

**INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION**
Town Center Village Phase IV
Infill Apartments Project
El Centro, California



Lead Agency

City of El Centro
Community Development Department
1275 Main Street
El Centro, CA 92243
Contact: Angel Hernandez, Associate Planner

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April 2021

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1.0 INTRODUCTION

1.1 INTRODUCTION AND REGULATORY GUIDANCE

This document is an Initial Study (IS) with supporting environmental studies, which provides justification for a Mitigated Negative Declaration (MND) pursuant to the California Environmental Quality Act (CEQA) for the Town Center Village Phase IV Infill Apartments Project (project).

The IS/MND is a public document to be used by the City of El Centro (City), acting as the CEQA lead agency, to determine whether the project may have a significant effect on the environment pursuant to CEQA. If the lead agency finds substantial evidence that any aspect of the project, either individually or cumulatively, may have a significant effect on the environment that cannot be mitigated, regardless of whether the overall effect of the project is adverse or beneficial, the lead agency is required to prepare an environmental impact report (EIR), use a previously prepared EIR and supplement that EIR, or prepare a subsequent EIR to analyze the project at hand (Public Resources Code Sections [PRC] 21080(d) and 21082.2(d)).

If the agency finds no substantial evidence that the project or any of its aspects may cause a significant impact on the environment with mitigation, an MND shall be prepared with a written statement describing the reasons why the proposed project, which is not exempt from CEQA, would not have a significant effect on the environment and therefore why it does not require the preparation of an EIR (CEQA Guidelines Section 15371).

According to CEQA Guidelines Section 15070, a Negative Declaration shall be prepared for a project subject to CEQA when either:

- 1) *The IS shows there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or*
- 2) *The initial study identifies potentially significant effects, but:*
 - a) *Revisions in the project plans or proposals made by, or agreed to by the applicant before the proposed MND and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and*
 - b) *There is no substantial evidence, in light of the whole record before the agency, that the proposed project as revised may have a significant effect on the environment.*

This IS/MND has been prepared in accordance with CEQA, PRC Section 21000 et seq., and the CEQA Guidelines Title 14 California Code of Regulations (CCR) Section 15000 et seq.

1.2 LEAD AGENCY

The lead agency is the public agency with primary responsibility over a proposed project. Where two or more public agencies will be involved with a project, CEQA Guidelines Section 15051 provides criteria for identifying the lead agency. In accordance with CEQA Guidelines Section 15051(b)(1), "the lead agency will normally be the agency with general governmental powers." Therefore, based on the criteria described above, the lead agency for the proposed project is the City of El Centro.

1.3 PURPOSE AND DOCUMENT ORGANIZATION

The purpose of this IS/MND is to evaluate the potential environmental impacts of the proposed Town Center Village Phase IV Infill Apartments Project. Mitigation measures have also been established that reduce or eliminate any identified significant and/or potentially significant impacts. This document is presented in the following format:

1.0 Introduction

This section provides an introduction and describes the purpose and organization of this document.

2.0 Project Description

This section provides a detailed description of the proposed project and the environmental setting, and lists the various agency approvals required.

3.0 Environmental Checklist

This section describes the environmental setting for each of the environmental subject areas, as appropriate; evaluates a range of impacts classified as “no impact,” “less than significant impact,” “less than significant impact with mitigation incorporated,” or “potentially significant impact” in response to the environmental checklist; provides mitigation measures, where appropriate, to mitigate potentially significant impacts to a less than significant level; and provides a determination of project impacts.

4.0 Document Preparers and References

This section identifies staff and consultants responsible for preparation of this document. It also lists the resources used in the preparation of this document.

Appendices

The appendices to this report include various technical reports, database records, and modeling printouts that were prepared during the course of the Initial Study.

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2.0 PROJECT DESCRIPTION

2.1 PROJECT CHARACTERISTICS

1. Project Title:

El Centro Town Center Village Phase IV - Infill Apartments Project

2. Lead Agency Name and Address

City of El Centro
1275 W. Main Street
El Centro, California 92243

3. Contact Person

Norma M. Villicaña, Director of Community Development
Phone Number: 760.337.4545
Email: nvillicana@cityofelcentro.org

4. Project Location and Size

The project site is located in the northernmost portion of the City of El Centro (City) in south-central Imperial County, California. The property site is located between Cruickshank Drive to the north and Bradshaw Avenue to the south, and between N. 8th Street to the east and N. 10th Street to the west. The affected County Assessor Parcel Numbers (APNs) are APNs 044-620-049 and APN 044-620-051. Regional access to the project vicinity is provided via Interstate 8 (I-8) which is located approximately 2.6 miles to the south; refer to [Figure 1, Regional/Local Vicinity Map](#). The site is located within the boundaries of the Town Center Village Project and represents Phase IV of four planned phases of development. Refer to [Figure 2, Aerial Photograph](#).

5. Project Sponsor's Name and Address:

YK America Group
c/o David Yang, Senior Project Manager
9680 Flair Drive
El Monte, California 91731

6. Existing General Plan Land Use Designation

General Commercial

7. Zoning

CG-General Commercial

2.2 PROJECT DESCRIPTION

Existing Setting and Surrounding Land Uses

Regional Setting

As stated, the City of El Centro is located in south-central Imperial County. The City is bordered to the north by the City of Imperial and the communities of Heber and Calexico to the south/southeast. The international United States/Mexico border is located approximately 6.5 miles to the south. The El Centro Naval Air Facility is northwest of the City. Additionally, expansive lands actively utilized for agricultural production surround the City. Regional access to the project site is provided via I-8 to northbound S. 4th Street or S. Imperial Avenue.

Local Setting

The project site lies within an urbanized area of the City, within the boundaries of the planned Town Center Village development. Refer to [Figure 2, Aerial Photograph](#). The subject property has been previously disturbed and, in its current state, is undeveloped bare ground with limited vegetation. The site is relatively flat, with on-site elevations ranging from approximately 51 feet below mean sea level to approximately 39 feet below mean sea level across the property (ECORP 2020b).

Infrastructure improvements were made as part of the prior phases of development of the Town Center Village. N. 10th Street was constructed as a two-lane road running north-south, forming the western property boundary, with curb, gutter, and sidewalk improvements. Bradshaw Avenue was improved between N. 8th Street and N. 12th Street to half-width with curb, gutter, and sidewalk improvements. Street lighting was installed along these roadways, and utilities (water and sewer) were constructed within N. 10th Street.

Surrounding Land Uses

Surrounding land uses include multi-family residential (Town Center Villa Apartments) to the west across N. 10th Street; vacant land adjacent to the north; multi-family residential development to the east, along with vacant land, Union Pacific railroad, and active agricultural fields; and single-family rural residential uses to the south across Bradshaw Avenue. The existing El Centro Town Center commercial retail development is located farther to the west (part of Phase I of the Town Center project) and includes such stores as Target, 99 Cents Only store, and Lowe's Home Improvement, among other commercial uses. Imperial Valley College is located approximately 3.5 miles to the northeast.

The Imperial County Airport is located approximately 1.8 miles northwest of the project site. An existing irrigation canal runs along the east side of N. 8th Street. A regional-serving railway extends northwest to southeast approximately 0.15 mile to the east of the site at its closest point.

The Imperial County Airport Land Use Compatibility Plan (Imperial County 1996) identifies the project site as being located within Zone B2, Extended Approach Departure Zone. The Imperial County Airport Land Use Commission previously reviewed the request to rezone the subject property as proposed and found that the rezone would be inconsistent with the Imperial County Airport Land Use Compatibility Plan. However, the City retains the authority to make a final consistency determination that may ultimately preside over the Airport Land Use Commission's decision as to the appropriateness of the requested rezone.

Proposed Project

The approximately 19.3-acre site is comprised of County APNs 044-620-049 and APN 044-620-051. The project as proposed would result in development of an approximately 11.6-acre portion of the subject property; the remainder of the site is not proposed for development as part of the project and would remain in its current state. The affected area (proposed development footprint) is shown in [Figure 3A, Site Plan](#).

The project would require a General Plan Amendment to change the existing General Plan land use designation on the portion of the site proposed for development from General Commercial to High Density Residential. The project would also rezone the same portion of the property from CG-General Commercial to R3-Multiple Family Residential. The existing General Commercial land use and CG-Commercial zoning would continue to apply to the remainder of the property, which is proposed to be subdivided to allow for future commercial development (not proposed for

2.0 PROJECT DESCRIPTION

development at this time); refer to [Figure 3B, Proposed Subdivision Map](#), and discussion under Subdivision Map, below.

Table 1, [Project Summary](#), provides a summary of the proposed improvements.

Table 1: Project Summary

APARTMENT SUMMARY				
Unit Plan	Square Feet	Bed/Bath	# Units	Total Square Feet
Unit 1	643	1/1	60	38,580
Unit 2A	970	2/2	60	58,200
Unit 2B (2-Story)	924	2/2.5	60	55,440
TOTAL	--	--	180	152,220
PARKING SUMMARY				
<i>Required Parking Spaces</i>		<i>Provided Parking Spaces</i>		
1 Bedroom; 1.5 space/unit	90	Private Garages		60
Bedroom; 2 spaces/unit	240	Standard Parking Stalls (9'x20')		280
Guest: 0.25 spaces/unit	45	Compact Stalls (8.5'x17')		45
TOTAL	375	--		385
OPEN SPACE SUMMARY				
<i>Required Open Space</i>		<i>Provided Open Space</i>		
150 SF per unit common open space (20' minimum width)	27,000	Recreation Amenity (Minus Clubhouse)		16,710
		Common Open Space & Dog Park		31,430
TOTAL	27,000	--		48,140
SITE COVERAGE				
<i>Required Site Coverage</i>		<i>Provided Site Coverage</i>		
Standard	Square Feet	Coverage Type	Square Feet	Percent
Maximum Lot Coverage = 60%	302,000 – 304,000	Building Coverage	126,900	25%
		Roads and Parking	169,980	34%
		TOTAL	296,880	59%

Multi-Family Residential

The proposed rezoning of a portion of the property to R3-Multiple Family Residential would allow for development of a 180-unit apartment complex at a density of 15.6 dwelling units per acre (du/ac). A mixture of unit types would be provided within 15 individual buildings. Sixty one-bedroom units are proposed of approximately 643 square feet in size with 1 bathroom and of 1 story in height. Two types of 2-bedroom units are proposed. Sixty 2-bedroom units are proposed of approximately 970 square feet in size with 2 bathrooms and of 1 story in height. Sixty 2-bedroom units are proposed of approximately 924 square feet in size with 2.5 bathrooms and of 2 stories in height. Each individual building would offer two 1-bedroom, 1 bath units; two 2-bedroom, 2-bath units; and four 2 bedroom/2.5 bath units.

Open Space/Recreation

Common open space provided on-site would meet the City's requirement of 150 square feet of common space per residential unit for the proposed R3-Multiple Family Residential zone. The development would offer a number of on-site opportunities for both passive and active outdoor recreation. As shown on [Figure 3A, Site Plan](#), a series of common open space areas would be provided adjacent to the majority of the individual buildings on-site for resident use. Additionally, a private dog park is proposed in the eastern portion of the property, adjacent to N. 8th Street. Other recreational amenities for use by residents and their guests would include a clubhouse, a recreational area with an outdoor pool and hot tub, and a barbecue/fire pit with outdoor seating.

Landscaping, Lighting, and Signage

Landscaping would be provided within the on-site parking areas, in the form of common open space, at the dog park, and along the project perimeter. Proposed landscaping would be consistent with City requirements for coverage and plant types, as well as irrigation systems. The use of reclaimed water for landscape irrigation is not proposed as part of the project.

The project would incorporate lighting and signage elements, as necessary, for safety, security, and locational purposes. One monument sign would be provided at the main entrance along N. 8th Street; no signs are proposed at the entrances along N. 10th Street. Street lighting has been installed along N. 8th Street, N. 10th Street, and Bradshaw Avenue. Interior lighting within the surface parking areas and at the clubhouse facilities would also be provided for purposes of public safety and circulation. All ancillary features would comply with applicable City design standards and nighttime lighting regulations.

Access/Circulation

Main access to the project site would be provided along the eastern boundary from N. 8th Street; refer to [Figure 3A, Site Plan](#). This access would be gated to prohibit entry by the general public. Direct access to the project site would also be provided along the western boundary from N. 10th Street in the northern portion of the site; this access drive would be for egress only. A secondary access point is also proposed from N. 10th Street at approximately the mid-point of the property; this access point would be a two-way drive. Both N. 10th St. access drives would be gated to prohibit entry by the general public. The southern access drive would be set back a distance into the property to ensure that queuing along N. 10th Street does not occur while residents wait for the gate to open when accessing the development.

Internal circulation would be provided via a series of linked internal drives. Drive aisles would be a minimum of 24 feet in width (with provision of adequate turning radii), consistent with City and fire department design requirements to ensure adequate on-site circulation and access for emergency vehicles; refer to [Figure 3A, Site Plan](#).

Parking

Parking for the project would be provided via a combination of private garages and on-site surface parking spaces. In conformance with parking requirements for the proposed R3-Multiple Family Residential zone, a total of 385 on-site parking spaces would be provided; refer to [Figure 3A, Site Plan](#). Sixty private garages are proposed in addition to 280 standard parking stalls and 45 compact parking stalls. Overhead shading structures would also be provided for a number of the surface parking spaces.

Utilities

Water

Water for the project would be supplied by the City's public water system. The City receives its water supply from the Imperial Irrigation District (IID). The project would connect to an existing 12-inch water line in N. 10th Street. No upgrades to the existing public water infrastructure system are required or proposed to serve the project as designed.

Sewer

Wastewater treatment for the project would be provided by the City's existing sewer system. The project would connect to an existing 36-inch sewer line in N. 10th Street. All of the City's wastewater is routed to and treated at the City's Wastewater Treatment Plant located at 2255 North La Brucherie, approximately 0.9 miles northwest of the project site. No upgrades to the existing public sewer infrastructure system are required or proposed to serve the project as designed.

Stormwater Facilities

Stormwater from the project site would be routed to an existing storm drain located in N. 10th Street. This storm drain outlets to an existing off-site detention basin, located north of the project site at the southwest corner of the intersection of N. 8th Street and Treshill Road. This detention basin was previously constructed as part of the El Centro Town Center Village project and was sized to accommodate all planned development within the Town Center Village. Therefore, no upgrades to the City's storm drain system would be required to accommodate stormwater runoff from the subject site with project implementation. Best management practices (BMPs) would be implemented during the construction and operational phases to ensure that stormwater quality leaving the site is maintained and that no adverse effects to off-site properties or downstream waterbodies would occur.

Electricity and Natural Gas

Electrical and gas lines are present in the project vicinity along adjacent local roadways. The project would tie into these existing services. No additional transmission lines or system upgrades would be necessary to convey electricity or natural gas to the site.

Sustainability/Energy Saving Measures

The project would be designed to meet the requirements of the 2019 California Green Building Code. Energy-saving measures incorporated into the project design are anticipated to include such features as low-flow fixtures (i.e., faucets, showers, and toilets) in individual units and the clubhouse. Additionally, 60 charging stations for electric vehicles (EV) would be provided on-site for use by residents.

General Plan Land Use and Zoning

The project as proposed would require a General Plan Amendment to change the existing General Plan land use designation on a portion of the site from General Commercial to High Density Residential. The project site is currently zoned CG-General Commercial; the project proposes to rezone a portion of the property from CG to R3-Multiple Family Residential. The General Plan Amendment and rezone would allow for the on-site residential uses as proposed. As stated, the balance of the property would remain under the current General Plan land use and

zoning designations to allow for future commercial development (not proposed for development at this time); see discussion under Subdivision Map, below.

Subdivision Map

As part of the mapping actions associated with the project, the applicant proposes a lot line adjustment (Lot Line Adjustment No. 20-01) and recordation of a subdivision map to divide the original parcel map Lot 4 (APN 044-620-049) and Remainder Lot (APN 044-620-051) into eight lots to allow for anticipated future development. Lot 4 (APN 044-620-049) with a total of approximately 11.59 acres is proposed to be rezoned to R3-Multiple Family Residential and would be divided into three lots ranging from approximately 3.29 acres to 4.16 acres. The Remainder Lot (APN 044-620-051), totaling approximately 7.74 acres, would remain as commercial use and would be divided into five lots ranging from approximately 0.98 acres to 2.85 acres. Refer to [Figure 3A, Site Plan](#), and [Figure 3B, Proposed Subdivision Map](#). No development is proposed on the Remainder Lot (APN 044-620-051) at this time as part of the project.

2.3 PROJECT CONSTRUCTION

Grading and Site Preparation

As the subject site is fairly level, project grading is expected to be minor; no mass grading is required or proposed. Grading would occur over a period of approximately 12 months and would require approximately 14,000 cubic yards (c.y.) of cut and 23,000 c.y. of fill. Therefore, an estimated 9,000 c.y. of soils would be imported to the site for use.

Schedule

Project construction would occur over a period of approximately 19 months from initial grading through final construction. It is anticipated that the work would be completed in 8- or 10-hour shifts, with a total of five shifts per week (Monday-Friday). Overtime and weekend work may occur as necessary to meet scheduled milestones or accelerate the schedule and would comply with all applicable California labor laws as well as local City regulations regulating construction activities.

Operational Characteristics

The project would result in development of multi-family residential uses on-site. All parking demands would be accommodated on-site; it is not anticipated that any off-site parking would occur that may affect surrounding streets. As stated, the access points to the project site would be gated for security purposes and would be accessed via keypad.

Operation of the dog park would occur during daylight hours; no nighttime lighting is proposed for this use. The clubhouse, pool, and barbecue/fire pit would generally operate during daylight/evening hours. Limited exterior lighting would be provided in this area for purposes of safety and circulation.

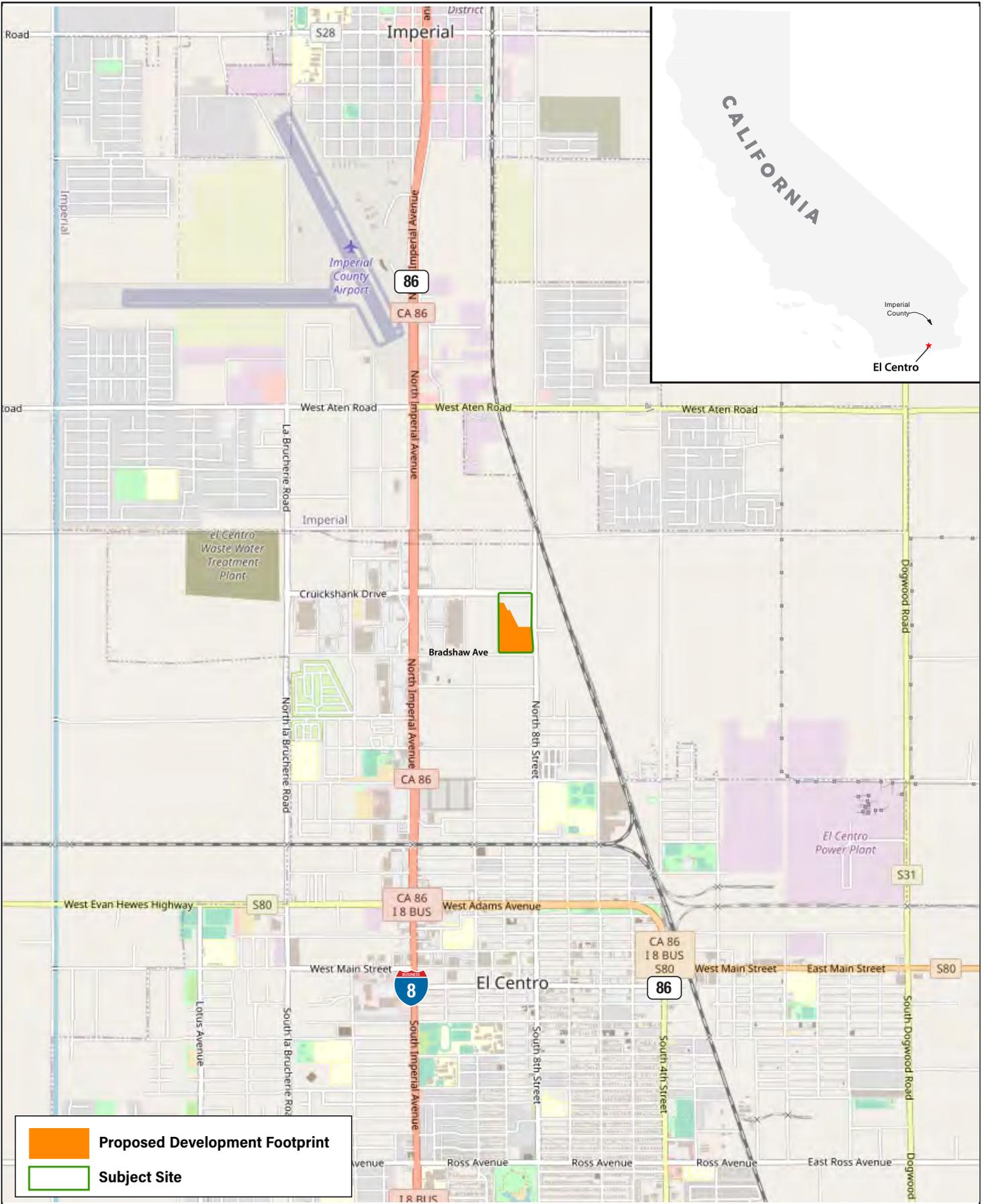
2.4 ANTICIPATED DISCRETIONARY ACTIONS AND APPROVALS

Listed below are public agencies, including the City of El Centro, that may have discretionary actions associated with the implementation of the proposed project:

Project entitlements/discretionary actions and approvals required for the project are anticipated to include, but may not be limited to, those identified in Table 2, Required Approvals and Permits.

