of Development Capacity of Existing General Plan and Proposed General Plan Update, provides a summary of the development capacity under the No Project/Existing 2004 General Plan Alternative compared to the proposed project. As shown in Table 3, future development under the existing General Plan would result in 1,678 fewer dwelling units in the City but 1,565 more units within the SOI. In addition, the No Project/Existing 2004 General Plan Alternative would result in 14,375 more square feet of non-residential development in the City but 3,655 fewer square feet within the SOI. The No Project/Existing 2004 General Plan Alternative does not include the proposed five OAs; therefore, it would not emphasize the principles of Smart Growth, sustainability, community identity, placemaking, and creating physical and social connections.

**Table 3. Comparison of Development Capacity of Existing General Plan and Proposed General Plan Update**

Land Uses	Existing General Plan				Proposed General Plan Update			
	Dwelling Units <sup>1</sup>		Non-Residential Square Footage <sup>2</sup> (thousand)		Dwelling Units <sup>1</sup>		Non-Residential Square Footage <sup>2</sup> (thousands)	
	City	SOI	City	SOI	City	SOI	City	SOI
Residential								
Rural Residential	70	425	—	—	12	531	—	—
Low Density Residential	10,058	31,414	—	—	9,079	28,004	—	—
Medium Density Residential	2,354	481	—	—	2,509	481	—	—
High-Medium Density Residential	6,610	302	—	—	6,552	302	—	—
Commercial								
General Commercial	—	—	8,742	634	—	—	5,337	570
Neighborhood Commercial	—	—	545	—	—	—	440	—
Office Commercial	—	—	287	—	—	—	254	—

**Table 3. Comparison of Development Capacity of Existing General Plan and Proposed General Plan Update**

Land Uses	Existing General Plan				Proposed General Plan Update			
	Dwelling Units <sup>1</sup>		Non-Residential Square Footage <sup>2</sup> (thousand)		Dwelling Units <sup>1</sup>		Non-Residential Square Footage <sup>2</sup> (thousands)	
	City	SOI	City	SOI	City	SOI	City	SOI
Heavy Commercial	—	—	1,734	—	—	—	1,585	—
Tourist Commercial	—	—	3,395	—	—	—	2,838	—
Downtown Commercial	—	—	15,345	—	—	—	See OA-2	—
Industrial								
Planned Industrial	—	—	3,344	5,339	—	—	NA	NA
Light Industrial	—	—	9,820	—	—	—	5,831	3,545
General Industrial	—	—	4,092	—	—	—	5,272	4,801
Mixed Use								
Mixed Use 1	NA	NA	NA	NA	See OA-1 and OA-5	—	See OA-1 and OA-5	—
Community Facilities								
Civic	—	—	1,821	—	—	—	1,857	—
Public	—	—	9,688	1,295	—	—	10,087	1,264
Overlays								
Single-Family Neighborhood Overlay <sup>3</sup>	NA	NA	NA	NA	NA	NA	NA	NA
El Centro Regional Medical Center Overlay	NA	NA	NA	NA	—	—	275	—
Medical Office Overlay	NA	NA	NA	NA	4	—	17	—
Mixed Use 2 Overlay (not in OAs)	NA	NA	NA	NA	598	—	104	—
Opportunity Areas								
OA-1	NA	NA	NA	NA	166	—	227	—
OA-2	NA	NA	NA	NA	—	—	1,565	—
OA-3	NA	NA	NA	NA	—	—	5,543	—
OA-4	NA	NA	NA	NA	1,021	—	2,718	—
OA-5	NA	NA	NA	NA	829	1,739	488	743
Total	19,092	32,622	58,813	7,268	20,770	31,057	44,438	10,923

**Source:** Bluman, pers comm. 2020.

**Notes:** City = City of El Centro; SOI = Sphere of Influence

<sup>1</sup> The number of dwelling units is based on average density at buildout, not maximum density.

<sup>2</sup> Non-residential development is shown in square feet and is based on average intensity (average floor area ratio [FAR]) at buildout, not maximum intensity.

<sup>3</sup> The Single-Family Neighborhood Overlay is for design purposes only and is not a factor in buildout projections.

The potential impacts of the No Project/Existing 2004 General Plan Alternative are discussed in detail in Section 5.3.1, Analysis of Alternative 1: No Project/Existing 2004 General Plan Alternative, in PEIR Chapter 5. Relative to the proposed project, the No Project/Existing 2004 General Plan Alternative

would have reduced impacts on transportation, but impacts would remain significant and unavoidable. However, it would result in greater impacts on air quality, biological resources, cultural resources and TCRs, GHG emissions, and noise.

The No Project/Existing 2004 General Plan Alternative would not avoid or substantially lessen the potentially significant impact and unavoidable impacts on air quality, cultural resources, GHG emissions, noise, and transportation. In addition, the City finds this alternative infeasible because it does not address topics and issues pursuant to state requirements that have been adopted since the existing General Plan was approved in 2004. These include environmental justice and transportation issues, such as assessing VMT and analyzing transportation systems more holistically (e.g., Complete Streets).

In addition, the No Project/Existing 2004 General Plan Alternative would meet project objectives 1, 2, and 4 because the existing General Plan provides opportunities for people to live, work, and play and retains the City's small town character and its neighborhoods to provide a diversity of housing, neighborhoods, and amenities. The No Project/Existing 2004 General Plan Alternative would also ensure the safe movement of people, goods, and services throughout the City and to the larger region.

The No Project/Existing 2004 General Plan Alternative does not include an Environmental Justice Element. Without an Environmental Justice Element, the No Project/Existing 2004 General Plan Alternative would not be able to ensure the City's long-term commitment to seek out and implement solutions to environmental justice issues (project objective 5). In addition, this alternative would not be able to provide policies designed to improve sustainability, promote public health, and foster a vibrant community that supports healthy lifestyles, historical resources, arts, education, and culture for all residents (project objectives 6 and 7). In addition, the No Project/Existing 2004 General Plan Alternative would not include the five OAs, including OA-2, Downtown El Centro, which would guide the restoration of Downtown El Centro as the symbolic, functional, and historic core of the City (project objective 3).

For the potentially significant impacts that cannot be avoided or mitigated to a level below significance, the City adopts the Statement of Overriding Considerations in Section 6 of this Findings document pursuant to CEQA Guidelines, Section 15093.

## **b. Alternative 2: Traditional Land Use Alternative**

The Traditional Land Use Alternative is a more typical suburban land use pattern, with an emphasis on separation of land uses as opposed to the proposed project that emphasizes mixed-use and village-oriented development patterns that support multimodal transportation options. It was chosen to analyze the continuation of traditional growth patterns for the City and SOI. Table 4, Traditional Land Use Alternative Development Capacity, shows the development capacity of the City and SOI under the Traditional Land Use Alternatives. Compared to the proposed project, this alternative would result in 967 fewer overall dwelling units and would reduce the amount of overall non-residential space by 369,000 square feet.

**Table 4. Traditional Land Use Alternative Development Capacity**

Land Uses	Traditional Land Use Alternative				Proposed Project			
	Dwelling Units <sup>1</sup>		Non-Residential Square Footage <sup>2</sup> (thousands)		Dwelling Units <sup>1</sup>		Non-Residential Square Footage <sup>2</sup> (thousands)	
	City	SOI	City	SOI	City	SOI	City	SOI
Residential								
Rural Residential	12	531	—	—	12	531	—	—
Low Density Residential	9,079	28,004	—	—	9,079	28,004	—	—
Medium Density Residential	2,509	481	—	—	2,509	481	—	—
High-Medium Density Residential	7,160	302	—	—	6,552	302	—	—
Commercial								
General Commercial	—	—	5,337	570	—	—	5,337	570
Neighborhood Commercial	—	—	440	—	—	—	440	—
Office Commercial	—	—	254	—	—	—	254	—
Heavy Commercial	—	—	1,585	—	—	—	1,585	—
Tourist Commercial	—	—	2,838	—	—	—	2,838	—
Downtown Commercial	—	—	See OA-2	—	—	—	See OA-2	—
Mixed Use								
Mixed Use 1	See OA-1 and OA-5	—	See OA-1 and OA-5	—	See OA-1 and OA-5	—	See OA-1 and OA-5	—
Industrial								
Planned Industrial	—	—	NA	NA	—	—	NA	NA
Light Industrial	—	—	5,831	3,545	—	—	5,831	3,545
General Industrial	—	—	5,272	4,801	—	—	5,272	4,801
Community Facilities								
Civic	—	—	1,857	—	—	—	1,857	—
Public	—	—	10,087	1,264	—	—	10,087	1,264
Overlays								
Single-Family Neighborhood Overlay <sup>3</sup>	NA	NA	NA	NA	NA	NA	NA	NA
Medical Office Overlay <sup>4</sup>	4	—	17	—	4	—	17	—
El Centro Regional Medical Center Overlay	—	—	275	—	—	—	275	—
Mixed Use 2 Overlay (not in OAs)	NA	NA	NA	NA	598	—	104	—
Opportunity Areas								
OA-1	166	—	227	—	166	—	227	—
OA-2	—	—	1,565	—	—	—	1,565	—
OA-3	—	—	4,396	—	—	—	5,543	—

**Table 4. Traditional Land Use Alternative Development Capacity**

Land Uses	Traditional Land Use Alternative				Proposed Project			
	Dwelling Units <sup>1</sup>		Non-Residential Square Footage <sup>2</sup> (thousands)		Dwelling Units <sup>1</sup>		Non-Residential Square Footage <sup>2</sup> (thousands)	
	City	SOI	City	SOI	City	SOI	City	SOI
OA-4	1,230	—	3,355	—	1,021	—	2,718	—
OA-5	228	1,154	553	923	829	1,739	488	743
Total	20,388	30,472	43,889	11,103	20,770	31,057	44,438	10,923

**Source:** Bluman, pers comm. 2020.

**Notes:** City = City of El Centro; SOI = Sphere of Influence

<sup>1</sup> The number of dwelling units is based on average density at buildout, not maximum density.

<sup>2</sup> Non-residential development is shown in square feet and is based on average intensity (average FAR) at buildout, not maximum intensity.

<sup>3</sup> The Single-Family Neighborhood Overlay is for design purposes only and is not a factor in buildout projections.

<sup>4</sup> Per buildout assumption.

The Traditional Land Use Alternative would include the five OAs similar to the proposed project; however, with a mix of different land use designations. OA-3 would change the existing land use designations from General Industrial and Planned Industrial to Tourist Commercial, with the anticipation that its location on the northern side of I-8 would bring a variety of regionally serving commercial, recreational, and entertainment uses and provide the potential for recreational vehicle parks and housing to encourage tourism.

OA-4 would retain the General Commercial land use designated properties on the eastern side of Dogwood Avenue, including Imperial Valley Mall and the commercially designated property to the north. The property at the northwestern intersection of Dogwood Avenue and Danenberg Drive would change from General Industrial to General Commercial with a Mixed Use 2 Overlay to allow additional commercial uses while also providing the opportunity for multi-family residential uses in proximity to commercial uses.

Finally, under this alternative, OA-5 would extend the existing commercial corridor land use pattern that is prevalent on Imperial Avenue north of the I-8 to the future southern extension of Imperial Avenue, with single-family residential development proposed behind strip commercial.

The potential impacts of the Traditional Land Use Alternative are discussed in detail in Section 5.3.2, Analysis of Alternative 2: Traditional Land Use Alternative, in PEIR Chapter 5. Relative to the proposed project, the Traditional Land Use Alternative would have reduced impacts on cultural resources and TCRs and biological resources; however, cultural resources and TCR impacts would remain significant and unavoidable. In addition, it would result in greater impacts on air quality, biological resources, GHG emissions, and transportation.

The City finds that implementation of the Traditional Land Use Alternative would slightly reduce the proposed project's significant impacts on cultural resources and TCRs and biological

resources. However, impacts on cultural resources and TCRs would remain significant and unavoidable. Further, the City finds that the Traditional Land Use Alternative would not achieve project objective 1, which would provide well-designed and accessible residential neighborhoods and commercial and industrial districts to provide opportunities for people to live, work, and play. For the potentially significant impacts that cannot be avoided or mitigated to a level below significance, the City adopts the Statement of Overriding Considerations in Section 6 of this Findings document pursuant to CEQA Guidelines, Section 15093.

### c. Alternative 3: Reduce Retail Alternative

The Reduced Retail Alternative would not promote implementation of a mixed-use village concept in the southern area of the City, which is designated as OA-5, South Imperial Avenue, for the proposed project. This alternative was chosen to reduce VMT associated with the land uses proposed in OA-5. The properties within OA-5 would retain their current land use designations as defined in the 2004 General Plan, which include single-family, public, and General Commercial land use designations that would allow the continuation of a strip commercial development pattern backing up to new traditional single-family subdivisions. In addition, the portions of OA-5 that are located in the SOI would also retain their current single-family land use designation and would not be designated as a Master Planned Mixed Use Study Area. Desert Village, located just south of I-8 on South Imperial Avenue, would be implemented as currently approved.

Table 5, Reduced Retail Alternative Development Capacity, shows the development capacity of the City and SOI under the Reduced Retail Alternative. This alternative would result in 1,044 fewer overall dwelling units and would reduce the amount of non-residential space by 1,529,000 square feet, including retail, compared to the proposed project.

**Table 5. Reduced Retail Alternative Development Capacity**

Land Uses	Reduced Retail Alternative				Proposed Project			
	Dwelling Units <sup>1</sup>		Non-Residential Square Footage <sup>2</sup> (thousands)		Dwelling Units <sup>1</sup>		Non-Residential Square Footage <sup>2</sup> (thousands)	
	City	SOI	City	SOI	City	SOI	City	SOI
Rural Residential	12	531	—	—	12	531	—	—
Low Density Residential	9,381	29,538	—	—	9,079	28,004	—	—
Medium Density Residential	2,509	481	—	—	2,509	481	—	—
High-Medium Density Residential	6,629	302	—	—	6,552	302	—	—

**Table 5. Reduced Retail Alternative Development Capacity**

Land Uses	Reduced Retail Alternative				Proposed Project			
	Dwelling Units <sup>1</sup>		Non-Residential Square Footage <sup>2</sup> (thousands)		Dwelling Units <sup>1</sup>		Non-Residential Square Footage <sup>2</sup> (thousands)	
	City	SOI	City	SOI	City	SOI	City	SOI
Commercial								
General Commercial	—	—	5,653	570	—	—	5,337	570
Neighborhood Commercial	—	—	440	—	—	—	440	—
Office Commercial	—	—	254	—	—	—	254	—
Heavy Commercial	—	—	1,585	—	—	—	1,585	—
Tourist Commercial	—	—	2,838	—	—	—	2,838	—
Downtown Commercial	—	—	See OA-2	—	—	—	See OA-2	—
Mixed Use								
Mixed Use 1	See OA-1	—	See OA-1	—	See OA-1 and OA-5	—	See OA-1 and OA-5	—
Industrial								
Light Industrial	—	—	5,831	3,545	—	—	5,831	3,545
General Industrial	—	—	5,272	4,801	—	—	5,272	4,801
Community Facilities								
Civic	—	—	1,857	—	—	—	1,857	—
Public	—	—	10,087	1,264	—	—	10,087	1,264
Overlays								
Single-Family Neighborhood Overlay <sup>3</sup>	NA	NA	NA	NA	NA	NA	NA	NA
Medical Office Overlay <sup>4</sup>	4	—	17	—	4	—	17	—
El Centro Regional Medical Center Overlay	—	—	275	—	—	—	275	—
Mixed Use 2 Overlay (not in OAs)	NA	NA	NA	NA	598	—	104	—

**Table 5. Reduced Retail Alternative Development Capacity**

Land Uses	Reduced Retail Alternative				Proposed Project			
	Dwelling Units <sup>1</sup>		Non-Residential Square Footage <sup>2</sup> (thousands)		Dwelling Units <sup>1</sup>		Non-Residential Square Footage <sup>2</sup> (thousands)	
	City	SOI	City	SOI	City	SOI	City	SOI
Opportunity Areas								
OA-1	166	—	227	—	166	—	227	—
OA-2	—	—	1,565	—	—	—	1,565	—
OA-3	—	—	4,396	—	—	—	5,543	—
OA-4	1,230	—	3,355	—	1,021	—	2,718	—
OA-5	NA	NA	NA	NA	829	1,739	488	743
Total	19,931	30,852	43,652	10,180	20,770	31,057	44,438	10,923

**Source:** Bluman, pers comm. 2021.

**Notes:** City = City of El Centro; SOI = Sphere of Influence

<sup>1</sup> The number of dwelling units is based on average density at buildout, not maximum density.

<sup>2</sup> Non-residential development is shown in square feet and is based on average intensity (average FAR) at buildout, not maximum intensity.

<sup>3</sup> The Single-Family Neighborhood Overlay is for design purposes only and is not a factor in buildout projections.

<sup>4</sup> Per buildout assumption.

Under this alternative, the roadway network designated in the proposed Mobility Element Update would not include the east–west connectors, Dannenberg Drive and Valleyview Avenue. However, the new interchange at Imperial Avenue and I-8 and the extension of Imperial Avenue south to McCabe Road would be constructed under this alternative.

The potential impacts of the Traditional Land Use Alternative are discussed in detail in Section 5.3.3, Analysis of Alternative 3: Traditional Land Use Alternative, in PEIR Chapter 5. Relative to the proposed project, the Traditional Land Use Alternative would have reduced impacts on air quality, GHG emissions, noise, and transportation; however, impacts would remain significant and unavoidable. In addition, it would result in similar impacts on agriculture and forestry resources, biological resources, and cultural resources.

The City rejects this alternative as it does not reduce any of the proposed project’s impacts below significant. In addition, the Reduced Retail Alternative would not achieve project objective 1, which would provide well-designed and accessible residential neighborhoods and commercial and industrial districts to provide opportunities for people to live, work, and play. In addition, the Reduced Retail Alternative would not achieve project objective 2 by providing diversity of housing, neighborhoods, and amenities. For the potentially significant impacts that cannot be avoided or mitigated to a level below significance, the City adopts the Statement of Overriding Considerations in Section 6 of this Findings document pursuant to CEQA Guidelines, Section 15093.

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## Section 6 Statement of Overriding Considerations

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The proposed project would have a significant, unavoidable environmental impact on the following area, which is described in detail in Chapter 3, Environmental Analysis, in the PEIR:

- Agriculture and forestry resources
- Air quality
- Cultural resources and TCRs
- GHG emissions
- Noise
- Transportation

The City has adopted all feasible mitigation measures regarding the significant, unavoidable environmental impacts. Although in some instances the mitigation measures may substantially lessen the unavoidable environmental impact, adoption of the mitigation measures will not fully avoid the impact. In addition, the City has analyzed a reasonable range of alternatives to the proposed project. Based on this analysis, the City has determined that none of these alternatives meet the objectives of the proposed project or are feasible and environmentally preferable to the proposed project as approved.

Therefore, pursuant to CEQA Guidelines, Sections 15043 and 15093, the City must adopt a Statement of Overriding Considerations to approve the proposed project. A Statement of Overriding Considerations allows a lead agency to determine that specific economic, social, or other expected benefits of a project outweigh its potential unavoidable, significant environmental risks. The City has weighed the benefits of the proposed project against its potentially significant environmental risks in determining whether to approve the proposed project.

Pursuant to CEQA Guidelines, Section 15093, the City hereby finds that the proposed project would have the following benefits and that each of the following benefits is sufficient on its own to justify adoption of the project:

- The City's General Plan Update would provide a land use plan that fosters economic prosperity; provides a range of affordable housing options; is sustainable and environmentally responsible; encourages social cohesion and equity; and reflects and celebrates the City's unique character, culture, identity, and traditions.
- The City's General Plan Update would restore Downtown El Centro as the symbolic, functional, and historic core of the City.
- The City's General Plan Update would promote infill development to encourage efficient land development patterns to spur economic revitalization.
- The City's General Plan Update would create additional employment-generating opportunities for the citizens of El Centro and surrounding communities.

- The City's General Plan Update would ensure that the City's infrastructure system could effectively serve the land use framework.
- The City's General Plan Update would promote economic development and enhanced employment opportunities by designating sufficient land for industrial uses, retail stores, and office parks.
- The City's General Plan Update would address the public health risks and environmental justice concerns of those living in disadvantaged communities.
- The City's General Plan Update would provide a safe and efficient multi-modal mobility system.
- The City's General Plan Update would provide disadvantaged communities with access to clean air and water, to transit, health care, childcare, parks, and other civic facilities, to healthy food, to safe and sanitary homes, and to physical activity and recreational opportunities.

**Attachment 1. Mitigation Monitoring and Reporting Program**

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Mitigation Monitoring and Reporting Program for the EI Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
Agriculture and Forestry Resources									
AG-1	Project-Specific Agricultural Study. If the City of EI Centro's Planning Director determines that the project site contains viable farmland warranting further assessment, a project-specific Agricultural Study shall be required. As a part of the discretionary review of subsequent projects proposed under the General Plan Update with Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance, applicants shall be required to demonstrate that the project would not convert agricultural resources that meet the Prime Farmland and Farmland of Statewide Importance soil criteria, as defined by the Farmland Mapping and Monitoring Program, to a non-agricultural use by undergoing project-level analysis pursuant to the State Land Evaluation and Site Assessment model, to submit an Agricultural Study to determine the importance, and to apply mitigation (if required) of said agricultural resources.	City Community Development	X			City			
Air Quality									
AIR-1	Site-Specific Air Quality Analysis and Construction Best Management Practices. Before the issuance of a grading or construction permit, the project applicant shall submit to the City of EI Centro Community Development Department documentation showing that the proposed project is below the project size that would potentially exceed the Imperial County Air Pollution Control District's significance thresholds based on the screening criteria established in Table 2 of the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook Screening Criteria for Project Air Quality Impacts. If the project would exceed the screening criteria, a project-specific Air Quality Analysis quantifying the potential air emissions of project construction shall be prepared by a qualified air quality professional. This Air Quality Analysis shall demonstrate that criteria pollutant emissions are below the Imperial County Air Pollution Control District thresholds for construction. If the Air Quality Analysis cannot demonstrate that the project is below the Imperial County Air Pollution Control District thresholds before mitigation, the project applicant shall implement the following measures in accordance with the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook performance criteria as applicable and to the extent necessary to reduce emissions to below Imperial County Air Pollution Control District thresholds: <ul style="list-style-type: none"> <li>• Water exposed soil with adequate frequency for continued moist soil</li> <li>• Replace ground cover in disturbed areas as quickly as possible</li> <li>• Install an automatic sprinkler system on all soil piles</li> <li>• Limit vehicle speed for all construction vehicles to 15 miles per hour on any unpaved surface at the construction site</li> </ul>	City Community Development	X	X		City, Construction Contractor			

Mitigation Monitoring and Reporting Program for the EI Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
	<ul style="list-style-type: none"> <li>Develop a Trip Reduction Plan to achieve a 1.5 average vehicle ridership for construction employees</li> <li>Implement a shuttle service to and from retail services and food establishments during lunch hours</li> <li>Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing construction activity during the peak hour of vehicular traffic on adjacent roadways</li> <li>Implement activity management (e.g., rescheduling activities to reduce short-term impacts)</li> </ul> <p>The project applicant shall provide documentation to the City of EI Centro detailing the measures that would be implemented and that mitigated emissions would be below Imperial County Air Pollution Control District thresholds. Measures shall be included in project construction documents, and contractors and subcontractors shall implement the applicable Imperial County Air Pollution Control District measures.</p>								
AIR-2	Operational Performance Criteria. Before the issuance of a grading or construction permit for future project sites, the project applicant shall submit to the City of EI Centro documentation showing that the proposed project is below the project size that would potentially exceed the Imperial County Air Pollution Control District significance thresholds for Tier 1 projects based on the screening criteria established in Table 2 of the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook Screening Criteria for Project Air Quality Impacts. If the project would exceed the screening criteria, the project applicant shall demonstrate to the satisfaction of the City of EI Centro Community Development Department that the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook performance criteria for residential, commercial, and industrial projects have been incorporated into the site-specific entitlements issued for the project as applicable and to the extent necessary to reduce project impacts to below Imperial County Air Pollution Control District significance thresholds. The performance criteria measures can be found in the most recent version of the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook.	City Community Development	X			City, Project Applicant			
AIR-3	Carbon Dioxide Hotspot Analysis. A Carbon Dioxide Hotspot Analysis shall be prepared by a qualified air quality professional for future projects that propose a new sensitive receptor within 500 feet of the intersections of Imperial Avenue and Ocotillo Drive or Imperial Avenue and the Interstate 8 westbound ramps or would significantly increase traffic volumes at either intersection. The Carbon Dioxide Hotspot Analysis shall perform screening for potential impacts based on the California Department of Transportation's 2010 Transportation Project-Level Carbon Monoxide Protocol. If the potential for a hotspot is identified, the Carbon Dioxide Hotspot Analysis shall require modeling using CALINE4 or other appropriate model to demonstrate that an	City Community Development	X			City, Quality Air Quality Professional			