Table 2: Required Approvals and Permits

Permit/Action Required	Approving Agency	Lead/Trustee/Responsible Agency
Site Plan	City	Lead Agency
Lot Line Adjustment	City	Leas Agency
Subdivision Map	City	Lead Agency
Landscape Plan	City	Lead Agency
Mitigated Negative Declaration	City	Lead Agency
General Plan Amendment	City	Lead Agency
Rezone	City	Lead Agency
General Construction Stormwater Permit	Colorado River Regional Water Quality Control Board (RWQCB)	Responsible Agency
National Pollution Discharge Elimination System (NPDES) Permit	Colorado River RWQCB	Responsible Agency
Construction Permit and/or Encroachment Permit	City	Lead Agency
Stormwater Quality Management Plan/Drainage Plan	City	Lead Agency
Grading Permit	City	Lead Agency
Building Permit	City	Lead Agency
Improvement Plans	City	Lead Agency
Consistency Determination (Override) – Imperial County Airport Land Use Compatibility Plan	City	Lead Agency
Permit to Construct	Imperial County Air Pollution District	Responsible Agency



TOWN CENTER VILLAGE PHASE IV
INFILL APARTMENT PROJECT

Regional/Local Vicinity Map

Figure 1



2.0 PROJECT DESCRIPTION

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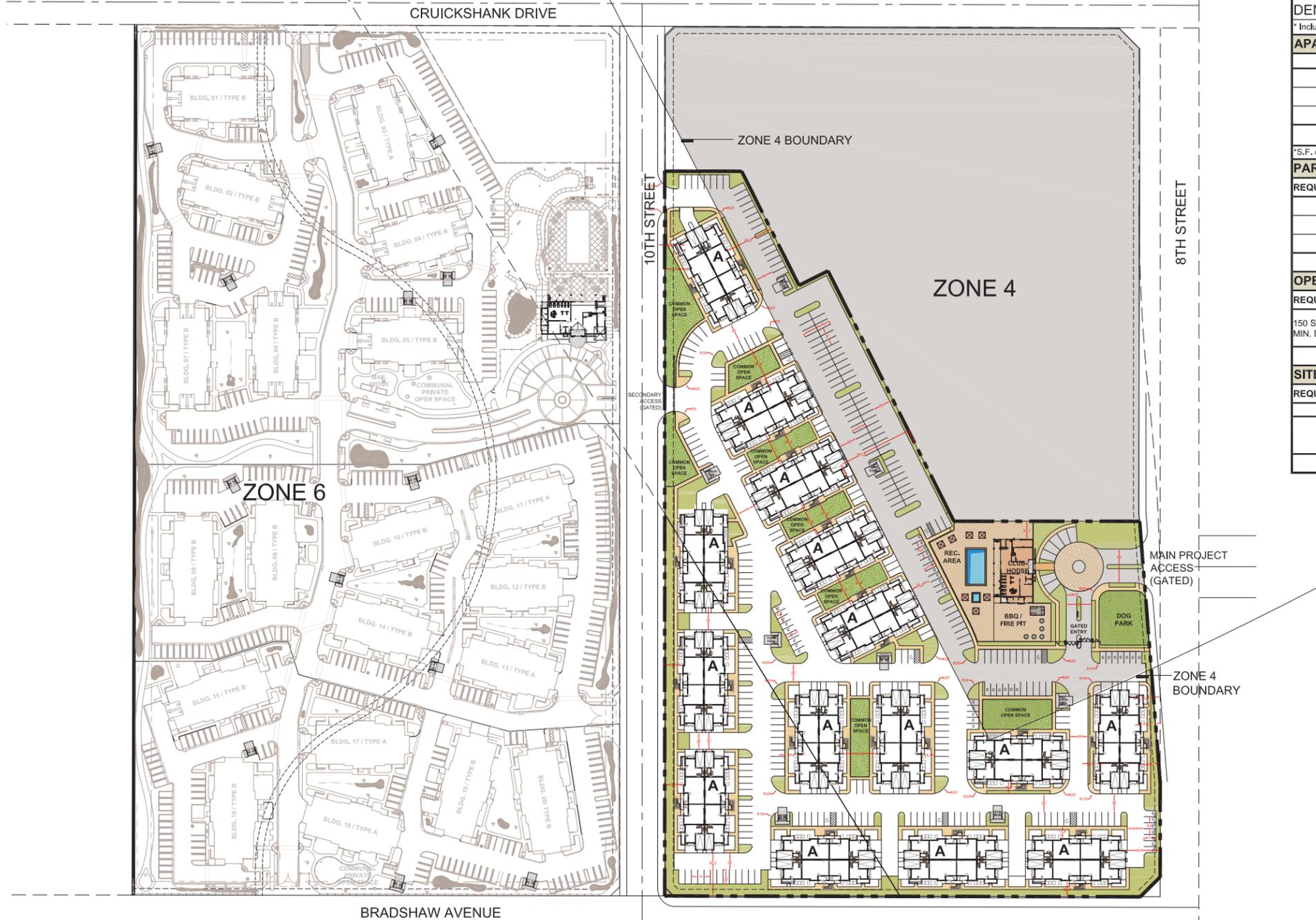


Subject Site - 19.3 acres
 Proposed Development Footprint

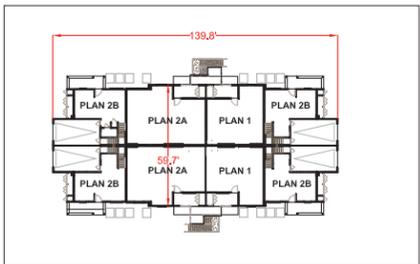
TOWN CENTER VILLAGE PHASE IV
 INFILL APARTMENT PROJECT
Aerial Photograph

2.0 PROJECT DESCRIPTION

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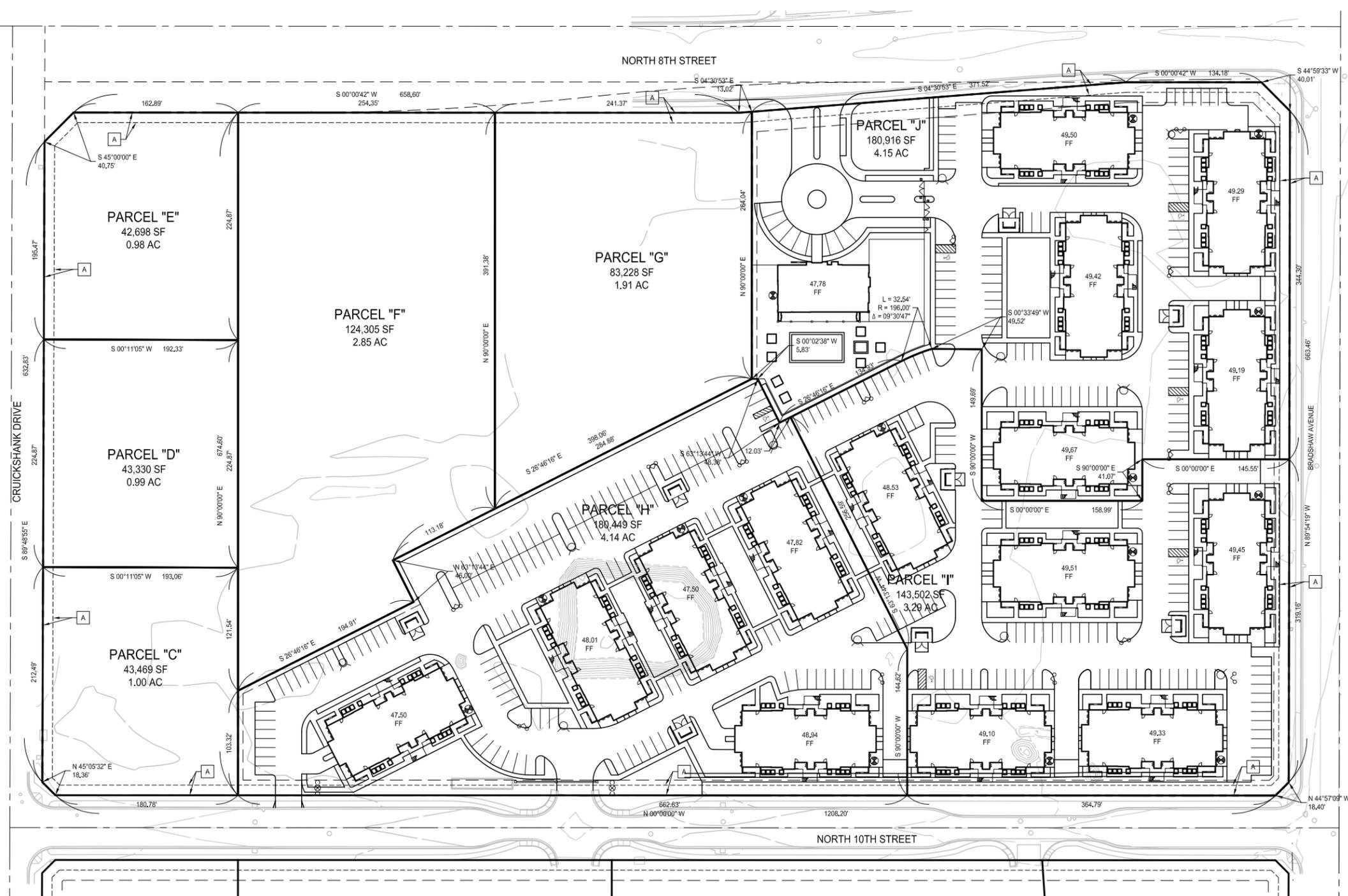
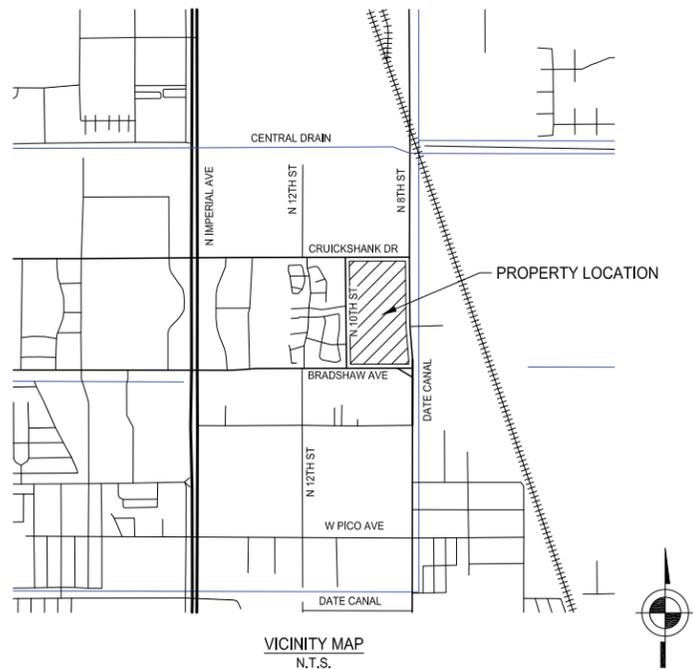


PROJECT SUMMARY TABLE				
SITE AREA*	11.56 ACRES			
TOTAL UNITS	180 UNITS			
DENSITY	15.6 DU/AC			
*Includes area in Zone 4 with parking and project amenities.				
APARTMENT SUMMARY				
UNIT PLAN	SQ. FT.*	BD/BA	# UNITS	TOTAL S.F.
UNIT 1	643	1/1	60	38,580
UNITS 2A	970	2/2	60	58,200
UNIT 2B (2-STORY)	924	2/2.5	60	55,440
TOTAL			180	152,220
*S.F. does not include patio or w/h closet.				
PARKING SUMMARY				
REQUIRED		PROVIDED		
1 BDRM: 1.5 space/unit	90	PRIVATE GARAGES	60	
2 BDRM: 2 spaces/unit	240	STANDARD PARKING STALLS (9' X 20')	280	
GUEST: 0.25 / UNIT	45	COMPACT STALLS (8.5' X 17')	45	
TOTAL	375		385	
OPEN SPACE SUMMARY				
REQUIRED		PROVIDED		
150 S.F. PER UNIT COMMON OPEN SPACE (20' MIN. DIM.)	27,000	RECREATION AMENITY (MINUS CLUBHOUSE)	16,710	
		COMMON OPEN SPACE & DOG PARK	31,430	
TOTAL	27,000		48,140	
SITE COVERAGE				
REQUIRED		PROVIDED		
STANDARD	S.F.	COVERAGE TYPE	S.F.	%
	302,000-304,000	BUILDING COVERAGE	126,900	25%
		ROADS & PARKING	169,980	34%
TOTAL			296,880	59%



TYPICAL BUILDING "A"

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PROJECT INFORMATION

PROPERTY INFORMATION	
PROPERTY ADDRESS	EL CENTRO, CA 92243
PROPERTY OWNER	TOWN CENTER VILLAGE, LLC 9680 FLAIR DRIVE EL MONTE, CA 91731
ASSESSORS ID NUMBER(S)	044-620-049 AND 044-620-051
LEGAL DESCRIPTIONS	<p>PARCEL "A" LOT 4 AND A PORTION OF THE REMAINDER LOT AS SHOWN ON THE TOWN CENTER VILLAGE APARTMENTS SUBDIVISION MAP, IN THE CITY OF EL CENTRO, COUNTY OF IMPERIAL, STATE OF CALIFORNIA, RECORDED IN BOOK 27, PAGES 16 THROUGH 17 OF FINAL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY.</p> <p>PARCEL "B" A PORTION OF THE REMAINDER LOT AS SHOWN ON THE TOWN CENTER VILLAGE APARTMENTS SUBDIVISION MAP, IN THE CITY OF EL CENTRO, COUNTY OF IMPERIAL, STATE OF CALIFORNIA, RECORDED IN BOOK 27, PAGES 16 THROUGH 17 OF FINAL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY.</p>
PROPERTY ZONING	CG - GENERAL COMMERCIAL
EXISTING LAND USE	VACANT
PROPOSED LAND USE	RESIDENTIAL
DEVELOPMENT AREA	11.59 ACRES
EXISTING TREES	THERE ARE NO EXISTING TREES ON THE SITE
EXISTING STRUCTURES	THERE ARE NO EXISTING STRUCTURES ON THE SITE
DATE MAP PREPARED	FEBRUARY 2021
LINEAR STREET FOOTAGE TOTAL	2250± FT
FLOOD ZONE	ZONE X, ACCORDING TO FEMA FLOOD MAP NO. 06025C1725C

EASEMENTS

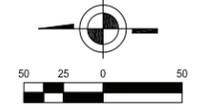
A PUBLIC UTILITY EASEMENT PER TOWN CENTER VILLAGE APARTMENTS SUBDIVISION MAP RECORDED IN BOOK 27, PAGES 16 THROUGH 17 OF FINAL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY.

BASIS OF BEARINGS

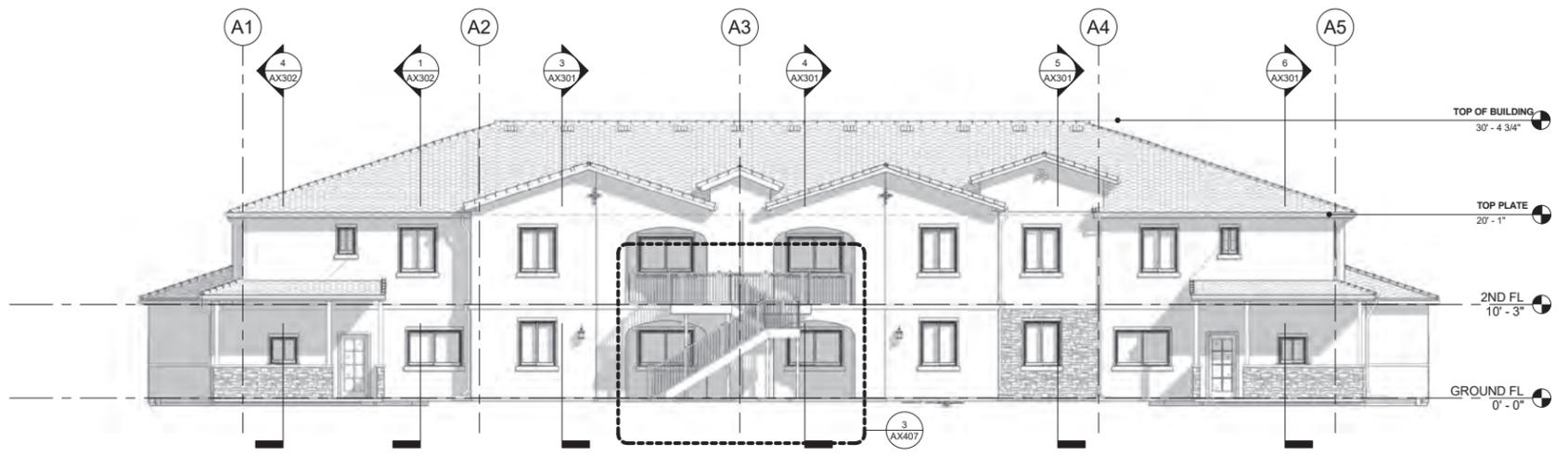
THE BASIS OF BEARINGS FOR THIS SURVEY IS THE NORTHERLY LINE OF REMAINDER PARCELS A AND B AS SHOWN ON THE MAP TITLED "EL CENTRO TOWN CENTER" FILED IN BOOK 20, PAGE 87 OF FINAL MAPS IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY, SHOWN AS S 89°57'57" E.

UTILITY PROVIDERS:

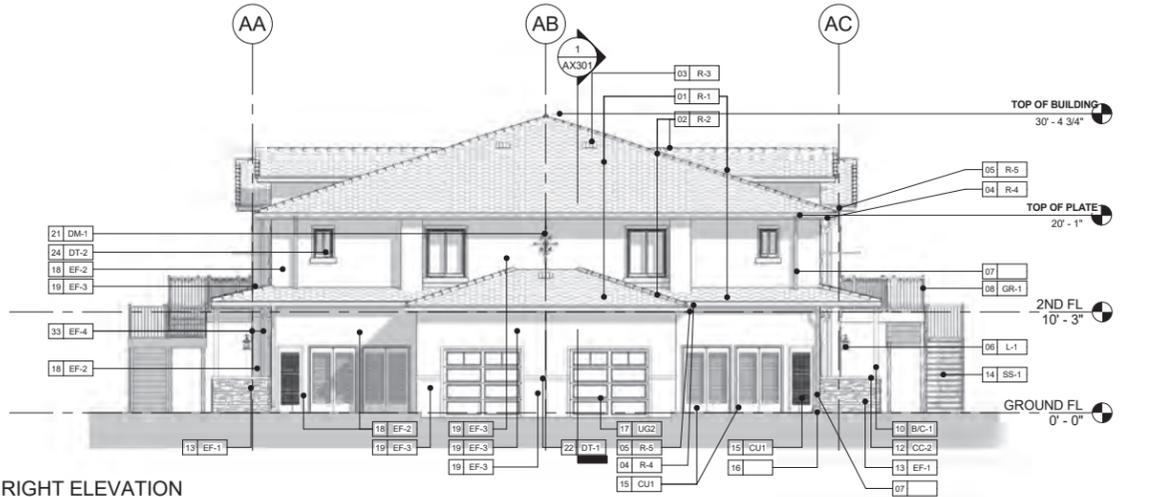
- ELECTRICITY**
IMPERIAL IRRIGATION DISTRICT
1285 BROADWAY
EL CENTRO, CA 92243
760-335-3640
- GAS**
SOUTHERN CALIFORNIA GAS COMPANY
PO BOX 1626
MONTEREY PARK, CA 91754-8626
1-877-238-0092
- WATER**
CITY OF EL CENTRO
1275 MAIN STREET
EL CENTRO, CA 92243
760-337-4510
- SEWER**
CITY OF EL CENTRO
2255 NORTH LA BRUCHERIE
EL CENTRO, CA 92243
760-337-4562
- BUILDING AND SAFETY DIVISION**
CITY OF EL CENTRO
1275 MAIN STREET
EL CENTRO, CA 92243
760-337-4508



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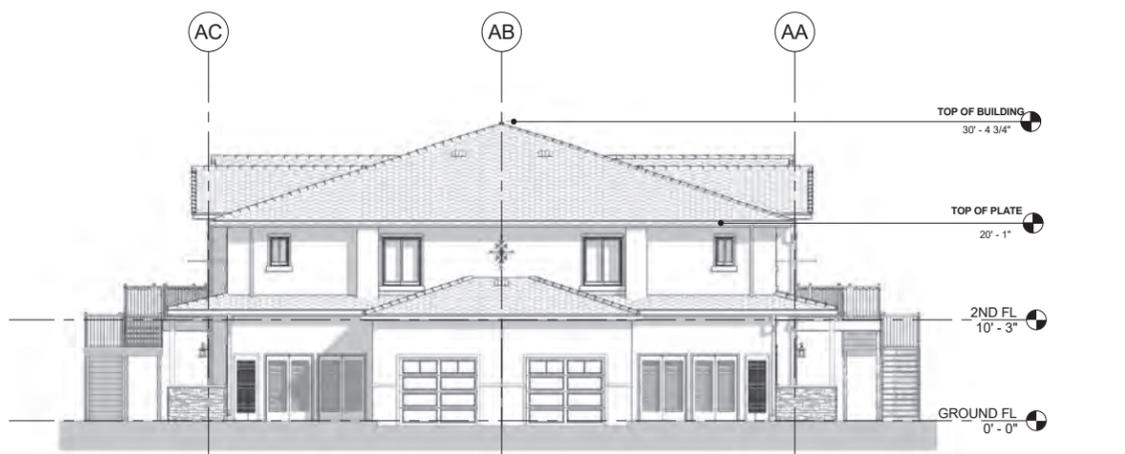
1 REAR ELEVATION



2 RIGHT ELEVATION



3 FRONT ELEVATION



4 LEFT ELEVATION

ELEVATION NOTES

NOTE:
AT LOCATIONS WHERE WALL SURFACES OF WOOD SUBSTRATE TO CONCRETE SUBSTRATE ARE SHOWN, FINISHES ARE TO BE FLUSH. PLASTER FINISHES WILL BE INSTALLED OVER CONCRETE OR C.M.U. SUBSTRATE IN THE NUMBER OF COATS AS REQUIRED TO MAINTAIN FLUSH FINISHED SURFACES.

- ALL VERTICAL DIMENSIONS SHOWN ARE FROM THE TOP OF PLYWOOD SHEATHING AT UPPER FLOORS OR FINISH SLAB AT FIRST FLOOR.
 - REFER TO DETAIL SHEETS FOR MINIMUM WINDOW, DOOR & WALL VENT MOISTURE BARRIER INSTALLATION REQUIREMENTS.
- WOOD SUBSTRATE:
- WINDOW HEADS WILL BE SET AT EITHER 7' - 11 1/2" OR 8' - 5 1/2" A.F.F. SEE ELEVATIONS
 - ALL HORIZONTAL PLASTER SURFACES SHALL RECEIVE SELF-ADHERED FLASHING, WEATHERBOARD LAPPED WITH BUILDING PAPER PRIOR TO THE APPLICATION OF WIRE LATH & PLASTER. WEATHER BOARD LAP WITH BLDG. PAPER MIN. 2" LAP.
 - CONNECT ALL BUILDING RAIN GUTTER DOWNSPOUTS TO SUSMP BIOFILTER DRAINAGE SYSTEM. REFER TO CIVIL PLANS. ALL OVERFLOW DRAINS TO HAVE A PRE-CAST CONCRETE SPLASH BLOCK.
 - REFER TO DETAIL SHEETS FOR MINIMUM WALL VENT FLASHING INSTALLATION (I.E. DRYER VENT, FOUNDATION VENT, COMBUSTION AIR VENT, ETC.).
 - REFER TO DOOR SCHEDULE FOR HEAD JAMB & THRESHOLD DETAILS NOT HEREWITH SHOWN.
 - INSTALL EXTERIOR PLASTER PER 2013 CBC TABLE 720.1 (2), ITEM #
 - PLASTER REGLET WHERE SHOWN ON ELEVATIONS WILL MITER @ CORNERS & RETURN ON SIDES OF COLUMNS OR WALLS.
 - ALL EXTERIOR WALLS ARE SOLID SHEATHED W/ EXTERIOR GRADE PLYWOOD SAME THICKNESS AS EXTERIOR SHEAR WALLS. REFER TO STRUCTURAL PLANS FOR SHEAR WALL LOCATIONS.
 - METAL CONTROL JOINTS (C.J.) SHALL BE PROVIDED FOR EVERY 150 S.F. OF STUCCO WALL AREA, EQUALLY DIVIDING A WALL PLANE, UNLESS NOTED OTHERWISE.
 - ALL DOUBLE TOP PLATE HEIGHT DIMENSIONS ARE FROM TOP OF INTERIOR FLOOR PLYWOOD SHEATHING.
 - ANTI-GRAFFITI FINISH TO BE PROVIDED AT THE FIRST 9 FEET, MEASURED FROM GRADE, AT EXTERIOR WALLS AND DOORS.
 - PROVIDE ADDRESS SIGNAGE ADJACENT TO UNIT ENTRY DOORS, SEE 6/AX509

EXTERIOR MATERIAL / FINISH SCHEDULE

KEYNOTE	MARK	DESCRIPTION	MINF COLOR	FINISH
	ET-1 & ET-2	DECORATIVE EXT. CERAMIC TILE. SEE DETAIL 3/AX509	FLOR SEVILLANA / TERRA COTTA PEACOCK	PRE-FINISHED
01	R-1	LIGHTWEIGHT CONC. ROOF S-TILE	SANTA CRUZ BLEND	INTEGRAL FINISH
02	R-2	LIGHTWEIGHT CONC. RIDGE, HIP AND EDGE TRIM	MATCH ROOF TILE BLEND	INTEGRAL FINISH
03	R-3	METAL ROOF VENT FOR S-TILE. SEE DETAIL 21/AX509	PRE-FINISHED	PRE-FINISHED
04	R-4	METAL ROOF GUTTER	MATCH ADJ. TRIM COLOR	PRE-FINISHED
05	R-5	CONC. FIBER BOARD FACIA	CHOCOLATE CANDY BROWN	PAINTED
06	L-1	DECORATIVE EXT. LED LIGHT FIXTURE. SEE DETAIL 4/AX509	BLACK	PRE-FINISHED
07		METAL DOWNSPOUT	BLACK	PRE-FINISHED
08	GR-1	DECORATIVE MTL. GUARD RAIL, 42" MIN.HT. FROM F.F.	BLACK	PRE-FINISHED
10	B/C-1	STRUCTURAL COLUMN/BEAM CLAD IN FINISHED WOOD TRIM	SMOOTH-COAT / MATCH CHOCOLATE CANDY BROWN	SMOOTH COAT
11	CC-1	CONC. PARAPET CAP	MATCH VENEER	INTEGRAL FINISH
12	CC-2	CONC. TRIM CAP	MATCH VENEER	INTEGRAL FINISH
13	EF-1	CORONADO - OLD COUNTRY LEDGE	COASTAL BROWN	INTEGRAL FINISH
14	SS-1	METAL STAIRS AND MTL. SUPPORTS W/ CONC. STEPS AND LANDING	CAFE BROWN	PRE-FINISHED
15	CU1	LOUVERED HOLLOW MTL. EXT. DOOR	CHOCOLATE CANDY BROWN	PAINTED / SEMI-GLOSS
16		CONC. SPLASH BLOCK. SEE DETAIL 15/AX510	CHOCOLATE CANDY BROWN	PAINTED / SEMI-GLOSS
17	UG2	ROLL-UP MTL. GARAGE DOOR W/ GL. WINDOW INSERTS	CHOCOLATE	INTEGRAL FINISH
18	EF-2	EXTERIOR CEMENT PLASTER	VANILLA CREAM	SMOOTH COAT
19	EF-3	EXTERIOR CEMENT PLASTER	EGYPTIAN SAND	SMOOTH COAT
21	DM-1	DECORATIVE WROUGHT IRON MEDALLION. SEE DETAIL 14/AX509	BLACK	PRE-FINISHED
22	DT-1	EXTERIOR CEMENT PLASTER OVER 2x4 WOOD BLOCKING	EGYPTIAN SAND	SMOOTH FINISH
23	UE1	FIBERGLASS FULL VIEW DOOR	MAHOGANY	INTEGRAL FINISH
24	DT-2	MILGARD VINYL SLIDER WINDOW W/ EXTERIOR CEMENT PLASTER TRIM	CHOCOLATE	INTEGRAL FINISH
25	CC-3	CONC. EDGE TRIM	MATCH VENEER	INTEGRAL FINISH
26	CC-4	LIGHTWEIGHT CONC. ACCENT, FAUX GABLE VENT (SEE DETAIL 5/AX509)	MATCH ROOF BLEND	INTEGRAL FINISH
27	DM-2	DECORATIVE WROUGHT IRON GRILLE. SEE DETAIL 14/AX509	BLACK	PRE-FINISHED
33	EF-4	EXTERIOR CEMENT PLASTER	BISON BEIGE	SMOOTH COAT

LEGEND

01 XX-01 MATERIAL / COLOR MARK
KEYNOTE

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Photo 1: View looking north from central portion of the site.