Mitigation Monitoring and Reporting Program for the El Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
	impact would not occur. The project applicant shall be required to submit results to the City of El Centro and implement improvements, such as intersection improvements or revised site design, as necessary to demonstrate that the project would not impact sensitive receptors.								
AIR-4	Health Risk Assessment. A Health Risk Assessment shall be prepared by a qualified air quality professional for future projects that would generate toxic air contaminants (such as diesel particulate matter) in the General Plan Update planning area or that would locate a new sensitive receptor within the applicable screening level distance identified in the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook. A project shall not be considered for approval until a Health Risk Assessment has been completed and approved by the Imperial County Air Pollution Control District. The methodology for the Health Risk Assessment shall follow the Office of Environmental Health Hazard Assessment guidelines for the preparation of Health Risk Assessments. If a potentially significant health risk is identified, the Health Risk Assessment shall identify appropriate measures, such as upgrading building ventilation systems, to reduce the potential health risk to below a significant level, or the sensitive receptor or proposed facility shall be sited in another location.	City Community Development	X			City, Air Quality Professional			
AIR-5	Odor Source Review. The Imperial County Air Pollution Control District shall be contacted by the project applicant for information regarding potential odor problems related to future projects that propose a new odor source within the screening level distance for existing receptors for the type of operation specified in the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook. For future projects that involve new receptors located near an existing odor source, a public information request shall be submitted to the Imperial County Air Pollution Control District for a review of any existing odor complaints at the nearest odor-emitting facility. Odor reduction measures recommended by the Imperial County Air Pollution Control District shall be implemented as applicable.	City Community Development	X			City, Project Applicant			
Biological Resources									
BIO-1	Qualified Biologist. Before the start of construction, the project proponent shall submit written documentation to the City of El Centro for approval, stating that a qualified biologist has been retained to implement the project mitigation measures in areas designated as biologically sensitive during implementation of Mitigation Measure BIO-4. The qualified biologist shall be responsible for implementing project mitigation measures, coordinating and communicating requirements to the project proponents and the City of El Centro, and facilitating consultation with the wildlife and resource agencies as required.	City Community Development	X			City, Qualified Biologist			
BIO-2	Contractor Training Program. If sensitive biological resources are known to occur in or adjacent to the planning area, a project-specific contractor training program shall be developed and implemented to	City Community Development, Qualified Biologist	X	X		City, Construction Contractor			

Mitigation Monitoring and Reporting Program for the EI Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
	educate contractors about the sensitive biological resources on and adjacent to the planning area and the measures being implemented to avoid or minimize impacts to these resources. A qualified biologist shall develop and implement the contractor training program.								
BIO-3	Flagging, Fencing, and Demarcation. The project proponent, in consultation with the qualified biologist, shall designate the limits of the construction area, where accessible, in the City of EI Centro rights-of-way using fencing, signage, or stakes in the field and shall review the placement of fencing, signage, or stakes with the contractors in accordance with the construction plans. Aquatic resources within 50 feet of the construction area, where accessible and feasible, shall also be demarcated in the field and avoided by construction personnel and activity.	City Community Development, Qualified Biologist	X			City, Qualified Biologist, Construction Contractor			
BIO-4	<p>BIO-4: Biological Resources Survey/Habitat Assessment. For projects proposed in the planning area on undeveloped land, a site-specific biological resources survey shall be conducted during the project design phase. The biological resources survey shall be conducted by a qualified biologist and shall include but not be limited to the following:</p> <ul style="list-style-type: none"> <li>• An analysis of available literature and biological databases, such as the California Natural Diversity Database, to determine sensitive biological resources that have been reported historically from the proposed project vicinity.</li> <li>• A review of current land use and land ownership within the project vicinity.</li> <li>• An assessment and mapping of vegetation communities present within the project vicinity. If vegetation community mapping has not been conducted on the site in the previous 3 years, updated vegetation mapping shall be conducted by a qualified biologist as part of the project planning and environmental review process. Vegetation communities shall be mapped according to the Manual of California Vegetation at the alliance level, and a crosswalk table with Holland vegetation communities shall be provided.</li> <li>• A general assessment of the potential for aquatic resources, including wetlands and riparian habitats, to occur on site.</li> <li>• An evaluation of potential local and regional wildlife movement corridors.</li> <li>• If the planning area supports vegetation communities that may provide habitat for plant or wildlife species, a focused habitat assessment conducted by a qualified biologist to determine the potential for sensitive plant or wildlife species to occur in or adjacent to the planning area.</li> <li>• If the planning area supports sensitive vegetation communities, the project proponent shall implement the following weed control methods to minimize the establishment and spread of non-native and invasive weed species in the planning area during construction activities:</li> </ul>	City Community Development, Qualified Biologist	X			City, Construction Contractor, Qualified Biologist			

Mitigation Monitoring and Reporting Program for the El Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
	<ul style="list-style-type: none"> <li>– Seeds and plant materials used for revegetation shall be certified weed free.</li> <li>– Straw materials, such as those used for erosion control, shall be certified weed free.</li> <li>– If sensitive non-native grassland vegetation is identified during the biological resources survey, temporarily disturbed non-native grassland areas shall be revegetated with local native plant species as soon as construction is complete to reduce erosion and to inhibit the establishment of non-native and invasive weeds.</li> </ul> <p>The results of the biological survey shall be presented in a biological survey letter report.</p>								
BIO-5	<p>Sensitive Plant Species Surveys. If one or more sensitive plant species has the potential to occur, focused species surveys shall be conducted before construction to determine the presence and absence of these species to adequately evaluate potential direct or indirect impacts to these species.</p> <p>Sensitive plant species surveys shall be conducted by a qualified biologist retained by the City of El Centro during the appropriate season to detect species as part of the project design phase. Surveys shall be floristic in nature and include lists of the plants identified in the survey area. Surveys shall be conducted on foot, employing a level of effort sufficient to provide comprehensive coverage. The locations and prevalence (estimated total numbers and percent cover, as applicable) of sensitive plants shall be recorded. The sensitive plant species surveys shall be valid for 3 years.</p> <p>If site-specific surveys are not required because a survey was conducted within the last 3 years, impact assessment and minimization and mitigation requirements shall be based on the most recent available survey. These requirements shall also include an analysis of the potential for sensitive plant species to occur on site based on existing site conditions and shall be consistent with the most recent U.S. Fish and Wildlife Service and California Department of Fish and Wildlife survey protocols.</p> <p>If sensitive plant species are observed, they shall be avoided if possible. If species cannot be avoided, impacts shall be mitigated through conservation of habitat that supports the impacted species in accordance with Mitigation Measures BIO-1 through BIO-3.</p>	City Community Development	X			City, Construction Contractor, Qualified Biologist			
BIO-6	<p>Burrowing Owl Surveys. A burrowing owl clearance survey shall be conducted before any ground-disturbing activities in accordance with the California Department of Fish and Wildlife 2012 Staff Report on Burrowing Owl Mitigation. Two preconstruction clearance surveys shall be conducted 14–30 days and 24 hours before ground-disturbing activities to document the continued absence of burrowing owl from the planning area. The burrowing owl surveys shall be valid for 1 year.</p>	City Community Development	X			City, Qualified Biologist			

Mitigation Monitoring and Reporting Program for the El Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
BIO-7	Preconstruction Nesting Bird Surveys. To the extent feasible, grubbing, trimming, or clearing of vegetation from the planning area shall not occur during the general bird nesting season (January 15 through September 15). If grubbing, trimming, or clearing of vegetation cannot feasibly occur outside the general bird nesting season, a qualified biologist shall perform a preconstruction nesting bird survey in the areas in the planning area with vegetation supporting nesting birds. Nesting bird surveys shall occur within 10 days before the start of vegetation clearing or grubbing to determine if active bird nests are present. If no active bird nests are identified in the planning area or within a 300-foot buffer of the planning area, no further mitigation is necessary. If active nests of bird species covered by the Migratory Bird Treaty Act are detected in the planning area during the 10-day preconstruction survey, construction activities shall stay outside a 300-foot buffer around the active nest. For raptor species, this buffer shall be expanded to 500 feet. It is recommended that a biological monitor be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by construction activity. Once the young have fledged and a qualified biologist has determined the nest is inactive, normal construction activities can occur.	City Community Development	X			City, Qualified Biologist			
BIO-8	Night Lighting. If temporary night lighting is necessary during construction adjacent to sensitive vegetation communities, construction contractors shall ensure lights are directed away from sensitive vegetation communities and shielded to minimize temporary lighting of the surrounding habitat and should be of the lowest illumination necessary for human safety.	City Community Development		X		City, Construction Contractor			
BIO-9	Permanent Impacts to Non-Native Grassland. Permanent impacts to sensitive non-native grassland shall be mitigated through the preservation of habitat, habitat creation, or enhancement, or a combination thereof, in the City of El Centro or off site through habitat acquisition and preservation or purchase of credits from an approved conservation bank. Mitigation for impacts to non-native grassland shall be in-kind using native grasses. Permanent impacts to sensitive non-native grassland shall be mitigated at a ratio of 1:1. For on-site mitigation, a detailed Mitigation Plan shall be prepared before the start of construction (not applicable to mitigation met through the purchase of credits from an approved wetland mitigation bank). The Mitigation Plan shall include at a minimum the proposed location of the mitigation areas, site preparation, a plant palette, installation procedures, success criteria, fencing and signage, monitoring requirements, and other details of the habitat restoration effort and shall be prepared by a qualified biologist.	City Community Development	X			City, Qualified Biologist			
BIO-10	Temporary Impacts to Non-Native Grassland. Temporary impacts to non-native grassland shall be restored in place or elsewhere in the planning area at a 1:1 replacement ratio using native grass species.	City Community Development		X		City, Construction Contractor			

Mitigation Monitoring and Reporting Program for the El Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
	A Revegetation Plan shall be prepared. The Revegetation Plan shall include site preparation specifications, a plant palette, installation procedures, development of reasonable success criteria, appropriate monitoring and reporting protocols, implementation timelines, and contingency measures in the event of restoration failure. The City of El Centro shall provide guidance for and oversight of the Revegetation Plan and implementation. In the event that non-native grassland vegetation cannot be restored in place or elsewhere in the planning area after construction, these impacts shall be considered permanent, and Mitigation Measure BIO-9 shall be implemented.								
BIO-11	Aquatic Resources Delineation. If sensitive aquatic resources are identified on construction sites, a qualified biologist shall conduct an aquatic resources delineation following the methods outlined in the 1987 U.S. Army Corps of Engineers Wetland Delineation Manual and the Regional Supplement to the U.S. Army Corps of Engineers Wetland Delineation Manual: Arid West Region to map the extent of wetlands and non-wetland waters, determine jurisdiction, and assess potential impacts. The results of the delineation shall be presented in an Aquatic Resources Delineation Report and shall be incorporated into the California Environmental Quality Act documents required for approval and permitting of the proposed project.	City Community Development	X			City, Qualified Biologist			
BIO-12	Aquatic Resources Permitting. If the project would impact sensitive aquatic resources, permits and authorizations shall be obtained from the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board. The regulatory agency authorizations would include impact avoidance and minimization measures and mitigation measures for unavoidable impacts. Specific avoidance and minimization measures and mitigation measures for impacts to jurisdictional resources shall be determined through discussions with the regulatory agencies during the proposed project permitting process and may include monetary contributions to a mitigation bank or habitat creation, restoration, or enhancement.	City Community Development	X			City, Qualified Biologist			
Cultural and Tribal Cultural Resources									
CUL-1	Identification and Evaluation of Built Environment Resources. Future development projects may need to prepare an evaluation of built environment resources if built environment resources that meet the age threshold for eligibility are located on the project site. If needed, the resource shall be evaluated in accordance with the California Office of Historic Preservation guidelines in order to identify any previously unrecorded potential historical resources that may be potentially affected by the proposed project. Pursuant to the definition of a historical resource under the California Environmental Quality Act, potential historical resources shall be evaluated under a developed historical context.	City Community Development	X			City, Qualified Architectural Historian			

Mitigation Monitoring and Reporting Program for the EI Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
CUL-2	Historical Structure Report. If avoidance or preservation in place of a built environment resource is not possible then appropriate site-specific mitigation measures shall be established and undertaken. To ensure that projects requiring the relocation, rehabilitation, or alteration of a historical resource <b>not impair its significance, the Secretary of the Interior's</b> Standards for the Treatments of Historic Properties shall be used to the maximum extent possible. The application of the standards shall be overseen by a qualified architectural historian <b>or historic architect meeting the Secretary of the Interior's</b> Professional Qualified Standards. Prior to any construction activities that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the City.	City Community Development	X			City, Qualified Architectural Historian			
CUL-3	Historical Recordation. If a proposed project would result in the demolition or significant alteration of a historical resource, recordation of the resource prior to construction activities would be required. Recordation shall take the form of Historic American Buildings Survey, Historic American Engineering Record, or Historic American Landscape Survey documentation and shall be performed by an architectural historian or historian who <b>meets the Secretary of the Interior's Professional Qualified</b> Standards. Documentation shall include an architectural and historical narrative, photographs, and supplementary information, such as building plans and elevations, and/or historical photographs. Documentation shall be reproduced on archival paper and placed in appropriate local, state, or federal institutions. The specific scope and details of documentation would be developed at the project level.	City Community Development	X			City, Qualified Architectural Historian			
CUL-4	Site-Specific Cultural Resources Study and Evaluation of Resources. Future development projects shall prepare a cultural resources assessment under the supervision of an archaeologist <b>who meets the Secretary of the Interior's Professional Qualified</b> Standards. Assessments shall include a California Historical Resources Inventory System records search at the South Coastal Information Center and a search of the Sacred Lands File maintained by the Native American Heritage Commission. A Phase I pedestrian survey shall be undertaken in areas that are undeveloped to locate any surface cultural materials. If resources are identified during the site-specific archaeological survey, a Phase II evaluation of the resources to the California Register of Historical Resources should be conducted to determine if the resource is significant under the California Environmental Quality Act and would be adversely impacted by the project. A Native American monitor from a culturally affiliated tribe should be present during any archaeological excavations involving prehistoric cultural resources. The evaluation of built environment resources shall be performed by an architectural historian or historian who meets the Secretary of the Interior Professional Qualified Standards in architectural history or history. If no significant resources are found, and site conditions	City Community Development	X	X		City, Qualified Archaeologist			

Mitigation Monitoring and Reporting Program for the EI Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
	<p>are such that there is no potential for further discoveries, then no further action is required. All resources should be documented on the appropriate California Department of Parks and Recreation site forms, and results of all assessments should be documented in a technical report.</p> <p>If potentially significant archaeological resources are identified during the Phase I or Phase II assessments, and impacts to these resources cannot be avoided, as described in Mitigation Measure CUL-5, then appropriate site-specific mitigation measures shall be established and undertaken. These might include a Phase III Data Recovery Program that would be implemented by a qualified archaeologist and shall be performed in accordance with the California Office of Historic Preservation's Archaeological Resource Management Reports: Recommended Contents and Format (1990) and Guidelines for Archaeological Research Designs (1991).</p> <p>If no significant resources are found, but if there is a potential for unknown archaeological resources or tribal cultural resources to be uncovered during specific project activities, then Mitigation Measure CUL-6, an archaeological and Native American monitoring program, is recommended.</p>								
CUL-5	<p>Avoidance and Preservation of Cultural Resources. The preferred alternative for mitigating impacts to cultural resources and tribal cultural resources is avoidance or preservation in place. If avoidance or preservation is demonstrated to be infeasible, then alternative measures would be required. Avoidance of cultural resources and tribal cultural resources can be accomplished through a project redesign. Preservation in place can include planning construction to avoid significant resources; planning parks, green space, or other open space to <b>preserve cultural resources; or "capping" or covering</b> archaeological sites with a layer of soil before building.</p>	City Community Development	X			City, Qualified Archaeologist			
CUL-6	<p>Archaeological and Native American Monitoring Program. There is always a potential for encountering cultural resources during excavation; therefore, the creation of an archaeological and Native American monitoring program is recommended for future development that will conduct new ground disturbance in areas identified as having a potential for unknown archaeological resources or tribal cultural resources. The archaeological and Native American monitoring program shall consist of the full-time presence of a qualified archaeologist and traditionally and culturally affiliated Native American monitor during ground-disturbing activities. The archaeological and Native American monitoring program should include the following:</p> <ol style="list-style-type: none"> <li>1. The requirement for the archaeological and Native American monitoring should be noted on applicable construction documents, including plans.</li> <li>2. The archaeologist and Native American monitor should attend the preconstruction meeting with the contractor and/or the City.</li> </ol>	City Community Development	X	X		City, Qualified Archaeologist, Native American Monitor			

Mitigation Monitoring and Reporting Program for the EI Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
	<p>3. The archaeologist shall maintain ongoing collaborative consultation with the Native American monitor during all ground-disturbing or altering activities, as identified above.</p> <p>4. The archaeologist and/or Native American monitor may halt ground-disturbing activities if archaeological artifact deposits or cultural features are discovered. In general, ground-disturbing activities shall be directed away from these deposits for a short time to allow a determination of potential significance, the subject of which shall be determined by the archaeologist and the Native American monitor. Ground-disturbing activities shall not resume until the archaeologist, in consultation with the Native American monitor and the City, deems the cultural resource or feature has been appropriately documented and/or protected.</p> <p>5. Archaeological isolates and non-significant materials shall be minimally documented in the field, and ground disturbance shall be allowed to resume.</p> <p>6. The avoidance and protection of discovered unknown and significant cultural resources and/or unique archaeological resources is the preferable mitigation for the proposed project. If avoidance is not feasible, a Data Recovery Plan may be authorized by the City of EI Centro as the lead agency under the California Environmental Quality Act.</p> <p>7. Prior to the completion of any projects a Monitoring Report and/or Evaluation Report, which describes the results, the analysis and conclusions of the archaeological and Native American monitoring program (such as but not limited to a Data Recovery Program) shall be submitted by the <b>archaeologist, along with the Native American monitor's notes and comments</b>, to the City of EI Centro for approval.</p>								
CUL-7	<p>Identification and Treatment of Human Remains. In the event that human remains or possible human remains are encountered, all ground disturbance within 100 feet of the remains shall halt and the California Environmental Quality Act Guidelines, Section 15064.5, subdivision (e); California Public Resource Code, Section 5097.98; and California Health and Safety Code, Section 7050.5, should be followed, including informing the County Medical Examiner and City of EI Centro. If human remains are determined to be of Native American origin, the applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the Native American Heritage Commission (California Public Resources Code, Section 5097). The County Medical Examiner shall contact the Native American Heritage Commission to determine the most likely descendant. The most likely descendant shall inspect the site as needed and make recommendations or preferences for treatment of the remains within 48 hours of being granted access to the site. The disposition of the remains shall be overseen by the most likely descendant to determine the most appropriate means of treating the human remains and any associated grave artifacts. The</p>	City Community Development		X	X	City, Construction Contractor, Qualified Archaeologist, Native American Monitor			

Mitigation Monitoring and Reporting Program for the EI Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
	specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. If Native American remains are discovered, the remains shall be kept in situ (in place) or in a secure location as approved by the most likely descendant until the repatriation process can be completed. According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony.								
Greenhouse Gas Emissions									
GHG-1	GHG-1: City-Wide Sustainability Program. The City of EI Centro shall continue to participate in the preparation of the Imperial County Regional Climate Action Plan. It is assumed that the adopted Climate Action Plan will demonstrate how the City of EI Centro shall implement its fair share of greenhouse gas emissions reductions to achieve statewide emissions reduction goals. The program shall include an inventory of existing community greenhouse gas emissions, establish greenhouse gas emissions reduction targets consistent with Senate Bill 32 and Executive Order S-03-05, and identify greenhouse gas emissions reduction measures to achieve reduction targets. In the event that the Imperial County Regional Climate Action Plan is not adopted, the City of EI Centro shall prepare a local Climate Action Plan or Sustainability Program that demonstrates reduction measures necessary at a local level to achieve reduction targets. Greenhouse gas emissions reduction measures may include but not be limited to the recommendations in Appendix B, Local Action, to the <b>California Air Resources Board California's 2017 Climate Change Scoping Plan</b> .	City Community Development	X			City			
GHG-2	Greenhouse Gas Reduction Features for Construction. Until the Imperial Valley Regional Climate Action Plan or City of EI Centro-wide Sustainability Program is in place, and before the issuance of a grading or construction permit, the project applicant shall submit to the City of EI Centro Community Development Department documentation showing that the proposed project is below the project size that would potentially exceed the Imperial <b>County Air Pollution Control District's significance thresholds</b> based on the screening criteria established in Table 2 of the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook Screening Criteria for Project Air Quality Impacts. If the project would exceed the screening criteria, a project-specific greenhouse gas emissions analysis shall be prepared that demonstrates implementation of the following greenhouse gas emissions reduction measures to the extent feasible during construction to minimize project greenhouse gas emissions. The following measures shall be included in project construction documents: <ul style="list-style-type: none"> <li>• Enforce idling time restrictions for construction vehicles</li> <li>• Require construction vehicles to operate with the highest tier engines commercially available</li> </ul>	City Community Development	X	X		City, Construction Contractor			

Mitigation Monitoring and Reporting Program for the EI Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
	<ul style="list-style-type: none"> <li>Divert and recycle construction and demolition waste and use locally sourced building materials with high recycled material content to the greatest extent feasible</li> <li>Minimize tree removal and mitigate indirect greenhouse gas emissions increases that occur due to vegetation removal, loss of sequestration, and soil disturbance</li> <li>Use existing grid power for electric energy rather than operating temporary gasoline- or diesel-powered generators</li> <li>Increase use of electric and renewable fuel-powered construction equipment and require renewable diesel fuel where commercially available</li> <li>Require diesel equipment fleets to be lower emitting than any current emission standard</li> </ul>								
GHG-3	<p>Greenhouse Gas Reduction Features for Individual Projects. Until the Imperial Valley Regional Climate Action Plan or City of EI Centro-wide Sustainability Program is in place, and before the issuance of a building permit, the project applicant shall submit to the City of EI Centro Community Development Department documentation showing that the proposed project is below the project size that would potentially exceed the Imperial County Air Pollution Control District's significance thresholds based on the screening criteria established in Table 2 of the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook Screening Criteria for Project Air Quality Impacts. If the project would exceed the screening criteria, a project-specific greenhouse gas emissions analysis shall be prepared that demonstrates implementation of the following California Air Resources Board California's 2017 Climate Change Scoping Plan Key Sector Actions and Local Measures to the extent feasible to minimize ongoing annual project greenhouse gas emissions:</p> <ul style="list-style-type: none"> <li>Install solar panels to reduce energy demand from the Imperial Irrigation District</li> <li>Provide electric vehicle parking spaces and charging stations in new commercial and multi-family residential development</li> <li>For industrial projects that would be subject to Imperial County Air Pollution Control District Rule X (Air Toxic Control Measures) or Rule XI (New Source Performance Standards), install best available control technology to reduce greenhouse gas and toxic air contaminant emissions</li> <li>Dedicate on-site parking for shared vehicles</li> <li>Install cool roofs and "cool parking" that promotes cool surface treatment for new parking facilities and existing surface lots undergoing resurfacing</li> <li>Provide parking spaces for park and ride to incentivize carpooling, vanpooling, commuter bus, electric vehicles, and rail service use</li> </ul>	City Community Development		X	X	City, Project Applicant			

Mitigation Monitoring and Reporting Program for the El Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
	<ul style="list-style-type: none"> <li>• Install electrical outlets on the front and back exterior walls of residences to promote the use of electric landscape maintenance equipment</li> <li>• Design electrical outlets and/or wiring in new residential unit garages to promote electric vehicle use</li> <li>• Install energy-conserving appliances, such as on-demand tank-less water heaters and whole-house fans</li> <li>• Install energy-efficient air conditioning units and heating systems with programmable thermostats and timers</li> <li>• Install energy-efficient lighting for all street, parking, and area lighting</li> <li>• Design landscaping for parking lots to use tree cover, compost, and mulch</li> <li>• Incorporate water retention in the design of parking lots and landscaping, including using compost and mulch</li> </ul>								
Geological Stability									
Noise									
NOI-1	<p>Roadway Noise Measures. Before the approval of building permits, project applicants for future development projects proposed as a result of the General Plan Update with the potential to generate 700 average daily trips or greater shall be required to complete a site-specific Noise Technical Study to determine if the project would result in a significant increase in traffic noise. This Noise Technical Study shall be prepared by a qualified acoustical analyst.</p> <p>If a significant increase in vehicle noise level is identified as a result of project implementation, the project shall incorporate buffers or other noise reduction measures to the extent feasible to reduce noise levels at affected sensitive receptors to a normally acceptable noise level. Reduction measures that shall be considered include but are not limited to alternative road design, reduced speeds, alternative paving, building retrofits to provide additional noise attenuation, and setbacks or buffers before berms and walls. The noise reduction measures shall be designed by a qualified acoustical engineer. Where noise reduction measures in the public right-of-way are infeasible, the project applicant shall conduct outreach to potentially affected sensitive receptors to determine the feasibility of noise reduction measures on private property, including a noise barrier or building retrofits. Based on affected receptor response, a qualified acoustical engineer shall determine the feasibility of a noise barrier on private property and/or the extent of required building retrofits. The project applicant shall submit plans to the City of El Centro Community Development Department for review and approval before the start of any construction. These plans shall demonstrate that the proposed noise reduction measures would reduce traffic noise exposure at sensitive receptors to the extent feasible.</p>	City Community Development	X			City, Acoustical Engineer			

Mitigation Monitoring and Reporting Program for the El Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
NOI-2	Site-Specific Acoustic Analysis. Before the approval of building permits, for each development, project applicants shall submit an Acoustical Study prepared by a certified acoustical engineer. Should the results of the Acoustical Study indicate that that exterior noise levels would exceed the land use compatibility limits in the El Centro General Plan Noise Element of 60 A-weighted decibels community noise equivalent level exterior limit for sensitive receptors, the project applicant shall include design measures that may include acoustical paneling or walls to ensure that interior noise levels do not exceed the City of El Centro's interior noise standard of 45 decibels community noise equivalent level. If it is necessary for windows to be able to remain closed to ensure that interior noise levels meet the interior standard of 45 A-weighted decibels community noise equivalent level, the design for these residences shall include ventilation or an air conditioning system to provide a habitable interior environment with the windows closed. Final project design shall incorporate special design measures in the construction of the residential units.	City Community Development	X			City, Acoustical Engineer			
NOI-3	Vibration Best Management Practices. Before the start of construction activities that would involve use of a vibratory roller (or equivalent equipment) within 235 feet of a vibration-sensitive land use or within 110 feet of other land uses or the use of typical (not vibratory) construction equipment within 135 feet of a vibration-sensitive land use or within 65 feet of other land uses, the project applicant shall retain a qualified acoustician to demonstrate that vibration would not exceed the applicable Federal Transit Administration threshold (65 vibration dB for vibration-sensitive land uses of 75 vibration dB for other daytime land uses), or shall identify best management practices to be implemented by the construction contractor to reduce vibration levels to below the applicable threshold. The best management practices shall be included in project construction documents, including the Grading Plan and contract with the construction contractor. Practices may include but not be limited to the following: <ul style="list-style-type: none"> <li>• Use only properly maintained equipment with vibratory isolators</li> <li>• Operate equipment as far from sensitive receptors as possible</li> <li>• Use rubber-tired vehicles as opposed to tracked vehicles</li> </ul>	City Community Development	X	X		City, Construction Contractor			
Transportation									
TRA-1	Transportation Demand Management Measures. Future projects shall use Transportation Demand Management measures to reduce single-occupancy vehicles and to encourage alternative modes of transportation, such as biking, walking, or taking public transit. A list of potential Transportation Demand Management measures is provided below: <ul style="list-style-type: none"> <li>• Increase mixed-use development</li> <li>• Increase transit accessibility</li> <li>• Provide pedestrian network improvements along project frontage</li> <li>• Provide bicycle network improvements along project frontage</li> </ul>	City Community Development	X		X	City			

Mitigation Monitoring and Reporting Program for the El Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
	<ul style="list-style-type: none"> <li>• Implement a neighborhood electric vehicle network, if appropriate</li> <li>• Provide bicycle parking, bike lockers, personal lockers, and showers</li> <li>• Implement subsidized or discounted transit passes</li> <li>• Provide rider-sharing programs</li> <li>• Implement commuter trip reduction marketing</li> <li>• Implement a school car/van pool program</li> <li>• Implement a bike-sharing or micro-mobility program</li> <li>• Provide a local shuttle to connect visitors to different attractions throughout the City of El Centro</li> <li>• Provide additional Transportation Demand Management measures from the California Air Pollution Control Officers Association's Quantifying Greenhouse Gas Mitigation Measures document, as applicable (<a href="http://www.aqmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf">http://www.aqmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf</a>)</li> </ul>								

Notes: City = City of El Centro

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**FINAL**

# **Program Environmental Impact Report**

## **El Centro General Plan Update**

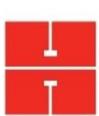
**June 2021**

Prepared for:



**City of El Centro  
1275 W. Main Street  
El Centro, California 92243  
Angel Hernandez, AICP, Associate Planner**

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# Revisions to the Draft Program Environmental Impact Report

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## Introduction

This chapter contains revisions to the Draft Program Environmental Impact Report (PEIR) for the El Centro General Plan Update (project or General Plan Update) based on additional or revised information required to prepare a response to a specific comment.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15088.5(a), recirculation of a Draft EIR is only required when significant new information is added to the Draft EIR after public review of the Draft EIR but before certification. Significant new information may include changes to the project or environmental setting and additional data or other information. New information added to a Draft EIR is not significant unless the Draft EIR is changed in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including feasible alternatives) that the project proponents have declined to implement. Recirculation is not required where the new information merely clarifies, amplifies, or makes insignificant modifications (CEQA Guidelines, Section 15088.5).

All modifications to the Draft PEIR were evaluated to determine whether new or more severe impacts were identified and whether feasible mitigation or avoidance measures were identified but rejected. None of the changes made would add any new significant information; therefore, recirculation is not required.

Changes made to the Draft PEIR are identified in ~~strikeout~~ text to indicate deletions and underlined text to signify additions.

## Draft Program Environmental Impact Report Revisions

### Appendix H1, Transportation Impact Study

A new section, Section 6.0, Summary, has been added to the Transportation Impact Study in response to a comment received from the California Department of Transportation.

#### Section 6.0 Summary

Table 6.1 presents a summary of El Centro average resident, employee VMT, and retail total VMT under all alternatives.

**Table 6.1. Summary of El Centro  
VMT Efficiency Metrics for Transportation Impact Analysis for All Alternatives**

<u>VMT Metric</u>	<u>Imperial County Region – Base Year</u>	<u>El Centro – Base Year</u>	<u>El Centro – No Project (Adopted GP)</u>	<u>El Centro – Alternative 1</u>	<u>El Centro – Alternative 2</u>	<u>% of Regional Base Year or Increase in Total VMT</u>	<u>Significant Impact?</u>
<u>Resident VMT/Capita</u>	<u>13.76</u>	<u>9.62</u>	<u>8.73</u>	<u>7.93</u>	<u>8.14</u>	<u>All Below 85%</u>	<u>No</u>
<u>Employee VMT/Employee</u>	<u>18.59</u>	<u>11.35</u>	<u>8.74</u>	<u>8.00</u>	<u>8.10</u>	<u>All Below 85%</u>	<u>No</u>
<u>Retail VMT</u>	<u>5,507,484</u>	<u>=</u>	<u>7,295,827</u>	<u>7,467,309</u>	<u>7,301,875</u>	<u>Yes – All Alternatives</u>	<u>Yes</u>

**Source:** ICTM, Iteris, Chen Ryan Associates (2021)

## Responses to Comments

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Section 15088 of the California Environmental Quality Act (CEQA) Guidelines requires the lead agency (i.e., City of El Centro [City]) to evaluate comments on environmental issues received from public agencies and interested parties that reviewed the Draft Program Environmental Impact Report (PEIR) for the El Centro General Plan Update (project or General Plan Update) and to prepare written responses.

This section provides all written comments received on the Draft PEIR and the City’s responses to each comment. Comment letters and specific comments are given letters and numbers for reference. Where sections of the Draft PEIR are excerpted in this document, the sections are indented. Changes to Draft PEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and interested parties that submitted comments on the Draft PEIR during the public review period.

**Table RTC-1. Comment Letters Received**

Comment Letter Number	Commenter	Date of Comment Letter
A	California Department of Transportation	April 22, 2021
B	Southern California Gas Company	April 23, 2021

Pursuant to the California Public Resources Code, Section 21092.5, and CEQA Guidelines, Section 15088(b), the City provided each public agency that commented on the Draft PEIR a copy of the City’s response to those comments at least 10 days before certifying the Final PEIR.

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## Comment Letter A: California Department of Transportation

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR **A**

### California Department of Transportation

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
SAN DIEGO, CA 92110  
(619) 709-5152 | FAX (619) 688-4299 TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



April 22, 2021

11-IMP-8  
PM 6.3 to 7.1  
11-IMP-86  
2040 City of El Centro General Plan  
Update PEIR/SCH #2020070349

Mr. Angel Hernandez  
Associate Planner  
City of El Centro  
1275 W. Main Street  
El Centro, CA 92243

Dear Mr. Hernandez:

Thank you for including the California Department of Transportation (Caltrans) in the review of the 2040 City of El Centro General Plan Update Draft Program Environmental Impact Report (PEIR), State Clearinghouse (SCH) #2020070349 for the City of El Centro. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with Caltrans' mission and state planning priorities.

Caltrans appreciates opportunity to review this Program Environmental Impact Report (PEIR). Should elements of the project and/or mitigation measures change to effect Caltrans Right-of-Way (R/W), we would then have discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. Caltrans asks that the City initiate contact with us to discuss the elements of the General Plan Update that impact Caltrans R/W.

Through the Responsible Agency coordination, Caltrans will engage with your efforts to ensure that the supporting documents address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

In the event an encroachment permit is required, as part of the encroachment permit process the applicant must provide approved final environmental documents and corresponding technical studies, and any necessary regulatory and resource agency permits.

"Provide a safe and reliable transportation network that serves all people and respects the environment"

**A-1** The City of El Centro (City) appreciates the California Department of Transportation's (Caltrans') participation in the review of the Draft Program Environmental Impact Report (PEIR) for the proposed El Centro General Plan Update (project or General Plan Update). This comment is an introductory comment and summarizes Caltrans' role pursuant to the California Environmental Quality Act (CEQA) and the project's effect on Caltrans' right-of-way. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR. Therefore, no further response is required.

Mr. Angel Hernandez, Associate Planner  
 April 22, 2021  
 Page 2

Caltrans has the following comments:

**A-2 Traffic Engineering and Analysis**

- Please see attached marked up "Appendix H1. Transportation Impact Study" attachment for additional comments.
- New developments resulting from the City's General Plan update should provide a Vehicle Miles of Travel (VMT) based Traffic Impact Study (TIS). Please use the Governor's Office of Planning and Research Guidance to identify VMT related impacts.<sup>1</sup>
- The El Centro General Plan Update Transportation Impact Study shows significant [VMT] impacts from the proposed retail and commercial land uses. This information is noted in section "Retail Land Uses Impact?" on pages 11-12 and section "Retail Land Uses" on pages 12-13. How will this information be included in the tables regarding VMT impacts, and also in places in the General Plan Update document where "No Impacts" is stated in the text?
- Caltrans agrees with the following statement from page 17: "To reduce retail VMT impacts, future developments under this proposed Land Use Environmental Update (LEU) would need to be mitigated on a project-by-project basis. This could be accomplished through a citywide VMT reduction ordinance that would require development projects to reduce their VMT, to the extent feasible by providing on-site VMT reducing infrastructure, such as those found in California Air Pollution Control Officers Association (CAPCOA) or other sources that have been vetted through peer-review research; or pay a fee that would fund active transportation infrastructure and transit improvements to reduce citywide VMT."
- Provide a table showing all VMT impacts from Residential, Employment, and Retail land use to better view impacts by proposed Alternatives 1 and 2, and no project condition. This would make it easier to see which Alternative has the highest VMT based impact.

A-6

	Imperial County Region - Base Year	15% below Regional Average Threshold (<85%)	El Centro - Base Year	Alternative 1	Alternative 2	No Project Alternative (Adopted GP)	Significant Impact	Impact By % or Net Increase
Residential VMT/Capita	13.76	11.70	9.62	7.93	8.14	8.73	NO Alternative	All Below 85%
Employee VMT/Employee	18.99	15.82	11.35	8.02	8.10	8.74	NO Alternative	All Below 85%
Retail Land Use VMT (trucks)	5,507,484			7,467,309	730,875	7,295,827	YES, All Alternative	Net increase
Retail (home based shopping) (trucks)	331,917			494,365	484,272	475,170	YES, All Alternative	Net increase

A-7

- Caltrans notes that all Alternatives have a VMT for Residential & Employment under the 85% threshold. We also note that all Alternatives have "Retail Land Use"

<sup>1</sup> California Governor's Office of Planning and Research (OPR) 2018. "Technical Advisory on Evaluating Transportation Impacts in CEQA." [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)

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**A-2** This comment refers to an attachment containing markups of the Transportation Impact Study (TIS) prepared for the proposed project. In response to the comments made to Figure 1-3, Proposed Bicycle Network, the City will continue to coordinate with the Caltrans Imperial Avenue Interchange Project Manager regarding any improvements proposed within Caltrans' right-of-way and/or adjacent to a Caltrans project, including the proposed Cycle Tracks (Class IV).

In response to comments made on TIS Table 3.1, Transportation VMT [Vehicle Miles Traveled] Thresholds of Significance by Land Use Type, the City disagrees that TIS Table 3.1 needs to be updated. The purpose of TIS Section 3.1 and Table 3.1 is to document the methodology used in the analysis. The VMT threshold will remain the same (15 percent below the regional average), while the VMT regional average may change with each regional model forecast (i.e., Regional Transportation Plan).

In response to comments made on TIS Table 4.2, El Centro Proposed Project VMT Efficiency Metrics for Transportation Impact Analysis of Residential and Employment Uses, the City would like to clarify that TIS Table 3.2 does include the City's sphere of influence in the base year.

Finally, in response to the comment requesting a VMT summary table, a new Table 6.1, Summary of El Centro VMT Efficiency Metrics for Transportation Impact Analysis for All Alternatives, has been added to the TIS. The comment was specific to the TIS, and no changes were made to the PEIR.

- A-3** The City notes this comment. The VMT analysis provided in the TIS and PEIR used the Governor’s Office of Planning and Research Guidance and the subregional (Imperial County) VMTs as the thresholds for VMT comparisons. This approach was discussed and approved by Caltrans District 11.

The development of Senate Bill 743-compliant traffic study guidelines is included in the El Centro Mobility Element (ME) as ME Policy 4.3: “Implement Senate Bill (SB) 743 by establishing Vehicle Miles Traveled (VMT) thresholds and developing Traffic Impact Guidelines.” The City is developing the traffic study guidelines. It is anticipated that these guidelines will provide direction for new development projects and remain consistent with the Governor’s Office of Planning and Research Guidance.

- A-4** As discussed in response to comment A-2, in response to the comment requesting a VMT summary table, a new Table 6.1 has been added to the TIS. The comment was specific to the TIS, and no changes were made to the PEIR.

- A-5** The City notes this comment.
- A-6** Please refer to response to comment A-4, which addresses the same issue raised in this comment.
- A-7** This comment states the Caltrans' recommendation of the "No Project Alternative" or "Alternative 2" due to the lower VMT impacts concluded for those alternatives. The City notes this comment, and it will be included for review by the decision makers in the Final PEIR.

Mr. Angel Hernandez, Associate Planner  
 April 22, 2021  
 Page 3

A-7 cont.	<p>significant impacts. "Alternative 1" has the highest "Retail Land Use" VMT based impact, "Alternative 2" has the second highest "Retail Land Use" VMT based impact, and "No Project Alternative" has the third highest "Retail Land Use" VMT based impact.</p> <ul style="list-style-type: none"> <li>○ Caltrans recommends the "No Project Alternative" or "Alternative 2" scenarios since they have the lowest VMT impact, and these two VMT results are very close to each other.</li> </ul>
A-8	<ul style="list-style-type: none"> <li>• With SCAG's recently adopted Regional Transportation Plan/Sustainable Communities Strategy in September 2020 (Connect SoCal), and the <a href="#">SCAG Transportation Demand Management Strategic Plan and Final Report (August 23, 2019)</a> efforts, Caltrans encourages the City of El Centro to coordinate with SCAG to address regional strategies to reduce greenhouse gases, and VMT as part of the City's 2040 El Centro General Plan Update.</li> </ul>
<b>Design</b>	
A-9	<ul style="list-style-type: none"> <li>• This comment is based on "4.0 El_Centro_Mobility_Element_2021_03_02.pdf Class I Bike Path". Due to the vulnerability of disabled pedestrians, please consider providing separate pathways for bicyclists and pedestrians.</li> </ul>
<ul style="list-style-type: none"> <li>• All improvements within Caltrans R/W will be required to comply with Caltrans Highway Design Manual (HDM) guidelines and standards.</li> <li>• Any roadwork, bicycle and pedestrian improvements, striping, and traffic controls encroaching in Caltrans R/W will require an approved Caltrans Encroachment Permit.</li> </ul>	
A-10	<p><b>Environmental</b></p> <p>Caltrans appreciates the opportunity to comment on this Draft Program Environmental Impact Report for the General Plan. The analysis presented may impact on Caltrans R/W in the future.</p> <p>Should future projects based upon the changes enacted from the PEIR have elements and/or mitigation measures change to effect Caltrans R/W, Caltrans would welcome the opportunity to be a Responsible Agency under the CEQA and to the continued coordination of our efforts.</p>

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**A-8** The City notes this comment. The General Plan Update and its goals and policies were developed in close alignment with those identified by the Southern California Association of Governmental (SCAG) in its 2020–2045 (Connect SoCal) Regional Transportation Plan/Sustainable Communities Strategy. The City is committed to maintaining close coordination with SCAG and the transportation projects identified in SCAG's long-range visional plan, Connect SoCal.

**A-9** The City notes this comment. The General Plan Update is a long-range planning document, and the concepts of its Class I facilities recommendation are in line with those requirements identified in the most recent Caltrans High Design Manual standards. When the City is ready to implement any of the recommended facilities, including the Class I Bike Path, detailed design efforts will be undertaken to ensure that both pedestrian and bicyclist needs and safety are accommodated and the latest design requirements are met.

**A-10** The City appreciates Caltrans' participation in the review of the PEIR and summary of Caltrans' role pursuant to CEQA and the project's potential impacts to Caltrans' right-of-way. The City acknowledges Caltrans' role should future projects impact Caltrans' right-of-way and its role as a CEQA responsible agency.

Mr. Angel Hernandez, Associate Planner  
 April 22, 2021  
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A-10  
 cont.

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, on-ramps and off-ramps, and appurtenant features including but not limited to lighting, signage, guardrail, drainage, slopes and landscapes. Caltrans is interested in any additional mitigation measures identified for the PEIR.

**Complete Streets and Mobility Network**

Caltrans views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation system. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of El Centro is encouraged.

A-11

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City to evaluate potential Complete Streets projects.

*Caltrans Deputy Directive 64-Revision 2 (DD-64-R2): Complete Streets – Integrating the Transportation System directs Caltrans to encourage integrated transportation systems that benefit all travelers. Caltrans seeks to also reduce vehicle trips and new vehicle miles traveled associated with development and recommends appropriate measures to avoid, minimize, or mitigate transportation impacts through smart mobility community design and innovative multimodal demand reduction strategies.*

**Broadband**

A-12

Caltrans recognizes that teleworking and remote learning lessen the impacts of traffic on our roadways and surrounding communities. This reduces the amount of VMT and decreases the amount of greenhouse gas (GHG) emissions and other pollutants. The availability of affordable and reliable, high speed broadband is a key component in

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**A-11** The El Centro Mobility Element Update is based on Complete Streets policies. Additionally, the City will complete early coordination with Caltrans in locations that may affect both Caltrans' and the City's rights-of-way when required.

**A-12** The City concurs with this comment. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR. Therefore, no further response is required.

Mr. Angel Hernandez, Associate Planner  
April 22, 2021  
Page 5

A-12 cont. supporting travel demand management and reaching the state's transportation and climate action goals.

**Right-of-Way**

A-13

- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- Any work performed within Caltrans R/W will require discretionary review and approval by Caltrans, and an encroachment permit will be required for any work within the Caltrans R/W prior to construction.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions, please contact Mark McCumsey at (619) 985-4957 or by email at [mark.mccumsey@dot.ca.gov](mailto:mark.mccumsey@dot.ca.gov).

Sincerely,

*Maurice A. Eaton*

MAURICE EATON  
Branch Chief  
Local Development and Intergovernmental Review

A-14 Attachment

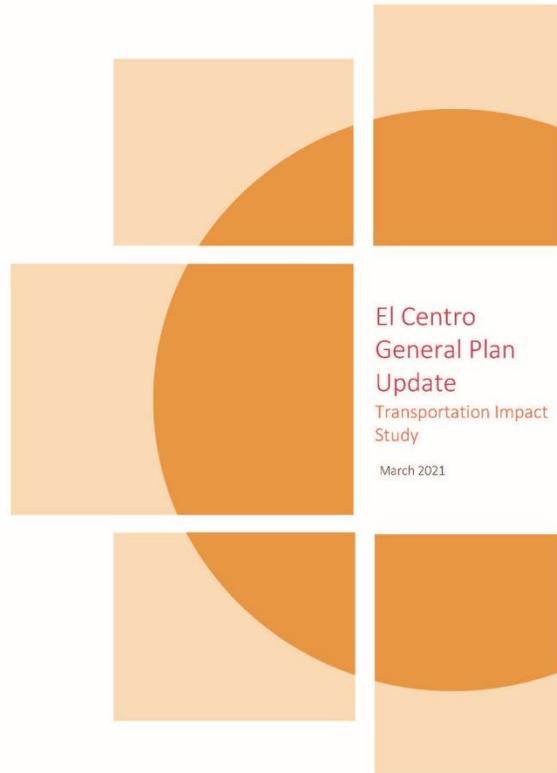
**A-13** The City acknowledges Caltrans' role should future projects impact Caltrans' right-of-way and the requirements of survey monuments per Business and Profession Code 8771. The City concurs that any work performed within Caltrans' right-of-way will require approval by Caltrans. The Caltrans contacts are noted. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft PEIR. Therefore, no further response is required.

**A-14** Please refer to response to comment A-2, which addresses the same issue raised in this comment.

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Appendix H1. Transportation Impact Study

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Prepared for



1275 W. Main Street  
El Centro, CA 92243

Prepared by



3900 Fifth Avenue, Suite 310  
San Diego, CA 92103

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- Appendix B Project Alternatives VMT Results

## 1.0 Introduction

### 1.1 Purpose of the Report

This Transportation Impact Study (TIS) serves to identify and document potential transportation impacts related to the City of El Centro General Plan Update proposed land uses and mobility networks (Proposed Project), its alternatives, and recommend improvements/mitigation measures, as appropriate.

The City of El Centro is in the southeastern portion of Imperial County (County), Southern California, 11 miles north of the United States-Mexico border. The City is the largest city in the Imperial Valley and 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 transportation corridor, which leads to north-south connectivity by way of State Route 86 in the City and State Route 111 east of the City.

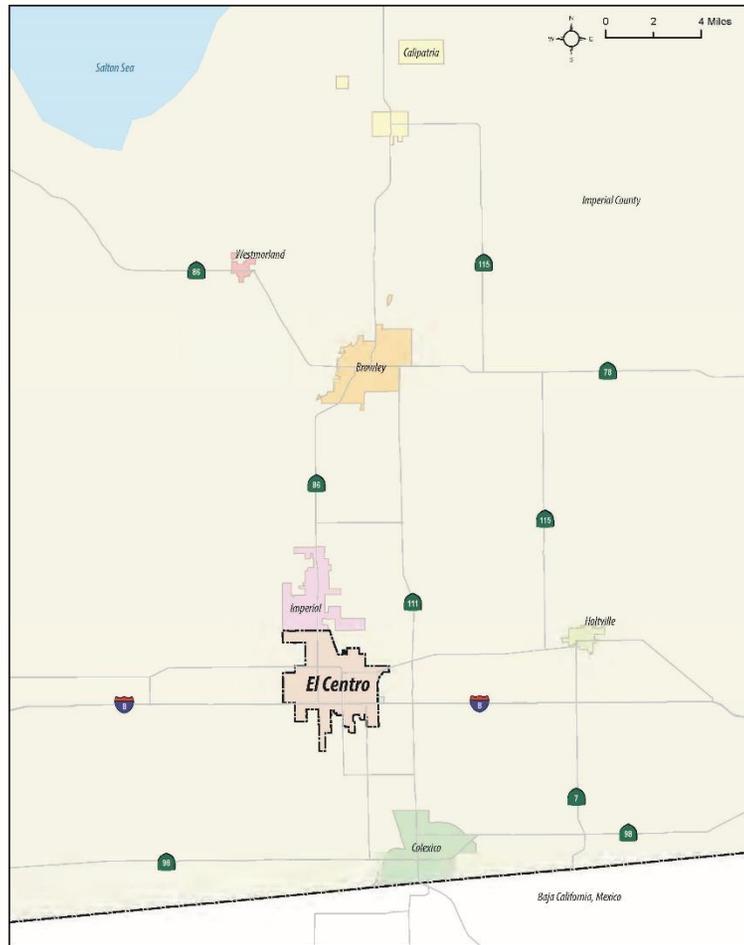
**Figure 1.1** displays the City of El Centro location in the Imperial County Region.

In December 2018, the California Resources Agency certified and adopted revised CEQA Guidelines, including new section 15064.3. Under the new section, vehicle miles traveled (VMT), which includes the amount and distance of automobile traffic attributable to a project, is identified as the “most appropriate measure of transportation impacts.” As of July 1, 2020, all CEQA lead agencies must analyze a project’s transportation impacts using VMT.