Photo 2: View looking south from central portion of the site.



Photo 3: View looking west from eastern portion of the site.



Photo 4: View looking north from eastern portion of the site.

2.0 PROJECT DESCRIPTION

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Photo 5: View of lot/residence located south of the project site.



Photo 6: Apartment complex located directly west of the project site.



Photo 7: Date Canal located east of the project site (looking north).



Photo 8: Disturbed lot located directly east of the project site.

2.0 PROJECT DESCRIPTION

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3.0 ENVIRONMENTAL CHECKLIST

3.0 ENVIRONMENTAL CHECKLIST

3.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

3.0 ENVIRONMENTAL CHECKLIST

3.2 DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because of the incorporated mitigation measures and revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Norma M. Villcaña
Signature

Norma Villcaña
Printed Name

4/12/21
Date

Community Development Director
Title

3.3 EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources cited. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards.
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect, and construction as well as operational impacts.
- 3) A “Less Than Significant Impact” applies when the proposed project would not result in a substantial and adverse change in the environment. This impact level does not require mitigation measures.
- 4) “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect is significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 5) “Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from a “Potentially Significant Impact” to a “Less Than Significant Impact.” The initial study must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.

3.0 ENVIRONMENTAL CHECKLIST

1. Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

a) *Would the project have a substantial adverse effect on a scenic vista? Less than Significant Impact.*

Figures 4A and 4B show views of the project site and the surrounding area. Scenic vistas include natural features such as topography, watercourses, rock outcrops, natural vegetation, and man-made alterations to the landscape. There are no such designated scenic vistas in the City of El Centro. The site is located in a generally developed area of the City, with a large commercial retail center and similar multi-family development (apartments) to the west; single-family residences to the south; and vacant graded land to the north and east. The site is generally flat and does not support any scenic resources or features, including waterways, rock outcroppings, or other natural features, nor does it offer any scenic views to off-site points of visual interest. As such, project implementation would have a less than significant impact on a scenic vista.

b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? No Impact.*

Refer also to Response 1(a), above. The project site is not located within a scenic corridor, nor are there any designated scenic highways located within the City of El Centro. No scenic resources, such as trees, rock outcroppings, or historic buildings are located on-site. As the project site is not located in the vicinity of a designated scenic highway, project implementation would have no impact to scenic resources within a state scenic highway.

c) *In urbanized areas, would the project conflict with applicable zoning and other regulations governing scenic quality? Less than Significant Impact.*

The project would be designed in accordance with the El Centro Municipal Code to ensure that development reflects required design requirements such as for building size and height, setbacks, provision of landscaping, and common open space, among other such design features. Figure 3C provides illustrative elevations of the proposed buildings. Development occurring with the project

3.0 ENVIRONMENTAL CHECKLIST

would also be required to be consistent with the City's adopted Design Standards, which encourage sound site development practices synonymous with that of the existing residential development surrounding the project. Additionally, the proposed buildings would be similar in design to the existing apartment complex located immediately to the west (Town Center Villa Apartments – Phases I to III) of the project site, and would therefore not substantially change the existing character of the area.

Furthermore, the project site is not located in one of the City's designated Visual Enhancement Areas, as identified in the City General Plan Land Use Element (City of El Centro 2004). The project site is currently undeveloped, previously graded land in proximity to other existing multi- and single-family residential uses and area commercial uses, as well as some undeveloped lands. As discussed under Response 1(b) above, development of the proposed residential uses would not substantially damage any resources having scenic quality, as the site does not support any such features.

Given that implementation of the proposed project would be required to comply with the City's adopted Zoning Code and Design Standards, impacts would be less than significant.

d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? Less than Significant Impact.*

Development of the proposed residential uses on the currently undeveloped site would result in the introduction of new nighttime lighting sources and/or potential sources of glare in the area. As the subject property is undeveloped in the current state, nighttime lighting levels on the project site would increase over current levels with the proposed development and could result in adverse effects to adjacent land uses (particularly single-family residential uses south across Bradshaw Avenue) through the "spilling over" of light or through "sky glow" conditions wherein light escapes from lighting fixtures and projects upward into the dark sky.

Exterior lighting would be installed on the individual buildings for identification purposes (i.e., addresses or building numbers) and access. Lighting would also be installed at the access drives and in the surface parking areas to ensure safe circulation, as well as at the clubhouse/pool area. Additional accent lighting may be used to illuminate the monument sign and associated landscaping at the N. 8th Street entrance. All project lighting would be low-level lighting shielded and directed downward to reduce potential effects on adjacent properties as well as nighttime skies. All new development in El Centro is required to meet the standards identified in Section 29-149, Lighting Standards, of the City's Zoning Code to ensure that potential adverse nighttime lighting effects are minimized.

Additionally, the project as designed does not include the incorporation of large expanses of glass or other reflective materials such as high gloss paints, metallic surfaces, or other such features; refer to [Figure 3C](#). Therefore, it is not anticipated that project elements would result in potential adverse glare effects on surrounding properties (or on operations associated with the Imperial County Airport located approximately 1.8 miles northwest of the project site).

Therefore, the project would not create a new source of substantial light or glare that could potentially adversely affect day or nighttime views in the area. Project impacts associated with light and glare would be less than significant.

2. Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
<p>2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation (DOC) as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board (CARB). Would the project:</p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forestland or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

- a) *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? Less than Significant Impact.*

According to available maps published by the California Department of Conservation (DOC 2018c) as part of the Farmland Mapping and Monitoring Program (FMMP), the project site is designated Farmland of Local Importance, which is land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee (DOC 2019). Adjoining lands to the west and south are designated as Urban and Built-Up Lands; adjoining lands to the east and north are designated as Farmland of Local Importance (DOC 2018c).

The project site is located in an urbanized area in the City of El Centro and is generally surrounded by developed lands supporting single- and multi-family uses, in addition to a large retail commercial center located at a distance to the west, paved roadways, and public utility and infrastructure systems. The site is currently undeveloped and has been previously graded. In addition, the site currently has a General Plan land use designation of General Commercial and

3.0 ENVIRONMENTAL CHECKLIST

is zoned CG-General Commercial, indicating the City's anticipation for future development of the property as a non-agricultural use.

Based on a review of historical aerial photographs and maps of the project area, the subject property was in use as agricultural land as recent as 1953; however, no structures or other development have been documented as having occurred on-site in the past. The land appears as barren dirt in photographs from 1996 to 2016, as it exists today (ECORP 2020b). Although the project would result in the conversion of Farmland of Local Importance to a non-agricultural use, the subject site has not been in active agricultural use for close to 70 years. Based on such conditions, combined with current zoning and General Plan land use designations that do not anticipate future agricultural uses, as well as the surrounding urbanized setting, development of the site as proposed is not anticipated to result in the loss of valuable farmland or adversely affect the City's inventory of agricultural resources over the long term.

For the reasons above, impacts relative to designated farmland are considered to be less than significant.

b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract? No Impact.*

As stated under Response 2(a), the site is zoned CG-General Commercial and is therefore not intended for agricultural use. The site is not subject to a Williamson Act contract and no agricultural uses are present on or adjacent to the property. Therefore, the project would not create a conflict with existing agricultural zoning for agricultural use or a Williamson Act contract. No impact would occur.

c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? No Impact.*

There are no lands zoned for forest or timber production on the project site or within the City of El Centro limits. Therefore, no impact would occur.

d) *Result in the loss of forest land or conversion of forest land to non-forest use? No Impact.*

There are no designated forestlands on or adjacent to the project site, and therefore, the project would not convert any such lands to non-forest uses. No impact would occur.

e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? Less than Significant Impact.*

Refer to Responses 2a) to 2d) above. The project site is not located within an agricultural use area and is located within proximity to lands that support single- and multi-family residential development, as well as retail commercial uses. It is not anticipated that development of the site would affect or encourage the conversion of any agricultural lands to a non-agricultural use. Thus, implementation of the project would not result in changes in the environment that would result in the conversion of farmland to non-agricultural use. Impacts would be less than significant.

3.0 ENVIRONMENTAL CHECKLIST

3. Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following discussion is based upon the *Air Quality, Greenhouse Gas Emissions, and Energy Consumption Assessment* prepared by ECORP Consulting, Inc. (2021; see Appendix A). This document provides additional detailed discussion, background information, and other relevant information considered in the analysis.

DISCUSSION OF IMPACTS

- a) *Would the project conflict with or obstruct implementation of the applicable air quality plan? Less than Significant Impact.*

The project site is located in Imperial County. Air quality in the county is under the jurisdiction of the Imperial County Air Pollution Control District (ICAPCD) which serves as the local air quality agency and shares responsibility with the California Air Resources Board (CARB) for ensuring that state and federal ambient air quality standards are achieved and maintained in Imperial County. ICAPCD responsibilities include monitoring ambient air quality, planning activities such as modeling and maintenance of the emission inventory, and preparing clean air plans.

Clean air plans, known as State Implementation Plans (SIP), must be prepared for areas designated as nonattainment to demonstrate how the area will come into attainment of the exceeded ambient air quality standard. As identified in Table 3-1 under Response 3b), below, the project region of the Salton Sea Air Basin is classified nonattainment for federal O₃, PM_{2.5}, and PM₁₀ standards (ECORP 2021).

The region's SIP includes the ICAPCD air quality plans: 2018 PM₁₀ SIP, the 2018 Annual PM_{2.5} SIP, the 2017 8-Hour Ozone SIP, 2013 24-Hour PM_{2.5} SIP, the 2009 1997 8-hour Ozone RACT SIP, the 2009 PM₁₀ SIP, and the 2008 Ozone Early Progress Plans. These air quality attainment plans are a compilation of new and previously submitted plans, programs (such as monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls describing how the state will attain ambient air quality standards. These SIP plans and associated control measures are based on information derived from projected growth in Imperial County in order to project future emissions and then determine strategies and regulatory controls for the reduction of emissions. Growth projections are

3.0 ENVIRONMENTAL CHECKLIST

based on the general plans developed by Imperial County and the incorporated cities in the county, including El Centro.

As such, projects that comply with all applicable district rules and regulations, comply with all proposed control measures from the applicable plan(s), and propose development consistent with the growth anticipated by the respective general plan of the jurisdiction in which the proposed development is located (e.g., El Centro) would be consistent with the SIP. A project is nonconforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan by failing to adhere to air district rules or control measures, exceeding air district thresholds of significance, or proposing a development substantially denser than that assumed in the general plan.

The project would generate criteria air pollutants at levels below all applicable ICAPCD thresholds of significance (refer to Response 3b), below) and would be required to adhere to ICAPCD control measures such as Rule 801 and ICAPCD Regulation VIII. However, as previously described, a General Plan Amendment is proposed to change the existing General Plan land use designation from General Commercial to High Density Residential. Thus, the project as proposed is not consistent with the El Centro General Plan and is therefore potentially inconsistent with the types, intensity, and patterns of land use assumed for the site vicinity in ICAPCD's air quality planning efforts.

The ICAPCD air quality plans aim to reduce emissions of criteria pollutants for which the region is in nonattainment by establishing a program of rules and regulations directed at reducing air pollutant emissions and achieving state and national air quality standards. The project proposal to amend the General Plan land use designation from General Commercial to High Density Residential is consistent with this strategy. First, the project is considered infill development, as it proposes to develop a property in a rapidly urbanizing area with residential uses in close proximity to a wide range of commercial businesses and services (along N. Imperial Avenue)—which means the project can be identified for its “location efficiency.” Location efficiency describes the location of the project relative to the type of urban landscape it's proposed to fit within. In general, compared to the statewide average, a project with location efficiency can realize automotive vehicle mile trip (VMT) reductions between 10 and 65 percent (ECORP 2021), which in turn results in reduced air pollutant emissions. The project would locate residences in proximity to existing off-site commercial uses, thereby providing commercial and work options to the future residents of the project site. The location efficiency of the project site would result in benefits that would reduce vehicle trips and VMT compared to the statewide average and would result in corresponding reductions in transportation-related emissions, a primary goal of the ICAPCD air quality planning efforts. Due to the wide range of commercial services along N. Imperial Avenue, the proposed General Plan Amendment and zone change would thereby enhance the physical design of the urban environment by instigating land use diversity and positioning more residents within close proximity to existing commercial land uses. The increases in land use diversity and mix of uses in the project area would reduce vehicle trips and VMT, compared to the statewide average, by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions, a primary goal of the ICAPCD. For these reasons, the project proposal to amend the General Plan land use designation of the project site from General Commercial to High Density Residential would be consistent with ICAPCD strategies for integrating land use and transportation in a manner that reduces regional air pollutants, and thus is consistent with the applicable air quality management plans.

Because the proposed project is required to comply with applicable ICAPCD rules, regulations, and requirements for controlling emissions of the nonattainment air pollutants and their precursors, and since maximum daily pollutant emissions projected to result from the project are

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below ICAPCD significance thresholds, the project would not conflict with or obstruct implementation of any air quality plans. Impacts would be less than significant.

- b) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? Less than Significant Impact.*

Ambient Air Quality

The USEPA and CARB designate air basins or portions of air basins and counties as being in “attainment” or “nonattainment” for each of the criteria pollutants. Areas that do not meet the standards are classified as nonattainment areas. The National Ambient Air Quality Standards (NAAQS) (other than for ozone [O₃], particulate matter [PM₁₀ and PM_{2.5}], and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. The NAAQS for O₃, PM₁₀, and PM_{2.5} are based on statistical calculations over one- to three-year periods, depending on the pollutant. The California Ambient Air Quality Standards (CAAQS) are not to be exceeded during a three-year period. The attainment status for the Salton Sea Air Basin, which encompasses the project site, is included in [Table 3-1](#).

Table 3-1: Attainment Status of Criteria Pollutants in the Salton Sea Air Basin

Pollutant	State Designation	Federal Designation
O ₃	Nonattainment	Nonattainment
PM ₁₀	Nonattainment	Nonattainment
PM _{2.5}	Attainment	Nonattainment
CO	Attainment	Unclassified/Attainment
NO ₂	Attainment	Unclassified/Attainment
SO ₂	Attainment	Unclassified/Attainment

Source: ECORP 2021; see Appendix A.

The determination of whether an area meets the state and federal standards is based on air quality monitoring data. Some areas are unclassified, which means there is insufficient monitoring data for determining attainment or nonattainment. Unclassified areas are typically treated as being in attainment. Because the attainment/nonattainment designation is pollutant-specific, an area may be classified as nonattainment for one pollutant and attainment for another. Similarly, because the state and federal standards differ, an area could be classified as attainment for the federal standards of a pollutant and as nonattainment for the state standards of the same pollutant. The region is designated as a nonattainment area for the federal O₃, PM₁₀, and PM_{2.5} standards and is also a nonattainment area for the state standards for O₃ and PM₁₀ (ECORP 2021).

ICPCD Thresholds of Significance

The significance criteria established by the applicable air quality management or air pollution control district (in this case, Imperial County Air Pollution Control District, or ICAPCD) may be relied upon to make the above determinations. The ICAPCD has identified significance thresholds for use in evaluating project impacts under CEQA. Accordingly, the ICAPCD recommended thresholds of significance to be used to determine whether project implementation would result in a significant air quality impact. Significance thresholds for evaluation of construction and operational air quality impacts are listed below in [Table 3-2](#).

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Table 3-2: ICAPCD Significance Thresholds – Pounds per Day

Criteria Pollutant and Precursors	Construction Activities	Operations	
	Average Daily Emissions (lbs/day)	Average Daily Emissions (lbs/day)	
		Tier I Threshold	Tier II Threshold
ROG	75	<137	>137
NO _x	100	<137	>137
PM ₁₀	150	<150	≥150
PM _{2.5}	N/A	<550	>550
CO	550	<550	>550
SO ₂	N/A	<150	>150

Source: ECORP 2021; see Appendix A.

Projects that are predicted to exceed Tier I thresholds require implementation of applicable ICAPCD standard mitigation measures to be considered less than significant. Projects exceeding Tier II thresholds are required to implement applicable ICAPCD standard mitigation measures, as well as applicable discretionary mitigation measures. Projects that exceed the Tier II thresholds after implementation of standard and discretionary mitigation measures would be considered to have a potentially significant impact to human health and welfare. ≥

By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's individual emissions exceed its identified significance thresholds, the project would be cumulatively considerable. Projects that do not exceed significance thresholds are not considered to be cumulatively considerable.

Construction

The ICAPCD has established methods to quantify air emissions associated with construction activities such as air pollutant emissions generated by operation of on-site construction equipment, fugitive dust emissions related to grading and site work activities, and mobile (tailpipe) emissions from construction worker vehicles and haul/delivery truck trips. Emissions would vary from day to day, depending on the level of activity, the specific type of construction activity occurring, and, for fugitive dust, prevailing weather conditions. The use of construction equipment on-site would result in localized exhaust emissions.

Emissions associated with project implementation would be temporary and short term but have the potential to represent a significant air quality impact. Two basic sources of short-term emissions will be generated through project implementation: operation of the heavy-duty equipment (i.e., excavators, loaders, haul trucks) and the creation of fugitive dust during clearing and grading. Construction activities such as excavation and grading operations, construction vehicle traffic, and wind blowing over exposed soils would generate exhaust emissions and fugitive PM emissions that affect local air quality at various times during construction. Effects would be variable depending on the weather, soil conditions, the amount of activity taking place, and the nature of dust control efforts. The dry climate of the area during the summer months creates a high potential for dust generation. Construction activities would be subject to ICAPCD Rule 801, which requires taking reasonable precautions to reduce the amount of PM₁₀ entrained in the ambient air as a result of emissions generated from construction and other earth-moving activities through actions to prevent, reduce, or mitigate PM₁₀ emissions. In addition, the project is required to adopt best available control measures to minimize emissions from surface-disturbing activities to comply with ICAPCD Regulation VIII (Fugitive Dust Rules). Emissions associated with project off-road equipment, worker commute trips, and ground disturbance were calculated using the CARB-

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approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements.

Predicted maximum daily emissions attributable to project construction are summarized in [Table 3-3](#). Such emissions are short term and of temporary duration, lasting only as long as project construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the ICAPCD thresholds of significance.

Table 3-3: Project Construction-Related Emissions (pounds per day)

Construction Year	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Construction 2021	10.03	45.87	26.67	0.11	11.77	2.99
Construction 2022	9.76	17.96	25.51	0.05	7.21	2.35
ICAPCD Daily Significance Threshold	75	100	550	None	150	None
Exceed Threshold?	No	No	No	No	No	No

Source: CalEEMod version 2016.3.2. Construction generated air pollutant emissions were calculated using a combination of model defaults for Imperial County, project site plans, and specific data provided by the project applicant including equipment used, duration of specific construction phases, and the amount of soil movement required (14,000 c.y. of cut material and 23,000 c.y. of fill material). Road silt loading has been increased to more accurately account for PM generated by worker commute and vendor traffic. Refer to Attachment A for Model Data Outputs.

As shown in [Table 3-3](#), emissions generated during project construction would not exceed the ICAPCD's construction thresholds of significance. Therefore, criteria pollutant emissions generated during project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard.

Operation

The ICAPCD has also established significance thresholds to evaluate the potential impacts associated with long-term project operations. Regional air pollutant emissions associated with project operations include area source emissions, energy-use emissions, and mobile source emissions.

Implementation of the project would result in long-term operational emissions of criteria air pollutants such as PM₁₀, PM_{2.5}, carbon monoxide (CO), and sulfur dioxide (SO₂) as well as O₃ precursors such as reactive organic gases (ROGs) and nitrogen oxides (NO_x). Project-generated increases in emissions would be predominantly associated with motor vehicle use. Operational air pollutant emissions were based on the project site plans and the estimated traffic trip generation rates provided by Michael Baker International (2021; see Appendix E). Long-term operational emissions attributable to the project are identified in [Table 3-4](#) and compared to the operational significance thresholds promulgated by the ICAPCD.

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Table 3-4: Project Operational-Related Emissions (Regional Significance Analysis)

Emission Source	Pollutant (pounds per day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer Emissions						
Area	4.99	0.17	14.89	0	0.08	0.08
Energy	0.08	0.71	0.30	0	0.06	0.06
Mobile	3.73	20.54	35.21	0.09	18.20	4.60
Total:	8.80	21.42	50.40	0.09	18.34	4.74
ICAPCD Daily Significance Threshold	137	137	550	150	150	550
Exceed ICAPCD Region Threshold?	No	No	No	No	No	No
Winter Emissions						
Area	4.99	0.17	14.89	0	0.08	0.08
Energy	0.08	0.71	0.30	0	0.06	0.06
Mobile	2.8	20.32	29.52	0.08	18.20	4.60
Total:	7.87	21.20	44.71	0.08	18.34	4.74
ICAPCD Daily Significance Threshold	137	137	550	150	150	550
Exceed ICAPCD Region Threshold?	No	No	No	No	No	No

Source: CalEEMod version 2016.3.2. Operational emissions were calculated using a combination of model defaults for Imperial County and an estimated project trip generation rate of 1,320 average daily trips. Road silt loading has been increased to more accurately account for PM generated by operational traffic. Refer to Attachment A for Model Data Outputs.

As shown in Table 3-4, the project's emissions would not exceed any ICAPCD thresholds for any criteria air pollutants during operation. Therefore, operational emissions projected to result from project implementation would be less than significant.

- c) *Would the project expose sensitive receptors to substantial pollutant concentrations? Less than Significant Impact.*

Sensitive receptors are defined as facilities or land uses that include members of the population who are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over age 65, children under age 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The nearest existing sensitive receptors to the project site are multi-family residences located to the east (across 8th Street) and west (across N. 10th Street) of the project site.

Construction-Generated Air Contaminants

Construction-related activities would result in temporary, short-term emissions of diesel particulate matter (DPM), ROG, NO_x, CO, and PM₁₀ from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g., clearing, grading); soil hauling truck traffic; paving; and other miscellaneous activities. The El Centro portion of the Salton Sea Air Basin is listed as a nonattainment area for the federal O₃, PM₁₀, and PM_{2.5} standards and is also a nonattainment area for the state standards for O₃ and PM₁₀. Thus, existing O₃ and PM_{2.5} levels in the project portion of the air basin are at unhealthy levels during certain periods. However, as shown in Table 3-3, the project would not exceed the ICAPCD significance thresholds for construction emissions.

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The health effects associated with O₃ are generally associated with reduced lung function. Because the project would not involve construction activities that would result in O₃ precursor emissions (ROG or NO_x) in excess of the ICAPCD thresholds, the project is not anticipated to substantially contribute to regional O₃ concentrations and the associated health impacts.

CO tends to be a localized impact associated with congested intersections. In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions. The project would not involve construction activities that would result in CO emissions in excess of the ICAPCD thresholds. Thus, the project's CO emissions would not contribute to the health effects associated with this pollutant.

Particulate matter (PM₁₀ and PM_{2.5}) contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Particulate matter exposure has been linked to a variety of problems, including premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms such as irritation of the airways, coughing, or difficulty breathing. For construction activity, DPM is the primary toxic air contaminant (TAC) of concern. Based on the emission modeling conducted, the maximum on-site construction-related daily emissions of exhaust PM_{2.5}, considered a surrogate for DPM, would be 0.72 pounds/day during construction in the year 2021, 0.43 pounds/day during construction in 2022 (see Appendix A). PM_{2.5} exhaust is considered a surrogate for DPM because more than 90 percent of DPM is less than 1 microgram in diameter and therefore is a subset of particulate matter under 2.5 microns in diameter (i.e., PM_{2.5}). Most PM_{2.5} derives from combustion, such as use of gasoline and diesel fuels by motor vehicles. As with O₃ and NO_x, the project would not generate emissions of PM₁₀ or PM_{2.5} that would exceed the ICAPCD's thresholds. Accordingly, the project's PM₁₀ and PM_{2.5} emissions are not expected to cause any increase in related regional health effects for these pollutants.

Therefore, project construction would not result in a potentially significant contribution to regional concentrations of nonattainment pollutants and would not result in a significant contribution to the adverse health impacts associated with those pollutants.

Operational Air Contaminants

Operation of the proposed project would not result in the development of any substantial sources of air toxics. There are no stationary sources associated with the operations of the project; nor would the project attract additional mobile sources that spend long periods queuing and idling at the site. On-site project emissions would not result in significant concentrations of pollutants at nearby sensitive receptors. The maximum operation-related emissions of exhaust PM_{2.5}, considered a surrogate for DPM, would be 0.17 pounds in a single day. Therefore, the project would not be a substantial source of TACs. The project would not result in a high carcinogenic or non-carcinogenic risk during operation.

Naturally Occurring Asbestos

Another potential air quality issue associated with construction-related activities is the airborne entrainment of asbestos due to the disturbance of naturally occurring asbestos-containing soils. The proposed project is not located within an area designated by the State of California as likely to contain naturally occurring asbestos (ECORP 2021). As a result, construction-related activities would not be anticipated to result in increased exposure of sensitive land uses to asbestos.

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Carbon Monoxide Hot Spots

It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when idling at congested intersections. Concentrations of CO are a direct function of the number of vehicles, length of delay, and traffic flow conditions. Under certain meteorological conditions, CO concentrations close to congested intersections that experience high levels of traffic and elevated background concentrations may reach unhealthy levels, affecting nearby sensitive receptors. Given the high traffic volume potential, areas of high CO concentrations, or "hot spots," are typically associated with intersections that are projected to operate at unacceptable levels of service during the peak commute hours.

However, transport of this criteria pollutant is extremely limited, and CO disperses rapidly with distance from the source under normal meteorological conditions. Furthermore, vehicle emissions standards have become increasingly more stringent in the last 20 years. In 1993, much of the state was designated nonattainment under the California Ambient Air Quality Standards and NAAQS for CO. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration across the entire state is now designated as attainment. Detailed modeling of project-specific CO "hot spots" is not necessary and thus this potential impact is addressed qualitatively.

A CO "hot spot" would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. The analysis prepared for CO attainment in the South Coast Air Quality Management District's (SCAQMD) 1992 Federal Attainment Plan for Carbon Monoxide in Los Angeles County and a Modeling and Attainment Demonstration prepared by the SCAQMD as part of the 2003 Air Quality Management Plan can be used to demonstrate the potential for CO exceedances of these standards. The SCAQMD conducted a CO hot spot analysis as part of the 1992 CO Federal Attainment Plan at four busy intersections in Los Angeles County during the peak morning and afternoon time periods. The intersections evaluated were Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection evaluated was at Wilshire Boulevard and Veteran Avenue, which has a traffic volume of approximately 100,000 vehicles per day. Despite this level of traffic, the CO analysis concluded that there was no violation of CO standards (ECORP 2021). In order to establish a more accurate record of baseline CO concentrations affecting the South Coast Air Basin, a CO "hot spot" analysis was conducted in 2003 at the same four busy intersections in Los Angeles at the peak morning and afternoon time periods. This "hot spot" analysis did not predict any violation of CO standards. The highest one-hour concentration was measured at 4.6 ppm at Wilshire Boulevard and Veteran Avenue and the highest eight-hour concentration was measured at 8.4 ppm at Long Beach Boulevard and Imperial Highway.

Similar considerations are also employed by other air districts when evaluating potential CO concentration impacts. Specifically, the Bay Area Air Quality Management District, the air district for the San Francisco Bay Area, concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour or 24,000 vehicles per hour where vertical and/or horizontal air does not mix in order to generate a significant CO impact.

According to the traffic analysis prepared for the project (Michael Baker International 2021), the project is anticipated to generate 1,320 daily trips on average. Because the proposed project would not increase traffic volumes at any intersection to more than 100,000 vehicles per day, or

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even 44,000 vehicles per day, there is no likelihood of the project traffic exceeding CO values. CO “hot spots” are not an environmental impact of concern for the project. Localized air quality impacts related to mobile source emissions would not be a concern.

Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

d) *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? Less than Significant Impact.*

Typically, odors are regarded as an annoyance rather than a health hazard. However, manifestations of a person’s reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).

With respect to odors, the human nose is the sole sensing device. The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals have the ability to smell minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; in fact, an odor that is offensive to one person (e.g., from a fast food restaurant) may be acceptable to another. It is also important to note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity.

Quality and intensity are two properties present in any odor. The quality of an odor indicates the nature of the smell experience. For instance, if a person describes an odor as flowery or sweet, then the person is describing the quality of the odor. Intensity refers to the strength of the odor. For example, a person may use the word “strong” to describe the intensity of an odor. Odor intensity depends on the odorant concentration in the air. When an odorous sample is progressively diluted, the odorant concentration decreases. As this occurs, the odor intensity weakens and eventually becomes so low that the detection or recognition of the odor is quite difficult. At some point during dilution, the concentration of the odorant reaches a detection threshold. An odorant concentration below the detection threshold means that the concentration in the air is not detectable by the average human.

Construction

During construction, the proposed project presents the potential for generation of objectionable odors in the form of diesel exhaust in the immediate vicinity of the site. However, these emissions are short term in nature and will rapidly dissipate and be diluted by the atmosphere downwind of the emission sources.

Additionally, odors would be localized and generally confined to the construction area. Given that there are no natural topographic features (e.g., canyon walls) or man-made structures (e.g., tall buildings) that would potentially trap such emissions, construction-related odors would occur at magnitudes that would not affect substantial numbers of people.

Operation

Criteria for evaluation of odor impacts are found in Table 3 of the ICAPCD’s CEQA Air Quality Handbook (2017). The ICAPCD’s Handbook identifies certain land uses as potential sources of odors. These land uses include wastewater treatment plants, sanitary landfills, composting station, feedlots, asphalt batching plants, painting/coating operations (including auto body shops), or

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rendering plants. The project proposes residential uses that would not include any of the land uses identified by the ICAPCD as potential odor-generating sources.

Therefore, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant.

4. Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal wetlands, etc.), through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following discussion is based upon the *Biological Resources Report* prepared by ECORP Consulting, Inc. (2020a; see Appendix B).

DISCUSSION OF IMPACTS

a) *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? Less than Significant Impact with Mitigation Incorporated.*

Database searches were performed to identify special-status species with the potential to occur in the area. Database searches were performed on the following websites:

- California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) within five miles of the project area

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- CDFW Special Animals Lists
- US Fish and Wildlife Service (USFWS) Critical Habitat Portal and Information for Planning and Consultation (IPaC) Trust Resource List
- California Native Plant Society (CNPS) Electronic Inventory of Rare and Endangered Plants
- Calflora Information on California Plants
- USFWS National Wetland Inventory

No sensitive plant species with the potential to occur within the project area were identified. One special-status wildlife species, burrowing owl, a federal Bird of Conservation Concern and a California Species of Special Concern, was determined to have a moderate potential to occur within the survey area. See Appendix B for the database search results and summary.

Site Survey Results

A site survey conducted on October 1, 2020, confirmed that the site appears to have been previously graded and disturbed and is characterized by ruderal, non-native vegetation that typically has limited ecological value. The entirety of the project site is classified as disturbed habitat. Dominant plant species observed included native herbs bush seepweed and silverscale saltbush, as well as non-native herbs tamarisk and fivehook bassia. These plant species were located on the periphery of the project area as the central portion of the project area was recently graded and did not support vegetation. Portions of lands buffering the site are also classified as disturbed: vacant lots to the north, northeast, and east. Vegetation on such lands consists of native herbs bush seepweed and silverscale saltbush, as well as ruderal species including tamarisk, fivehook bassia, Russian thistle, and puncture vine and non-native grasses including red brome.

Habitats and Vegetation Communities

Habitat and land cover within the survey area are not considered sensitive biological resources. All proposed disturbance and construction staging would occur on previously graded and disturbed lands.

Special-Status Species

Candidate, sensitive, or special-status species are commonly characterized as species that are at a potential risk or actual risk to their persistence in a given area or across their native habitat. These species have been identified and assigned a status ranking by governmental agencies such as the CDFW and USFWS, and private organizations such as the CNPS. The degree to which a species is at risk of extinction is the determining factor in the assignment of a status ranking. Some common threats to a species' or population's persistence include habitat loss, degradation, fragmentation, human conflict, and intrusion. For the purposes of this MND, special-status species are defined by the following codes:

1. Listed, proposed, or candidates for listing under the federal Endangered Species Act (50 Code of Federal Regulations [CFR] 17.11;
2. Listed or proposed for listing under the California Endangered Species Act (Fish and Game Code [FGC] 1992 Section 2050 et seq.; 14 California Code of Regulations [CCR] Section 670.1 et seq.);

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3. Designated as Species of Special Concern by the CDFW;
4. Designated as Fully Protected by the CDFW (FGC Sections 3511, 4700, 5050, 5515); and,
5. Species that meet the definition of rare or endangered under CEQA (14 CCR Section 15380), including CNPS List Rank 1b and 2.

Special-status plants and wildlife species reported for the region in the literature review or for which suitable habitat occurs were evaluated for their potential to occur within the project area or in adjacent areas where indirect impacts could occur; refer to Appendix B.

Special-Status Plant Species

No special-status plant species were observed within the survey area during the field assessment. All special-status plants were determined unlikely to occur within the survey area due to the lack of suitable habitat and/or other conditions such as soil or elevation.

Special-Status Wildlife Species

Special-status wildlife species with occurrence records were assessed for the potential to occur within the survey area. One special-status wildlife species, burrowing owl, a federal Bird of Conservation Concern and a California Species of Special Concern, was determined to have a moderate potential to occur within the survey area. Burrowing owl is a small owl typically found in dry open areas with few trees and short grasses such as prairie, pastures, and desert scrublands. This species is also found near human habitation in agricultural areas, vacant lots, and airports and uses uninhabited mammal burrows for roosts and nests, often times in close proximity to California ground squirrel colonies.

The disturbed project site provides habitat for burrowing owl; however, on-site soils are not suitable for burrowing. Some disturbed lots surrounding the project site have more suitable soils for burrowing. No sign of burrowing owl was observed during the site survey, and no mammal burrows or berms were observed throughout the entirety of the survey area. However, the species has been previously recorded within 5 miles of the site with the closest being approximately 2 miles away. Due to the presence of moderately suitable habitat and known records within 5 miles of the site, this species was determined to have a moderate potential to occur.

Therefore, the project has the potential for direct and indirect impacts to burrowing owl. Although no burrowing owl or potential burrows were identified during the field survey, conditions could change by the time project construction activities begin. Additional vegetation could grow on-site if not maintained and provide suitable nesting habitat for ground dwelling/sparse shrub nesting birds. Additionally, soils within the project area could become compacted enough to become suitable for California ground squirrel and other burrowing mammals. Because recent occurrences of burrowing owl have been recorded in the project area, a preconstruction survey is recommended. Mitigation measure **BIO-1** would reduce potential impacts to special-status wildlife species to less than significant.

Therefore, the project would have the potential to have a substantial adverse effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. With implementation of mitigation measure **BIO-1**, impacts would be reduced to less than significant.

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- b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? No Impact.*

Sensitive habitats include those that are of special concern to resource agencies and those that are protected under CEQA, F G C Section 1600, and Section 404 of the Clean Water Act. No waters of the state or waters of the United States occur within the project site. As stated above, the site is highly disturbed and habitat is characterized by ruderal, non-native vegetation that typically has limited ecological value. Therefore, no impact to riparian habitat or other sensitive natural communities would occur with project implementation.

- c) *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal wetlands, etc.), through direct removal, filling, hydrological interruption, or other means? No Impact.*

Project implementation would not result in the loss of jurisdictional waters of the state and waters of the United States. No waters of the state or United States occur within the project site. As a result, no impact to federally protected wetlands would occur.

- d) *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? Less than Impact with Mitigation Incorporated.*

Native bird species and their nests are protected under the Migratory Bird Treaty Act (MBTA) of 1918 (16 United States Code 703- 712). Potential nesting habitat within the project area is limited to birds that nest on the ground and in open, sparsely vegetated habitat. The project area provides limited foraging habitat for migratory bird species and raptors. Lands buffering the project site support ornamental, landscaped trees and shrubs that could potentially provide nesting habitat for migratory bird species and, in some locations, for raptors; however, they are situated adjacent to highly trafficked areas (i.e., roads and structures). Therefore, raptor species are not expected to use these trees for nesting, nor anticipated to be directly affected by project construction activities. Disturbed areas within lands buffering the project site appear to be consistently tended (i.e., graded lot) or contain limited vegetation; therefore, foraging habitat is of low quality for raptors. No nests were observed within the survey area during the field survey .

Due to conditions on-site and on adjacent lands, project implementation would not interfere substantially with the movement of native resident or migratory fish or wildlife species. No established migratory routes, wildlife corridors, or linkages were identified on-site or within the vicinity. Due to the generally developed character of the project vicinity, there is a low potential for wildlife to use or pass through the area as a corridor.

However, there is potential for migratory and nesting birds to be impacted by project activities. Although no nesting birds were identified during the field survey, conditions could change by the time project construction activities begin. Vegetation could grow on-site and, if not maintained, could provide nesting habitat for ground dwelling/sparse shrub nesting birds. Direct and/or indirect impacts may occur during project construction if a nest is physically disturbed or destroyed, or if breeding or nesting activities are disrupted or cease due to noise or increased human activity. Mitigation measure **BIO-2** is proposed to ensure that direct and indirect impacts to migratory species would be reduced to less than significant.

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- e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? No Impact.*

There are currently no adopted or proposed local policies or ordinances protecting biological resources that affect the project site. As stated, the project site is highly disturbed and does not support sensitive biological resources, including mature trees. Therefore, no impact would occur.

- f) *Would the project conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan? No Impact.*

There are currently no adopted or proposed habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans that affect the project site. Therefore, no impact would occur.

Mitigation Measures

BIO-1 Burrowing Owl Habitat Assessment. A preconstruction habitat assessment shall be required for burrowing owls within the one-month period prior to construction. The habitat assessment shall be conducted within the impact area and a 500-foot buffer (where practicable) to assess the area for suitable habitat and the presence of any burrows or burrow surrogates (e.g., culverts, open drain tiles, riprap, and/or discarded tires). If no burrows or burrow surrogates are present, a survey shall not be required. If burrows or burrow surrogates are present, a preconstruction burrowing owl survey shall be required between 14 and 30 days prior to the start of construction.

Timing/Implementation: Prior to commencement of project construction

Enforcement/Monitoring: City of El Centro Community Development Department

BIO-2 Compliance with Migratory Bird Treaty Act. If construction activities (for example, but not limited to staging, site preparation, grading) commence during the breeding season (January 1st through July 31st for raptors and March 1st through September 15th for songbirds), a pre-construction nesting bird survey shall be conducted by a qualified biologist. The survey shall be performed within three days prior to the commencement of construction activities. Surveys shall include the construction area plus a 500-foot buffer. Survey findings would be documented prior to initiating any construction activities.

If no nesting birds are observed during the survey, implementation of project activities may begin. If nesting birds (including nesting raptors) are found to be present, avoidance or minimization measures shall be undertaken. Measures shall include establishment of an avoidance buffer until nesting has been completed. The width of the buffer will be determined by the biologist based on CDFW recommendations. The qualified biologist will determine the appropriate buffer size and level of nest monitoring necessary for species not listed under the federal or California Endangered Species Acts based on the species' life history, the species' sensitivity to disturbances (e.g., noise, vibration, human activity), individual behavior, status of nest, location of nest and site conditions, presence of screening vegetation, anticipated project activities, ambient noise levels compared to project-related noise levels, existing non-project-related disturbances in vicinity, and ambient levels of human activity.

Buffers will be marked (flagged or fenced with environmentally sensitive area fencing) around any active nests and periodic monitoring by the qualified biologist will occur to ensure the project does not result in the failure of the nest. The buffer(s) will be maintained

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around each nest until the nest becomes inactive as determined by the qualified biologist. At the discretion of the qualified biologist, if a nesting bird appears to be stressed as a result of project activities and the buffer does not appear to provide adequate protection, additional minimization measures may need to be implemented.

Construction may continue outside of the no-work buffers. The qualified biologist will ensure that restricted activities occur outside of the delineated buffers, check nesting birds for any potential indications of stress, and ensure that installed fencing or flagging is properly maintained during nest monitoring and any additional site visits. Buffer sizes may be adjusted (either increased or reduced), or the extent of nest monitoring may be adjusted, at the discretion of the qualified biologist based on the conditions of the surrounding area and/or the behavior of the nesting bird.

Any changes to buffer sizes and/or nest monitoring frequency will be documented. If listed species are found to be nesting in the survey area, construction activity should not occur without coordination with regulating agencies and may require an agency-approved bird management plan.

Timing/Implementation: Prior to commencement of project construction

Enforcement/Monitoring: City of El Centro Community Development Department

Mitigation measures **BIO-1** and **BIO-2** can occur concurrently if project and seasonal timing allow.

Level of Significance after Mitigation:

Less than significant.

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5. Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following discussion is based upon the *Cultural Resources Inventory* prepared by ECORP Consulting, Inc. (2020b; see Appendix C).

DISCUSSION OF IMPACTS

- a) *Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5? Less than Significant Impact with Mitigation Incorporated.*

The project site is currently undeveloped and does not support any existing structures or improvements. No historic-period resources have been identified on the site over past decades; refer to the discussion below.

To evaluate the potential for the presence of historical resources, ECORP requested a records search for the property at the South Coastal Information Center (SCIC) of the California Historical Resources Information System (CHRIS) at San Diego State University on October 2, 2020; refer to Appendix C. The purpose of the records search was to determine the extent of previous surveys conducted within a 1-mile radius of the project site and whether previously documented pre-contact or historic-period archaeological sites, architectural resources, or traditional cultural properties exist within the area.

As part of the investigation, relevant databases were searched for potential historical records within the project area. The National Register Information System did not list any eligible or listed properties within the project area or 1-mile vicinity. Additionally, no resources were identified as listed as California Historical Landmarks and by the Office of Historic Preservation. A search of historic General Land Office land patent records also revealed no historic-period resources in the project area or 1-mile search radius. Additionally, the Caltrans Bridge Local and State Inventories did not list any historic bridges in the project area.

Twenty-eight previous cultural resource investigations have been conducted within one mile of the project area between 1977 and 2018. No previous cultural resources investigations overlap the project area and the records search indicates that the project area has not been previously surveyed as part of a cultural resources technical study; refer to Appendix C for a list of previous cultural resource investigations. The CHRIS records search determined that three previously recorded cultural resources are located within 1 mile of the project site: two historic period railroad

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segments and one historic-period road (refer to [Table 5-1](#)). No previously recorded resources are located on the project site.

Table 5-1: Previously Recorded Cultural Resources in or within One Mile of the Project Area

Primary Number	Site Number	Age/Period	Site Description	Within Project Area?
P-13-008682	CA-IMP-8166H	Historic	Segment of Niland to Calexico Railroad (1902-1904), Southern Pacific Company	No
P-13-009302	CA-IMP-84899H	Historic	Segment of San Diego & Arizona Eastern Railroad (1907-1917)	No
P-13-014314	--	Historic	Segment of Villa Road	No

Source: EORP 2020b; refer to Appendix C.

A field survey was conducted on October 14, 2020, by EORP personnel. No pre-contact or historic-period cultural resources were identified during the field survey.

No evidence of structures or historic-period resources were identified on the project site through a review of historic aerial photographs dated 1936 to present. Based on the above findings, the project would not disturb any known historical resources as defined under CEQA or historic properties as defined by Section 106 of the National Historic Preservation Act. The project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.

However, the project may have the potential to uncover unknown historical resources during ground-disturbing activities such as grading and/or construction. Such impacts would be reduced with incorporation of mitigation measure **CUL-1** to ensure that proper measures are taken for the protection, evaluation, and documentation of such resources, as appropriate. With implementation of mitigation measure **CUL-1**, potential impacts to historic resources would be reduced to less than significant.

- b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5? Less than Significant Impact with Mitigation Incorporated.*

The underlying geology of the project area has been mapped as Quaternary alluvium and marine deposits dated to the Pliocene to Holocene (5.333–0 million years ago). This geologic deposit is described as alluvium, lake, playa, and terrace deposits of unconsolidated and semi-consolidated material. The project area lies within the boundaries of the now dry Lake Cahuilla, an ancient lake fed by waters of the Colorado River that existed periodically throughout the Pleistocene and Holocene until ultimately drying up around 400 years before present. Therefore, the potential exists for buried pre-contact archaeological sites in the project area due to the exploitation of lake resources by Native American communities in pre-contact times.

According to the US Department of Agriculture's Natural Resources Conservation Service (NRCS) Web Soil Survey website, two soil types are located within the project area: Imperial-Glenbar silty clay loams, wet, 0 to 2 percent slopes; and Imperial silty clay, wet. These soils are classified as torrifluvents and result from fluvial deposition during flooding events in arid alluvial plains.

As stated above, a records search of the CHRIS at the SCIC on October 2, 2020, revealed that 28 cultural resources investigations were conducted in or within 1 mile of the project area. Three cultural resources were previously recorded within 1 mile of the project area as a result of these investigations; refer to [Table 5-1](#). However, no cultural resources have been previously identified on the project site. A search of the Sacred Lands File was also completed by the California Native

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American Heritage Commission (NAHC) on October 1, 2020, and resulted in a negative finding, meaning that no Native American Sacred Lands have been recorded in the project area.

Additionally, a field survey of the project area was conducted on October 12, 2020. No cultural resources were identified or recorded as a result of the field survey.

However, as mentioned, project ground-disturbing activities could potentially encounter previously undiscovered archaeological resources, due to the history of the area. Though no pre-contact cultural resources have been previously recorded in the project area or its 1-mile vicinity, the potential for subsurface cultural deposits still exists due to the presence of sediments contemporaneous with human occupation of the region, and the location of the project area within the dry lakebed of ancient Lake Cahuilla.

Mitigation measure **CUL-1** is therefore proposed to require that, in the event of discovery of unknown cultural resources on-site, proper measures are taken for protection, evaluation, and documentation of such resources, as appropriate. Implementation of mitigation measure **CUL-1** would ensure that the project does not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. Impacts would be reduced to less than significant.

c) *Would the project disturb any human remains, including those interred outside of formal cemeteries? Less than Significant Impact with Mitigation Incorporated.*

No human remains were identified in the project area through the records search or field survey conducted as part of the archaeological assessment. However, unidentified human remains, whether as part of a prehistoric cemetery, an archaeological site, or an isolated occurrence, could be present below the ground surface.