### 1.2 Study Scenarios

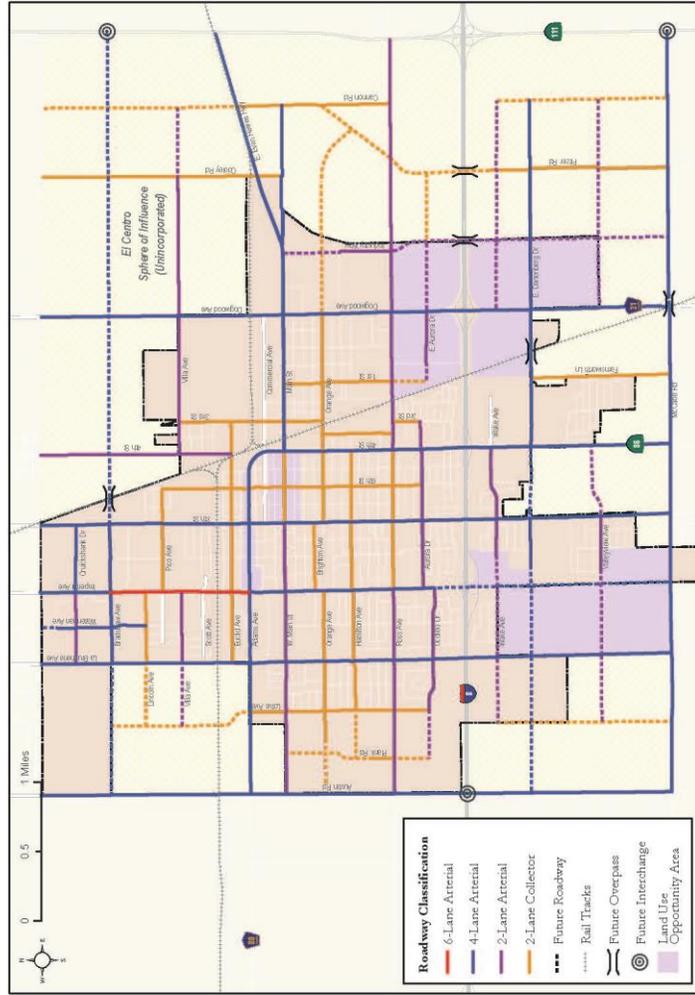
Four (4) study scenarios were evaluated, including base year (2014) and three (3) future year alternatives, as follows:

- **Base Year (2014)** – establishes the baseline VMT within the project study area (both the City of El Centro and its sphere of influence). The Imperial County Transportation Model (ICTM) Base Year (2014) was utilized as a starting-point and validated for the City of El Centro.
- **No Project (Adopted General Plan)** – represents buildout of the City of El Centro’s currently Adopted General Plan Land Use and Mobility Elements.
- **Alternative 1 (Proposed Project)** – represents buildout of the Proposed Project’s land uses and mobility network, which were developed in collaboration with community members, City staff, and the project consultant team. The center piece of this Land Use Element consists of five Opportunity Areas where the City wants or anticipates land use change or growth to occur during the planning period (see LUE Figure 3 of the General Plan Update). A summary of the proposed land uses is provided in Chapter 2 of this report, while the mobility network recommendations are provided in **Figures 1.2 and 1.3**. Figure 1.3 displays the proposed roadway network and Figure 1.3 illustrates the proposed bicycle network.



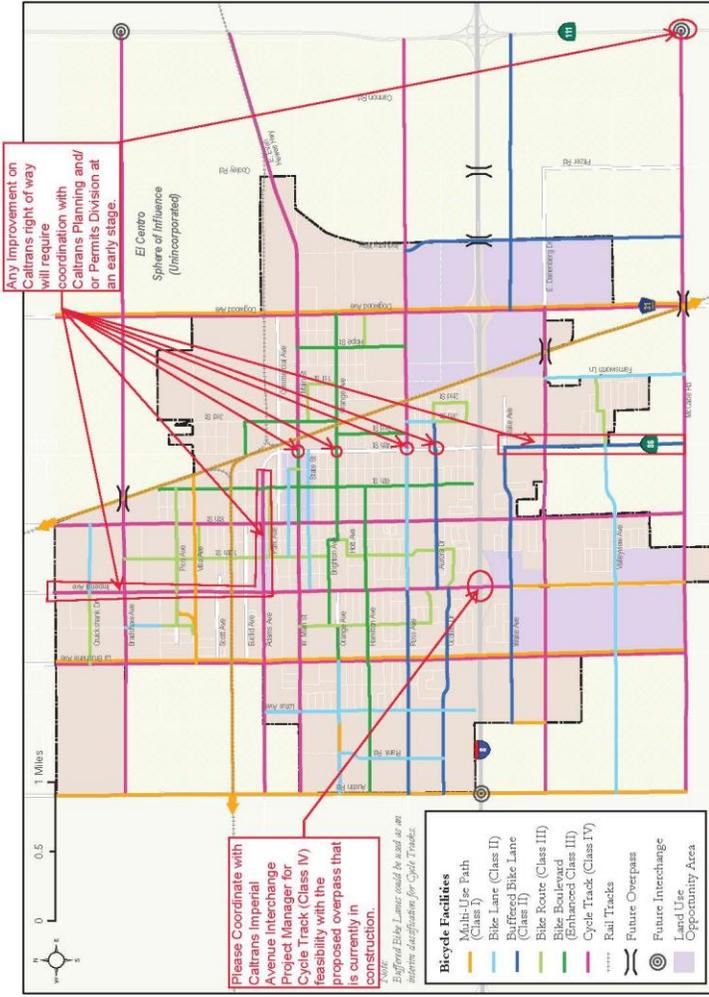
El Centro General Plan Update  
Transportation Impact Study  
CHEN RYAN

Figure 1.1  
Project Regional Location



El Centro General Plan Update  
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Figures 1.2  
 Proposed Roadway Network



El Centro General Plan Update  
Transportation Impact Study  
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City of El Centro General Plan Update  
Transportation Impact Study

- **Alternative 2** – represents a more typical traditional suburban land use pattern, with an emphasis on the separation of land uses as opposed to the proposed project, which emphasizes mixed-use and village-oriented development patterns that support multimodal transportation options. It was chosen to analyze the continuation of traditional growth patterns for the City and its Sphere of Influence (SOI). The Traditional Land Use Alternative would result in 967 fewer overall residential units and would reduce the amount of non-residential space by 372,000 square feet, compared to the proposed project.

All study scenarios were modeled using the validated Imperial County Transportation Model (ICTM). This model was developed by Caltrans District 11 in coordination with Southern California Association of Governments (SCAG) in 2018. As part of this General Plan Update effort, the project team developed a El Centro-focused subarea model by updating the ICTM with accurate El Centro information, including roadway network and socioeconomic data for the various alternatives listed above. Detailed modeling information and documentation can be found in Chapter 2 of the *Mobility Technical Report*.

### 1.3 Report Organization

The remainder of this report is organized into the following chapters:

- 2.0 *Project Description* – This chapter summarizes land use assumptions for Base Year (2014) and future year alternatives including the Adopted General Plan (No Project), the Proposed Project (Alternative 1), and Alternative 2.
- 3.0 *Analysis Methodology* – This chapter describes the methodologies and thresholds utilized to evaluate potential VMT impacts for each of the future alternatives. Note that as of July 1, 2020, VMT is the metric (rather than Level of Service) for CEQA transportation-related impact evaluation.
- 4.0 *Project Impacts* – This chapter discusses the VMT analysis and identifies potential transportation impacts of the Proposed Project. Mitigation measures to reduce the identified VMT impacts, as necessary, are also discussed.
- 5.0 *Alternatives Analysis* – This chapter discusses the VMT analysis and potential transportation impacts of the two project alternatives, including the No Project and Alternative 2.

## 2.0 Project Description

The Proposed Project includes an update of the currently Adopted General Plan land uses to plan and accommodate future growth and development in the City of El Centro and its sphere of influence. Land use assumptions for the No Project (Adopted Plan), Alternative 1 (Proposed Project), and Alternative 2 scenarios are provided in Chapter 5.0 of the EIR.

Two geographic areas, the City's corporate limits and its SOI, are within the planning area covered by the El Centro General Plan. As defined by the City and the Imperial County Local Agency Formation Commission, an 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. The project does not propose or anticipate annexation of the SOI at this time. Should annexation of one or more areas be considered at a future point in time, applicable procedures from the Imperial County Local Agency Formation Commission would apply. For a conservative analysis, this study includes both the City's corporate limits and the SOI.

### 2.1 Project Components

The El Centro Land Use Element was developed in concert with the Mobility Element. Both Elements focus on sustainability principles by providing a better balance between jobs and housing, encouraging smart-growth and mixed-use developments, connecting residential and employment land uses, and planning for well-connected and safe facilities to make the City of El Centro more walkable and bikeable. Each project component is described below.

#### Land Use Element Update

The proposed update to the Land Use Element in the El Centro General Plan would be based on the City's existing Vision 2050, policy direction from City staff and decision makers, and input from the Community Advisory Committee and the public. The update would designate the proposed general distribution and extent of land uses in the City, focusing on preserving established land uses and accommodating future growth and physical development of the community. It would incorporate policies that integrate land use and transportation strategies to increase the share of bicycle, transit, and pedestrian trips, reducing greenhouse gas emissions. Specific topics to be incorporated into the Land Use Element Update include equity, health, sustainability, the economy, and the environment. An overarching objective of the Land Use Element Update would be to promote infill development and encourage efficient development patterns to spur economic revitalization, provide opportunities for innovative lifestyles envisioned by the Vision 2050, and promote environmental justice and equity.

The overall goal of the Land Use Element Update is to create a land use plan that promotes quality of life, health, and safety; meets the needs of the City's residents; supports multiple modes of transportation; fosters economic prosperity; provides a range of affordable housing options; is sustainable and environmentally responsible; encourages social cohesion and equity; and reflects and celebrates the City's unique character, culture, identity, and traditions.

#### Proposed Land Use Designations

The proposed Land Use Element Update would include changes to the existing land use designations, which establish the general pattern of land uses in the planning area and would identify maximum permitted land use densities and intensities. The Land Use Element Update would establish 19 land use designations (15 primary land use designations and 4 overlay designations) that govern land uses in the planning area.

City of El Centro General Plan Update  
Transportation Impact Study

**Proposed Opportunity Areas**

The centerpiece of the General Plan Land Use Element Update consists of five Opportunity Areas (OAs) where the City wants or anticipates land use change or growth to occur during the planning period. OAs are larger, specific areas where targeted change is anticipated. Several OAs are areas of existing development that can benefit from targeted plans and policies to help guide transformation, while others are proposed where growth is expected or proposed to occur.

Each OA has a vision and policies to guide future planning that emphasize the principles of smart growth, sustainability, community identity, and placemaking and the creation of physical and social connections. A key element of each OA is the correlation of land use and site design with proposed improvements to the mobility infrastructure, including providing right-sizing existing roadways, adding new roadways, improving sidewalks, adding multi-use trails and bicycle facilities, and facilitating transit.

**Mobility Element Update**

The California Complete Streets Act of 2008 requires that General Plans demonstrate how cities will provide for the routine accommodation of all users of a road or street, including pedestrians, bicyclists, public transportation users, motorists, children, older adults, and those with disabilities. The El Centro General Plan Mobility Element addresses this requirement with policies and programs that consider all modes of travel, with the goal of making streets safer, accessible, and more convenient to walk, ride a bicycle, or use public transportation.

El Centro's transition from low density to higher density land use patterns under the Proposed Project, would require equally supportive mobility infrastructure, public improvements, and policies focused on better serving pedestrians, bicyclists and transit users, in addition to motorists. Therefore, to supplement these land use changes, the Proposed Project also includes transportation network and policy improvements to address existing and forecasted mobility needs and deficiencies. The proposed roadway and bicycle networks are included in Figures 1.2 and 1.3, and more detailed infrastructure, policy, and program recommendations can be found in the Mobility Element section of the General Plan Update.

### 3.0 Analysis and Methodology Thresholds

This chapter describes the methodologies and thresholds utilized to evaluate potential VMT impacts for each of the future alternatives. On September 27, 2013, Governor Edmund G. Brown, Jr. signed SB-743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. Related revisions to the State's CEQA Guidelines include elimination of auto delay, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts, and replacement with Vehicle Miles Traveled (VMT) as the preferred CEQA transportation metric.

This chapter describes the methodologies and thresholds utilized to evaluate potential VMT impacts for each of the future alternatives.

#### 3.1 Determination of VMT Significant Impacts

VMT is positively correlated with growth and as the region is expected to grow, VMT is also expected to increase. However, where the growth occurs plays a significant role to determine how much the VMT will increase. Growth in areas with access to high-quality transit, a complete active transportation network, and/or complementary land use mixes are projected to be more VMT efficient.

In their Technical Advisory on Evaluating Transportation Impacts on CEQA (December 2018), the Governor's Office of Planning and Research (OPR) recommends the use of VMT metrics when analyzing land use projects and plans. For residential uses, the recommended efficiency metric is Resident VMT per Capita; and for employment uses, the recommended efficiency metric is Employee VMT per Employee. However, for retail uses, the recommended metric is a net change of total area (i.e. Imperial County) VMT due to the nature of retail trips typically redistributing shopping trips rather than creating new trips.

The following definitions describe how VMT is referred to, calculated, and accounted for in this programmatic CEQA impact analysis:

- **Resident VMT/Capita** includes all daily vehicle-based person trips originated from or ended at the home location of the individual (driver or passenger). Only home-based VMT are included in this calculation. The VMT for each individual is then summed for all individuals in the analysis area and divided by the population of the same analysis area to arrive at Resident VMT/Capita.
- **Employee VMT/Employee** includes all daily vehicle-based, work-based employee travel grouped and summed to the work location. The VMT for each work location is then summed for all work locations in the analysis area and then divided by the total number of employees of the same analysis area to arrive at the VMT/Employee. This does not include employees whose work location is specified as home.
- **Total Retail VMT** is the sum of all vehicle trips generated by retail uses in the analysis area multiplied by their associated trip lengths.
- **Transportation Project.** The OPR Technical Advisory and CEQA Guidelines provide that a VMT analysis be conducted for major roadway capacity expansion projects and that the analysis address potential induced travel effects.

City of El Centro General Transportation Plan  
 Add a column stating what the 15% reduction of 13.76 and 18.59 would be:

The OPR Technical Advisory recommends that VMT/capita and VMT/employee results should be compared to the 85<sup>th</sup> percentile of region's average for that land use type – in this case, the region's average is the average Imperial County. The regional average VMT is determined using the ICTM Base Year (2014), and the regional average resident VMT per Capita is 13.76 miles and the regional average employee VMT per Employee is 18.59 miles per person. Excerpts from the regional transportation model is provided in **Appendix A**.

Consistent with the OPR Technical Advisory, the significance thresholds are shown in **Table 3.1**.

**Table 3.1 Transportation VMT Thresholds of Significance by Land Use Type**

Land Use Type	Threshold for Determination of a Significant Transportation VMT Impact
Residential	15% Below Region's Average Resident VMT/Capita
Employment	15% Below Region's Average Employee VMT/Employee
Retail	A Net increase in Total Regional VMT

Source: ICTM, Iteris, Chen Ryan Associates (2020)

this would be 11.70 Miles

This would be 15.80 miles

For the purpose of the transportation impact study, a Plan-to-Ground analysis was conducted by comparing the Proposed Project and the various alternatives to Base Year (2014), which is representative of the baseline conditions.

Since Table 4.2 show the (<85%) then this should be shown in both resident and employment table to tie both tables together and minimize confusion.

#### 4.0 Impact Analysis – Proposed Project (Alternative 1)

This chapter focuses on whether the Proposed Project would have a significant impact if proposed new residential, office, or retail land uses would in aggregate exceed the respective VMT by land use thresholds in Table 3.1.

##### 4.1 VMT Impact Analysis

To establish a baseline understanding, Table 4.1 displays both Imperial County and El Centro's resident and employee VMT efficiency metrics for the Base Year (2014) conditions. As shown, El Centro has more efficient VMT per capita for both residents and employees that are lower when compared to the region, at approximately 70% of the region's resident VMT/capita and just over 60% of region's employee VMT/employee.

Table 4.1 El Centro Base Year VMT Metrics for Transportation Impact Analysis

VMT Metric	Base Year (2014)		% of Regional Base Year
	Region	El Centro	El Centro
Resident VMT/Capita	13.76	9.62	70.0%
Employee VMT/Employee	18.59	11.35	61.1%

Source: ICTM, Iteris, Chen Ryan Associates (2020)

Please clarify: Does the El Centro Proposed Project (Alt 1) include the base year VMT SOI area or is it just the proposed improvements locations?

By 2040 with the implementation of the Proposed Project, the VMT efficiency of El Centro substantially improves. Table 4.2 presents the El Centro average resident and employee VMT for the Proposed Project.

Table 4.2 El Centro Proposed Project VMT Efficiency Metrics for Transportation Impact Analysis of Residential and Employment Uses

VMT Metric	Imperial County Region - Base Year	El Centro Proposed Project (Alternative 1)	% of Regional Base Year	Significant Impact?
Resident VMT / Capita	13.76	7.93	57.6% (< 85%)	No
Employee VMT / Employee	18.59	8.00	43.0% (< 85%)	No

Source: ICTM, Iteris, Chen Ryan Associates (2020)

##### Residential and Employment Land Uses Impact?

As shown in the table above, El Centro is projected to have an average Resident VMT per Capita at 7.93 and an average Employee VMT per Employee at 8.00, which are 57.6 percent and 43.0 percent, respectively, of the Base Year regional averages for these efficiency metrics. VMT associated with residential and employment land uses would not exceed the 85 percent thresholds at buildout of the Proposed Project. Therefore, impacts related to VMT for residential and employment land uses would be less than significant.

Highest VMT Impact Alternative

##### Retail Land Uses Impact?

Regarding VMT associated with retail land uses, the total regional VMT would increase from 5,507,484 miles under the Base Year conditions to 7,467,309 miles with the implementation of the Proposed Project, an increase of 1,959,825 miles. The VMT associated with retail (home-based shopping) also would increase from 331,912 miles under the base year to 494,465 miles with the implementation of the Proposed Project, an increase of 162,553 miles. According to OPR's recommendations, a retail impact is considered significant when there is a net increase in total regional VMT related to the new retail and commercial uses that could be developed with the adoption of the Proposed Project. Furthermore, the

City of El Centro General Plan Update  
Transportation Impact Study

proposed retail land uses particular in some of the Opportunity Areas are regional retail in nature including tourist commercial and large regional shopping, would attract visitors from the surrounding cities and regions. Therefore, based on the criteria provided in Table 3.1, the retail component of the Proposed Project would have a significant impact.

OPR Technical Advisory states that “by adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT”, and “retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT.” In summary, OPR defers to the local jurisdiction to determine the definition of local-serving retail at the project-level.

#### Transportation Project

According to OPR’s recommendations, a transportation impact is considered significant when the project caused an increase in VMT by encouraging more vehicular trips. This could come in the forms of adding new roadway connections and widening existing roadway to accommodate additional demand, etc. Given parts of El Centro are undeveloped and expecting growth and the existing roadway network does not provide direct or adequate access to these areas, the Proposed Project recommends several new roadway connections and widenings to accommodate the anticipated land use growth. However, it is important to note that the Proposed Projects proposes a number of road diets along with a comprehensive active transportation network is also recommended for the entire city when comparing to the currently Adopted General Plan (No Project). With that said, the Proposed Projects does increase the overall roadway capacities in El Centro from the baseline conditions; hence, it would result in a significant transportation impact under the VMT thresholds.

## 4.2 Mitigation Measures

As described in the Land Use Element of the General Plan Update, new developments are focused in mixed-use villages that would introduce new residential, retail and employment opportunities consolidated around a balanced mobility system to serve the needs of all current and future users. This system would provide an active transportation network that would be a viable and enjoyable option for traveling within the City in addition to providing connections to transit to get to and from destinations around the region. By bringing in varied and complementary uses and a mobility network that supports and encourages alternative mode choice, the Proposed Project plans a more VMT efficient and sustainable future for the community.

#### Residential Land Uses

As shown in Table 4.2, impacts associated with the proposed residential land uses of the Proposed Project are considered *less than significant*, therefore, no mitigation measures are required.

#### Employment Land Uses

As shown in Table 4.2, impacts associated with the proposed employment land uses of the Proposed Project are considered *less than significant*, therefore, no mitigation measures are required.

#### Retail Land Uses

For the Proposed Project’s retail land uses, there is a *significant impact due to planned and proposed retail and commercial uses* that would be regionally serving. Overall, the proposed Land Use Element

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Update (LEU) is a planning document intended to guide future development throughout El Centro. It provides detailed policies and implementation guidance that would be applicable for future developments. Due to the programmatic nature of the proposed LEU, it does not propose any specific development projects, and thus, cannot adequately anticipate specific project-level requirements at this time. To reduce retail VMT impacts, future developments under this proposed LEU would need to be mitigated on a project-by-project basis. This could be accomplished through a citywide VMT reduction ordinance that would require development projects to reduce their VMT to the extent feasible by providing on-site VMT reducing infrastructure such as those found in CAPCOA or other sources that have been vetted through peer-review research; or pay a fee that would fund active transportation infrastructure and transit improvements to reduce citywide VMT. ← Noted!

**Mitigation Measure MM-TR-1:** Implementation of Mobility Element Policies 1.1 through 1.11, 2.1 through 2.9, 3.1 through 3.5, 4.3 and 4.7. would reduce VMT throughout the City. Specifically, the City should ensure that future projects are compliant with Mobility Element Policy 4.5, which utilizes Transportation Demand Management Measures (TDM) to reduce single-occupant vehicles, and encourage alternative modes of transportation such as biking, walking or taking transit. Since TDM are typically applied at the project-level, a list of potential TDM is provided below:

- Increase mixed-use development
- Increase transit accessibility
- Provide pedestrian network improvement along project frontage
- Provide bicycle network improvement along project frontage
- Implement a Neighborhood Electric Vehicle (NEV) network, if appropriate
- Provide bicycle parking, bike locker, personal lockers, and showers
- Implement subsidized or discounted transit passes
- Provide ride-sharing programs
- Implement commute trip reduction marketing
- Implement school pool program
- Implement bike-sharing or micro mobility program
- Provide local shuttle to connect visitors to different attractions throughout the City

Additional measures can be found in the California Air Pollution Control Officers' Association's (CAPCOA) Quantifying Greenhouse Gas Mitigation Measures report (<http://www.agcmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf>).

Implementation of the TDM above would potentially reduce each project's VMT. However, since TDM level of effectiveness varies from project to project, this Programmatic Environmental Impact Report (PEIR) cannot ensure that the TDMs would reduce the regional VMT to baseline conditions. Therefore, this mitigation while potentially feasible, is not implementable at this time. Therefore, this VMT impact is considered *significant and unavoidable*.

#### 4.3 Level of Significance After Mitigation

Should MM-TR-1 be adopted by City Council, and implemented, VMT would be reduced by individual projects that maybe permitted and constructed under the proposed LEU. The effectiveness of the VMT reducing measures would need to be context-sensitive and would vary depending on the individual project site such as the location, access to transit, etc. For this reason, and because it is uncertain if, or when such measures would become effective, MM-TR-1 would not fully mitigate the VMT impact for retail land uses nor would it fully mitigate the VMT impact for transportation project (induced growth). Thus, transportation impacts due to the Proposed Project's retail land uses and transportation project would remain significant and unavoidable.

#### 5.0 Alternatives Analysis

The California Environmental Quality Act (CEQA) mandates consideration and analysis of alternatives to the Proposed Project. According to CEQA Guidelines, the range of alternatives "shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant impacts" (CEQA Guidelines Section 15126.6 (d) (2)). The discussion must also include an evaluation of the No Project Alternative to allow decision-makers to compare the impacts of approving the Proposed Project against the impacts of not approving it.

The alternatives discussion need not be exhaustive and is subject to a determination of reasonableness. The impacts of the alternatives may be discussed "in less detail than the significant effects of the project proposed" (CEQA Guidelines Section 15126.6 (d)). Additionally, the CEQA Guidelines generally permit analysis of alternatives at a less detailed level for general plans and other program EIRs than what is required for project EIRs. The CEQA Guidelines do not specify what constitutes an adequate level of detail, though an EIR must provide sufficient information to allow meaningful evaluation, analysis, and comparison of each alternative. The CEQA Guidelines require that this analysis identify the environmentally superior alternative among those analyzed.

This chapter discusses potential VMT impacts under the No Project alternative and Alternative 2. The No Project alternative is identical to the currently adopted General Plan, and Alternative 2 shares the same mobility network as the Proposed Project (Alternative 1) but varies in land uses especially in the Opportunity Areas. The Vehicle Miles of Travel Reports (SB 743 metrics for residential and employment) for both alternatives are included in **Appendix B**.

#### 5.1 No Project Alternative (Adopted General Plan)

The purpose of evaluating the No Project Alternative is to allow decision makers to compare the outcomes by approving the Proposed Project vs. maintain the currently adopted Plan. The No Project Alternative represents what would reasonably be expected to occur in the foreseeable future if the Proposed Project were not adopted. Future development under the No Project Alternative would result in 1,678 fewer dwelling units in the City but 1,565 more dwelling units in the SOI. In addition, the No Project Alternative would result in 14,385 more square feet of non-residential development in the City but 3,655 fewer square feet of non-residential development in the SOI. The No Project Alternative does not include the proposed five Opportunity Areas (OAs); therefore, it would not emphasize the principles of Smart Growth, sustainability, community identity, placemaking, and the creation of physical and social connections.

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Table 5.1 presents the El Centro average resident and employee VMT under the No Project conditions.

**Table 5.1 El Centro No Project**  
**VMT Efficiency Metrics for Transportation Impact Analysis of Residential and Employment Uses**

VMT Metric	Imperial County Region - Base Year	El Centro – No Project (Adopted GP)	% of Regional Base Year	Significant Impact?
Resident VMT / Capita	13.76	8.73	63.4% (< 85%)	No
Employee VMT / Employee	18.59	8.74	47.0% (< 85%)	No

Source: ICTM, Iteris, Chen Ryan Associates (2020)

Residential and Employment Land Uses Impact?

As shown in the table above, El Centro is projected to have an average Resident VMT per Capita at 8.73 and an average Employee VMT per Employee at 8.74, which are 63.4 percent and 47.0 percent, respectively, of the Base Year regional averages for these efficiency metrics. VMT associated with residential and employment land uses would not exceed the 85 percent thresholds at buildout of the No Project. Therefore, impacts related to VMT for residential and employment land uses would be less than significant.