If human remains are encountered during construction, the California Health and Safety Code and State CEQA Guidelines Section 15064.5(e) require that work in the immediate area must halt, the remains must be protected, and the county coroner must be notified immediately. If the remains are determined to be Native American, then the NAHC must be notified (typically by the coroner) within 24 hours, as required by PRC Section 5097. The NAHC would identify and contact a most likely descendant, who would be given the opportunity to provide recommendations for the treatment of the remains within 48 hours of being granted access to the site. Mitigation measure **CUL-1** would ensure that such requirements are adhered to. With implementation of mitigation measure **CUL-1**, potential impacts relative to human remains would be reduced to less than significant.

Mitigation Measures

CUL-1 If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work shall halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- a) If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required.
- b) If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify

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- the City and the landowner. The lead agency shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines, or a Historic Property, as defined in 36 CFR 60.4. Work may not resume within the no-work radius until the lead agency, through consultation as appropriate, determines that the site either: 1) is not a historical resource under CEQA or a historic property under Section 106; or 2) that the treatment measures have been completed to their satisfaction.
- c) If the find includes human remains, or remains that are potentially human, the professional archaeologist shall ensure reasonable protection measures are taken to protect the discovery from disturbance (Assembly Bill [AB] 2641). The archaeologist shall notify the Imperial County coroner (per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, PRC Section 5097.98, and AB 2641 will be implemented. If the coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American most likely descendant (MLD) for the project (PRC Section 5097.98). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC may mediate (PRC Section 5097.94). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (PRC Section 5097.98). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinterment document with Imperial County (AB 2641). Work may not resume within the no-work radius until the lead agency, through consultation as appropriate, determines that the treatment measures have been completed to their satisfaction.

Level of Significance after Mitigation

Less than significant.

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6. Energy

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

The following discussion is based upon the *Air Quality, Greenhouse Gas Emissions, and Energy Consumption Assessment* prepared by ECORP Consulting, Inc. (2021; see Appendix A).

The Imperial Irrigation District (IID) provides electricity to all of Imperial County, including the project site, along with parts of Riverside and San Diego Counties (IID 2021). Nearly 60 percent of its power is supplied locally using hydroelectric facilities, a steam-generating facility, several gas turbines, and a diesel unit. The Southern California Gas Company provides natural gas services to the project area. Southern California Gas services approximately 21.8 million customers, spanning roughly 24,000 square miles of California (SCG 2021).

DISCUSSION OF IMPACTS

- a) *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? Less than Significant Impact.*

Levels of construction and operational related energy consumption estimated to be consumed by the project include the number of kWh of electricity, therms of natural gas, and gallons of gasoline. Energy use quantification was based on project-specific information such as the estimated traffic trip generation rates and project site plans.

The four sources of energy that are relative to the proposed project include electricity, natural gas, the equipment-fuel necessary for project construction, and the automotive fuel necessary for project operations. Addressing energy impacts requires an agency to make a determination as to what constitutes a significant impact. There are no established thresholds of significance, statewide or locally, for what constitutes a wasteful, inefficient, or unnecessary consumption of energy for a land use project. For the purpose of this analysis, the amount of electricity and natural gas estimated to be consumed by the project was quantified and compared to that consumed by all residential land uses in Imperial County. Similarly, the amount of fuel necessary for project construction and operations were calculated and compared to that consumed in Imperial County.

Energy consumption associated with the project is summarized in [Table 6-1](#).

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Table 6-1: Project Energy and Fuel Consumption

Energy Type	Annual Energy Consumption	Percentage Increase Countywide
Electricity Consumption ¹	928,747 kilowatt-hours	0.16 percent
Natural Gas ¹	28,034 therms	0.34 percent
Automotive Fuel Consumption		
Project Construction 2021 ²	49,064 gallons	0.02 percent
Project Construction 2022 ²	30,443 gallons	0.01 percent
Project Operations ³	159,507 gallons	0.08 percent

Source: ECORP 2021; see Appendix A.

Notes: ¹ CalEEMod; ² Climate Registry 2016; ³ EMFAC2017 (CARB 2017)

The project increases in electricity and natural gas consumption are compared with all of the residential buildings in Imperial County in 2019, the latest data available. The project increases in automotive fuel consumption are compared with the countywide fuel consumption in 2020, the most recent full year of data.

Project operation would include electricity and natural gas usage from lighting, space and water heating, and landscape maintenance activities. As shown in [Table 6-1](#), the annual electricity consumption due to operations would be 928,747 kWh resulting in an approximate 0.16 percent increase in the typical annual electricity consumption attributable to all residential uses in Imperial County. Furthermore, the project's increase in natural gas usage of 0.34 percent across all residential uses in Imperial County would also be negligible. For these reasons, the project would not result in the inefficient, wasteful, or unnecessary consumption of building energy.

Fuel necessary for project construction would be required for the operation and maintenance of construction equipment and the transportation of materials to the project site. The fuel expenditure necessary to construct the physical building and infrastructure would be temporary, lasting only as long as project construction. As further indicated in [Table 6-1](#), the project's gasoline fuel consumption during the one-time construction period is estimated to be 49,064 gallons of fuel during 2021 construction and 30,443 gallons of fuel during 2022 construction. This would increase the annual countywide gasoline fuel use in the county by 0.02 percent and 0.01 percent, respectively. As such, project construction would have a nominal effect on local and regional energy supplies. No unusual project characteristics would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or the state. Construction contractors would purchase their own gasoline and diesel fuel from local suppliers and would judiciously use fuel supplies to minimize costs due to waste and subsequently maximize profits. Additionally, construction equipment fleet turnover and increasingly stringent state and federal regulations on engine efficiency, combined with state regulations limiting engine idling times and requiring recycling of construction debris, would further reduce the amount of transportation fuel demand during project construction. It is therefore anticipated that construction fuel consumption associated with the project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature.

The project is estimated to generate approximately 1,320 daily trips; refer also to Section 17, Transportation and Appendix E. As indicated in [Table 6-1](#), this would be a consumption of approximately 159,507 gallons of automotive fuel per year, which would increase the annual countywide automotive fuel consumption by 0.08 percent. The amount of operational fuel use was estimated using CARB's EMFAC2017 computer program, which provides projections for typical daily fuel usage in Imperial County. This analysis conservatively assumes that all automobile trips projected to arrive at the project during operations would be new to Imperial County. Further, a conservative approach was taken for vehicle trip estimation to ensure potential impacts due to

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operational gasoline usage were adequately accounted. Fuel consumption associated with vehicle trips generated by the project would therefore not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Based on the discussion above, the project would not result in a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be less than significant.

b) *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? Less than Significant Impact.*

The project has been designed in a manner that is consistent with relevant energy conservation plans aimed at encouraging development that results in the efficient use of energy resources. The project would be built to the Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6, of the California Code of Regulations (Title 24). Title 24 was established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 is updated approximately every three years. The most recent 2019 update to the Energy Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings.

Additionally, the California Green Building Standards Code (CalGreen, amended 2013) establishes mandatory green building standards for all buildings in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. The project would be designed consistent with such requirements to ensure that energy efficiency is achieved as required. Furthermore, the project would be consistent with the City's General Plan Conservation and Open Space Element, specifically Energy Conservation Implementation Program action COS-20, Implement State Energy Performance Requirements, which encourages project proponents to incorporate energy conservation techniques through the implementation of State energy performance standards.

For the reasons above, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

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7. Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the projects, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

The following analysis is based upon available soils and geotechnical data from various sources, including databases, soils maps, and the City of El Centro General Plan. A *Geotechnical Investigation* was prepared for the property immediately west of the project site in June 2007 (Landmark Consultants, Inc. 2007; available under separate cover). Relevant information from the report was reviewed and incorporated herein where appropriate relative to the proposed project.

- a) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving:*
- i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other*

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substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42? Less than Significant Impact.

There are no known faults traversing the project site or in the vicinity of the project site or in the City of El Centro (City of El Centro 2004). The project site is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault (DOC 2018a). However, like much of Southern California, the project site is located in a seismically active area. The City requires proper development engineering and building construction of proposed development and enforces these requirements through the development and environmental review process. Adherence to the California Building Code (CBC), as adopted in the City of El Centro Municipal Code, with regard to construction of the project development would ensure that impacts relative to rupture of a known earthquake fault remain less than significant.

ii) *Strong seismic ground shaking? Less than Significant Impact.*

The Imperial Valley, which includes the project site, is susceptible to seismic ground shaking. The valley is considered likely to be subjected to moderate to strong ground motion from earthquake events in the larger region (Landmark Consultants 2007). Branches of the San Andreas Fault form the eastern boundary of the basin (Salton Trough) and the western edge is defined by the San Jacinto-Coyote Creek and the Elsinore-Laguna Salada Faults. A greater number of small to moderate earthquakes have occurred in the Imperial Valley area than along any other section of the San Andreas Fault system. The Imperial Fault is located approximately 5 miles to the east of the City of El Centro (City of El Centro 2004), while the Imperial, Brawley, and Superstition Hills Faults are also subject to the potential for strong seismic ground shaking in the project vicinity (Landmark Consultants 2007).

To ensure the structural integrity of all buildings and structures, the project is required to conform to the Seismic Requirements as outlined in the CBC. Development would require implementation of project design measures and adherence to the CBC, as adopted in the City of El Centro Municipal Code. Therefore, compliance with the CBC and City Code would ensure that the project does not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking. Implementation of such design and building techniques would reduce potential impacts to less than significant.

iii) *Seismic-related ground failure, including liquefaction? Less than Significant Impact.*

Liquefaction is the phenomenon whereby soils lose shear strength and exhibit fluid-like flow behavior. Loose granular soils are most susceptible to these effects, with liquefaction generally restricted to saturated or near-saturated soils at depths of less than 50 feet. Liquefaction normally occurs in soils such as sand in which the strength is purely friction. However, liquefaction has occurred in soils other than clean sand. Liquefaction occurs under vibratory conditions such as those induced by a seismic event.

Groundwater in the site vicinity has been historically encountered at approximately 9 to 10 feet below ground surface (bgs) (Landmark Consultants 2007). However, groundwater levels may fluctuate with precipitation, irrigation of adjacent lands, drainage, and site grading. Nonetheless, such groundwater levels may indicate the potential for liquefaction to occur on-site.

Project design and construction would incorporate standard design measures to address potential seismic-related liquefaction and related effects such as settlement and lateral spreading, including similar types of measures from the CBC. However, the project would also be required to prepare a comprehensive design-level geotechnical evaluation prior to final design

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and construction. Completion of this evaluation and adherence to the current CBC and local codes regulating construction would ensure that the project is designed to withstand seismic-related ground failure, including liquefaction. With a site-specific engineering design, impacts due to liquefaction would be less than significant.

iv) *Landslides? No Impact.*

The topography of the City of El Centro is generally flat. Therefore, landslides are not considered to represent a major safety hazard (City of El Centro 2004).

The topography of the project site and surrounding vicinity is relatively flat with on-site elevations ranging from approximately 51 feet below mean sea level to approximately 39 feet below mean sea level across the property (ECORP 2020b). The project site has been previously graded and does not include slopes greater than 25 percent. Further, signs of landslides are not present on-site. Therefore, no significant impact from exposure of people or structures to potential adverse effects from landslides would occur.

b) *Would the project result in substantial soil erosion or the loss of topsoil? Less than Significant Impact.*

Soil erosion is most prevalent in unconsolidated alluvium and surficial soils and in areas that have slopes. Erosive soils are generally found in areas of steep slope where runoff velocity is greater and vegetative cover is low. According to the US Department of Agriculture's Natural Resources Conservation Service Web Soil Survey website, two soil types are located within the project area: Imperial-Glenbar silty clay loams, wet, 0 to 2 percent slopes; and Imperial silty clay, wet. These soils are classified as torrifluvents and result from fluvial deposition during flooding events in arid alluvial plains (ECORP 2020b).

Grading and trenching during project construction would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. In addition, the project would increase impervious surface areas on-site, which would potentially contribute to increased stormwater runoff.

The project applicant would be required to meet City grading standards and prepare a Storm Water Pollution Prevention Plan (SWPPP) in accordance with National Pollutant Discharge Elimination System Permit (NPDES) requirements for approval by the City prior to grading. The SWPPP would identify specific best management practices (BMPs) to be implemented by the project applicant to prevent erosion, minimize siltation from impacting downstream water bodies, and protect water quality. Grading regulations specified in the City's Municipal Code require preparation of an erosion control plan prior to the issuance of a grading permit (Chapter 7, Article XIX, Section 7-124) and implementation of BMPs during construction to reduce the potential for soil erosion to occur (Chapter 22, Article VII, Division 1, Section 22-707; Ord. No. 15-05, §1, 4-21-15). With conformance to the above standards, project impacts related to soil erosion or the loss of topsoil would be less than significant.

c) *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the projects, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? Less than Significant Impact.*

The City of El Centro rests upon a bed of deep lacustrine (lakebed) deposits which consist of interbedded lenticular and tabular silt, sand, and clay (Landmark Consultants 2007). Such conditions generally require the conditioning of soils in order to support structural footings and reinforced foundations.

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On- or Off-Site Landslide

Refer to Response 7(a)iv), above. The occurrence of bluff failure and mudslides in the Imperial Valley is generally limited to slopes and embankments of the rivers and canals (El Centro 2003). The project site is generally level and does not support any slopes or hillsides, and therefore would not be susceptible to landslides. Furthermore, the project as designed would be required to comply with structural standards set forth by both the City and the state. Impacts in this regard would be less than significant.

Lateral Spreading

Lateral spreading is a phenomenon in which large blocks of intact, non-liquefied soil move down slope on a liquefied soil layer. Lateral spreading is often a regional event. For lateral spreading to occur, the liquefiable soil zone must be unconstrained laterally and free to move along sloping ground.

The project site is generally flat and does not support slopes that may be subject to the potential for lateral spread. The risk of lateral spreading can be further reduced through appropriate land use planning, development engineering, and building construction practices. As such, the project would comply with the most recent CBC, Uniform Mechanical Code, Uniform Fire Code, and National Electric Code, as adopted by the City of El Centro, which contain structural requirements for existing and new buildings designed to ensure structural integrity during seismic events and to prevent injury, loss of life, and substantial property damage due to liquefaction. Conformance with such regulations would ensure that project impacts relative to lateral spreading remain less than significant.

Liquefaction

Refer to Response 7(a)iii), above. A geotechnical investigation prepared for lands adjacent to the west of the project site determined that 1- to 5-foot-thick, isolated, interbedded layers of silty sand exist at a depth between 10 and 48 feet and may liquefy under seismically induced ground shaking. The estimated settlement of approximately 1.5 to 3.75 inches was identified as sufficient to require deep ground improvement or specially designed foundations at the site (Landmark Consultants 2007). Similar conditions may therefore be present on the project site and would be considered in identifying appropriate engineering methods to minimize potential effects of liquefaction-induced settlements.

The risk of liquefaction can be reduced through appropriate land use planning, development engineering, and building construction practices. As such, the project would comply with the most recent CBC, Uniform Mechanical Code, Uniform Fire Code, and National Electric Code, as adopted by the City of El Centro, which contain structural requirements for existing and new buildings designed to ensure structural integrity during seismic events and to prevent injury, loss of life, and substantial property damage. Conformance with such requirements would reduce potential impacts relative to liquefaction to less than significant.

Collapse

Neither natural nor man-made subsurface features that encourage collapse, including mines, aggregate extraction operations, or karst topography, are known to underlie or occur adjacent to the project site. Therefore, mandatory compliance with applicable codes would ensure that impacts related to unstable or collapsible soils would be less than significant.

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- d) *Would the project be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? Less than Significant Impact.*

Expansive soils are those that undergo volume changes as moisture content fluctuates, swelling substantially when wet or shrinking when dry. Soil expansion can damage structures by cracking foundations, causing settlement, and distorting structural elements.

In general, much of the near surface soils in the Imperial Valley consist of silty clays and clays which are moderate to highly expansive (Landmark Consultants 2007). As indicated above, the project site is underlain by Imperial-Glenbar silty clay loams and Imperial silty clay (ECORP 2020b). Based on the clay content, such soils have the potential to be expansive as they exhibit a moderate to high swell potential.

Project construction would be required to occur in accordance with typical building construction practices that comply with the CBC. Measures may include compaction, over-excavation, and slab-on-grade foundations. Compliance with the CBC would result in less than significant impacts associated with expansive soils.

- e) *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? No Impact.*

The project would connect to the existing public sewer system. Septic tanks and alternative wastewater disposal systems would not be installed on the project site. Project implementation would not result in impacts to soils associated with the use of such wastewater treatment systems. No impact would occur.

- f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? Less than Significant Impact.*

Underlying geology of the project area has been mapped as Quaternary alluvium and marine deposits dated to the Pliocene to Holocene (5.333–0 million years ago). This geologic deposit is described as alluvium, lake, playa, and terrace deposits of unconsolidated and semi-consolidated material. The project area lies within the boundaries of the now dry Lake Cahuilla, an ancient lake fed by waters of the Colorado River that existed periodically throughout the Pleistocene and Holocene until ultimately drying up around 400 years before present (ECORP 2020b).

Though the Lake Cahuilla bed deposits, on which the project rests, are known to contain fossils, such finds typically occur at depths greater than several meters and likely would not be encountered during project construction. In addition, the site has been previously graded and/or disturbed (i.e., prior agricultural use) and the on-site soil types (clays) are considered to have a low potential to yield significant paleontological resources. For these reasons, the project is not anticipated to adversely affect any unknown unique paleontological resource or geologic feature. Impacts are considered to be less than significant.

8. Greenhouse Gas Emissions

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

The following section is based on the *Air Quality, Greenhouse Gas Emissions, and Energy Consumption Assessment* prepared by ECORP Consulting, Inc. in March 2021 (2021; see Appendix A).

DISCUSSION OF IMPACTS

Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Human-caused emissions of these GHGs in excess of natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming (ECORP 2021). Refer to Appendix A for additional discussion of global warming and climate change.

To date, neither the Imperial County Air Pollution Control District (ICAPCD) nor the City of El Centro have adopted GHG significance thresholds applicable to potential development. Section 15064.7(c) of the CEQA Guidelines specifies that a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the lead agency's decision is supported by substantial evidence. Thus, in the absence of any GHG emissions significance thresholds, the projected emissions are compared to the South Coast Air Quality Management (SCAQMD) numeric threshold of 3,000 metric tons of CO₂e (carbon dioxide equivalent) annually. While significance thresholds used in the South Coast Air Basin are not binding on the ICAPCD or El Centro, they are instructive for comparison purposes. This threshold is also appropriate as the SCAQMD GHG thresholds were formulated based on similar geography and climate patterns as found in Imperial County and are also employed for use in CEQA GHG analyses in the Riverside County portion of the Salton Sea Air Basin, the same air basin that encompasses the proposed project. Therefore, the 3,000 metric ton of CO₂e threshold is appropriate for analysis of the proposed project. The project was also assessed for consistency with regulations or requirements adopted by the 2008 Climate Change Scoping Plan and subsequent updates.

Where GHG emission quantification was required, emissions were modeled using CalEEMod, version 2016.3.2. CalEEMod is a statewide land use emissions computer model designed to quantify potential GHG emissions associated with both construction and operations from a variety of land use projects.

Construction-generated GHG emissions were calculated using a combination of model defaults for Imperial County, project site plans, and specific data provided by the project applicant including equipment used, duration of specific construction phases, and the amount of soil

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movement required. Operational GHG emissions were calculated using a combination of model defaults for Imperial County and an estimated a project trip generation rate of 1,320 average daily trips (Michael Baker International 2021; see Appendix E).

- a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? Less than Significant Impact.*

Construction and operation of project development would generate GHG emissions, with the majority of energy consumption (and associated generation of GHG emissions) occurring during the project's operation (as opposed to during its construction).

Construction

Construction-related activities that would generate GHG emissions include worker commute trips, haul trucks carrying supplies and materials to and from the project site, and off-road construction equipment (i.e., dozers, loaders, excavators). [Table 8-1](#) illustrates the specific construction-generated GHG emissions. Once construction is complete, the generation of these GHG emissions would cease.

Table 8-1: Construction-Related Greenhouse Gas Emissions

Emissions Source	CO ₂ e (Metric Tons/Year)
Year 2021	498
Year 2022	309
Significance Threshold	3,000
Exceed Significance Threshold?	No

Source: ECORP 2021, see Appendix A; CalEEMod version 2016.3.2.

Notes: Construction-generated air pollutant emissions were calculated using a combination of model defaults for Imperial County, project site plans, and specific data provided by the project applicant including equipment used, duration of specific construction phases, and the amount of soil movement required (14,000 c.y. of cut material and 23,000 c.y. of fill material). Refer to Appendix A for Model Data Outputs.

As shown in [Table 8-1](#), project construction would not exceed the significance threshold for GHG emissions. Impacts would be less than significant.

Operations

Project operation would result in an increase in GHG emissions primarily associated with motor vehicle trips and on-site energy sources. Long-term operational GHG emissions attributed to the project are identified in [Table 8-2](#).

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Table 8-2: Operational-Related Greenhouse Gas Emissions

Emission Source	CO ₂ e (Metric Tons/Year)
Area Source	2
Energy	687
Mobile	1,453
Waste	42
Water	152
Total	2,336
<i>Significance Threshold</i>	<i>3,000</i>
<i>Exceed Significance Threshold?</i>	<i>No</i>

Source: ECORP 2021, see Appendix A; CalEEMod version 2016.3.2.

Operational emissions were calculated using a combination of model defaults for Imperial County and an estimated project trip generation rate of 1,320 average daily trips. Refer to Appendix A for Model Data Outputs.

As shown in [Table 8-2](#), the project would generate approximately 2,336 metric tons of CO₂e per year during operations, which is below the significance threshold of 3,000 metric tons of CO₂e per year. Therefore, impacts would be less than significant.

- b) *Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? Less than Significant Impact.*

The City of El Centro does not currently have an adopted plan for the purpose of reducing GHG emissions. However, as previously described, the State of California promulgates several mandates and goals to reduce statewide GHG emissions, including the goal to reduce statewide GHG emissions to 40 percent below 1990 levels by the year 2030 and 80 percent below 1990 levels by the year 2050 (Senate Bill 32, or SB 32). The project is subject to compliance with SB 32. As discussed previously, the GHG emissions generated by the proposed project would not surpass GHG significance thresholds, which were prepared with the purpose of complying with these requirements.

Additionally, the project is consistent with regulations or requirements adopted by the 2008 Climate Change Scoping Plan and subsequent updates, pursuant to Assembly Bill 32 (AB 32). The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of SB 32 and establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. The Scoping Plan (approved by CARB in 2008 and updated in 2014 and 2017) provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations. It does not provide recommendations for lead agencies to develop evidence-based numeric thresholds consistent with the Scoping Plan, the state's long-term GHG goals, and climate change science. Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (i.e., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (i.e., Low Carbon Fuel Standard), among others.

[Table 8-3](#) highlights measures that have been, or will be, developed under the Scoping Plan and presents the project's consistency with Scoping Plan measures.

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Table 8-3: Project Consistency with Scoping Plan GHG Emission Reduction Strategies

Scoping Plan Measure	Measure Number	Proposed Project Consistency
Transportation Sector		
Advanced Clean Cars	T-1	<i>Consistent.</i> The project's residents would purchase vehicles in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase.
Low Carbon Fuel Standard	T-2	<i>Consistent.</i> Motor vehicles driven by the project's residents and customers would use compliant fuels.
Regional Transportation-Related GHG Targets	T-3	<i>Consistent.</i> The project would result in a GHG emissions per capita that is less than that project for the region within the Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy planning area.
Advanced Clean Transit	N/A	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Last-Mile Delivery	N/A	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Reduction in VMT	N/A	<i>Consistent.</i> According to the VMT analysis prepared for the project, the project would result in a GHG emissions per capita that is less than that projected for the county.
Vehicle Efficiency Measure 1. Tire Pressure 2. Fuel Efficiency Tire Program 3. Low-Friction Oil 4. Solar-Reflective Automotive Paint and Window Glazing	T-4	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Ship Electrification at Ports (Shore Power)	T-5	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Goods Movement Efficiency Measures 1. Port Drayage Trucks 2. Transport Refrigeration Units Cold Storage Prohibition 3. Cargo Handling Equipment, Anti-Idling, Hybrid, Electrification 4. Goods Movement Systemwide Efficiency Improvements 5. Commercial Harbor Craft Maintenance and Design Efficiency 6. Clean Ships 7. Vessel Speed Reduction	T-6	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.

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Table 8-3, continued

Scoping Plan Measure	Measure Number	Proposed Project Consistency
Heavy-Duty Vehicle GHG Emission Reduction <ul style="list-style-type: none"> • Tractor-Trailer GHG Regulation • Heavy-Duty GHG Standards for New Vehicle and Engines (Phase I) 	T-7	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Medium- and Heavy-Duty Vehicle Hybridization Voucher Incentive Proposed Project	T-8	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Medium- and Heavy-Duty GHG Phase 2	N/A	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
High-Speed Rail	T-9	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Electricity and Natural Gas Sector		
Energy Efficiency Measures (Electricity)	E-1	<i>Consistent.</i> The project would be constructed in accordance with Title 24 building standards.
Energy Efficiency Measures (Natural Gas)	CR-1	<i>Consistent.</i> The project would be constructed in accordance with Title 24 building standards.
Solar Water Heating (California Solar Initiative Thermal Program)	CR-2	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Combined Heat and Power	E-2	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Renewables Portfolio Standard (33% by 2020)	E-3	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Renewables Portfolio Standard (60% by 2030)	N/A	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
SB 1 Million Solar Roofs (California Solar Initiative, New Solar Home Partnership, Public Utility Programs) and Earlier Solar Programs	E-4	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Water Sector		
Water Use Efficiency	W-1	<i>Consistent.</i> The project would be constructed in accordance with Title 24 building standards.
Water Recycling	W-2	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Water System Energy Efficiency	W-3	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Reuse Urban Runoff	W-4	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Renewable Energy Production	W-5	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.

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Table 8-3, continued

Scoping Plan Measure	Measure Number	Proposed Project Consistency
Green Buildings		
State Green Building Initiative: Leading the Way with State Buildings (Greening New and Existing State Buildings)	GB-1	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Green Building Standards Code (Greening New Public Schools, Residential and Commercial Buildings)	GB-1	<i>Consistent.</i> The project would be constructed in accordance with Title 24 building standards.
Beyond Code: Voluntary Programs at the Local Level (Greening New Public Schools, Residential, and Commercial Buildings)	GB-1	<i>Consistent.</i> The project would be constructed in accordance with Title 24 building standards.
Greening Existing Buildings (Greening Existing Homes and Commercial Buildings)	GB-1	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Industry Sector		
Energy Efficiency and Co-Benefits Audits for Large Industrial Sources	I-1	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Oil and Gas Extraction GHG Emissions Reduction	I-2	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Reduce GHG Emissions by 20% in Oil Refinery Sector	N/A	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
GHG Emissions Reduction from Natural Gas Transmission and Distribution	I-3	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Refinery Flare Recovery Process Improvements	I-4	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Work with the Local Air Districts to Evaluate Amendments to Their Existing Leak Detection and Repair Rules for Industrial Facilities to Include Methane Leaks	I-5	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Recycling and Waste Management Sector		
Landfill Methane Control Measure	RW-1	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Increasing the Efficiency of Landfill Methane Capture	RW-2	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Mandatory Commercial Recycling	RW-3	<i>Consistent.</i> The project would include recycling during both construction and operation consistent with the requirements of the Title 24 Building Standards.
Increase Production and Markets for Compost and Other Organics	RW-3	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Anaerobic/Aerobic Digestion	RW-3	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Extended Producer Responsibility	RW-3	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.

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Table 8-3, continued

Scoping Plan Measure	Measure Number	Proposed Project Consistency
Environmentally Preferable Purchasing	RW-3	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Forests Sector		
Sustainable Forest Target	F-1	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Motor Vehicle Air Condition Systems: Reduction of Refrigerant Emissions from Non-Professional Servicing	H-1	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
SF6 Limits in Non-Utility and Non-Semiconductor Applications	H-2	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Reduction of Perfluorocarbons (PFCs) in Semiconductor Manufacturing	H-3	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Limit High GWP Use in Consumer Products	H-4	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Air Conditioning Refrigerant Leak Test During Vehicle Smog Check	H-5	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Stationary Equipment Refrigerant Management Program–Refrigerant Tracking/Reporting/Repair Program	H-6	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Stationary Equipment Refrigerant Management Program–Specifications for Commercial and Industrial Refrigeration	H-6	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
SF6 Leak Reduction Gas Insulated Switchgear	H-6	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
40% Reduction in Methane and Hydrofluorocarbon (HFC) Emissions	N/A	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
50% Reduction in Black Carbon Emissions	N/A	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.
Agriculture Sector		
Methane Capture at Large Dairies	A-1	<i>Not applicable.</i> The project would not prevent CARB from implementing this measure.

Source: ECORP 2021; see Appendix A.

As shown, the project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law and to the extent that they are applicable to the project. The project would not impede the attainment of the GHG reduction goals for 2030 or 2050 identified in Executive Order (EO) S-03-05 and SB 32. EO S-03-05 establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. SB 32 establishes a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40 percent below 1990 levels by December 31, 2030.

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While there are no established protocols or thresholds of significance for that future year analysis, CARB forecasts that compliance with the current Scoping Plan puts the state on a trajectory toward meeting these long-term GHG goals, although the specific path to compliance is unknown. Additionally, CARB has expressed in the First Update to the Climate Change Scoping Plan that "California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32 (ECORP 2021)." Additionally, CARB has indicated that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, SB 32, and EO S-03-05.

As discussed, the project is consistent with the GHG emission reduction measures in the Scoping Plan and would not conflict with the state's trajectory toward future GHG reductions. In addition, as the specific path to compliance for the state in regard to the long-term goals will likely require development of technology or other changes that are not currently known or available, specific additional mitigation measures for the project would be speculative and cannot be identified at this time. The project's consistency would assist in meeting the City's contribution to GHG emission reduction targets in California.

The project would therefore not interfere with implementation of the previously described GHG reduction goals for 2030 or 2050 or impede the state's trajectory toward the previously described statewide GHG reduction goals for 2030 or 2050. Impacts would be less than significant.

3.0 ENVIRONMENTAL CHECKLIST

9. Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

- a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? Less than Significant Impact.*

The routine transport, use, and disposal of hazardous materials can result in potential hazards to the public through accidental release. Such hazards are typically associated with certain types of land uses, such as chemical manufacturing facilities, industrial processes, waste disposal, and storage and distribution facilities.

None of these uses are proposed by the project; rather, the project would consist of multi-family residential uses including 180 apartment units and associated amenities, the construction of which would not involve the transport, use, or disposal of hazardous materials aside from those normally associated with construction and maintenance activities. Small amounts of hazardous materials would be used during construction activities (equipment maintenance, vehicle fuels, solvents, etc.). Similarly, limited amounts of hazardous materials may be used for landscape and building maintenance over the long term.

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Any use of hazardous materials would occur in compliance with applicable federal, state, and local standards associated with the use, handling, and/or disposal of hazardous materials. As such, the project would not create a hazard to the public or to the environment. Impacts are considered to be less than significant.

- b) *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? Less than Significant Impact.*

Construction

Project construction activities could result in the transport, use, and disposal of hazardous materials such as gasoline fuels, asphalt, lubricants, paint, and solvents. Although care would be taken to transport, use, and dispose of small quantities of these materials by licensed professionals, there is a possibility that upset or accidental conditions may arise which could release hazardous materials into the environment. Accidental releases of hazardous materials are those releases that are unforeseen or that result from unforeseen circumstances, while reasonably foreseeable upset conditions are those release or exposure events that can be anticipated and planned for.

Project construction activities would occur in accordance with all applicable local standards adopted by the City of El Centro, as well as state and federal health and safety requirements intended to minimize hazardous materials risk to the public, such as Cal/OSHA requirements, the Hazardous Waste Control Act, the California Accidental Release Protection Program, and the California Health and Safety Code.

Stormwater runoff from the site, under both construction and post-construction development conditions, would be avoided through compliance with NPDES regulations administered by the Colorado River Regional Water Quality Control Board (RWQCB). The project is required to prepare and implement a Construction General Storm Water Permit and stormwater pollution prevention plan (SWPPP) (refer to Section 10, Hydrology and Water Quality). The contractor would be required to implement such regulations relative to the transport, handling, and disposal of any hazardous materials, including the use of standard construction controls and safety procedures that would avoid or minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local and state laws.

Operation

The project proposes multi-family residential uses, passive and active recreational uses, sewer/water connections, and access/circulation improvements typical of residential development. Due to their nature, these uses are not generally expected to involve the routine transport, use, or disposal of hazardous materials in substantial quantities.

Once the project is operational, hazardous material use associated with the residences, recreational uses, landscaping, and maintenance would be limited to private use of commercially available cleaning products, landscaping pesticides and fertilizers, and use of various other commercially available substances. Development of the project site is therefore anticipated to result in use of commercially available potentially hazardous materials or chemicals. The use of these substances is expected to occur in relatively small quantities and to be typical of that for residential uses and associated landscape maintenance and would be subject to applicable federal, state, and local health and safety laws and regulations intended to minimize health risk to the public.

3.0 ENVIRONMENTAL CHECKLIST

Project conformance with existing local, state, and federal regulations pertaining to the routine transport, use, storage, or disposal of hazardous materials or hazardous wastes would ensure that potential adverse effects are minimized and that such substances are handled appropriately in the event of accidental release.

For the reasons above, the project is not anticipated to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? No Impact.*

See Responses 9(a) and 9(b) above for project-specific discussion. No schools are located within one-quarter mile of the project site. Therefore, no impact would occur in this regard.

- d) *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? No Impact.*

Research of the California Department of Toxic Substances Control (DTSC) Cortese List Data Resources revealed that the project site is not located on a site listed as a hazardous materials site (DTSC 2020; SWRCB 2020). The Cortese List indicates that the project site contains no above- or belowground storage tanks, soil stains, or other types of potential hazards to the public. Therefore, no impact would occur.

- e) *For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, result in a safety hazard or excessive noise for people residing or working in the project area? Less than Significant Impact.*

The Imperial County Airport Land Use Commission has established a set of land use compatibility criteria for lands surrounding the county's airports. The Imperial County Airport Land Use Compatibility Plan (Imperial County 1996) identifies the project site as being located within Zone B2, Extended Approach Departure Zone. Uses within Zone B2 are considered to be subject to significant risk and noise exposure. However, as indicated by Figure 5.10-1, Imperial County Airport Noise Impact Area, of the City's General Plan EIR (City of El Centro 2003), the site is located outside of the noise contours for the airport, and therefore, significant noise effects on future residents of the development from airport operations are not anticipated.

The project as designed would not exceed height standards as set forth in Chapter 29 of the Code of Ordinances of the City of El Centro for the R3 zone, and therefore would not support any structural elements (i.e., greater than 150 feet in height) with the potential to obstruct or otherwise affect airport operations, thus avoiding a potential safety hazard. The proposed residential uses would not adversely affect airport operations if developed within Zone B2 or result in a safety hazard for people working or residing in the area. Further, the project would be subject to Federal Aviation Administration (FAA) airspace review prior to development.

The 1996 Imperial County Airport Land Use Compatibility Plan indicates that the majority of residential development is incompatible within a B2 zone, with the exception of some low-density residential developments that are potentially compatible with restrictions. It should be noted that the Imperial County Airport Land Use Commission previously reviewed the request to rezone the subject property as proposed and found that the rezone would be inconsistent with the Imperial County Airport Land Use Compatibility Plan. However, the City retains the authority to make a final

3.0 ENVIRONMENTAL CHECKLIST

consistency determination that may ultimately preside over the Airport Land Use Commission's decision as to the appropriateness of the requested rezone.

Following such a determination, it is not anticipated that the project would result in a safety hazard or excessive noise for people residing or working in the project area. Impacts would be less than significant.

- f) *Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan? Less than Significant Impact.*

The City of El Centro participates in implementation of the Imperial County Multi-Jurisdictional Mitigation Plan (MJMP) which is intended to provide guidance for responding to emergency situations through a coordinated system of emergency service providers and facilities (Imperial County 2020). The MJMP addresses planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The plan does not address normal day-to-day emergencies or routine procedures used in dealing with such emergencies. Rather, the plan focuses on potential large-scale disasters that represent unique situations requiring unusual emergency responses. Such threats addressed by the plan include major earthquakes, hazardous materials incidents, flooding, transportation, civil unrest, and threats to national security.

During construction, materials would be placed within the project boundaries adjacent to the active on-site area of construction to avoid any access conflicts in case of emergency evacuations. Direct access to the project site would be from N. 8th Street and from N. 10th Street. The project does not propose any components that would be anticipated to obstruct or conflict with emergency response or evacuation during project operations. No off-site roadway improvements are proposed that would alter existing circulation patterns. In addition, the project has been designed to recess the access gate at the southern entrance along N. 10th Street, thereby allowing vehicles to pull off of the road while waiting for the gate to open in order to avoid potential queuing or circulation along the roadway.

Any improvements needed to provide adequate access to the site would be subject to City review for the potential to interfere with emergency evacuation routes to ensure that access and circulation are maintained during the construction and operational phases. Additionally, the project would be subject to site plan review by City emergency services personnel to ensure that it would not result in components that potentially interfere with an emergency response plan or an emergency evacuation plan. Impacts are considered to be less than significant.

- g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? Less than Significant Impact.*

Refer also to Section 20, Wildfire. The project site is located in a developed urbanized area generally supporting commercial development, as well as multi-family and single-family uses. According to CalFire's Hazard Severity Zone Map, the project site is not located in a zone designated as Very High Fire Hazard Severity (VHFHSZ) (CalFire 2020). Similarly, adjacent lands are not identified as being in a VHFHSZ. Therefore, the project area is not considered to be at high risk for wildfire events or the damage and public safety risks associated with such occurrences.

Similar to existing conditions, the project would be served by the City of El Centro Fire Department. The nearest fire station is located at 1910 N. Waterman Avenue, approximately 0.63 miles southwest of the site. Existing fire protection services are adequate to serve the project as proposed with applicant payment of the required development impact fees; no new facilities or personnel would be required as the direct result of project implementation. Therefore, it is not anticipated that the project would expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires. Impacts would be less than significant.

10. Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or,	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

a) *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? Less than Significant Impact.*

Stormwater runoff (both dry and wet weather) generally discharges into storm drains and/or flows directly to creeks, rivers, lakes, and the ocean. Polluted runoff can have harmful effects on drinking water, recreational water, and wildlife. Stormwater characteristics depend on site conditions, e.g., land use, impervious cover, pollution prevention, types and amounts of best management practices (BMPs), rain events (duration, amount of rainfall, intensity, time between events), soil type and particle sizes, multiple chemical conditions, the amount of vehicular traffic, and atmospheric deposition. Major pollutants typically found in runoff include sediments, nutrients, oxygen-demanding substances, heavy metals, petroleum hydrocarbons, pathogens, and bacteria.

3.0 ENVIRONMENTAL CHECKLIST

The majority of stormwater discharges are considered nonpoint sources and are regulated by an NPDES Municipal General Permit or Construction General Permit. The Colorado River RWQCB administers the NPDES stormwater permitting program for construction activities for the project area. Construction activities disturbing one acre or more of land are subject to the permitting requirements of the NPDES General Permit for Discharges of Storm Water Runoff Associated with Construction Activity. As the project site is more than one acre in size, the City, as the lead agency, is required to submit a Notice of Intent to the RWQCB that covers the Construction General Permit prior to the beginning of construction. The project would comply with the requirements of the NPDES General Permit for the City (State Water Resources Control Board Order No. 2013-0001-DWG). The project would also be subject to the City's requirements for stormwater treatment (Ordinance Chapter 22, Article VII) which consist of the City's Jurisdictional Runoff Management Plan (JRMP) and the Post-Construction Stormwater Best Management Practice Standards Manual for Development Projects, which is Attachment A of the JRMP (City of El Centro 2015). Additionally, the project would implement BMPs in conformance with Chapter 22, Article VII, Division 1, Section 22-707 of the City's Municipal Code.

The Construction General Permit requires the preparation and implementation of a water quality management plan and a stormwater pollution prevention plan (SWPPP), both of which must be prepared before construction can begin. The water quality management plan outlines the project site design, source control, and treatment control of BMPs utilized throughout the life of the project. The SWPPP outlines all activities to prevent stormwater contamination, control sedimentation and erosion, and comply with Clean Water Act requirements during construction. Implementation of the SWPPP starts with the commencement of construction and continues through to the completion of the project. The SWPPP would identify site-specific construction BMPs to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater runoff from the project area. Potential construction BMPs may include the following:

- Minimization of disturbed areas to the portion of the project site necessary for construction
- Stabilization of exposed or stockpiled soils and cleared or graded slopes
- Establishment of permanent landscaping as early as feasible
- Removal of sediment from surface runoff before it leaves the project site by silt fences or other similar devices around the site perimeter
- Protection of all storm drain inlets on-site or downstream of the project site to eliminate entry of sediment
- Prevention of tracking of soil through use of a gravel strip or wash facilities at exits from the project area
- Proper storage, use, and disposal of construction materials
- Continual inspection and maintenance of all specified BMPs through the duration of construction

With conformance to such measures and adherence to state and local regulations, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant.

3.0 ENVIRONMENTAL CHECKLIST

- b) *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? Less than Significant Impact.*

The City of El Centro does not utilize its groundwater supply for consumption, as the underlying groundwater is too brackish in quality for human consumption and agricultural uses. Water service for the project would be supplied from the City's public water supply system rather than from groundwater, which would not result in a net deficit of aquifer volume or lowering of the groundwater table. Therefore, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

- c)i) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site? Less than Significant Impact.*

The project would not alter the course of a stream or river because such features are Refer to Response 10(a), above. No rivers or streams are present on the project site, and therefore, no such features would be altered with the proposed development. The project would have the potential to result in additional sources of polluted runoff, including through construction and operational activities associated with the proposed residential development and parking lots, as well as other on-site improvements. Stormwater runoff from the project site would be routed to an existing off-site detention basin, located immediately north of the project site at the southwest corner of Treshill Road and N. 8th Street. The basin was constructed as part of the El Centro Town Center Phase I project and subsequently expanded to accept the increased flows. The detention basin has been designed to adequately accommodate stormwater runoff resulting with future development of the project site; the construction of additional on-site or off-site detention basins for the treatment of stormwater is therefore not required with project implementation.

Although development of the subject property would result in the addition of impervious surfaces on-site, the project would not substantially change existing drainage patterns, nor increase the rate or volume of stormwater runoff from the subject property. As stated, the project would be subject to the City's requirements for stormwater treatment (Ordinance Chapter 22, Article VII) which consist of the JRMP and the Post-Construction Stormwater Best Management Practice Standards Manual for Development Projects (City of El Centro 2015). Additionally, the project would implement BMPs in conformance with Article VII, Division 1, Section 22-707 of the City's Municipal Code. All proposed stormwater infrastructure improvements and site grading would be subject to City discretionary review and approval of a grading permit application. With conformance to such requirements, it is not anticipated that the project would result in substantial erosion or siltation on- or off-site. Project impacts would be less than significant.

- c)ii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? Less than Significant Impact.*

See Response 10(c)i., above for project-specific discussion. The project site is not located within a 100-year flood hazard area and is therefore not susceptible to flooding (FEMA 2008). Development of the site would not substantially change drainage patterns on-site or off-site, and no increase in the rate or amount of surface runoff would occur with the project. Impacts would be less than significant.

3.0 ENVIRONMENTAL CHECKLIST

- c)iii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? Less than Significant Impact.*

See Responses 10(a) and 10(c)i., above. The project has the potential to increase stormwater runoff with development of the site, as impervious surface area would increase, as compared to the current undeveloped condition. However, as noted above, stormwater runoff from the project site would be routed to an existing off-site detention basin designed to adequately accommodate stormwater runoff resulting with future development of the project site; the construction of additional on-site or off-site detention basins to accommodate stormwater from the site is therefore not required with project implementation. Additionally, the project would be required to implement an SWPPP and BMPs to ensure that stormwater quality is properly managed during the construction and operational phases. Project conformance with relevant state and local regulations would prevent substantial stormwater pollutant discharge from entering the City's existing storm drain system. Therefore, the project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

- c)iv) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would impede or redirect flood flows? Less than Significant Impact.*

Refer to Responses 10(c)i and 10(c)ii, above. The project site is not in an area subject to flooding, and stormwater runoff can be accommodating by existing off-site facilities. The project would not impede or redirect flood flows such that any off-site properties would be adversely affected by stormwater runoff from the subject site. With compliance with applicable state and local drainage regulations and standards, the proposed project would not substantially alter the existing drainage pattern of the project site or substantially increase the rate or amount of surface runoff in a manner that would impede or redirect flood flows. Impacts would be less than significant.

- d) *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation? Less than Significant Impact.*

The project site is located in Zone X (Other Areas) as illustrated on Federal Emergency Management Act (FEMA) map panel 06025C1725C, which is outside of the FEMA-mapped 100-year floodplain (FEMA 2008). Therefore, the potential for on-site flooding is considered low.

Tsunamis are a type of earthquake-induced flooding that is produced by large-scale sudden disturbances of the sea floor. Tsunamis interact with the shallow sea floor topography upon approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The site is located approximately 93 miles east of the Pacific Ocean. Therefore, the site is not located in a tsunami inundation area and inundation due to tsunami would not occur.

A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. Based on the distance between the site and large, open bodies of water, inundation of the site due to a seiche event is not anticipated.

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As the potential for project inundation relative to flood hazard, tsunami, or seiche zones is low, it is not anticipated that project implementation would risk release of pollutants as the result of such events. Impacts would be less than significant.

- e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? Less than Significant Impact.*

Refer to Responses 10(a), 10(c)i and 10(c)iii, above. As described, the project applicant would prepare and implement an SWPPP that would manage stormwater runoff during construction activities. The SWPPP would include site design and source control BMPs to ensure stormwater runoff and impervious areas are minimized. The use of the off-site detention basin is anticipated to meet the treatment and flow control requirements for post-construction BMPs. The project would comply with all relevant state and local water quality management requirements (i.e., the City's JRMP and Post-Construction Stormwater Best Management Practice Standards Manual for Development Projects) to ensure proper treatment and management of stormwater runoff generated on the project site. Infiltration would be maintained through project design, including use of the existing detention basin to the north, and would implement appropriate management practices, control techniques, system design and engineering methods, and other measures as appropriate. The project would not decrease the quality or increase the quantity or runoff discharging from the project site compared to existing conditions.

Water for the project would be supplied by the City's public water system. The project would connect to an existing 12-inch water line in N. 10th Street and does not include the use of groundwater wells. Therefore, it is not anticipated that the project would conflict with or obstruct implementation of a groundwater management program.

With compliance with local, state, and federal water quality and groundwater requirements, as applicable, the project would not conflict with a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

11. Land Use and Planning

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

DISCUSSION OF IMPACTS

a) *Would the project physically divide an existing community? Less than Significant Impact.*

Under existing conditions, surrounding land uses include multi-family residential (Town Center Villa Apartments) to the west across N. 10th Street; vacant land adjacent to the north; multi-family residential development to the east, along with vacant land and active agricultural fields; and single-family rural residential uses to the south across Bradshaw Avenue. The existing El Centro Town Center commercial retail development is located farther to the west (part of Phase I of the Town Center project) and includes such stores as Target, 99 Cents Only store, and Lowe's Home Improvement.

The proposed multi-family development would be consistent with similar multi-family uses in the area and would not result in a land use that would conflict with or disrupt surrounding development patterns. The project does not require or propose the construction of new streets or the closure or redesign of any existing area roadways, nor would it have an adverse effect on area circulation patterns or access. Additionally, utility lines (i.e., water, sewer) would be extended into the site from existing lines currently located in adjacent streets. All utility lines serving the site would be undergrounded and would therefore not create a barrier or obstruction on-site or in the surrounding area.

For these reasons, it is not anticipated that the project would physically divide an existing community. Impacts would be less than significant.

b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? Less than Significant Impact.*

The project as proposed would require a General Plan Amendment to change the existing General Plan land use designation from CG-General Commercial to High Density Residential. The project would also rezone the property from CG-General Commercial to R3-Multiple Family Residential. Although City approvals would be required to allow for the project as proposed, with such approvals, the project would not conflict with a land use plan, policy, or regulation applicable to the project site relative to land use and zoning.