Retail Land Uses Impact?

Regarding VMT associated with retail land uses, the total regional VMT would increase from 5,507,484 miles under the Base Year conditions to 7,295,827 miles with the implementation of the No Project, an increase of 1,788,343 miles. The VMT associated with retail (home-based shopping) also would increase from 331,912 miles under the base year to 473,170 miles with the implementation of the No Project, an increase of 141,258 miles. According to OPR's recommendations, a retail impact is considered significant when there is a net increase in total regional VMT related to the new retail and commercial uses that could be developed with the adoption of the No Project. Furthermore, the No Project includes land uses that are regional retail in nature including tourist commercial and large regional shopping, these land uses would attract visitors from the surrounding cities and regions. Therefore, based on the criteria provided in Table 3.1, the retail component of the No Project would have a significant impact.

OPR Technical Advisory states that "by adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT", and "retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT." In summary, OPR defers to the local jurisdiction to determine the definition of local-serving retail at the project-level.

Transportation Project

According to OPR's recommendations, a transportation impact is considered significant when the project caused an increase in VMT by encouraging more vehicular trips. This could come in the forms of adding new roadway connections and widening existing roadways to accommodate additional demand, etc. Given parts of El Centro are undeveloped and expecting growth and the existing roadway network does not provide direct or adequate access to these areas, the No Project scenario includes several new roadway connections and widenings to accommodate the anticipated land use growth. Since the No Project scenario increases the overall roadway capacities in El Centro from the baseline conditions, it would result in a significant transportation impact under the VMT thresholds.

**5.2 Alternative 2**

Compared to the Proposed Project, Alternative 2 results in 967 fewer overall residential units and would reduce the amount of non-residential space by 372,000 square feet, compared to the proposed project.

Alternative 2 also includes five OAs similar to the proposed project. However, the planned designations change. OA-3 would change the existing land use designations from General Industrial and Planned Industrial to Tourist Commercial, with the anticipation that its location on the northern side of Interstate 8 would draw a variety of regionally serving commercial, recreational, and entertainment uses and provide the potential for recreational vehicle parks and housing to encourage tourism.

In addition, OA-4 would retain the General Commercial land use designation for the properties on the eastern side of Dogwood Avenue, including the Imperial Valley Mall and the commercially designated property to the north. The property at the northwestern intersection of Dogwood Avenue and Danenberg Drive would change from General Industrial to General Commercial with a Mixed Use 2 Overlay to allow additional commercial uses while also providing the opportunity for multi-family residential uses in proximity to commercial uses.

Table 5.2 presents the El Centro average resident and employee VMT for Alternative 2.

**Table 5.2 El Centro Alternative 2**  
**VMT Efficiency Metrics for Transportation Impact Analysis of Residential and Employment Uses**

VMT Metric	Imperial County Region - Base Year	El Centro – Alternative 2	% of Regional Base Year	Significant Impact?
Resident VMT / Capita	13.76	8.14	59.2% (< 85%)	No
Employee VMT / Employee	18.59	8.10	43.6% (< 85%)	No

Source: ICTM, Iteris, Chen Ryan Associates (2020)

Residential and Employment Land Uses Impact?

As shown in the table above, El Centro is projected to have an average Resident VMT per Capita at 8.14 and an average Employee VMT per Employee at 8.10, which are 59.2 percent and 43.6 percent, respectively, of the Base Year regional averages for these efficiency metrics. VMT associated with residential and employment land uses would not exceed the 85 percent thresholds at buildout of the Alternative 2. Therefore, impacts related to VMT for residential and employment land uses would be less than significant.

Retail Land Uses Impact?

Regarding VMT associated with **retail land uses**, the total regional VMT would increase from 5,507,484 miles under the Base Year conditions to 7,301,875 miles with the implementation of the Alternative 2, an increase of **1,794,391 miles**. The VMT associated with **retail (home based shopping)** also would increase from 331,912 miles under the base year to 484,272 miles with the implementation of the Alternative 2, an increase of **152,360 miles**. According to OPR's recommendations, a retail impact is considered significant when there is a net increase in total regional VMT related to the new retail and commercial uses that could be developed with the adoption of the Alternative 2. Furthermore, the Alternative 2 includes land uses that are regional retail in nature including tourist commercial and large regional shopping, these land uses would attract visitors from the surrounding cities and regions. Therefore, based on the criteria provided in Table 3.1, the retail component of the Alternative 2 would have a significant impact.

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OPR Technical Advisory states that “by adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT”, and “retail development (including stores larger than 50,000 square feet) might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT.” In summary, OPR defers to the local jurisdiction to determine the definition of local-serving retail at the project level.

Transportation Project

According to OPR’s recommendations, a transportation impact is considered significant when the project caused an increase in VMT by encouraging more vehicular trips. This could come in the forms of adding new roadway connections and widening existing roadways to accommodate additional demand, etc. Given parts of El Centro are undeveloped and expecting growth and the existing roadway network does not provide direct or adequate access to these areas, the Alternative 2 scenario includes several new roadway connections and widenings to accommodate the anticipated land use growth. Since the Alternative 2 scenario increase the overall roadway capacities in El Centro from the baseline conditions, it would result in a significant transportation impact under the VMT thresholds.

Provide a table showing all VMT impacts from Residential, Employment, and Retail land use to better view impacts by proposed alternatives 1 and 2, and no project condition.

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Appendix A  
Base Year and Proposed Project VMT Results

**Region VMT**
**Base Year VMT (2014)**

Imperial County			
ID	Purpose	Productions	Attractions
1	Home-based Work	1,090,934	991,090
2	Home-based School	50,141	49,037
3	Home-based University	82,990	95,002
4	Home-based Shopping	167,107	164,904
5	Home-based Social/Recreational	433,178	365,319
6	Home-based Service Passenger	210,129	209,315
7	Home-based Other	492,845	437,349
8	Work-Based Other	100,458	89,856
9	Other Based Other	239,941	237,989
Total VMT		2,867,723	2,639,761
Total Home-based VMT		2,527,324	2,327,324
Total Work-based VMT		340,399	312,437
Total Population		183,730	1,091,547
Total Employees		58,730	
<b>Total Home-based VMT/Capita</b>		<b>13.76</b>	
<b>Total Work-based VMT/Employee</b>		<b>18.59</b>	

El Centro			
ID	Purpose	Productions	Attractions
1	Home-based Work	206,182	136,102
2	Home-based School	8,741	10,018
3	Home-based University	12,711	-
4	Home-based Shopping	26,684	59,074
5	Home-based Social/Recreational	81,241	66,976
6	Home-based Service Passenger	43,104	57,596
7	Home-based Other	92,232	93,402
8	Work-Based Other	21,929	14,346
9	Other Based Other	61,800	66,506
Total VMT		554,625	504,022
Total Home-based VMT		470,886	470,886
Total Work-based VMT		83,739	33,136
Total Population		48,927	158,031
Total Employees		13,924	
<b>Total Home-based VMT/Capita</b>		<b>9.62</b>	
<b>Total Work-based VMT/Employee</b>		<b>11.35</b>	

**Proposed Project VMT (2040)**

El Centro			
ID	Purpose	Productions	Attractions
1	Home-based Work	194,882	369,788
2	Home-based School	16,391	6,417
3	Home-based University	15,183	-
4	Home-based Shopping	33,198	164,333
5	Home-based Social-Recreational	105,030	176,778
6	Home-based Serve Passenger	55,112	129,623
7	Home-based Other	120,698	273,731
8	Work-Based Other	74,701	45,606
9	Other Based Other	178,406	217,044
Total VMT		793,601	1,383,321
Total Home-based VMT			540,495
Total Work-based VMT			444,489
Total Population		68,193	
Total Employees		55,594	
<b>Total Home-based VMT/Capita</b>		<b>7.93</b>	
<b>Total Work-based VMT/Employee</b>		<b>8.00</b>	

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Appendix B  
Project Alternatives VMT Results

**No Project VMT (2040)**

El Centro			
ID	Purpose	Productions	Attractions
1	Home-based Work	184,203	358,017
2	Home-based School	13,673	13,535
3	Home-based University	15,346	-
4	Home-based Shopping	38,355	115,394
5	Home-based Social-Recreational	109,213	123,899
6	Home-based Serve Passenger	51,916	116,691
7	Home-based Other	118,024	217,380
8	Work-Based Other	87,537	47,515
9	Other Based Other	119,496	134,095
Total VMT		737,763	1,126,527
Total Home-based VMT			530,730
Total Work-based VMT			445,555
Total Population		60,827	
Total Employees		50,983	
<b>Total Home-based VMT/Capita</b>			<b>8.73</b>
<b>Total Work-based VMT/Employee</b>			<b>8.74</b>

**Alternative 2 VMT (2040)**

El Centro			
ID	Purpose	Productions	Attractions
1	Home-based Work	192,538	339,136
2	Home-based School	15,122	21,334
3	Home-based University	15,222	-
4	Home-based Shopping	34,785	148,802
5	Home-based Social-Recreational	103,942	156,138
6	Home-based Serve Passenger	52,829	125,753
7	Home-based Other	117,208	243,638
8	Work-Based Other	52,664	39,581
9	Other Based Other	146,386	181,075
Total VMT		730,695	1,255,457
Total Home-based VMT			531,645
Total Work-based VMT			391,800
Total Population		65,339	
Total Employees		48,378	
<b>Total Home-based VMT/Capita</b>			<b>8.14</b>
<b>Total Work-based VMT/Employee</b>			<b>8.10</b>

## Comment Letter B: Southern California Gas Company



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April 23, 2021

Angel Hernandez, AICP  
Associate Planner  
1275 Main Street  
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Mr. Hernandez:

The City of El Centro's ("City" or "El Centro") forward-looking energy and environmental goals, as detailed in the Draft Program Environmental Impact Report ("Draft EIR") and elements of the General Plan Update, will serve the public interest by supporting the health and welfare of its residents. SoCalGas is pleased to have served the residents of El Centro with reliable and affordable energy for more than 100 years and looks forward to working with the City to achieve our shared climate goals. SoCalGas' vision is to be the cleanest gas utility in North America, and we are committed to being a partner in helping the communities we serve achieve their energy and environmental goals.

Since the California legislature enacted AB 32, the Global Warming Solutions Act of 2016, SoCalGas has been investing in early decarbonization efforts, diversification through expanded fuel options, and increased business efficiency and effectiveness with implementation of digital solutions. More recently we announced our ASPIRE 2045 sustainability strategy, which includes a bold commitment to achieve net zero greenhouse gas ("GHG") emissions in our operations and delivery of energy by 2045. Under ASPIRE 2045, SoCalGas will accelerate the shift to cleaner fuels, complementing wind and solar energy, and add clean fuels, such as hydrogen, to the energy mix. We have committed to replacing twenty percent (20%) of our core service with renewable natural gas ("RNG") by 2030. Through these and other efforts, we will help our customers mitigate GHG emissions through providing increasingly decarbonized gas. Further, the reliability and resiliency of our gas grid is critical to enabling higher percentages of renewable electricity.

SoCalGas sees alignment with several areas of the Draft EIR and General Plan Update, including reducing GHG emissions, supporting clean transportation, enhancing energy resilience and mitigating waste impact through beneficial uses. As such, we respectfully offer the following comments on these topic areas.

### Reducing GHG Emissions

SoCalGas' commitment to reducing the carbon intensity of its gas supply supports the City's commitment to mitigating GHG emissions by reducing dependence of fossil fuels, which is referenced in Table 3.5-4 of the Draft EIR (2017 Scoping Plan Key Sector Actions Compliance). The more we decarbonize gas delivered to consumers, the less the City, its residents and businesses will depend on traditional fossil natural gas.

Similarly, energy efficiency measures can help reduce El Centro's natural gas usage, further supporting the City's GHG emission reduction efforts. According to a recent Energy Futures Initiative report,<sup>1</sup> energy efficiency is the most cost-effective tool for decarbonizing energy. SoCalGas offers a range of proven and cost-effective strategies to reduce building emissions today, including energy conservation, home weatherization, and energy efficiency incentive programs.

<sup>1</sup> "Optionality, Flexibility and Innovation: Pathways for Deep Decarbonization in California," May 2019, available at <https://energyfuturesinitiative.org/efir-reports>

**B**

**B-1**

The City of El Centro (City) appreciates the Southern California Gas Company's (SoCalGas') participation in the review of the Draft Program Environmental Impact Report (PEIR) for the proposed El Centro General Plan Update (project or General Plan Update). This comment is an introductory comment and summarizes SoCalGas' role in providing electricity to the City and its commitment to reducing greenhouse gas (GHG) emissions. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR. Therefore, no further response is required.

**B-2**

The City notes this comment and appreciates SoCalGas' commitment to reducing GHG emissions in the City. PEIR Section 3.5, Greenhouse Gas Emissions, evaluates the potential for impacts to GHG emissions resulting from the project. PEIR Table 3.5-4, 2017 Scoping Plan Key Sector Actions Compliance, identifies applicable actions and evaluates proposed project compliance. In addition, Chapter 5, Achieving Success, of the 2017 Scoping Plan outlines plan- and project-level recommendations for 2017 Scoping Plan consistency. It is recommended that projects incorporate design features and GHG emissions reduction measures to the degree feasible to minimize GHG emissions. The comment will be available for review by the decision makers in the Final PEIR



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B-2 cont. These programs assist and educate customers about the benefits of reducing energy use during extreme weather events, incent the purchase of efficient appliances and equipment, and help pay for the weatherization of older and less energy inefficient homes. Many customers are often unaware that these programs exist or that they are eligible to participate in them. Communities like El Centro can play a vital role in connecting residents to these programs and facilitating higher levels of participation. Collectively, higher participation in these programs can lead to a greater reduction in natural gas usage as part of El Centro’s goal of mitigating GHG emissions.

**Mobility Element: Supporting Clean Transportation**

B-3 For many Southern California cities, a majority of air emissions result from regional transportation intensity, which significantly degrades local air quality in frequently traveled areas. As stated in the Mobility Element of the General Plan Update, the City seeks to provide “for the efficient and safe movement of all people and goods; promotes walking, bicycling and healthy living; reduces vehicle miles traveled and GHG emissions; and accommodates future growth for the City of El Centro.”<sup>2</sup> Yet, diesel exhaust from motorized travel methods – even from mass transit – can pose a potential hazard to residents near heavily trafficked areas. This concern is exacerbated by medium- and heavy-duty truck activity integral for goods movement throughout the City. These vehicles often utilize the same transportation pathways as other transit methods, further contributing to greater air emissions. Encouraging the use of alternative-fuel vehicles for both public transit and goods movement circulation through and across these roadways can greatly reduce GHG emissions and criteria pollutants, such as nitrous oxides (NOx) and particulate matter (PM), that contribute to ground level ozone and degrade public air quality.

SoCalGas applauds the City for its stated goal of increasing the use of alternative-fuel vehicles, such as micro-mobility devices and neighborhood electric vehicles, to reduce harmful emissions. While these vehicles are important, so too is the need for alternative-fuel heavy-duty trucks and buses. Therefore, SoCalGas recommends expanding the types of alternative-fuel vehicles referenced in the Mobility Element to include compressed natural gas (“CNG”) buses (including CNG buses fueled by RNG) and heavy-duty trucks that surpass the EPA’s air quality and GHG standards, due to their greater potential to improve air quality and reduce GHG emissions in heavily trafficked regions. The General Plan Update should also contemplate the extent to which hydrogen fuel cell vehicles are another viable option for reducing air emissions and hold great potential for the heavy-duty sector.<sup>3</sup>

**Environmental Justice Element: Enhancing Future Resilience**

B-4 SoCalGas appreciates the City’s recognition of the need for resilience and commitment to environmental justice principles, particularly in light of climate change. As stated in the Environmental Justice Element of the General Plan Update, “Climate change will also bring unprecedented challenges to the City, forcing El Centro to adapt its public facilities to the changing needs and circumstances. Rising temperatures, more forceful weather events, and the possibility of increased pollution impacts from Mexico may all contribute to future public facility needs. As El Centro

<sup>2</sup> General Plan Update, Mobility Element, Public Draft Review at 7.

<sup>3</sup> Road Map to a US Hydrogen Economy, Executive Summary, at 5, October 2020, available at [Road+map+to+a+US+hydrogen+economy+Exec+Sum+Web+Final.pdf \(squarepace.com\)](https://www.squarepace.com/roadmap-to-a-us-hydrogen-economy-exec-sum-web-final.pdf)

**B-3** The City appreciates this comment and SoCalGas’ mutual commitment to supporting clean transportation. The City concurs with the increase in use of alternative-fuel vehicles will reduce harmful emissions. As discussed in the PEIR, Section 3.5, Greenhouse Gas Emissions, Table 3.5-5, 2017 Scoping Plan Minimization Measure Compliance, identifies where recommended GHG minimization measures have been incorporated into the proposed project. Some measures recommended in 2017 Scoping Plan Appendix B cannot be implemented by the City, such as requirements for transit fleet vehicles (alternative-fuel heavy trucks and buses) and are not applicable to the proposed project. The City would like to note Table 3.5-5, 2017 Scoping Plan Minimization Measure Compliance, does include a policy to “streamline local permitting and siting for hydrogen fueling and electric vehicle (EV) charging infrastructure.”

**B-4** The City appreciates this comment and SoCalGas’ mutual commitment to environmental justice and the need for resilience and commitment to “environmental justice issues in light of climate change.” The City concurs with SoCalGas that energy system vulnerability significantly impacts local energy resilience; however, the policies recommended in the comment are more appropriately incorporated into the Public Facilities Element and/or the Conservation/Open Space Element. The City will ensure



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looks ahead, it must coordinate across jurisdictions and identify the redundancies or modifications to public facilities that may be required to ensure future resilience.”<sup>4</sup> [emphasis added]

Experts agree that buildings with both natural gas and electric service are more resilient to extreme weather events and disasters. With recent and increasing wildfires, regional heatwaves, rolling blackouts and de-energization events (known as “Public Safety Power Shutoffs”), energy system vulnerability significantly impacts local resilience. In the past year, power was preemptively shut off to hundreds of thousands of buildings during extreme heat days. Overreliance on a single energy system compounds these impacts, and not only can leave thousands of people without power, but also impact operations of critical facilities and sensitive populations.

B-4  
cont.

The inherent resilience of the gas system to climate impacts can significantly benefit local and regional energy reliability. This is highlighted in the Governor’s Office of Emergency Services recently released *Adaptation Planning Guide*, which includes a strategy to “expand redundancy in the energy network” and highlights, “in the future, emerging power-to-gas technologies and local sources of renewable natural gas may also enhance local energy resilience.”<sup>5</sup> The importance of resiliency has been observed nationwide during a multitude of climate events, where redundant energy systems enabled critical municipal services and facilities, such as buses, hospitals, and emergency response facilities, to operate and support public health and safety during climate events. In addition, existing research and data show that leveraging the gas system in tandem with the electric system can more effectively decarbonize local energy supplies while enhancing local energy resilience.<sup>6</sup>

As such, SoCalGas recommends including language in the General Plan Update that recognizes the inherent value of the leveraging the gas system in tandem with the electric system to help ensure system reliability and resilience.

**Environmental Justice Element: Mitigating Waste Impact Through Beneficial Uses**

B-5

SoCalGas also has a recommendation to help mitigate impacts from waste facilities. According to the “Reduce Pollution Exposure” section of the Environmental Justice Element, “...state data shows that communities in El Centro are disproportionately affected by proximity to solid waste facilities.”<sup>7</sup> Municipal solid waste landfills in the United States accounted for approximately 15.1 percent of methane emissions in 2018. That’s nearly equivalent to the GHG emissions from more than 20.6 million passenger vehicles driven for one year, or the carbon dioxide emissions from more than 11.0 million homes’ energy use for one year.<sup>8</sup> In California, about 20 percent of methane emissions come from landfills.<sup>9</sup>

Methane emissions from municipal solid waste landfills represent an opportunity to capture and put these emissions to beneficial use as RNG, a carbon-negative energy resource. As such, SoCalGas suggests that the General Plan Update include language regarding the potential of RNG as a waste management strategy to recover methane produced from

<sup>4</sup> General Plan Update, Mobility Element, Public Draft Review, at 10 (emphasis added).

<sup>5</sup> Governor’s Office of Emergency Services, *Adaptation Planning Guide*, available at <https://www.caloes.ca.gov/cal-oes-divisions/hazard-mitigation/hazard-mitigation-planning/california-climate-adaptation>

<sup>6</sup> Lawrence Livermore National Laboratory, “Getting to Neutral,” August 2020, available at [https://www.llnl.gov/content/assets/docs/Energy/Getting\\_to\\_Neutral.pdf](https://www.llnl.gov/content/assets/docs/Energy/Getting_to_Neutral.pdf); see also ICF, “Case Studies of Natural Gas Sector Resilience,” October 2019, available at <https://www.socalgas.com/1443742022576/SoCalGas-Case-Studies.pdf>

<sup>7</sup> General Plan Update, Environmental Justice Element, Public Draft Review at 7.

<sup>8</sup> Basic Information about Landfill Gas, I Landfill Methane Outreach Program (LMOP) | US EPA  
<sup>9</sup> <https://ww2.arb.ca.gov/our-work/programs/landfill-methane-regulation/about>

consistency between each of Elements at the time of the update. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR. Therefore, no further response is required.

**B-5**

The City appreciates this comment and SoCalGas’ recommendation to help mitigate impacts from waste facilities. The City concurs with SoCalGas that methane emissions from landfills represent an opportunity to capture emissions to put to beneficial uses; however, the policies recommended in the comment are more appropriately incorporated into the Public Facilities Element and/or the Conservation/Open Space Element. The City will ensure consistency between each of Elements at the time of the update. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the Draft PEIR. Therefore, no further response is required.



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B-5 | landfills, rather than flaring the gas. This strategy could similarly be applied to the agricultural sector, putting organic  
cont. farm waste to beneficial use, rather than allowing it to decompose and emit GHGs.

**Conclusion**

B-6

We appreciate El Centro's leadership as an environmentally progressive municipality and support the City's efforts to identify policies and programs that mitigate the impacts of climate change and improve air quality. As a trusted long-term energy provider in El Centro, we look forward to continuing to work with the City to achieve those goals. We are committed to replacing increasing amounts of our natural gas supplies with clean and decarbonized molecules, including RNG, which will enable customers to replace some or all of their natural gas use with renewable gas, and providing rebates and incentives to encourage customers to reduce their energy use.

We hope the information we are providing you will help achieve the goals outlined in the City's Draft EIR and General Plan Update. Thank you for the opportunity to comment on this important policy issue.