The project would be required to demonstrate conformance with the Multi-Family Residential Zones design standards identified in City Municipal Code Chapter 29, Article II, Division 2, Residential Zones, as well as with Municipal Code Chapter 7, Building and Construction Regulations. Project design would be subject to the development standards identified for the Multi-Family Residential Zone relevant to architectural and site design, parking and circulation

3.0 ENVIRONMENTAL CHECKLIST

requirements, wall and fence design, landscaping, and exterior lighting, among other elements, to ensure compatibility and avoid potential conflict with surrounding land uses.

The Imperial County Airport Land Use Compatibility Plan (Imperial County 1996) identifies the project site as being located within Zone B2, Extended Approach Departure Zone. However, as indicated by Figure 5.10-1, Imperial County Airport Noise Impact Area, of the City's General Plan EIR (City of El Centro 2003), the site is located outside of the noise contours for the airport, and therefore, significant noise effects on future residents of the development from airport operations are not anticipated. As designed, project elements would not exceed height standards as set forth in Chapter 29, Zoning, of the City's Municipal Code for the R3 zone, and therefore, the project would not support features (i.e., greater than 150 feet in height) with the potential to obstruct or conflict with airport operations or indirectly interfere with public safety as a result.

The Imperial County Airport Land Use Commission previously reviewed the request to rezone the subject property to residential use (as is currently proposed) and found that the rezone would be inconsistent with the Imperial County Airport Land Use Compatibility Plan. However, the City retains the authority to make a final consistency determination that may ultimately preside over the Airport Land Use Commission's decision as to the appropriateness of the requested rezone. Refer to Response 9(e), above, for additional discussion.

Currently, there is no adopted habitat conservation plan or natural community conservation plan in the City of El Centro. Therefore, the project would not conflict with any such plan.

Based on the above conditions, the project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant in this regard.

3.0 ENVIRONMENTAL CHECKLIST

12. Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
12. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? No Impact.*

The City of El Centro is generally built out with urban uses that are typically incompatible with surface mining and mineral extraction activities. Further, the General Plan does not provide for mining activity to occur (City of El Centro 2004). No mineral resources that would be of value to the region or to residents of the state have been identified on the project site (DOC 2018b). Therefore, no impact would occur.

b) *Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? No Impact.*

Refer to Response 12(a), above. The project site is not delineated as a locally important mineral resource recovery site. Therefore, the project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impact would occur.

13. Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
13. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or of applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following analysis is based upon the *Noise Impact Assessment* prepared by ECORP Consulting, Inc., dated November 2020 (see Appendix D). More detailed background information on the fundamentals of noise, human response to noise levels, noise effects, and other such technical aspects are provided in Appendix D. The following represents a summary of the findings of the Noise Impact Assessment.

DISCUSSION OF IMPACTS

- a) *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or of applicable standards of other agencies? Less than Significant Impact.*

The following evaluation discusses sound levels in terms of the community noise equivalent level (CNEL) and equivalent noise level (Leq). CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale that accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day.

Human reaction to sound between 7:00 p.m. and 10:00 p.m. is often as if the sound were actually 5 decibels dBA higher than if it occurred from 7:00 a.m. to 7:00 p.m.¹ From 10:00 p.m. to 7:00 a.m., humans generally perceive sound as if it were 10 dBA higher due to the lower background level. Hence, the CNEL is obtained by adding an additional 5 dBA to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night from 10:00 p.m. to 7:00 a.m.

Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour average. Leq is the average noise level on an energy basis for any specific time period. The Leq for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound.

¹ dBA = A-weighted sound level, which is the sound pressure level in decibels as measured on a sound level meter using the A weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.

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L_{eq} can be thought of as the level of a continuous noise that has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

City of El Centro Noise Limits

The City of El Centro has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise-sensitive land uses. Section 17.1-8, Construction Equipment, of the City of El Centro Municipal Code indicates that no construction or repair work is to be performed on Sundays and holidays. Mondays through Saturdays, construction can only occur between the hours of 6:00 a.m. and 7:00 p.m. Additionally, no such equipment, or combination of equipment regardless of age or date of acquisition, shall be operated so as to cause noise at a level in excess of 75 decibels for more than eight hours during any 24 hour period when measured at or within the property lines of any property which is developed and used either in part or in whole for residential purposes. Under certain conditions, the City may grant a waiver to allow limited construction activities to occur outside of the limits described above.

The City's General Plan Noise Element is intended to guide in the development of noise regulations. The City uses land use compatibility standards when planning and making development decisions to ensure that noise producers do not adversely affect sensitive receptors. Table 13-1 summarizes the City's noise standards for various types of land uses. The standards represent the maximum acceptable noise levels and are used to determine potential noise impacts.

Table 13-1: City of El Centro Exterior Noise Level Limits

Zone ¹	Time of Day	One-Hour Average
Single-Family Residential Zones	7:00 a.m. – 10:00 p.m.	55
	10:00 p.m. – 7:00 a.m.	45
Multi-Family Residential Zones	7:00 a.m. – 10:00 p.m.	55
	10:00 p.m. – 7:00 a.m.	50
Commercial, Civic and Limited Use Zones	7:00 a.m. – 10:00 p.m.	60
	10:00 p.m. – 7:00 a.m.	55
Manufacturing Zones	7:00 a.m. – 10:00 p.m.	75
	10:00 p.m. – 7:00 a.m.	70

Source: City of El Centro 2020.

Notes: 1. Zones which exists on the abutting or nearby property at whose boundary the measurement is taken. The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts. If the measured ambient sound level exceeds the applicable limit shown in the table, the allowable sound level shall be the ambient noise level minus 5 dB but not less than the sound level limit specified in the table.

Federal Interagency Committee on Noise (FICON)

The FICON thresholds of significance assist in the evaluation of increased traffic noise. The 2000 FICON findings provide guidance as to the significance of changes in ambient noise levels due to transportation noise sources. FICON recommendations are based on studies that relate aircraft and traffic noise levels to the percentage of persons highly annoyed by the noise. FICON's measure of substantial increase for transportation noise exposure is as follows:

- If the existing ambient noise levels at existing and future noise-sensitive land uses (e.g., residential) are less than 60 dBA CNEL and the project creates a readily perceptible 5 dBA CNEL or greater noise level increase and the resulting noise level would exceed acceptable exterior noise standards; or

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- If the existing noise levels range from 60 to 65 dBA CNEL and the project creates a barely perceptible 3 dBA CNEL or greater noise level increase and the resulting noise level would exceed acceptable exterior noise standards; or
- If the existing noise levels already exceed 65 dBA CNEL, and the project creates a community noise level increase of greater than 1.5 dBA CNEL.

In 1974, the California Commission on Housing and Community Development adopted noise insulation standards for residential buildings (CCR Title 24, Part 2, Chapter 12, Section 1207.11.2). Title 24 establishes standards for interior room noise attributable to outside noise sources. Title 24 also specifies that acoustical studies should be prepared whenever a residential building or structure is proposed to be located in areas with exterior noise levels 60 dB L_{dn} or greater. The acoustical analysis must show that the building has been designed to limit intruding noise to an interior level not exceeding 45 dB L_{dn} for any habitable room. The provisions of the Title 24 standard apply to all new hotels, motels, apartments, and multi-family developments.

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise- and vibration-sensitive and may warrant unique measures for protection from intruding noise. The nearest sensitive receptors to the project site are multi-family residences located to the east (across N. 8th Street) and west (across N. 10th Street) of the project site.

The most common and significant source of noise in the City of El Centro is mobile noise generated by transportation-related sources. Other sources of noise are the various land uses (i.e., residential, commercial and agricultural) that generate stationary-source noise. The project site is bound by vacant land to the north with Cruickshank Drive beyond, N. 8th Street to the east with multi-family residential units beyond, Bradshaw Avenue to the south with residential land uses beyond, and N. 10th Street and multi-family residential units to the west, with a commercial shopping center beyond.

Existing Ambient Noise Levels

To quantify existing ambient noise levels in the project area, three short-term noise measurements were taken on October 1, 2020. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the project site during the daytime (see Appendix D for a depiction of noise measurement locations). As shown in [Table 13-2](#), the ambient recorded noise level directly adjacent to the project site ranges from 52.0 dBA to 55.7 dBA L_{eq}.

Table 13-2: Existing (Baseline) Noise Measurements

Location Number	Location	L _{eq} dBA	L _{min} dBA	L _{max} dBA	Time
1	Corner of Bradshaw Avenue and N. 10 th Street	55.7	45.7	75.6	7:27 a.m.- 7:57 a.m.
2	Residential complex on N. 8 th Street across from project site	61.3	46.6	75.6	8:04 a.m. – 8:34 a.m.
3	Intersection of N. 10 th Street and Cruickshank Drive	52.0	36.6	79.2	8:45 a.m. – 9:15 a.m.

Source: ECORP 2020c; see Appendix D for noise measurement outputs.

The most common noise in the project vicinity is produced by automotive vehicles (e.g., cars, trucks, buses, motorcycles). Traffic moving along streets produces a sound level that remains

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relatively constant and is part of the minimum ambient noise level in the project vicinity. Infrequent or intermittent noise also is associated with vehicles, including sirens, vehicle alarms, slamming of doors, trains, garbage, and construction vehicle activity and honking of horns. Such sources add to urban noise levels and are regulated by a variety of agencies.

Existing Roadway Noise Levels

Existing roadway noise levels were calculated for the roadway segments in the project vicinity. This task was accomplished using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) and traffic volumes from the Transportation Impact Study (Michael Baker International 2021; see Appendix E). The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by Caltrans. Available Caltrans data shows that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along these roadway segments are provided in [Table 13-3](#).

Table 13-3: Existing (Baseline) Traffic Noise Levels

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway
Cruickshank Drive		
Between Imperial Avenue and 12 th Street	Residential and Commercial	55.7
Between 12 th Street and 10 th Street	Residential and Commercial	54.7
Bradshaw Road		
West of Imperial Avenue	Residential and Commercial	55.1
Between Imperial Avenue and 12 th Street	Residential and Commercial	51.8
Between 12 th Street and 10 th Street	Residential	50.0
Between 10 th Street and 8 th Street	Residential	48.2
8th Street		
Between the project site driveway and Bradshaw Road	Residential	56.1
Between Bradshaw Road and El Dorado Avenue	Residential	56.7
South of El Dorado Avenue	Residential	56.4
10th Street		
Between Cruickshank Drive and the project site driveway	Residential	43.5
Imperial Avenue		
South of Bradshaw Road	Commercial and Religious	61.7

Source: ECORP 2020c; see Appendix D.

Notes:

1. Traffic noise levels were calculated by ECORP using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified in the Transportation Impact Study included in Appendix E. A total of 11 intersections were analyzed in the Transportation Impact Study; however, only roadway segments that impact sensitive receptors were included for the purposes of the noise analysis.

As shown, the existing traffic-generated noise levels on project-vicinity roadways currently range from 43.5 to 61.7 dBA CNEL at a distance of 100 feet from the roadway centerline. As previously described, CNEL is 24-hour average noise level with a 5 dBA “weighting” during the hours of 7:00

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p.m. to 10:00 p.m. and a 10 dBA “weighting” during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. It should be noted that the modeled noise levels depicted in [Table 13-3](#) may differ from measured levels in [Table 13-2](#) because the measurements represent noise levels at different locations around the project site and are also reported in different noise metrics (e.g., noise measurements are the L_{eq} values and traffic noise levels are reported in CNEL).

Construction

Construction noise associated with the proposed project would be temporary and would vary depending on the nature of the activities being performed. Noise generated would primarily be associated with the operation of off-road equipment for on-site construction activities as well as construction vehicle traffic on area roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). During construction, exterior noise levels could negatively affect sensitive land uses in the vicinity of the construction site.

Nearby noise-sensitive land uses consist of multi-family residential units located across N. 10th Street adjacent to the western project site boundary. There are also multi-family residences located directly across 8th Street to the east of the project site. As previously described, Section 17.1-8 of the City’s Municipal Code states that it shall be unlawful for any person to operate construction equipment at any construction site on Sundays, and days appointed by the president, governor, or the City council for a public holiday. In addition, it shall be unlawful for any person to operate construction equipment at any construction site on Mondays through Saturdays except between the hours of 6:00 a.m. and 7:00 p.m.

No such equipment, or combination of equipment regardless of age or date of acquisition, shall be operated so as to cause noise at a level in excess of 75 decibels for more than eight hours during any 24-hour period when measured at or within the property lines of any property which is developed and used either in part or in whole for residential purposes.

The anticipated short-term construction noise levels generated for the necessary construction equipment are provided in [Table 13-4](#). Consistent with FTA recommendations for calculating construction noise, construction noise was measured from the center of the project site (ECORP 2020c).

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Table 13-4: Unmitigated Construction Average (dBA) Noise Levels at Nearest Receptor

Equipment	Estimated Exterior Construction Noise Level at Existing Residences	Construction Noise Standards (dBA L _{eq})	Exceeds Standards?
Site Preparation			
Tractors/Loaders/Backhoes (1)	62.0	75	No
<i>Combined Site Preparation Equipment</i>	62.0	75	No
Grading			
Graders (2)	63.0 (each)	75	No
Scraper (1)	61.5	75	No
<i>Combined Grading Equipment</i>	67.3	75	No
Construction, Trenching, Paving & Painting			
Forklift (1)	61.4	75	No
Tractors/Loaders/Backhoes (2)	62.0 (each)	75	No
Trencher (1)	54.1	75	No
Pavers (1)	56.1	75	No
Rollers (2)	54.9 (each)	75	No
Air Compressor (1)	55.6	75	No
<i>Combined Construction, Trenching, Paving & Painting Equipment</i>	67.9	75	No

Source: ECORP 2020c; see Appendix D.

Notes: Construction equipment used during construction derived from CalEEMod 2016.3.2. CalEEMod is designed to calculate air pollutant emissions from construction activity and contains default construction equipment and usage parameters for typical construction projects based on several construction surveys conducted in order to identify such parameters. The nearest residence is located approximately 400 feet from the center of the construction site.

L_{eq} = The equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

As shown in [Table 13-4](#), no individual or cumulative pieces of construction equipment would exceed the 75 dBA City construction noise standard during any phase of construction at the nearby noise-sensitive receptors. Construction noise levels would not exceed established thresholds. Impacts would be less than significant and no mitigation measures are required.

Operation

Noise-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise sensitive and may warrant unique measures for protection from intruding noise. The nearest noise-sensitive land uses are multi-family residential units located to the west directly across N. 10th Street and to the east directly across N. 8th Street.

Operational Off-site Traffic Noise

Future traffic noise levels throughout the project vicinity (i.e., vicinity roadway segments that traverse noise-sensitive land uses) for the project were modeled based on the traffic volumes

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identified in the Transportation Impact Study (Michael Baker International 2021; see Appendix E) to determine the noise levels along project vicinity roadways. Table 13-5 shows the calculated off-site roadway noise levels under existing traffic levels compared to future buildout of the project. The calculated noise levels as a result of the project at affected sensitive land uses were compared to the FICON recommendation for evaluating the impact of increased traffic noise.

Table 13-5: Proposed Project - Predicted Traffic Noise Levels

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway		Noise Standard (dBA CNEL)	Exceed Standard AND result in Noise Levels Exceeding Acceptable Exterior Noise Standards
		Existing Conditions	Existing + Project Conditions		
Cruickshank Drive					
Between Imperial Avenue and N. 12th Street	Residential and Commercial	55.7	55.9	>5	No
Between N. 12th Street and N. 10th Street	Residential and Commercial	54.7	55.0	>5	No
Bradshaw Road					
West of Imperial Avenue	Residential and Commercial	55.1	55.1	>5	No
Between Imperial Avenue and 12th Street	Residential and Commercial	51.8	52.1	>5	No
Between 12th Street and 10th Street	Residential	50.0	50.4	>5	No
Between 10th Street and 8th Street	Residential	48.2	49.8	>5	No
N. 8th Street					
Between the project site driveway and Bradshaw Road	Residential	56.1	56.3	>5	No
Between Bradshaw Road and El Dorado Avenue	Residential	56.7	56.9	>5	No
South of El Dorado Avenue	Residential	56.4	56.5	>5	No
N. 10th Street					
Between Cruickshank Drive and the project site driveway	Residential	43.5	44.6	>5	No
Imperial Avenue					
South of Bradshaw Road	Commercial and Religious	61.7	61.7	>3	No

Source: ECORP 2020c; see Appendix D.

Notes:

1. Traffic noise levels were calculated by using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified in the Transportation Impact Study (see Appendix E).
2. A total of 11 intersections were analyzed in the Transportation Impact Study; however, only roadway segments that impact sensitive receptors were included for the purposes of the noise analysis.

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As shown in [Table 13-5](#), no roadway segment would generate an increase of noise beyond the FICON significance standards. Operational noise from traffic would not result in a significant traffic noise impact. Impacts would be less than significant and no mitigation measures are required.

Cumulative traffic noise levels throughout the project vicinity (i.e., vicinity roadway segments that traverse noise-sensitive land uses) were also modeled based on the traffic volumes identified in the Transportation Impact Study (Michael Baker International 2021) to determine the noise levels along project vicinity roadways. [Table 13-6](#) shows the calculated off-site roadway noise levels under cumulative conditions without the project (Cumulative No Project) compared to cumulative conditions plus future buildout of the project (Cumulative Plus Project). The calculated noise levels as a result of Cumulative Plus Project conditions at affected sensitive land uses were compared to the FICON significance standards.

Table 13-6: Cumulative Traffic Noise Scenario

Roadway Segment	Cumulative No Project	Cumulative Plus Project	Noise Standard (dBA CNEL)	Exceed Standard AND result in Noise Levels Exceeding Acceptable Exterior Noise Standards?
	CNEL @ 100 Feet from Roadway Centerline	CNEL @ 100 Feet from Roadway Centerline		
Cruickshank Drive				
Between Imperial Avenue and N. 12th Street	57.1	58.2	>5	No
Between N. 12th Street and N. 10th Street	56.4	58.6	>5	No
Bradshaw Road				
West of Imperial Avenue	56.2	57.0	>5	No
Between Imperial Avenue and N. 12th Street	52.3	52.6	>5	No
Between N. 12th Street and N. 10th Street	51.0	51.1	>5	No
Between N. 10th Street and N. 8th Street	50.1	53.1	>5	No
8th Street				
Between the project site driveway and Bradshaw Road	57.3	57.3	>5	No
Between Bradshaw Road and El Dorado Avenue	57.8	59.0	>5	No
South of El Dorado Avenue	57.5	57.6	>5	No
10th Street				
Between Cruickshank Drive and the project site driveway	46.3	46.9	>5	No
Imperial Avenue				
South of Bradshaw Road	63.0	63.0	>3	No

Source: ECORP 2020c: see Appendix D.

Notes:

1. Traffic noise levels were calculated using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified in the Transportation Impact Study; see Appendix E.
2. A total of 11 intersections were analyzed in the Transportation Impact Study; however, only roadway segments that impact sensitive receptors were included for the purposes of the noise analysis.

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As shown in Table 13-6, no roadway segment would generate an increase of noise beyond the FICON significance standards in any scenario. Therefore, no mobile-source cumulative impacts would occur.

Project Land Use Compatibility

The City uses the land use compatibility standards from the General Plan, which provide the City with a tool to gauge the compatibility of new land users relative to existing noise levels. Table 4-1, Noise/Land Use Compatibility Matrix, of Appendix D identifies acceptable noise levels for various land uses, including residential land uses such as those proposed by the project. In the case that noise levels identified at the project site fall within levels presented in the General Plan, the project is considered compatible with the existing noise environment.

A normally acceptable noise standard for residential land uses is 59 dBA CNEL or under. As previously stated, noise measurements were taken to quantify existing ambient noise levels in the project area. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the project site and are considered representative of the noise levels throughout the day. As shown in Table 13-2, the ambient noise levels recorded closest to the project site range from 52.0 dBA to 55.7 dBA.

Additionally, the roadway segment on N. 10th Street between Cruickshank Drive and the future project site driveway, which is adjacent to the northwestern boundary of the project site, has a calculated existing roadway noise level of 43.5 dBA CNEL at 100 feet from the centerline of the road, which extends onto the site. Further, the roadway segment on Bradshaw Avenue between N. 10th Street and N. 8th Street, which traverses the southern boundary of the project site, has a calculated existing roadway noise level of 48.2 dBA CNEL at 100 feet from the centerline of the road, which extends onto the site.

These modeled noise levels are reported in the noise metric, CNEL, which is the same noise metric promulgated by City noise compatibility guidelines identified in Table 4-1 of Appendix D. As these noise levels fall below the noise standard of 59 dBA CNEL, the project site is considered an appropriate noise environment to locate the proposed land use.

Operational On-site Noise

The primary operational noise source associated with the project would be that of stationary sources. Potential stationary noise sources related to long-term operation of residences on the project site would include mechanical equipment and other typical sources specific to urban residential land uses such as barking dogs, internal traffic circulation, radios, and people talking. According to reference field noise measurements taken, mechanical heating, ventilation, and air conditioning equipment generates noise levels less than 45 dBA at 20 feet, which is less than City's noise threshold for protecting residential uses (ECORP 2020c). Urban residential noise generally registers at 55 to 60 dBA. Based on field measurements conducted by ECORP on October 1, 2020, existing noise levels currently range from 52.0 dBA to 55.7 dBA directly adjacent to the project site (ECORP 2020c). Therefore, on-site project-generated noise would be expected to be similar to noise levels currently experienced.

The project would locate new residential uses adjacent to other similar existing residential uses. In minimizing potential adverse impacts on new land uses due to noise, a key approach is to avoid designating certain land uses at locations within the community that would negatively affect noise-sensitive land uses. The project is consistent with the types, intensity, and patterns of land use envisioned for the project area and is considered compatible with the existing noise environment.

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Project operation would not result in a significant noise-related impact associated with on-site sources. Impacts would be less than significant and no mitigation measures are required.

- b) *Would the project result in the generation of excessive groundborne vibration or groundborne noise levels? Less than Significant Impact.*

Construction

Construction activities can generate varying degrees of vibration, depending on the construction procedures and the type of construction equipment used. High levels of vibration may cause physical personal injury or damage to buildings. However, vibrations rarely affect human health. Instead, construction-related vibration impacts are typically associated with building damage. The operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. Unless heavy construction activities are conducted extremely close (within a few feet) to the neighboring structures, vibrations from construction activities rarely reach the levels that damage structures.

Construction-related ground vibration is normally associated with impact equipment such as pile drivers, jackhammers, and the operation of some heavy-duty construction equipment, such as dozers and trucks. It is noted that pile drivers would not be necessary during project construction. Vibration decreases rapidly with distance and it is acknowledged that construction activities would occur throughout the project site and would not be concentrated at the point closest to sensitive receptors. Groundborne vibration levels associated with construction equipment are summarized in [Table 13-7](#).

Table 13-7: Representative Vibration Source Levels for Construction Equipment

Equipment Type	Peak Particle Velocity at 25 Feet (inches per second)
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076
Hoe Ram	0.089
Jackhammer	0.035
Small Bulldozer/Tractor	0.003
Vibratory Roller	0.210

Source : ECORP 2020c; see Appendix D.

The City of El Centro does not regulate vibrations associated with construction. However, for comparison purposes, the Caltrans (2020) recommended standard of 0.2 inch per second PPV with respect to the prevention of structural damage for older residential buildings is used as a threshold. This is also the level at which vibrations may begin to annoy people in buildings. Consistent with Federal Transit Authority (FTA) recommendations for calculating construction vibration, construction vibration was measured from the center of the project site (ECORP 2020c). The nearest structures of concern to the construction site are located across N. 10th Street and across N. 8th Street.

Based on the representative vibration levels presented for various construction equipment types in [Table 13-8](#) and the construction vibration assessment methodology published by the FTA (2018), potential project construction vibration levels were estimated. [Table 13-8](#) presents the anticipated project generated vibration levels at a distance of 400 feet.

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Table 13-8: Construction Vibration Levels at 400 Feet

Receiver PPV Levels (inches/second) ¹					Peak Vibration	Threshold	Threshold Exceeded?
Small Bulldozer	Jackhammer	Loaded Trucks	Large Bulldozer	Vibratory Roller			
0.00004	0.005	0.001	0.001	0.003	0.005	0.2	No

Source: ECORP 2020c; see Appendix D.

Notes: 1. Based on the Vibration Source Levels of Construction Equipment included on Table 5-3 (FTA 2018). Distance to the nearest residence is approximately 400 feet measured from the center of the project site.