Sincerely,

*Deborah McGarrey*

Deborah McGarrey  
SoCalGas, Public Affairs Manager

Cc: Steve Pangariotias, SoCalGas, Policy and Strategy Manager

**B-6** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the Draft PEIR. Therefore, no further response is required.

Mitigation Monitoring and Reporting Program for the EI Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
Agriculture and Forestry Resources									
AG-1	Project-Specific Agricultural Study. If the City of EI Centro's Planning Director determines that the project site contains viable farmland warranting further assessment, a project-specific Agricultural Study shall be required. As a part of the discretionary review of subsequent projects proposed under the General Plan Update with Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance, applicants shall be required to demonstrate that the project would not convert agricultural resources that meet the Prime Farmland and Farmland of Statewide Importance soil criteria, as defined by the Farmland Mapping and Monitoring Program, to a non-agricultural use by undergoing project-level analysis pursuant to the State Land Evaluation and Site Assessment model, to submit an Agricultural Study to determine the importance, and to apply mitigation (if required) of said agricultural resources.	City Community Development	X			City			
Air Quality									
AIR-1	Site-Specific Air Quality Analysis and Construction Best Management Practices. Before the issuance of a grading or construction permit, the project applicant shall submit to the City of EI Centro Community Development Department documentation showing that the proposed project is below the project size that would potentially exceed the Imperial County Air Pollution Control District's significance thresholds based on the screening criteria established in Table 2 of the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook Screening Criteria for Project Air Quality Impacts. If the project would exceed the screening criteria, a project-specific Air Quality Analysis quantifying the potential air emissions of project construction shall be prepared by a qualified air quality professional. This Air Quality Analysis shall demonstrate that criteria pollutant emissions are below the Imperial County Air Pollution Control District thresholds for construction. If the Air Quality Analysis cannot demonstrate that the project is below the Imperial County Air Pollution Control District thresholds before mitigation, the project applicant shall implement the following measures in accordance with the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook performance criteria as applicable and to the extent necessary to reduce emissions to below Imperial County Air Pollution Control District thresholds: <ul style="list-style-type: none"> <li>• Water exposed soil with adequate frequency for continued moist soil</li> <li>• Replace ground cover in disturbed areas as quickly as possible</li> <li>• Install an automatic sprinkler system on all soil piles</li> <li>• Limit vehicle speed for all construction vehicles to 15 miles per hour on any unpaved surface at the construction site</li> </ul>	City Community Development	X	X		City, Construction Contractor			

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Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
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	<ul style="list-style-type: none"> <li>Develop a Trip Reduction Plan to achieve a 1.5 average vehicle ridership for construction employees</li> <li>Implement a shuttle service to and from retail services and food establishments during lunch hours</li> <li>Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing construction activity during the peak hour of vehicular traffic on adjacent roadways</li> <li>Implement activity management (e.g., rescheduling activities to reduce short-term impacts)</li> </ul> <p>The project applicant shall provide documentation to the City of EI Centro detailing the measures that would be implemented and that mitigated emissions would be below Imperial County Air Pollution Control District thresholds. Measures shall be included in project construction documents, and contractors and subcontractors shall implement the applicable Imperial County Air Pollution Control District measures.</p>								
AIR-2	Operational Performance Criteria. Before the issuance of a grading or construction permit for future project sites, the project applicant shall submit to the City of EI Centro documentation showing that the proposed project is below the project size that would potentially exceed the Imperial County Air Pollution Control District significance thresholds for Tier 1 projects based on the screening criteria established in Table 2 of the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook Screening Criteria for Project Air Quality Impacts. If the project would exceed the screening criteria, the project applicant shall demonstrate to the satisfaction of the City of EI Centro Community Development Department that the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook performance criteria for residential, commercial, and industrial projects have been incorporated into the site-specific entitlements issued for the project as applicable and to the extent necessary to reduce project impacts to below Imperial County Air Pollution Control District significance thresholds. The performance criteria measures can be found in the most recent version of the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook.	City Community Development	X			City, Project Applicant			
AIR-3	Carbon Dioxide Hotspot Analysis. A Carbon Dioxide Hotspot Analysis shall be prepared by a qualified air quality professional for future projects that propose a new sensitive receptor within 500 feet of the intersections of Imperial Avenue and Ocotillo Drive or Imperial Avenue and the Interstate 8 westbound ramps or would significantly increase traffic volumes at either intersection. The Carbon Dioxide Hotspot Analysis shall perform screening for potential impacts based on the California Department of Transportation's 2010 Transportation Project-Level Carbon Monoxide Protocol. If the potential for a hotspot is identified, the Carbon Dioxide Hotspot Analysis shall require modeling using CALINE4 or other appropriate model to demonstrate that an	City Community Development	X			City, Quality Air Quality Professional			

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Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
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	impact would not occur. The project applicant shall be required to submit results to the City of El Centro and implement improvements, such as intersection improvements or revised site design, as necessary to demonstrate that the project would not impact sensitive receptors.								
AIR-4	Health Risk Assessment. A Health Risk Assessment shall be prepared by a qualified air quality professional for future projects that would generate toxic air contaminants (such as diesel particulate matter) in the General Plan Update planning area or that would locate a new sensitive receptor within the applicable screening level distance identified in the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook. A project shall not be considered for approval until a Health Risk Assessment has been completed and approved by the Imperial County Air Pollution Control District. The methodology for the Health Risk Assessment shall follow the Office of Environmental Health Hazard Assessment guidelines for the preparation of Health Risk Assessments. If a potentially significant health risk is identified, the Health Risk Assessment shall identify appropriate measures, such as upgrading building ventilation systems, to reduce the potential health risk to below a significant level, or the sensitive receptor or proposed facility shall be sited in another location.	City Community Development	X			City, Air Quality Professional			
AIR-5	Odor Source Review. The Imperial County Air Pollution Control District shall be contacted by the project applicant for information regarding potential odor problems related to future projects that propose a new odor source within the screening level distance for existing receptors for the type of operation specified in the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook. For future projects that involve new receptors located near an existing odor source, a public information request shall be submitted to the Imperial County Air Pollution Control District for a review of any existing odor complaints at the nearest odor-emitting facility. Odor reduction measures recommended by the Imperial County Air Pollution Control District shall be implemented as applicable.	City Community Development	X			City, Project Applicant			
Biological Resources									
BIO-1	Qualified Biologist. Before the start of construction, the project proponent shall submit written documentation to the City of El Centro for approval, stating that a qualified biologist has been retained to implement the project mitigation measures in areas designated as biologically sensitive during implementation of Mitigation Measure BIO-4. The qualified biologist shall be responsible for implementing project mitigation measures, coordinating and communicating requirements to the project proponents and the City of El Centro, and facilitating consultation with the wildlife and resource agencies as required.	City Community Development	X			City, Qualified Biologist			
BIO-2	Contractor Training Program. If sensitive biological resources are known to occur in or adjacent to the planning area, a project-specific contractor training program shall be developed and implemented to	City Community Development, Qualified Biologist	X	X		City, Construction Contractor			

Mitigation Monitoring and Reporting Program for the EI Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
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	educate contractors about the sensitive biological resources on and adjacent to the planning area and the measures being implemented to avoid or minimize impacts to these resources. A qualified biologist shall develop and implement the contractor training program.								
BIO-3	Flagging, Fencing, and Demarcation. The project proponent, in consultation with the qualified biologist, shall designate the limits of the construction area, where accessible, in the City of EI Centro rights-of-way using fencing, signage, or stakes in the field and shall review the placement of fencing, signage, or stakes with the contractors in accordance with the construction plans. Aquatic resources within 50 feet of the construction area, where accessible and feasible, shall also be demarcated in the field and avoided by construction personnel and activity.	City Community Development, Qualified Biologist	X			City, Qualified Biologist, Construction Contractor			
BIO-4	<p>BIO-4: Biological Resources Survey/Habitat Assessment. For projects proposed in the planning area on undeveloped land, a site-specific biological resources survey shall be conducted during the project design phase. The biological resources survey shall be conducted by a qualified biologist and shall include but not be limited to the following:</p> <ul style="list-style-type: none"> <li>• An analysis of available literature and biological databases, such as the California Natural Diversity Database, to determine sensitive biological resources that have been reported historically from the proposed project vicinity.</li> <li>• A review of current land use and land ownership within the project vicinity.</li> <li>• An assessment and mapping of vegetation communities present within the project vicinity. If vegetation community mapping has not been conducted on the site in the previous 3 years, updated vegetation mapping shall be conducted by a qualified biologist as part of the project planning and environmental review process. Vegetation communities shall be mapped according to the Manual of California Vegetation at the alliance level, and a crosswalk table with Holland vegetation communities shall be provided.</li> <li>• A general assessment of the potential for aquatic resources, including wetlands and riparian habitats, to occur on site.</li> <li>• An evaluation of potential local and regional wildlife movement corridors.</li> <li>• If the planning area supports vegetation communities that may provide habitat for plant or wildlife species, a focused habitat assessment conducted by a qualified biologist to determine the potential for sensitive plant or wildlife species to occur in or adjacent to the planning area.</li> <li>• If the planning area supports sensitive vegetation communities, the project proponent shall implement the following weed control methods to minimize the establishment and spread of non-native and invasive weed species in the planning area during construction activities:</li> </ul>	City Community Development, Qualified Biologist	X			City, Construction Contractor, Qualified Biologist			

Mitigation Monitoring and Reporting Program for the El Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
	<ul style="list-style-type: none"> <li>– Seeds and plant materials used for revegetation shall be certified weed free.</li> <li>– Straw materials, such as those used for erosion control, shall be certified weed free.</li> <li>– If sensitive non-native grassland vegetation is identified during the biological resources survey, temporarily disturbed non-native grassland areas shall be revegetated with local native plant species as soon as construction is complete to reduce erosion and to inhibit the establishment of non-native and invasive weeds.</li> </ul> <p>The results of the biological survey shall be presented in a biological survey letter report.</p>								
BIO-5	<p>Sensitive Plant Species Surveys. If one or more sensitive plant species has the potential to occur, focused species surveys shall be conducted before construction to determine the presence and absence of these species to adequately evaluate potential direct or indirect impacts to these species.</p> <p>Sensitive plant species surveys shall be conducted by a qualified biologist retained by the City of El Centro during the appropriate season to detect species as part of the project design phase. Surveys shall be floristic in nature and include lists of the plants identified in the survey area. Surveys shall be conducted on foot, employing a level of effort sufficient to provide comprehensive coverage. The locations and prevalence (estimated total numbers and percent cover, as applicable) of sensitive plants shall be recorded. The sensitive plant species surveys shall be valid for 3 years.</p> <p>If site-specific surveys are not required because a survey was conducted within the last 3 years, impact assessment and minimization and mitigation requirements shall be based on the most recent available survey. These requirements shall also include an analysis of the potential for sensitive plant species to occur on site based on existing site conditions and shall be consistent with the most recent U.S. Fish and Wildlife Service and California Department of Fish and Wildlife survey protocols.</p> <p>If sensitive plant species are observed, they shall be avoided if possible. If species cannot be avoided, impacts shall be mitigated through conservation of habitat that supports the impacted species in accordance with Mitigation Measures BIO-1 through BIO-3.</p>	City Community Development	X			City, Construction Contractor, Qualified Biologist			
BIO-6	<p>Burrowing Owl Surveys. A burrowing owl clearance survey shall be conducted before any ground-disturbing activities in accordance with the California Department of Fish and Wildlife 2012 Staff Report on Burrowing Owl Mitigation. Two preconstruction clearance surveys shall be conducted 14–30 days and 24 hours before ground-disturbing activities to document the continued absence of burrowing owl from the planning area. The burrowing owl surveys shall be valid for 1 year.</p>	City Community Development	X			City, Qualified Biologist			

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Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
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BIO-7	Preconstruction Nesting Bird Surveys. To the extent feasible, grubbing, trimming, or clearing of vegetation from the planning area shall not occur during the general bird nesting season (January 15 through September 15). If grubbing, trimming, or clearing of vegetation cannot feasibly occur outside the general bird nesting season, a qualified biologist shall perform a preconstruction nesting bird survey in the areas in the planning area with vegetation supporting nesting birds. Nesting bird surveys shall occur within 10 days before the start of vegetation clearing or grubbing to determine if active bird nests are present. If no active bird nests are identified in the planning area or within a 300-foot buffer of the planning area, no further mitigation is necessary. If active nests of bird species covered by the Migratory Bird Treaty Act are detected in the planning area during the 10-day preconstruction survey, construction activities shall stay outside a 300-foot buffer around the active nest. For raptor species, this buffer shall be expanded to 500 feet. It is recommended that a biological monitor be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by construction activity. Once the young have fledged and a qualified biologist has determined the nest is inactive, normal construction activities can occur.	City Community Development	X			City, Qualified Biologist			
BIO-8	Night Lighting. If temporary night lighting is necessary during construction adjacent to sensitive vegetation communities, construction contractors shall ensure lights are directed away from sensitive vegetation communities and shielded to minimize temporary lighting of the surrounding habitat and should be of the lowest illumination necessary for human safety.	City Community Development		X		City, Construction Contractor			
BIO-9	Permanent Impacts to Non-Native Grassland. Permanent impacts to sensitive non-native grassland shall be mitigated through the preservation of habitat, habitat creation, or enhancement, or a combination thereof, in the City of El Centro or off site through habitat acquisition and preservation or purchase of credits from an approved conservation bank. Mitigation for impacts to non-native grassland shall be in-kind using native grasses. Permanent impacts to sensitive non-native grassland shall be mitigated at a ratio of 1:1. For on-site mitigation, a detailed Mitigation Plan shall be prepared before the start of construction (not applicable to mitigation met through the purchase of credits from an approved wetland mitigation bank). The Mitigation Plan shall include at a minimum the proposed location of the mitigation areas, site preparation, a plant palette, installation procedures, success criteria, fencing and signage, monitoring requirements, and other details of the habitat restoration effort and shall be prepared by a qualified biologist.	City Community Development	X			City, Qualified Biologist			
BIO-10	Temporary Impacts to Non-Native Grassland. Temporary impacts to non-native grassland shall be restored in place or elsewhere in the planning area at a 1:1 replacement ratio using native grass species.	City Community Development		X		City, Construction Contractor			

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Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
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	A Revegetation Plan shall be prepared. The Revegetation Plan shall include site preparation specifications, a plant palette, installation procedures, development of reasonable success criteria, appropriate monitoring and reporting protocols, implementation timelines, and contingency measures in the event of restoration failure. The City of El Centro shall provide guidance for and oversight of the Revegetation Plan and implementation. In the event that non-native grassland vegetation cannot be restored in place or elsewhere in the planning area after construction, these impacts shall be considered permanent, and Mitigation Measure BIO-9 shall be implemented.								
BIO-11	Aquatic Resources Delineation. If sensitive aquatic resources are identified on construction sites, a qualified biologist shall conduct an aquatic resources delineation following the methods outlined in the 1987 U.S. Army Corps of Engineers Wetland Delineation Manual and the Regional Supplement to the U.S. Army Corps of Engineers Wetland Delineation Manual: Arid West Region to map the extent of wetlands and non-wetland waters, determine jurisdiction, and assess potential impacts. The results of the delineation shall be presented in an Aquatic Resources Delineation Report and shall be incorporated into the California Environmental Quality Act documents required for approval and permitting of the proposed project.	City Community Development	X			City, Qualified Biologist			
BIO-12	Aquatic Resources Permitting. If the project would impact sensitive aquatic resources, permits and authorizations shall be obtained from the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board. The regulatory agency authorizations would include impact avoidance and minimization measures and mitigation measures for unavoidable impacts. Specific avoidance and minimization measures and mitigation measures for impacts to jurisdictional resources shall be determined through discussions with the regulatory agencies during the proposed project permitting process and may include monetary contributions to a mitigation bank or habitat creation, restoration, or enhancement.	City Community Development	X			City, Qualified Biologist			
Cultural and Tribal Cultural Resources									
CUL-1	Identification and Evaluation of Built Environment Resources. Future development projects may need to prepare an evaluation of built environment resources if built environment resources that meet the age threshold for eligibility are located on the project site. If needed, the resource shall be evaluated in accordance with the California Office of Historic Preservation guidelines in order to identify any previously unrecorded potential historical resources that may be potentially affected by the proposed project. Pursuant to the definition of a historical resource under the California Environmental Quality Act, potential historical resources shall be evaluated under a developed historical context.	City Community Development	X			City, Qualified Architectural Historian			

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Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
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CUL-2	Historical Structure Report. If avoidance or preservation in place of a built environment resource is not possible then appropriate site-specific mitigation measures shall be established and undertaken. To ensure that projects requiring the relocation, rehabilitation, or alteration of a historical resource <b>not impair its significance, the Secretary of the Interior's</b> Standards for the Treatments of Historic Properties shall be used to the maximum extent possible. The application of the standards shall be overseen by a qualified architectural historian <b>or historic architect meeting the Secretary of the Interior's</b> Professional Qualified Standards. Prior to any construction activities that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the City.	City Community Development	X			City, Qualified Architectural Historian			
CUL-3	Historical Recordation. If a proposed project would result in the demolition or significant alteration of a historical resource, recordation of the resource prior to construction activities would be required. Recordation shall take the form of Historic American Buildings Survey, Historic American Engineering Record, or Historic American Landscape Survey documentation and shall be performed by an architectural historian or historian who <b>meets the Secretary of the Interior's Professional Qualified</b> Standards. Documentation shall include an architectural and historical narrative, photographs, and supplementary information, such as building plans and elevations, and/or historical photographs. Documentation shall be reproduced on archival paper and placed in appropriate local, state, or federal institutions. The specific scope and details of documentation would be developed at the project level.	City Community Development	X			City, Qualified Architectural Historian			
CUL-4	Site-Specific Cultural Resources Study and Evaluation of Resources. Future development projects shall prepare a cultural resources assessment under the supervision of an archaeologist <b>who meets the Secretary of the Interior's Professional Qualified</b> Standards. Assessments shall include a California Historical Resources Inventory System records search at the South Coastal Information Center and a search of the Sacred Lands File maintained by the Native American Heritage Commission. A Phase I pedestrian survey shall be undertaken in areas that are undeveloped to locate any surface cultural materials. If resources are identified during the site-specific archaeological survey, a Phase II evaluation of the resources to the California Register of Historical Resources should be conducted to determine if the resource is significant under the California Environmental Quality Act and would be adversely impacted by the project. A Native American monitor from a culturally affiliated tribe should be present during any archaeological excavations involving prehistoric cultural resources. The evaluation of built environment resources shall be performed by an architectural historian or historian who meets the Secretary of the Interior Professional Qualified Standards in architectural history or history. If no significant resources are found, and site conditions	City Community Development	X	X		City, Qualified Archaeologist			

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	<p>are such that there is no potential for further discoveries, then no further action is required. All resources should be documented on the appropriate California Department of Parks and Recreation site forms, and results of all assessments should be documented in a technical report.</p> <p>If potentially significant archaeological resources are identified during the Phase I or Phase II assessments, and impacts to these resources cannot be avoided, as described in Mitigation Measure CUL-5, then appropriate site-specific mitigation measures shall be established and undertaken. These might include a Phase III Data Recovery Program that would be implemented by a qualified archaeologist and shall be performed in accordance with the California Office of Historic Preservation's Archaeological Resource Management Reports: Recommended Contents and Format (1990) and Guidelines for Archaeological Research Designs (1991).</p> <p>If no significant resources are found, but if there is a potential for unknown archaeological resources or tribal cultural resources to be uncovered during specific project activities, then Mitigation Measure CUL-6, an archaeological and Native American monitoring program, is recommended.</p>								
CUL-5	<p>Avoidance and Preservation of Cultural Resources. The preferred alternative for mitigating impacts to cultural resources and tribal cultural resources is avoidance or preservation in place. If avoidance or preservation is demonstrated to be infeasible, then alternative measures would be required. Avoidance of cultural resources and tribal cultural resources can be accomplished through a project redesign. Preservation in place can include planning construction to avoid significant resources; planning parks, green space, or other open space to <b>preserve cultural resources; or "capping" or covering</b> archaeological sites with a layer of soil before building.</p>	City Community Development	X			City, Qualified Archaeologist			
CUL-6	<p>Archaeological and Native American Monitoring Program. There is always a potential for encountering cultural resources during excavation; therefore, the creation of an archaeological and Native American monitoring program is recommended for future development that will conduct new ground disturbance in areas identified as having a potential for unknown archaeological resources or tribal cultural resources. The archaeological and Native American monitoring program shall consist of the full-time presence of a qualified archaeologist and traditionally and culturally affiliated Native American monitor during ground-disturbing activities. The archaeological and Native American monitoring program should include the following:</p> <ol style="list-style-type: none"> <li>1. The requirement for the archaeological and Native American monitoring should be noted on applicable construction documents, including plans.</li> <li>2. The archaeologist and Native American monitor should attend the preconstruction meeting with the contractor and/or the City.</li> </ol>	City Community Development	X	X		City, Qualified Archaeologist, Native American Monitor			

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	<p>3. The archaeologist shall maintain ongoing collaborative consultation with the Native American monitor during all ground-disturbing or altering activities, as identified above.</p> <p>4. The archaeologist and/or Native American monitor may halt ground-disturbing activities if archaeological artifact deposits or cultural features are discovered. In general, ground-disturbing activities shall be directed away from these deposits for a short time to allow a determination of potential significance, the subject of which shall be determined by the archaeologist and the Native American monitor. Ground-disturbing activities shall not resume until the archaeologist, in consultation with the Native American monitor and the City, deems the cultural resource or feature has been appropriately documented and/or protected.</p> <p>5. Archaeological isolates and non-significant materials shall be minimally documented in the field, and ground disturbance shall be allowed to resume.</p> <p>6. The avoidance and protection of discovered unknown and significant cultural resources and/or unique archaeological resources is the preferable mitigation for the proposed project. If avoidance is not feasible, a Data Recovery Plan may be authorized by the City of EI Centro as the lead agency under the California Environmental Quality Act.</p> <p>7. Prior to the completion of any projects a Monitoring Report and/or Evaluation Report, which describes the results, the analysis and conclusions of the archaeological and Native American monitoring program (such as but not limited to a Data Recovery Program) shall be submitted by the <b>archaeologist, along with the Native American monitor's notes and comments</b>, to the City of EI Centro for approval.</p>								
CUL-7	<p>Identification and Treatment of Human Remains. In the event that human remains or possible human remains are encountered, all ground disturbance within 100 feet of the remains shall halt and the California Environmental Quality Act Guidelines, Section 15064.5, subdivision (e); California Public Resource Code, Section 5097.98; and California Health and Safety Code, Section 7050.5, should be followed, including informing the County Medical Examiner and City of EI Centro. If human remains are determined to be of Native American origin, the applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the Native American Heritage Commission (California Public Resources Code, Section 5097). The County Medical Examiner shall contact the Native American Heritage Commission to determine the most likely descendant. The most likely descendant shall inspect the site as needed and make recommendations or preferences for treatment of the remains within 48 hours of being granted access to the site. The disposition of the remains shall be overseen by the most likely descendant to determine the most appropriate means of treating the human remains and any associated grave artifacts. The</p>	City Community Development		X	X	City, Construction Contractor, Qualified Archaeologist, Native American Monitor			

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	specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. If Native American remains are discovered, the remains shall be kept in situ (in place) or in a secure location as approved by the most likely descendant until the repatriation process can be completed. According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony.								
Greenhouse Gas Emissions									
GHG-1	GHG-1: City-Wide Sustainability Program. The City of EI Centro shall continue to participate in the preparation of the Imperial County Regional Climate Action Plan. It is assumed that the adopted Climate Action Plan will demonstrate how the City of EI Centro shall implement its fair share of greenhouse gas emissions reductions to achieve statewide emissions reduction goals. The program shall include an inventory of existing community greenhouse gas emissions, establish greenhouse gas emissions reduction targets consistent with Senate Bill 32 and Executive Order S-03-05, and identify greenhouse gas emissions reduction measures to achieve reduction targets. In the event that the Imperial County Regional Climate Action Plan is not adopted, the City of EI Centro shall prepare a local Climate Action Plan or Sustainability Program that demonstrates reduction measures necessary at a local level to achieve reduction targets. Greenhouse gas emissions reduction measures may include but not be limited to the recommendations in Appendix B, Local Action, to the <b>California Air Resources Board California's 2017 Climate Change Scoping Plan</b> .	City Community Development	X			City			
GHG-2	Greenhouse Gas Reduction Features for Construction. Until the Imperial Valley Regional Climate Action Plan or City of EI Centro-wide Sustainability Program is in place, and before the issuance of a grading or construction permit, the project applicant shall submit to the City of EI Centro Community Development Department documentation showing that the proposed project is below the project size that would potentially exceed the Imperial <b>County Air Pollution Control District's significance thresholds</b> based on the screening criteria established in Table 2 of the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook Screening Criteria for Project Air Quality Impacts. If the project would exceed the screening criteria, a project-specific greenhouse gas emissions analysis shall be prepared that demonstrates implementation of the following greenhouse gas emissions reduction measures to the extent feasible during construction to minimize project greenhouse gas emissions. The following measures shall be included in project construction documents: <ul style="list-style-type: none"> <li>• Enforce idling time restrictions for construction vehicles</li> <li>• Require construction vehicles to operate with the highest tier engines commercially available</li> </ul>	City Community Development	X	X		City, Construction Contractor			

Mitigation Monitoring and Reporting Program for the EI Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
	<ul style="list-style-type: none"> <li>Divert and recycle construction and demolition waste and use locally sourced building materials with high recycled material content to the greatest extent feasible</li> <li>Minimize tree removal and mitigate indirect greenhouse gas emissions increases that occur due to vegetation removal, loss of sequestration, and soil disturbance</li> <li>Use existing grid power for electric energy rather than operating temporary gasoline- or diesel-powered generators</li> <li>Increase use of electric and renewable fuel-powered construction equipment and require renewable diesel fuel where commercially available</li> <li>Require diesel equipment fleets to be lower emitting than any current emission standard</li> </ul>								
GHG-3	<p>Greenhouse Gas Reduction Features for Individual Projects. Until the Imperial Valley Regional Climate Action Plan or City of EI Centro-wide Sustainability Program is in place, and before the issuance of a building permit, the project applicant shall submit to the City of EI Centro Community Development Department documentation showing that the proposed project is below the project size that would potentially exceed the Imperial County Air Pollution Control District's significance thresholds based on the screening criteria established in Table 2 of the Imperial County Air Pollution Control District California Environmental Quality Act Air Quality Handbook Screening Criteria for Project Air Quality Impacts. If the project would exceed the screening criteria, a project-specific greenhouse gas emissions analysis shall be prepared that demonstrates implementation of the following California Air Resources Board California's 2017 Climate Change Scoping Plan Key Sector Actions and Local Measures to the extent feasible to minimize ongoing annual project greenhouse gas emissions:</p> <ul style="list-style-type: none"> <li>Install solar panels to reduce energy demand from the Imperial Irrigation District</li> <li>Provide electric vehicle parking spaces and charging stations in new commercial and multi-family residential development</li> <li>For industrial projects that would be subject to Imperial County Air Pollution Control District Rule X (Air Toxic Control Measures) or Rule XI (New Source Performance Standards), install best available control technology to reduce greenhouse gas and toxic air contaminant emissions</li> <li>Dedicate on-site parking for shared vehicles</li> <li>Install cool roofs and "cool parking" that promotes cool surface treatment for new parking facilities and existing surface lots undergoing resurfacing</li> <li>Provide parking spaces for park and ride to incentivize carpooling, vanpooling, commuter bus, electric vehicles, and rail service use</li> </ul>	City Community Development		X	X	City, Project Applicant			

Mitigation Monitoring and Reporting Program for the El Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
	<ul style="list-style-type: none"> <li>• Install electrical outlets on the front and back exterior walls of residences to promote the use of electric landscape maintenance equipment</li> <li>• Design electrical outlets and/or wiring in new residential unit garages to promote electric vehicle use</li> <li>• Install energy-conserving appliances, such as on-demand tank-less water heaters and whole-house fans</li> <li>• Install energy-efficient air conditioning units and heating systems with programmable thermostats and timers</li> <li>• Install energy-efficient lighting for all street, parking, and area lighting</li> <li>• Design landscaping for parking lots to use tree cover, compost, and mulch</li> <li>• Incorporate water retention in the design of parking lots and landscaping, including using compost and mulch</li> </ul>								
Geological Stability									
Noise									
NOI-1	<p>Roadway Noise Measures. Before the approval of building permits, project applicants for future development projects proposed as a result of the General Plan Update with the potential to generate 700 average daily trips or greater shall be required to complete a site-specific Noise Technical Study to determine if the project would result in a significant increase in traffic noise. This Noise Technical Study shall be prepared by a qualified acoustical analyst.</p> <p>If a significant increase in vehicle noise level is identified as a result of project implementation, the project shall incorporate buffers or other noise reduction measures to the extent feasible to reduce noise levels at affected sensitive receptors to a normally acceptable noise level. Reduction measures that shall be considered include but are not limited to alternative road design, reduced speeds, alternative paving, building retrofits to provide additional noise attenuation, and setbacks or buffers before berms and walls. The noise reduction measures shall be designed by a qualified acoustical engineer. Where noise reduction measures in the public right-of-way are infeasible, the project applicant shall conduct outreach to potentially affected sensitive receptors to determine the feasibility of noise reduction measures on private property, including a noise barrier or building retrofits. Based on affected receptor response, a qualified acoustical engineer shall determine the feasibility of a noise barrier on private property and/or the extent of required building retrofits. The project applicant shall submit plans to the City of El Centro Community Development Department for review and approval before the start of any construction. These plans shall demonstrate that the proposed noise reduction measures would reduce traffic noise exposure at sensitive receptors to the extent feasible.</p>	City Community Development	X			City, Acoustical Engineer			

Mitigation Monitoring and Reporting Program for the El Centro General Plan Update

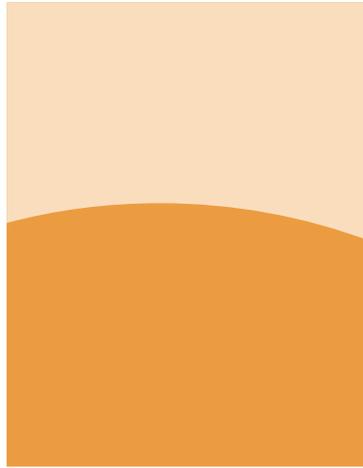
Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
NOI-2	Site-Specific Acoustic Analysis. Before the approval of building permits, for each development, project applicants shall submit an Acoustical Study prepared by a certified acoustical engineer. Should the results of the Acoustical Study indicate that that exterior noise levels would exceed the land use compatibility limits in the El Centro General Plan Noise Element of 60 A-weighted decibels community noise equivalent level exterior limit for sensitive receptors, the project applicant shall include design measures that may include acoustical paneling or walls to ensure that interior noise levels do not exceed the City of El Centro's interior noise standard of 45 decibels community noise equivalent level. If it is necessary for windows to be able to remain closed to ensure that interior noise levels meet the interior standard of 45 A-weighted decibels community noise equivalent level, the design for these residences shall include ventilation or an air conditioning system to provide a habitable interior environment with the windows closed. Final project design shall incorporate special design measures in the construction of the residential units.	City Community Development	X			City, Acoustical Engineer			
NOI-3	Vibration Best Management Practices. Before the start of construction activities that would involve use of a vibratory roller (or equivalent equipment) within 235 feet of a vibration-sensitive land use or within 110 feet of other land uses or the use of typical (not vibratory) construction equipment within 135 feet of a vibration-sensitive land use or within 65 feet of other land uses, the project applicant shall retain a qualified acoustician to demonstrate that vibration would not exceed the applicable Federal Transit Administration threshold (65 vibration dB for vibration-sensitive land uses of 75 vibration dB for other daytime land uses), or shall identify best management practices to be implemented by the construction contractor to reduce vibration levels to below the applicable threshold. The best management practices shall be included in project construction documents, including the Grading Plan and contract with the construction contractor. Practices may include but not be limited to the following: <ul style="list-style-type: none"> <li>• Use only properly maintained equipment with vibratory isolators</li> <li>• Operate equipment as far from sensitive receptors as possible</li> <li>• Use rubber-tired vehicles as opposed to tracked vehicles</li> </ul>	City Community Development	X	X		City, Construction Contractor			
Transportation									
TRA-1	Transportation Demand Management Measures. Future projects shall use Transportation Demand Management measures to reduce single-occupancy vehicles and to encourage alternative modes of transportation, such as biking, walking, or taking public transit. A list of potential Transportation Demand Management measures is provided below: <ul style="list-style-type: none"> <li>• Increase mixed-use development</li> <li>• Increase transit accessibility</li> <li>• Provide pedestrian network improvements along project frontage</li> <li>• Provide bicycle network improvements along project frontage</li> </ul>	City Community Development	X		X	City			

Mitigation Monitoring and Reporting Program for the El Centro General Plan Update

Mitigation Measure No.	Measure	Person(s) to Verify	Timing of Verification			Responsible Party	Completed		Completed
			Pre-Const.	During Const.	Post-Const.		Initials	Date	
	<ul style="list-style-type: none"> <li>• Implement a neighborhood electric vehicle network, if appropriate</li> <li>• Provide bicycle parking, bike lockers, personal lockers, and showers</li> <li>• Implement subsidized or discounted transit passes</li> <li>• Provide rider-sharing programs</li> <li>• Implement commuter trip reduction marketing</li> <li>• Implement a school car/van pool program</li> <li>• Implement a bike-sharing or micro-mobility program</li> <li>• Provide a local shuttle to connect visitors to different attractions throughout the City of El Centro</li> <li>• Provide additional Transportation Demand Management measures from the California Air Pollution Control Officers Association's Quantifying Greenhouse Gas Mitigation Measures document, as applicable (<a href="http://www.aqmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf">http://www.aqmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf</a>)</li> </ul>								

Notes: City = City of El Centro

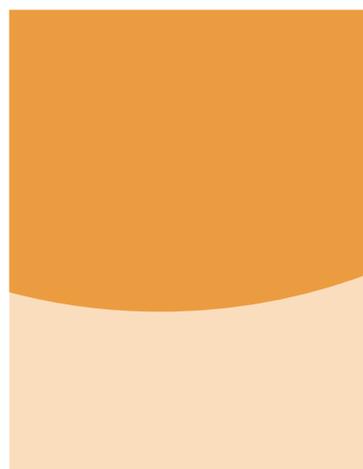
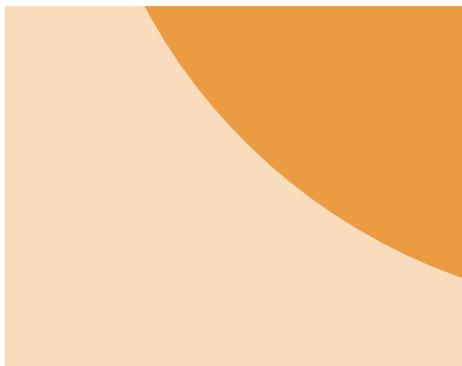
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# El Centro General Plan Update

Transportation Impact  
Study

May 2021  
~~March 2021~~



Prepared for



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El Centro, CA 92243

Prepared by



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- Appendix B Project Alternatives VMT Results

## 1.0 Introduction

### 1.1 Purpose of the Report

This Transportation Impact Study (TIS) serves to identify and document potential transportation impacts related to the City of El Centro General Plan Update proposed land uses and mobility networks (Proposed Project), its alternatives, and recommend improvements/mitigation measures, as appropriate.

The City of El Centro is in the southeastern portion of Imperial County (County), Southern California, 11 miles north of the United States-Mexico border. The City is the largest city in the Imperial Valley and 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 transportation corridor, which leads to north–south connectivity by way of State Route 86 in the City and State Route 111 east of the City.

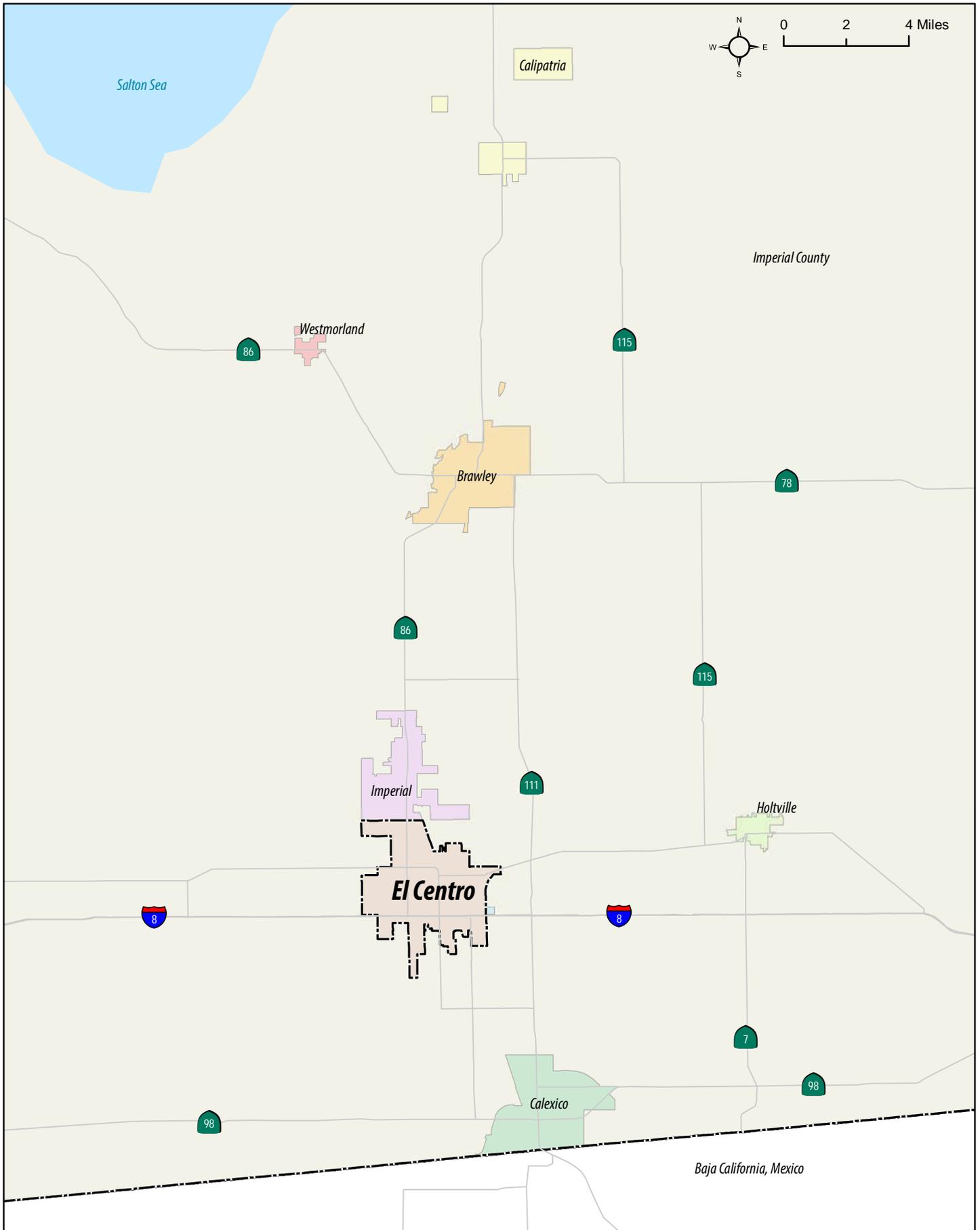
Figure 1.1 displays the City of El Centro location in the Imperial County Region.

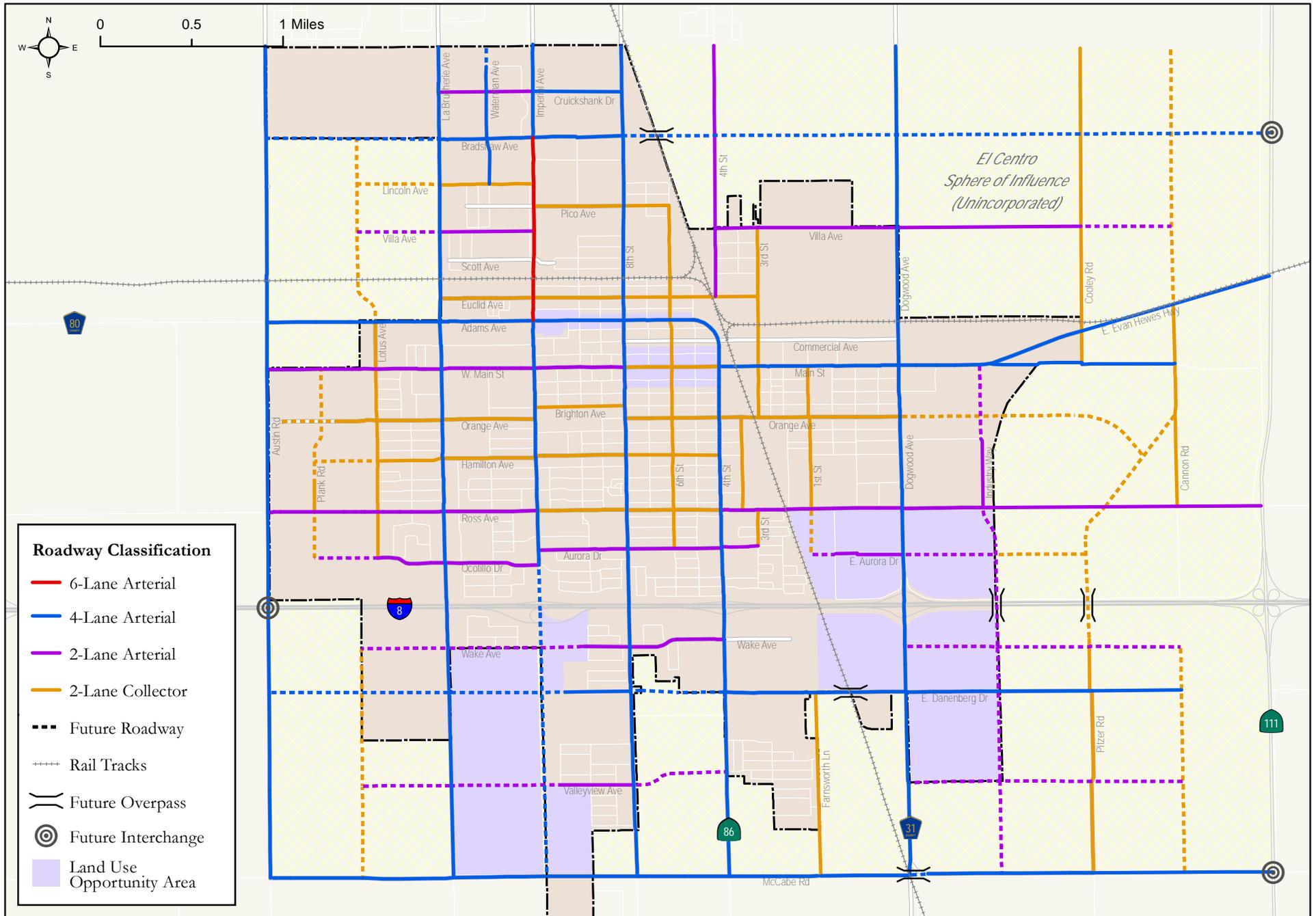
In December 2018, the California Resources Agency certified and adopted revised CEQA Guidelines, including new section 15064.3. Under the new section, vehicle miles traveled (VMT), which includes the amount and distance of automobile traffic attributable to a project, is identified as the “most appropriate measure of transportation impacts.” As of July 1, 2020, all CEQA lead agencies must analyze a project’s transportation impacts using VMT.

### 1.2 Study Scenarios

Four (4) study scenarios were evaluated, including base year (2014) and three (3) future year alternatives, as follows:

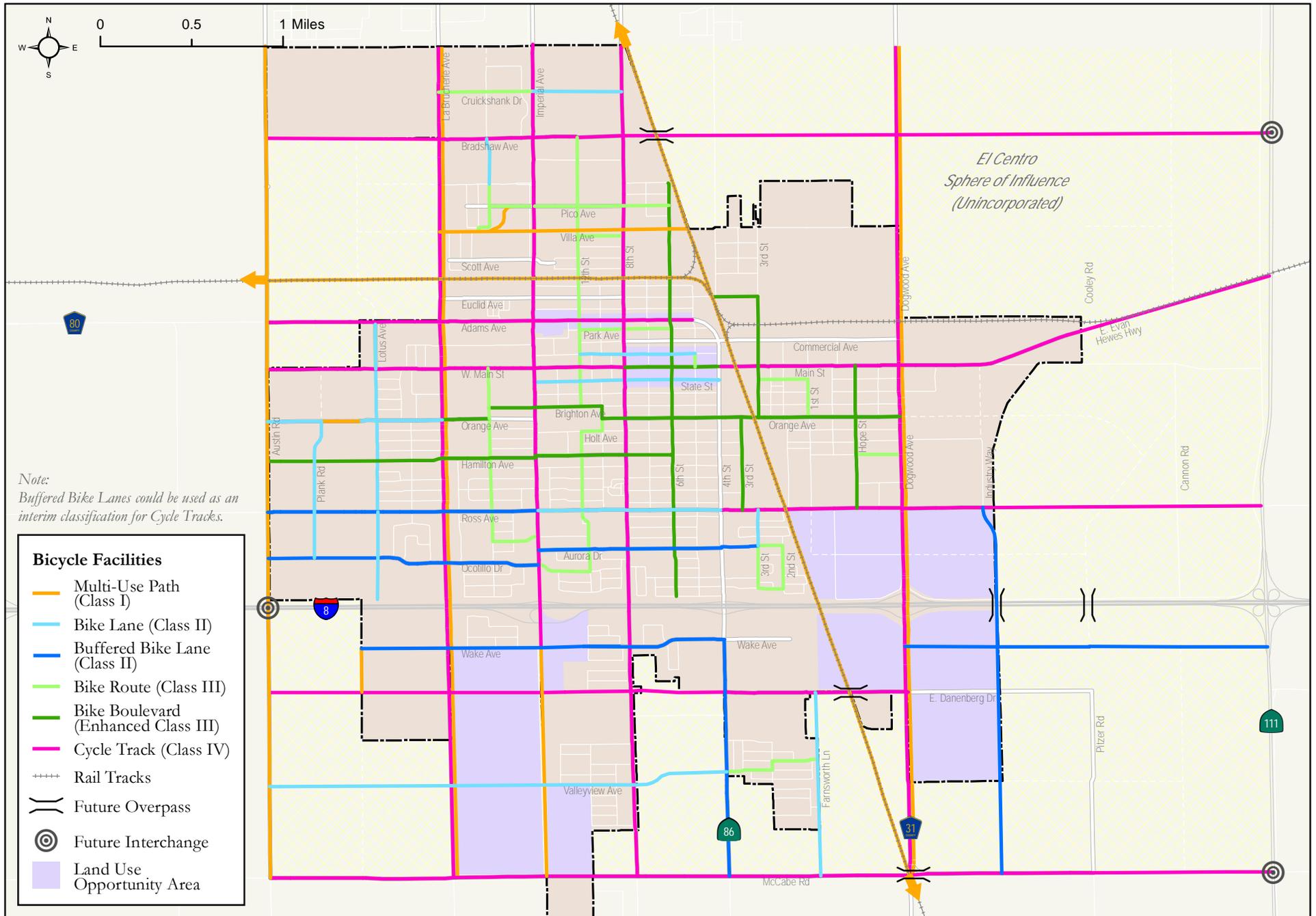
- **Base Year (2014)** – establishes the baseline VMT within the project study area (both the City of El Centro and its sphere of influence). The Imperial County Transportation Model (ICTM) Base Year (2014) was utilized as a starting-point and validated for the City of El Centro.
- **No Project (Adopted General Plan)** – represents buildout of the City of El Centro’s currently Adopted General Plan Land Use and Mobility Elements.
- **Alternative 1 (Proposed Project)** – represents buildout of the Proposed Project’s land uses and mobility network, which were developed in collaboration with community members, City staff, and the project consultant team. The center piece of this Land Use Element consists of five Opportunity Areas where the City wants or anticipates land use change or growth to occur during the planning period (see LUE Figure 3 of the General Plan Update). A summary of the proposed land uses is provided in Chapter 2 of this report, while the mobility network recommendations are provided in **Figures 1.2 and 1.3**. Figure 1.3 displays the proposed roadway network and Figure 1.3 illustrates the proposed bicycle network.





**El Centro General Plan Update  
Transportation Impact Study**

*Figure 1.2  
Proposed Roadway Network*



- **Alternative 2** – represents a more typical traditional suburban land use pattern, with an emphasis on the separation of land uses as opposed to the proposed project, which emphasizes mixed-use and village-oriented development patterns that support multimodal transportation options. It was chosen to analyze the continuation of traditional growth patterns for the City and its Sphere of Influence (SOI). The Traditional Land Use Alternative would result in 967 fewer overall residential units and would reduce the amount of non-residential space by 372,000 square feet, compared to the proposed project.

All study scenarios were modeled using the validated Imperial County Transportation Model (ICTM). This model was developed by Caltrans District 11 in coordination with Southern California Association of Governments (SCAG) in 2018. As part of this General Plan Update effort, the project team developed a El Centro-focused subarea model by updating the ICTM with accurate El Centro information, including roadway network and socioeconomic data for the various alternatives listed above. Detailed modeling information and documentation can be found in Chapter 2 of the Mobility Technical Report.

## 1.3 Report Organization

The remainder of this report is organized into the following chapters:

- 2.0 Project Description – This chapter summarizes land use assumptions for Base Year (2014) and future year alternatives including the Adopted General Plan (No Project), the Proposed Project (Alternative 1), and Alternative 2.
- 3.0 Analysis Methodology – This chapter describes the methodologies and thresholds utilized to evaluate potential VMT impacts for each of the future alternatives. Note that as of July 1, 2020, VMT is the metric (rather than Level of Service) for CEQA transportation-related impact evaluation.
- 4.0 Project Impacts – This chapter discusses the VMT analysis and identifies potential transportation impacts of the Proposed Project. Mitigation measures to reduce the identified VMT impacts, as necessary, are also discussed.
- 5.0 Alternatives Analysis – This chapter discusses the VMT analysis and potential transportation impacts of the two project alternatives, including the No Project and Alternative 2.

## 2.0 Project Description

The Proposed Project includes an update of the currently Adopted General Plan land uses to plan and accommodate future growth and development in the City of El Centro and its sphere of influence. Land use assumptions for the No Project (Adopted Plan), Alternative 1 (Proposed Project), and Alternative 2 scenarios are provided in Chapter 5.0 of the EIR.

Two geographic areas, the City's corporate limits and its SOI, are within the planning area covered by the El Centro General Plan. As defined by the City and the Imperial County Local Agency Formation Commission, an 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. The project does not propose or anticipate annexation of the SOI at this time. Should annexation of one or more areas be considered at a future point in time, applicable procedures from the Imperial County Local Agency Formation Commission would apply. For a conservative analysis, this study includes both the City's corporate limits and the SOI.

## 2.1 Project Components

The El Centro Land Use Element was developed in concert with the Mobility Element. Both Elements focus on sustainability principles by providing a better balance between jobs and housing, encouraging smart-growth and mixed-use developments, connecting residential and employment land uses, and planning for well-connected and safe facilities to make the City of El Centro more walkable and bikeable. Each project component is described below.

### Land Use Element Update

The proposed update to the Land Use Element in the El Centro General Plan would be based on the City's existing Vision 2050, policy direction from City staff and decision makers, and input from the Community Advisory Committee and the public. The update would designate the proposed general distribution and extent of land uses in the City, focusing on preserving established land uses and accommodating future growth and physical development of the community. It would incorporate policies that integrate land use and transportation strategies to increase the share of bicycle, transit, and pedestrian trips, reducing greenhouse gas emissions. Specific topics to be incorporated into the Land Use Element Update include equity, health, sustainability, the economy, and the environment. An overarching objective of the Land Use Element Update would be to promote infill development and encourage efficient development patterns to spur economic revitalization, provide opportunities for innovative lifestyles envisioned by the Vision 2050, and promote environmental justice and equity.

The overall goal of the Land Use Element Update is to create a land use plan that promotes quality of life, health, and safety; meets the needs of the City's residents; supports multiple modes of transportation; fosters economic prosperity; provides a range of affordable housing options; is sustainable and environmentally responsible; encourages social cohesion and equity; and reflects and celebrates the City's unique character, culture, identity, and traditions.

### Proposed Land Use Designations

The proposed Land Use Element Update would include changes to the existing land use designations, which establish the general pattern of land uses in the planning area and would identify maximum permitted land use densities and intensities. The Land Use Element Update would establish 19 land use designations (15 primary land use designations and 4 overlay designations) that govern land uses in the planning area.

### **Proposed Opportunity Areas**

The centerpiece of the General Plan Land Use Element Update consists of five Opportunity Areas (OAs) where the City wants or anticipates land use change or growth to occur during the planning period. OAs are larger, specific areas where targeted change is anticipated. Several OAs are areas of existing development that can benefit from targeted plans and policies to help guide transformation, while others are proposed where growth is expected or proposed to occur.

Each OA has a vision and policies to guide future planning that emphasize the principles of smart growth, sustainability, community identity, and placemaking and the creation of physical and social connections. A key element of each OA is the correlation of land use and site design with proposed improvements to the mobility infrastructure, including providing right-sizing existing roadways, adding new roadways, improving sidewalks, adding multi-use trails and bicycle facilities, and facilitating transit.

### **Mobility Element Update**

The California Complete Streets Act of 2008 requires that General Plans demonstrate how cities will provide for the routine accommodation of all users of a road or street, including pedestrians, bicyclists, public transportation users, motorists, children, older adults, and those with disabilities. The El Centro General Plan Mobility Element addresses this requirement with policies and programs that consider all modes of travel, with the goal of making streets safer, accessible, and more convenient to walk, ride a bicycle, or use public transportation.

El Centro's transition from low density to higher density land use patterns under the Proposed Project, would require equally supportive mobility infrastructure, public improvements, and policies focused on better serving pedestrians, bicyclists and transit users, in addition to motorists. Therefore, to supplement these land use changes, the Proposed Project also includes transportation network and policy improvements to address existing and forecasted mobility needs and deficiencies. The proposed roadway and bicycle networks are included in Figures 1.2 and 1.3, and more detailed infrastructure, policy, and program recommendations can be found in the Mobility Element section of the General Plan Update.

### 3.0 Analysis and Methodology Thresholds

This chapter describes the methodologies and thresholds utilized to evaluate potential VMT impacts for each of the future alternatives. On September 27, 2013, Governor Edmund G. Brown, Jr. signed SB-743 into law, starting a process that fundamentally changes the way transportation impact analysis is conducted under CEQA. Related revisions to the State's CEQA Guidelines include elimination of auto delay, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts, and replacement with Vehicle Miles Traveled (VMT) as the preferred CEQA transportation metric.

This chapter describes the methodologies and thresholds utilized to evaluate potential VMT impacts for each of the future alternatives.

#### 3.1 Determination of VMT Significant Impacts

VMT is positively correlated with growth and as the region is expected to grow, VMT is also expected to increase. However, where the growth occurs plays a significant role to determine how much the VMT will increase. Growth in areas with access to high-quality transit, a complete active transportation network, and/or complementary land use mixes are projected to be more VMT efficient.

In their Technical Advisory on Evaluating Transportation Impacts on CEQA (December 2018), the Governor's Office of Planning and Research (OPR) recommends the use of VMT metrics when analyzing land use projects and plans. For residential uses, the recommended efficiency metric is Resident VMT per Capita; and for employment uses, the recommended efficiency metric is Employee VMT per Employee. However, for retail uses, the recommended metric is a net change of total area (i.e. Imperial County) VMT due to the nature of retail trips typically redistributing shopping trips rather than creating new trips.

The following definitions describe how VMT is referred to, calculated, and accounted for in this programmatic CEQA impact analysis:

- **Resident VMT/Capita** includes all daily vehicle-based person trips originated from or ended at the home location of the individual (driver or passenger). Only home-based VMT are included in this calculation. The VMT for each individual is then summed for all individuals in the analysis area and divided by the population of the same analysis area to arrive at Resident VMT/Capita.
- **Employee VMT/Employee** includes all daily vehicle-based, work-based employee travel grouped and summed to the work location. The VMT for each work location is then summed for all work locations in the analysis area and then divided by the total number of employees of the same analysis area to arrive at the VMT/Employee. This does not include employees whose work location is specified as home.
- **Total Retail VMT** is the sum of all vehicle trips generated by retail uses in the analysis area multiplied by their associated trip lengths.
- **Transportation Project.** The OPR Technical Advisory and CEQA Guidelines provide that a VMT analysis be conducted for major roadway capacity expansion projects and that the analysis address potential induced travel effects.

The OPR Technical Advisory recommends that VMT/capita and VMT/employee results should be compared to the 85<sup>th</sup> percentile of region's average for that land use type – in this case, the region's average is the average Imperial County. The regional average VMT is determined using the ICTM Base Year (2014), and the regional average resident VMT per Capita is 13.76 miles and the regional average employee VMT per Employee is 18.59 miles per person. Excerpts from the regional transportation model is provided in **Appendix A**.

Consistent with the OPR Technical Advisory, the significance thresholds are shown in **Table 3.1**.

**Table 3.1 Transportation VMT Thresholds of Significance by Land Use Type**

Land Use Type	Threshold for Determination of a Significant Transportation VMT Impact
Residential	15% Below Region's Average Resident VMT/Capita
Employment	15% Below Region's Average Employee VMT/Employee
Retail	A Net Increase in Total Regional VMT

Source: ICTM, Iteris, Chen Ryan Associates (2021<sup>9</sup>)

For the purpose of the transportation impact study, a Plan-to-Ground analysis was conducted by comparing the Proposed Project and the various alternatives to Base Year (2014), which is representative of the baseline conditions.

## 4.0 Impact Analysis – Proposed Project (Alternative 1)

This chapter focuses on whether the Proposed Project would have a significant impact if proposed new residential, office, or retail land uses would in aggregate exceed the respective VMT by land use thresholds in Table 3.1.

### 4.1 VMT Impact Analysis

To establish a baseline understanding, **Table 4.1** displays both Imperial County and El Centro’s resident and employee VMT efficiency metrics for the Base Year (2014) conditions. As shown, El Centro has more efficient VMT per capita for both residents and employees that are lower when compared to the region, at approximately 70% of the region’s resident VMT/capita and just over 60% of region’s employee VMT/employee.

**Table 4.1 El Centro Base Year VMT Metrics for Transportation Impact Analysis**

VMT Metric	Base Year (2014)		% of Regional Base Year
	Region	El Centro	El Centro
Resident VMT/Capita	13.76	9.62	70.0%
Employee VMT/Employee	18.59	11.35	61.1%

Source: ICTM, Iteris, Chen Ryan Associates (2021<sup>9</sup>)

By 2040 with the implementation of the Proposed Project, the VMT efficiency of El Centro substantially improves. **Table 4.2** presents the El Centro average resident and employee VMT for the Proposed Project.

**Table 4.2 El Centro Proposed Project VMT Efficiency Metrics for Transportation Impact Analysis of Residential and Employment Uses**

VMT Metric	Imperial County Region - Base Year	El Centro - Proposed Project (Alternative 1)	% of Regional Base Year	Significant Impact?
Resident VMT / Capita	13.76	7.93	57.6% (< 85%)	No
Employee VMT / Employee	18.59	8.00	43.0% (< 85%)	No

Source: ICTM, Iteris, Chen Ryan Associates (2021<sup>9</sup>)

#### Residential and Employment Land Uses Impact?

As shown in the table above, El Centro is projected to have an average Resident VMT per Capita at 7.93 and an average Employee VMT per Employee at 8.00, which are 57.6 percent and 43.0 percent, respectively, of the Base Year regional averages for these efficiency metrics. VMT associated with residential and employment land uses would not exceed the 85 percent thresholds at buildout of the Proposed Project. Therefore, impacts related to VMT for residential and employment land uses would be less than significant.

#### Retail Land Uses Impact?

Regarding VMT associated with retail land uses, the total regional VMT would increase from 5,507,484 miles under the Base Year conditions to 7,467,309 miles with the implementation of the Proposed Project, an increase of 1,959,825 miles. The VMT associated with retail (home-based shopping) also would increase from 331,912 miles under the base year to 494,465 miles with the implementation of the Proposed Project, an increase of 162,553 miles. According to OPR’s recommendations, a retail impact is considered significant when there is a net increase in total regional VMT related to the new retail and commercial uses that could be developed with the adoption of the Proposed Project. Furthermore, the

proposed retail land uses particular in some of the Opportunity Areas are regional retail in nature including tourist commercial and large regional shopping, would attract visitors from the surrounding cities and regions. Therefore, based on the criteria provided in Table 3.1, the retail component of the Proposed Project would have a significant impact.

OPR Technical Advisory states that “by adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT”, and “retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT.” In summary, OPR defers to the local jurisdiction to determine the definition of local-serving retail at the project-level.

#### Transportation Project

According to OPR’s recommendations, a transportation impact is considered significant when the project caused an increase in VMT by encouraging more vehicular trips. This could come in the forms of adding new roadway connections and widening existing roadway to accommodate additional demand, etc. Given parts of El Centro are undeveloped and expecting growth and the existing roadway network does not provide direct or adequate access to these areas, the Proposed Project recommends several new roadway connections and widenings to accommodate the anticipated land use growth. However, it is important to note that the Proposed Projects proposes a number of road diets along with a comprehensive active transportation network is also recommended for the entire city when comparing to the currently Adopted General Plan (No Project). With that said, the Proposed Projects does increase the overall roadway capacities in El Centro from the baseline conditions; hence, it would result in a significant transportation impact under the VMT thresholds.

## **4.2 Mitigation Measures**

As described in the Land Use Element of the General Plan Update, new developments are focused in mixed-use villages that would introduce new residential, retail and employment opportunities consolidated around a balanced mobility system to serve the needs of all current and future users. This system would provide an active transportation network that would be a viable and enjoyable option for traveling within the City in addition to providing connections to transit to get to and from destinations around the region. By bringing in varied and complementary uses and a mobility network that supports and encourages alternative mode choice, the Proposed Project plans a more VMT efficient and sustainable future for the community.

#### Residential Land Uses

As shown in Table 4.2, impacts associated with the proposed residential land uses of the Proposed Project are considered less than significant, therefore, no mitigation measures are required.

#### Employment Land Uses

As shown in Table 4.2, impacts associated with the proposed employment land uses of the Proposed Project are considered less than significant, therefore, no mitigation measures are required.

#### Retail Land Uses

For the Proposed Project’s retail land uses, there is a significant impact due to planned and proposed retail and commercial uses that would be regionally serving. Overall, the proposed Land Use Element

Update (LEU) is a planning document intended to guide future development throughout El Centro. It provides detailed policies and implementation guidance that would be applicable for future developments. Due to the programmatic nature of the proposed LEU, it does not propose any specific development projects, and thus, cannot adequately anticipate specific project-level requirements at this time. To reduce retail VMT impacts, future developments under this proposed LEU would need to be mitigated on a project-by-project basis. This could be accomplished through a citywide VMT reduction ordinance that would require development projects to reduce their VMT to the extent feasible by providing on-site VMT reducing infrastructure such as those found in CAPCOA or other sources that have been vetted through peer-review research; or pay a fee that would fund active transportation infrastructure and transit improvements to reduce citywide VMT.

**Mitigation Measure MM-TR-1:** Implementation of Mobility Element Policies 1.1 through 1.11, 2.1 through 2.9, 3.1 through 3.5, 4.3 and 4.7. would reduce VMT throughout the City. Specifically, the City should ensure that future projects are compliant with Mobility Element Policy 4.5, which utilizes Transportation Demand Management Measures (TDM) to reduce single-occupant vehicles, and encourage alternative modes of transportation such as biking, walking or taking transit. Since TDM are typically applied at the project-level, a list of potential TDM is provided below:

- Increase mixed-use development
- Increase transit accessibility
- Provide pedestrian network improvement along project frontage
- Provide bicycle network improvement along project frontage
- Implement a Neighborhood Electric Vehicle (NEV) network, if appropriate
- Provide bicycle parking, bike locker, personal lockers, and showers
- Implement subsidized or discounted transit passes
- Provide rider-sharing programs
- Implement commute trip reduction marketing
- Implement school pool program
- Implement bike-sharing or micro mobility program
- Provide local shuttle to connect visitors to different attractions throughout the City

Additional measures can be found in the California Air Pollution Control Officers Associations (CAPCOA) Quantifying Greenhouse Gas Mitigation Measures report (<http://www.aqmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf>).

Implementation of the TDM above would potentially reduces each project's VMT. However, since TDM level of effectiveness varies from project to project, this Programmatic Environmental Impact Report (PEIR) cannot ensure that the TDMs would reduce the regional VMT to baseline conditions. Therefore, this mitigation while potentially feasible, is not implementable at this time. Therefore, this VMT impact is considered significant and unavoidable.

### 4.3 Level of Significance After Mitigation

Should MM-TR-1 be adopted by City Council, and implemented, VMT would be reduced by individual projects that maybe permitted and constructed under the proposed LEU. The effectiveness of the VMT reducing measures would need to be context-sensitive and would vary depending on the individual project site such as the location, access to transit, etc. For this reason, and because it is uncertain if, or when such measures would become effective, MM-TR-1 would not fully mitigate the VMT impact for retail land uses nor would it fully mitigate the VMT impact for transportation project (induced growth). Thus, transportation impacts due to the Proposed Project's retail land uses and transportation project would remain significant and unavoidable.

## 5.0 Alternatives Analysis

The California Environmental Quality Act (CEQA) mandates consideration and analysis of alternatives to the Proposed Project. According to CEQA Guidelines, the range of alternatives "shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant impacts" (CEQA Guidelines Section 15126.6 (d) (2)). The discussion must also include an evaluation of the No Project Alternative to allow decision-makers to compare the impacts of approving the Proposed Project against the impacts of not approving it.

The alternatives discussion need not be exhaustive and is subject to a determination of reasonableness. The impacts of the alternatives may be discussed "in less detail than the significant effects of the project proposed" (CEQA Guidelines Section 15126.6 (d)). Additionally, the CEQA Guidelines generally permit analysis of alternatives at a less detailed level for general plans and other program EIRs than what is required for project EIRs. The CEQA Guidelines do not specify what constitutes an adequate level of detail, though an EIR must provide sufficient information to allow meaningful evaluation, analysis, and comparison of each alternative. The CEQA Guidelines require that this analysis identify the environmentally superior alternative among those analyzed.

This chapter discusses potential VMT impacts under the No Project alternative and Alternative 2. The No Project alternative is identical to the currently adopted General Plan, and Alternative 2 shares the same mobility network as the Proposed Project (Alternative 1) but varies in land uses especially in the Opportunity Areas. The Vehicle Miles of Travel Reports (SB 743 metrics for residential and employment) for both alternatives are included in **Appendix B**.

### 5.1 No Project Alternative (Adopted General Plan)

The purpose of evaluating the No Project Alternative is to allow decision makers to compare the outcomes by approving the Proposed Project vs. maintain the currently adopted Plan. The No Project Alternative represents what would reasonably be expected to occur in the foreseeable future if the Proposed Project were not adopted. Future development under the No Project Alternative would result in 1,678 fewer dwelling units in the City but 1,565 more dwelling units in the SOI. In addition, the No Project Alternative would result in 14,385 more square feet of non-residential development in the City but 3,655 fewer square feet of non-residential development in the SOI. The No Project Alternative does not include the proposed five Opportunity Areas (OAs); therefore, it would not emphasize the principles of Smart Growth, sustainability, community identity, placemaking, and the creation of physical and social connections.

Table 5.1 presents the El Centro average resident and employee VMT under the No Project conditions.

**Table 5.1 El Centro No Project  
VMT Efficiency Metrics for Transportation Impact Analysis of Residential and Employment Uses**

VMT Metric	Imperial County Region - Base Year	El Centro – No Project (Adopted GP)	% of Regional Base Year	Significant Impact?
Resident VMT / Capita	13.76	8.73	63.4% (< 85%)	No
Employee VMT / Employee	18.59	8.74	47.0% (< 85%)	No

Source: ICTM, Iteris, Chen Ryan Associates (2020)

Residential and Employment Land Uses Impact?

As shown in the table above, El Centro is projected to have an average Resident VMT per Capita at 8.73 and an average Employee VMT per Employee at 8.74, which are 63.4 percent and 47.0 percent, respectively, of the Base Year regional averages for these efficiency metrics. VMT associated with residential and employment land uses would not exceed the 85 percent thresholds at buildout of the No Project. Therefore, impacts related to VMT for residential and employment land uses would be less than significant.

Retail Land Uses Impact?

Regarding VMT associated with retail land uses, the total regional VMT would increase from 5,507,484 miles under the Base Year conditions to 7,295,827 miles with the implementation of the No Project, an increase of 1,788,343 miles. The VMT associated with retail (home-based shopping) also would increase from 331,912 miles under the base year to 473,170 miles with the implementation of the No Project, an increase of 141,258 miles. According to OPR’s recommendations, a retail impact is considered significant when there is a net increase in total regional VMT related to the new retail and commercial uses that could be developed with the adoption of the No Project. Furthermore, the No Project includes land uses that are regional retail in nature including tourist commercial and large regional shopping, these land uses would attract visitors from the surrounding cities and regions. Therefore, based on the criteria provided in Table 3.1, the retail component of the No Project would have a significant impact.

OPR Technical Advisory states that “by adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT”, and “retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT.” In summary, OPR defers to the local jurisdiction to determine the definition of local-serving retail at the project-level.

Transportation Project

According to OPR’s recommendations, a transportation impact is considered significant when the project caused an increase in VMT by encouraging more vehicular trips. This could come in the forms of adding new roadway connections and widening existing roadways to accommodate additional demand, etc. Given parts of El Centro are undeveloped and expecting growth and the existing roadway network does not provide direct or adequate access to these areas, the No Project scenario includes several new roadway connections and widenings to accommodate the anticipated land use growth. Since the No Project scenario increases the overall roadway capacities in El Centro from the baseline conditions, it would result in a significant transportation impact under the VMT thresholds.

## 5.2 Alternative 2

Compared to the Proposed Project, Alternative 2 results in 967 fewer overall residential units and would reduce the amount of non-residential space by 372,000 square feet, compared to the proposed project.

Alternative 2 also includes five OAs similar to the proposed project. However, the planned designations change. OA-3 would change the existing land use designations from General Industrial and Planned Industrial to Tourist Commercial, with the anticipation that its location on the northern side of Interstate 8 would draw a variety of regionally serving commercial, recreational, and entertainment uses and provide the potential for recreational vehicle parks and housing to encourage tourism.

In addition, OA-4 would retain the General Commercial land use designation for the properties on the eastern side of Dogwood Avenue, including the Imperial Valley Mall and the commercially designated property to the north. The property at the northwestern intersection of Dogwood Avenue and Danenberg Drive would change from General Industrial to General Commercial with a Mixed Use 2 Overlay to allow additional commercial uses while also providing the opportunity for multi-family residential uses in proximity to commercial uses.

Table 5.2 presents the El Centro average resident and employee VMT for Alternative 2.

**Table 5.2 El Centro Alternative 2  
VMT Efficiency Metrics for Transportation Impact Analysis of Residential and Employment Uses**

VMT Metric	Imperial County Region - Base Year	El Centro – Alternative 2	% of Regional Base Year	Significant Impact?
Resident VMT / Capita	13.76	8.14	59.2% (< 85%)	No
Employee VMT / Employee	18.59	8.10	43.6% (< 85%)	No

Source: ICTM, Iteris, Chen Ryan Associates (2020)

### Residential and Employment Land Uses Impact?

As shown in the table above, El Centro is projected to have an average Resident VMT per Capita at 8.14 and an average Employee VMT per Employee at 8.10, which are 59.2 percent and 43.6 percent, respectively, of the Base Year regional averages for these efficiency metrics. VMT associated with residential and employment land uses would not exceed the 85 percent thresholds at buildout of the Alternative 2. Therefore, impacts related to VMT for residential and employment land uses would be less than significant.

### Retail Land Uses Impact?

Regarding VMT associated with retail land uses, the total regional VMT would increase from 5,507,484 miles under the Base Year conditions to 7,301,875 miles with the implementation of the Alternative 2, an increase of 1,794,391 miles. The VMT associated with retail (home-based shopping) also would increase from 331,912 miles under the base year to 484,272 miles with the implementation of the Alternative 2, an increase of 152,360 miles. According to OPR's recommendations, a retail impact is considered significant when there is a net increase in total regional VMT related to the new retail and commercial uses that could be developed with the adoption of the Alternative 2. Furthermore, the Alternative 2 includes land uses that are regional retail in nature including tourist commercial and large regional shopping, these land uses would attract visitors from the surrounding cities and regions. Therefore, based on the criteria provided in Table 3.1, the retail component of the Alternative 2 would have a significant impact.

OPR Technical Advisory states that “by adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT”, and “retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT.” In summary, OPR defers to the local jurisdiction to determine the definition of local-serving retail at the project-level.

Transportation Project

According to OPR’s recommendations, a transportation impact is considered significant when the project caused an increase in VMT by encouraging more vehicular trips. This could come in the forms of adding new roadway connections and widening existing roadways to accommodate additional demand, etc. Given parts of El Centro are undeveloped and expecting growth and the existing roadway network does not provide direct or adequate access to these areas, the Alternative 2 scenario includes several new roadway connections and widenings to accommodate the anticipated land use growth. Since the Alternative 2 scenario increase the overall roadway capacities in El Centro from the baseline conditions, it would result in a significant transportation impact under the VMT thresholds.

**6.0 Summary**

Table 6.1 presents a summary of El Centro average resident, employee VMT, and retail total VMT under all alternatives.

**Table 6.1 Summary of El Centro  
VMT Efficiency Metrics for Transportation Impact Analysis for All Alternatives**

<u>VMT Metric</u>	<u>Imperial County Region - Base Year</u>	<u>El Centro – Base Year</u>	<u>El Centro – No Project (Adopted GP)</u>	<u>El Centro – Alternative 1</u>	<u>El Centro – Alternative 2</u>	<u>% of Regional Base Year or Increase in Total VMT</u>	<u>Significant Impact?</u>
<u>Resident VMT / Capita</u>	<u>13.76</u>	<u>9.62</u>	<u>8.73</u>	<u>7.93</u>	<u>8.14</u>	<u>All Below 85%</u>	<u>No</u>
<u>Employee VMT / Employee</u>	<u>18.59</u>	<u>11.35</u>	<u>8.74</u>	<u>8.00</u>	<u>8.10</u>	<u>All Below 85%</u>	<u>No</u>
<u>Retail VMT</u>	<u>5,507,484</u>	<u>-</u>	<u>7,295,827</u>	<u>7,467,309</u>	<u>7,301,875</u>	<u>Yes – All Alternatives</u>	<u>Yes</u>

Source: ICTM, Iteris, Chen Ryan Associates (2021)

## Appendix A Base Year and Proposed Project VMT Results

## Region VMT

Imperial County			
ID	Purpose	Productions	Attractions
1	Home-based Work	1,090,934	991,090
2	Home-based School	50,141	49,037
3	Home-based University	82,990	95,002
4	Home-based Shopping	167,107	164,804
5	Home-based Social-Recreational	433,178	365,319
6	Home-based Serve Passenger	210,129	209,315
7	Home-based Other	492,845	437,349
8	Work-Based Other	100,458	89,856
9	Other Based Other	239,941	237,989
Total VMT		2,867,723	2,639,761
Total Home-based VMT		2,527,324	
Total Work-based VMT		1,091,547	
Total Population		183,730	
Total Employees		58,730	
Total Home-based VMT/Capita		13.76	
Total Work-based VMT/Employee		18.59	

## Base Year VMT (2014)

El Centro			
ID	Purpose	Productions	Attractions
1	Home-based Work	206,182	136,102
2	Home-based School	8,741	10,018
3	Home-based University	12,711	-
4	Home-based Shopping	26,684	59,074
5	Home-based Social-Recreational	81,241	66,976
6	Home-based Serve Passenger	43,104	57,596
7	Home-based Other	92,232	93,402
8	Work-Based Other	21,929	14,346
9	Other Based Other	61,800	66,506
Total VMT		554,625	504,022
Total Home-based VMT		470,896	
Total Work-based VMT		158,031	
Total Population		48,927	
Total Employees		13,924	
Total Home-based VMT/Capita		9.62	
Total Work-based VMT/Employee		11.35	

## Proposed Project VMT (2040)

El Centro			
ID	Purpose	Productions	Attractions
1	Home-based Work	194,882	369,788
2	Home-based School	16,391	6,417
3	Home-based University	15,183	-
4	Home-based Shopping	33,198	164,333
5	Home-based Social-Recreational	105,030	176,778
6	Home-based Serve Passenger	55,112	129,623
7	Home-based Other	120,698	273,731
8	Work-Based Other	74,701	45,606
9	Other Based Other	178,406	217,044
Total VMT		793,601	1,383,321
Total Home-based VMT		540,495	
Total Work-based VMT		444,489	
Total Population		68,193	
Total Employees		55,594	
Total Home-based VMT/Capita		7.93	
Total Work-based VMT/Employee		8.00	

## Appendix B Project Alternatives VMT Results

## No Project VMT (2040)

El Centro			
ID	Purpose	Productions	Attractions
1	Home-based Work	184,203	358,017
2	Home-based School	13,673	13,535
3	Home-based University	15,346	-
4	Home-based Shopping	38,355	115,394
5	Home-based Social-Recreational	109,213	123,899
6	Home-based Serve Passenger	51,916	116,691
7	Home-based Other	118,024	217,380
8	Work-Based Other	87,537	47,515
9	Other Based Other	119,496	134,095
Total VMT		737,763	1,126,527
Total Home-based VMT		530,730	
Total Work-based VMT		445,555	
Total Population		60,827	
Total Employees		50,983	
Total Home-based VMT/Capita		8.73	
Total Work-based VMT/Employee		8.74	

## Alternative 2 VMT (2040)

El Centro			
ID	Purpose	Productions	Attractions
1	Home-based Work	192,538	339,136
2	Home-based School	15,122	21,334
3	Home-based University	15,222	-
4	Home-based Shopping	34,785	148,802
5	Home-based Social-Recreational	103,942	156,138
6	Home-based Serve Passenger	52,829	125,753
7	Home-based Other	117,208	243,638
8	Work-Based Other	52,664	39,581
9	Other Based Other	146,386	181,075
Total VMT		730,695	1,255,457
Total Home-based VMT		531,645	
Total Work-based VMT		391,800	
Total Population		65,339	
Total Employees		48,378	
Total Home-based VMT/Capita		8.14	
Total Work-based VMT/Employee		8.10	