As shown in Table 13-8, vibration as a result of construction activities would not exceed 0.2 PPV at the nearest structure. Thus, project construction would not exceed the recommended threshold. Therefore, the project would result in a less than significant impact related to construction vibration levels.

Operation

The project would not include significant stationary sources of vibration, such as heavy equipment operations. Operational vibration in the project vicinity would be generated by vehicular travel on the local roadways. Similar to existing conditions, traffic-related vibration levels would not be perceptible by sensitive receptors. Therefore, the project would result in a less than significant impact related to operational vibration levels.

- c) *For a project located within the vicinity of a private airstrip or an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels? Less than Significant Impact.*

The project site is not located within 10 miles of an active private airstrip and noise levels generated at private airports are not audible at the project site. Therefore, no impact would occur related to the exposure of people residing or working in the project area to excessive noise levels from a private airstrip.

The Imperial County Airport is located approximately 1.8 miles northwest of the project site. The Imperial County Airport Land Use Commission has established a set of land use compatibility criteria for lands surrounding the county's airports. The Imperial County Airport Land Use Compatibility Plan (Imperial County 1996) identifies the project site as being located within Zone B2, Extended Approach Departure Zone. Uses within Zone B2 are considered to be subject to significant risk and noise exposure; however, such uses would not adversely affect airport operations if developed within the zone. As indicated by Figure 5.10-1, Imperial County Airport Noise Impact Area, of the City's General Plan EIR (City of El Centro 2003), the site is located outside of the noise contours for the airport, and therefore, significant noise effects on the proposed development from airport operations are not anticipated.

The project would not expose people residing or working in the project area to excessive noise levels. A less than significant impact would occur.

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14. Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
14. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

a) *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? Less than Significant Impact.*

The project as proposed would require a General Plan Amendment to change the existing General Plan land use designation on a portion of the site from General Commercial to High Density Residential. The project would also rezone a portion of the property from CG-General Commercial to R3-Multiple Family Residential. The existing General Commercial land use and CG-Commercial zoning would continue to apply to the remainder of the property, which is proposed to be subdivided to allow for future commercial development (not proposed for development at this time).

Although the project would change the current land use type from commercial to residential, development of the subject site was anticipated by the City as Phase IV of the Town Center Village project and therefore does not represent unplanned growth. Further, the project as proposed would result in multi-family (apartment) uses similar to that which have been constructed just to the west of the site along N. 10th Street. With implementation, the project would provide new housing opportunities within an area of the City where planned development is currently underway and expanding.

The project would allow for development of 180 multi-family residential units, which would be a mixture of one- and two-bedroom units. Based upon the current estimated persons per household for the City of El Centro (3.74 persons per household), an estimated 673 residents would be housed by the development (US Census Bureau 2019). The population generated by future development of the site as proposed would therefore not represent substantial population growth within the City. Additionally, it is assumed that many residents that would live in the proposed development would be existing residents of the City of El Centro that would relocate to the site. It is also anticipated that some of the future residents would be students attending Imperial Valley College, located approximately 3.5 miles northeast of the project site, who may be either local residents or residents from surrounding communities.

The project does not propose the construction of any new roadways that would provide access to land areas previously inaccessible. Additionally, all infrastructure (water, sewer, stormwater, electricity) is already present in the project vicinity and serves adjacent properties under existing

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conditions. The project would therefore not result in the provision of new access or infrastructure to areas where such facilities were not already available.

Based on the above, the project would not induce substantial unplanned population growth in the area, either directly or indirectly. Impacts would be less than significant.

b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? No Impact.*

The project would not require the removal or replacement of any existing housing or residents as the subject site does not currently support any residential uses. Therefore, no impact would occur.

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15. Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
15. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

a) *Fire protection? Less than Significant Impact.*

The project would be served by the El Centro Fire Department (ECFD). The ECFD provides emergency and disaster response to mitigate fire, emergency medical, hazardous materials, and other incidents within its boundaries as well as to other jurisdictions via a mutual aid agreement. Fire Station No. 3 is nearest to the project site, located approximately 0.7 miles west at 1910 N. Waterman Avenue. It is not anticipated that the addition of 180 multi-family residential units to the ECFD service area would require the construction of new or expansion of existing facilities to provide service to the project as proposed.

The ECFD maintains a staffing standard providing that 10 sworn and uniformed personnel are available to respond to calls at any given time throughout the day or night (City of El Centro 2016). There is currently no standard that dictates the total number of personnel on staff relative to City population.

The ECFD has adopted standards for fire and emergency response performance based on the National Fire Protection Association Standard 1710 (2010 Edition) - Standard for the Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments. The ECFD standards require that they meet such adopted response times at least 90 percent of the time (City of El Centro 2016).

Although the project would not substantially alter the ECFD's ability to provide fire protection services to the project site, constructing new residences on the site would increase the demand on ECFD services, personnel, and equipment, adding new demand for emergency and non-emergency service responses. As such, the project applicant would be required to pay development impact fees in proportion to the development proposed to help fund fire protection services in the City. Additionally, the ECFD operates and shall continue to operate under mutual

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aid agreements with other agencies as-needed for assistance and backup (City of El Centro 2016). With the payment of development impact fees, the project would not result in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable fire protection service ratios, response times, or other performance objectives. Impacts would be less than significant.

b) *Police protection? Less than Significant Impact.*

Police protection services for the project site would be provided by the El Centro Police Department (ECPD). The ECPD is headquartered at 150 N. 11th Street, approximately 1.25 miles south of the project site.

The project as proposed would present an increase in demand on ECPD personnel and resources due to the increased intensity of use on the site with development of 180 new multi-family units. A greater number of homes and residents in the project area would be a potential source of additional calls for police protection services.

The City's General Plan Public Facilities Element identifies the goal of maintaining a staffing goal of 1.75 sworn officers per 1,000 City residents (City of El Centro 2004). In addition, the ECPD staffing goal is to have a minimum of five police personnel on duty, including four responding officers and one supervising sergeant or officer-in-charge at any given period throughout the day and night (City of El Centro 2016).

The project would consist of 180 residential units, which are estimated to house a future population of approximately 673 residents, assuming 3.74 persons per household (US Census Bureau 2019). The increase in demand for the provision of law enforcement generated by an additional 673 residents within the El Centro community is not considered to be substantial.

The ECPD does not maintain response time goals. However, the department tracks and reviews response times on an annual basis to determine the adequacy of its service and any possible alterations or improvements to methods that would reduce response time (City of El Centro 2016).

To compensate for an increase in law enforcement costs resulting from increased service demand generated by the project, the developer would be required to pay development impact fees. With the payment of development impact fees, the project would not result in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable law enforcement service ratios, response times, or other performance objectives. Impacts would be less than significant.

c) *Schools? Less than Significant Impact.*

Residents in the City of El Centro are served by three school districts in a total of 18 schools geographically dispersed throughout El Centro. These districts are the El Centro Elementary School District, the McCabe Union School District, and the Central Union High School District. Two charter schools are also located in the City and operated by the El Centro Elementary School District (City of El Centro 2016). School-age students residing in the proposed multi-family units constructed would enroll in El Centro Elementary School District for grades kindergarten through 8th grade and Central Union High School District for grades 9 to 12.

To assist in determining suitable future school locations, inclusion of a school site into a development or identification of a proper site within City limits may be required if a certain

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threshold number of units of new residential development is surpassed. Schools in the City are generally constructed for a school year enrollment of 600 students. The three school districts have their own student yield rates (average number of students per dwelling unit) that range from 0.21 to 0.66 students per dwelling unit (City of El Centro 2016). According to the Office of Public School Construction, the state yield is 0.69 students per dwelling unit. To standardize the student yield rate, the City's Service Area Plan utilizes the state rate of 0.69 students per dwelling unit. Therefore, each school of 600 students supports an estimated 870 residential units. The estimated 870 units serve as the threshold number considered to require a proposed development project to incorporate a school on-site or to identify a site within the City's limits. The 180 multi-family units proposed with the project would yield an estimated 124 students (at 0.69 students/dwelling unit) and would not trigger the need for a new school facility.

To offset the educational costs associated with increased enrollment in the school districts, the project applicant would be required to pay state-mandated school impact fees. Prior to the issuance of building permits, the project applicant would provide funding to the El Centro and Central Union High School Districts in accordance with Government Code Section 65996 and SB 50. Government Code Section 65996 states that payment of development fees is deemed to be full and complete school facilities mitigation. Impacts in this regard would be less than significant.

d) *Parks? Less than Significant Impact.*

The project would construct 180 multi-family units (estimated 673 residents) that would place additional demand on existing City park facilities. The City General Plan Public Facilities Element identifies the goal of providing 3 acres of public parkland per 1,000 residents (City of El Centro 2004). Therefore, the project would result in new demand for an additional 2 acres of parkland (City of El Centro 2016).

According to the General Plan, the City operates at a deficit of parkland within its jurisdiction. In addition to parkland required to meet current demands, future growth of the City would continue to require acquisition of additional parkland to meet its performance standard at anticipated buildout of the General Plan.

To make up for the existing parkland demand and to accommodate anticipated future population increase, the City requires that new development include provision of additional public parks and recreational facilities to the maximum extent allowed by law in accordance with Public Facilities Policy 1.2 of the General Plan (City of El Centro 2004). The City would require the project applicant to pay a fair-share park impact fee in lieu of the dedication of parkland in conformance with Section 24, Article V of the City of El Centro Code of Ordinances. With the payment of development impact fees, the proposed project would not result in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable park service ratios or other performance objectives. Impacts would be less than significant.

e) *Other public facilities? Less than Significant Impact.*

The nearest City library to the subject site is the City of El Centro Public Library, approximately 0.6 miles southwest at 1140 N. Imperial Avenue. Services provided by the library include circulation of library materials such as books, magazines and video and audio recordings; reference service; internet access; word processing stations; copy machines; a publicly available conference room; children's reading programs; vocal, acting, and speaking workshops for children and adults; and tax preparation assistance for senior citizens.

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The Imperial County Local Agency Formation Commission requires that the library facilities section of the City's Service Area Plan maintain a performance standard measured in demand for square feet. The performance standard for the City is a range of 300 to 600 square feet of library facility space per 1,000 residents (0.30 to 0.50 square feet of library facility space per capita) (City of El Centro 2016).

The project would construct 180 multi-family units, whose residents would place demand on existing City library facilities. As the project is expected to generate 673 residents, the project would create demand for an additional 202 to 337 square feet of library space.

The City would require that the project applicant pay development impact fees to ensure that library service remain adequate to serve the City's population over the long term. With the payment of development impact fees, the project would not result in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives. Impacts would be less than significant.

16. Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporation	Less Than Significant Impact	No Impact
16. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION OF IMPACTS

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

As stated above, the project is anticipated to generate 673 residents. It is anticipated that a portion of project occupants would relocate to the development from other areas of El Centro, and therefore, would not all be new residents to the City.

Common open space provided on-site would meet the City's requirement of 150 square feet of common space per residential unit for the proposed R3-Multiple Family Residential zone. The development would offer a number of on-site opportunities for both passive and active outdoor recreation. As shown on [Figure 3A, Site Plan](#), a series of common open space areas would be provided adjacent to the majority of the individual buildings on-site for resident use. Additionally, a private dog park is proposed in the eastern portion of the property, adjacent to N. 8th Street. Other recreational amenities for use by residents and their guests include a clubhouse, a recreational area with an outdoor pool and hot tub, and a barbecue/fire pit with outdoor seating. Therefore, it is not anticipated that the project would substantially increase demands on existing area neighborhood or regional parks or other recreational facilities, or contribute to a substantial deterioration of such facilities as a result. Impacts would be less than significant.

- b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? Less than Significant Impact.*

Refer to Response 16(a), above. The project proposes a variety of active and passive recreational amenities on-site that would be available for use by residents of the development and that would meet City requirements for the provision of common space.

The potential physical effects that could result from construction of these facilities are discussed throughout this IS/MND and, where necessary, mitigation measures are provided to ensure that impacts are reduced to less than significant. It is not anticipated that the project would directly require the construction or expansion of off-site recreational facilities that may have an adverse physical effect on the environment. Therefore, impacts are considered to be less than significant in this regard.

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17. Transportation

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

The following evaluation is based on the *Transportation Impact Study* prepared for the project by Michael Baker International (2021; see Appendix E).

DISCUSSION OF IMPACTS

a) *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? Less than Significant Impact.*

Within the project vicinity, there are no sidewalks provided on either side of Imperial Avenue (SR 86). Sidewalks are provided on both sides of Cruickshank Drive between Waterman Avenue and N. 8th Street. To the east of Waterman, there is a gap in the sidewalk between La Brucherie Road and Waterman Avenue (approximately 0.25 miles) on the north side of the street; however, continuous sidewalks are provided on the south side of the street. Sidewalks are provided on both sides of Bradshaw Avenue between La Brucherie Road and Imperial Avenue; however, there is an approximately 430-foot gap on the south side of the street to the west of Waterman Avenue. Between Imperial Avenue and N. 8th Street, sidewalks are only provided on the north side of the street. Sidewalks are provided on both sides of 8th Street south of Bradshaw Avenue. Between Bradshaw Avenue and the City limits to the north, sidewalks are only provided on the west side of N. 8th Street and N. 10th Street.

There are currently no bicycle facilities provided along the project frontage on N. 10th Street and Bradshaw Avenue. Class II bike lanes are provided on Cruickshank Drive and N. 8th Street. According to the City of El Centro Bicycle Master Plan (October 2010), Imperial Avenue is classified as a Class III Bicycle Route within the project vicinity; however, there are no signs or markings posted on the roadway stating such.

Imperial Valley Transit (IVT) operates the local bus service within the City of El Centro and provides access to employment centers, shopping centers, hospitals, the library, and government offices, as well as Imperial Valley College. The El Centro Green Line travels along Bradshaw Avenue, which allows transfer at the transit station located at State Street and N. 7th Street. This transit station also serves the citywide Blue Line as well as other regional IVT bus routes connecting Imperial, Brawley, Calexico, and the rest of Imperial Valley. The nearest bus stop to the project site is located on

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Cruickshank Drive, approximately 500 feet east of Imperial Avenue. No changes to the existing bus stop are proposed with the project.

As shown in [Figure 3A, Site Plan](#), no off-site road improvements are proposed. As such, the project would not impact existing or proposed transportation facilities, such as sidewalks, bicycle lanes, or public transportation stops. The project does not propose any features that would be inconsistent with applicable policies of the City's General Plan, Bicycle Master Plan, or other relevant plans addressing the circulation system.

Therefore, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

b) *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)? Less than Significant Impact.*

The City of El Centro is currently in the process of developing its own vehicle miles traveled (VMT) thresholds and guidelines; however, as the guidelines have not been adopted at the time of the preparation of this IS/MND, the VMT analysis prepared for the project herein is based on Office of Planning and Research's (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018). VMT is a measure of the total number of miles driven for various purposes and is sometimes expressed as an average per trip or per person.

The Technical Advisory includes screening criteria for all land development projects. A project that meets at least one of the screening criteria would have a less than significant VMT impact due to project characteristics and/or location. Analysis in the Transportation Impact Study concluded that the project meets the screening criteria of a project located in a VMT Efficient Area, which is an area with VMT more than 15 percent below the regional average VMT. Since at least one of the VMT screening criteria is satisfied, a detailed VMT analysis is not required, and the proposed project is presumed to have a less than significant transportation impact. The following text substantiates the VMT Efficient Area designation.

According to the Technical Advisory, the metric for evaluating VMT for residential projects is Home Based VMT per Capita. The City of El Centro is currently updating its 2040 General Plan. As part of this effort, the Imperial County Transportation Model (ICTM) Base Year 2014 was utilized to establish the baseline VMT in the City and Imperial County region. Based on modeling efforts conducted for the General Plan, the Imperial County baseline (2014) Total Home Based VMT is 2,192,401 with a population of 183,309. Therefore, the regional Home Based VMT/capita is 11.96 (2,192,401/183,309). As noted above, the Technical Advisory suggests a threshold of significance of 15 percent below the baseline condition. As such, the threshold of significance for Imperial County is 10.17 VMT/capita.

Using the baseline (2014) ICTM, the Home-Based VMT/capita was extracted for the traffic analysis zone (TAZ) where the project is located. Since the existing TAZ has a very low number of residential units (10 households), the residential VMT/capita for TAZs within a one-mile radius of the project site was also extracted to compare and validate the VMT for the project TAZ.

The Home Based VMT per capita for each TAZ was compared to the threshold of significance to determine if the project TAZ and the area surrounding the project TAZ are considered to be VMT efficient (85 percent of the regional average). As shown in [Table 17-1](#), all but one of the TAZs near the project site below the threshold of significance. It is reasonable to assume the project is located within a VMT efficient area and as such satisfies the VMT Efficient Area screening criteria.

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Table 17-1: VMT/Capita for TAZs within One Mile of Project Site

TAZ	Total Home-Based VMT/Capita	Threshold (85% of Regional Average) ¹	Above or Below Threshold of Significance?	Consider VMT Efficient & Less-Than-Significant?
14037101	8.38	10.17	Below	Yes
14026102	5.88		Below	Yes
14046102	10.94		Above	No
14037103	9.77		Below	Yes
14026101	6.64		Below	Yes
14037201	7.85		Below	Yes
14037202	7.61		Below	Yes
14033101	3.33		Below	Yes
14040101	6.52		Below	Yes
14050101	7.65		Below	Yes
14033102	5.74		Below	Yes
14040201	6.03		Below	Yes
Average	7.20		60%	Below

Source: Transportation Impact Study, Michael Baker International, 2021; see Appendix E.

¹ Regional Home Based VMT/Capita in Imperial County is 11.96. Threshold of significance is 85% of Regional Average.

As the project meets at least one of the screening criteria set by OPR, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b). Impacts would be less than significant.

c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? Less than Significant Impact.*

The project design does not propose any features that would construct or modify local roads that would potentially increase hazards. No new roadway design or features (i.e., sharp curves, dangerous intersections, or other hazardous features) would be required that could result in transportation-related hazards or safety concerns. As shown in [Figure 3A, Site Plan](#), no off-site road improvements are proposed.

The project would be served by three driveways with two driveways on N. 10th Street and one driveway on N. 8th Street. The project driveway on N. 8th Street and the southern driveway on N. 10th Street would be full access driveways with gates. The northern driveway on 10th Street would be configured as an exit-only access and would be gated. These access points would be designed in accordance with the City's street standards that ensure safe ingress/egress. Analysis in the Transportation Impact Study found that the sight distance for N. 8th Street and N. 10th Street is equal to or greater than the required sight distance and drivers exiting from the project site have adequate visibility at the project driveway. Additionally, on-site structures would be set back from adjacent access roadways as required by the City's Zoning Code to ensure that views at the driveways are uninhibited.

The project would result in residential development of the subject site. No uses that would involve farm equipment or heavy machinery are proposed.

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Therefore, the project would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts related to the project's design features would be less than significant.

d) *Would the project result in inadequate emergency access? Less than Significant Impact.*

Construction of the project would not result in inadequate emergency access. The project would be designed to meet City and fire department standards for emergency access and circulation. The proposed project would not alter any established emergency vehicle routes or otherwise interfere with emergency access.

All construction would be staged on-site and would not interfere with emergency access to the site. As noted above, the project site would have multiple ingress/egress points along N. 8th Street and N. 10th Street. The project site and vicinity are accessible via a number of existing roads, with alternative roads allowing access in the event of an emergency. Emergency vehicle access would be maintained throughout construction activities, in accordance with the City's construction specifications. Further, construction activities would not be permitted to impede emergency access to any local roadways or surrounding properties. A traffic control plan would be prepared to ensure that adequate access and circulation is maintained on all surrounding streets during the project construction phase. As such, construction impacts are considered to be less than significant.

Project operation would not result in inadequate emergency access. As mentioned above, the project site would have multiple ingress/egress points along N. 8th Street and N. 10th Street. These access points would be gated and designed in accordance with the City's street standards that ensure safe ingress/egress. Access gates along N. 10th Street would be recessed to allow cars to pull in and wait for the gate to open so as not to impede traffic flows along the roadway. All gates would have a Knox Box, or similar system, to allow emergency personnel to access the site at any time in case of an emergency. As such, operation impacts are considered less than significant.

Therefore, the project would not result in inadequate emergency access. Impacts would be less than significant.

18. Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES. Would the project cause substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, that is:				
a) Listed or eligible for listing in the California Register if Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?; or,	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 3024.1. In applying the criteria set for in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American tribe?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following discussion considers the findings of the *Cultural Resources Inventory* prepared by ECORP (2020b; see Appendix C).

DISCUSSION OF IMPACTS

- a) *Would the project cause substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, that is listed or eligible for listing in the California Register if Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Less than Significant with Mitigation Incorporated.*

California State AB 52 (Chapter 532, Statutes of 2014) establishes a formal consultation process for California Native American tribes as part of CEQA and equates significant impacts on tribal cultural resources with significant environmental impacts (California Public Resources Code Section 21084.2).

The project site is currently undeveloped. As discussed in Section 5, Cultural Resources, the site does not support any listed or eligible historical or cultural resources, as defined by Public Resources Code Section 5020.1(k). A cultural resources inventory was conducted for the project by ECORP Consulting (2020b; Appendix C). ECORP requested a records search for the property at the South Coastal Information Center of the California Historical Resources Information System at San Diego State University. No previously recorded resources were identified within the project area. In addition, ECORP contacted the California Native American Heritage Commission (NAHC) to request a search of the Sacred Lands File for the area of potential effect (APE). The search was negative and no Native American cultural resources were identified within the project area. Additionally, the entire project area was field surveyed on October 14, 2020. No cultural or tribal cultural resources were identified as a result of the field survey.

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Pursuant to AB 52, the City initiated consultation with culturally affiliated tribes by sending initial notification letters on September 15, 2020. The City received one letter from the Jamul Indian Village of California in response to the notifications sent. The Tribe indicated that while the project site does not lie within the boundaries of the recognized Pala Indian Reservation, it does lie within the boundaries of the territory that the Tribe considers to be its Traditional Use Area. The Tribe requested further notification of any construction or ground disturbance.

While no specific tribal cultural resources that could be impacted by the project have been identified, mitigation measure **CUL-1** would be implemented to reduce potential impacts to unknown tribal cultural resources, including human remains, to less than significant.

- b) *Would the project cause substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 3024.1? In applying the criteria set for in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American tribe? Less than Significant Impact with Mitigation Incorporated.*

As noted above, while no specific tribal cultural resources that could be impacted by the project have been identified, mitigation measure **CUL-1** to reduce potential impacts to unknown tribal cultural resources, including human remains, to less than significant. Pending the outcome of consultation, these mitigation measures may be revised or additional mitigation may be implemented.

Mitigation Measures

Implement Mitigation Measure **CUL-1**.

Level of Significance after Mitigation:

Less than significant.

3.0 ENVIRONMENTAL CHECKLIST

19. Utilities and Service Systems

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

DISCUSSION OF IMPACTS

- a) *Would the project require or result in the relocation or reconstruction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects? Less than Significant Impact.*

According to the City's Service Area Plan (2016), the City purchases its untreated water from the Imperial Irrigation District (IID), which is conveyed to City facilities from the Colorado River via the IID's canal system. City facilities are developed and maintained by the Department of Public Works.

The average daily demand on the City's water system is approximately 8.6 million gallons per day (mgd) and the maximum daily demand is approximately 13.8 mgd. The existing storage and conveyance capacity of 21 mgd is sufficient for existing daily water demand and peak flow requirements through the planning horizon year 2025 and can be expanded in 21 mgd increments to provide the maximum daily demand of 42 mgd and ultimately 63 mgd (City of El Centro 2016). The system also has adequate capacity to accommodate anticipated near-term development. The City continues to make periodic improvements to modernize the facilities and materials over time. Any expansions would be considered when the maximum daily demand approaches 21 mgd (City of El Centro 2016).

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The project would connect to an existing 12-inch water line in N. 10th Street. The existing water line would be adequate to serve the project site and no upgrades to or expansion of existing facilities would be required to serve the project as proposed.

Additionally, according to the City's Service Area Plan (2016), capacity of the City's wastewater treatment plant (WWTP) is 8.0 mgd. Current generation from City wastewater customers averages approximately 3.4 mgd, and existing peak flow is approximately 6 mgd. The WWTP consistently meets Secondary Treatment Standards and has adequate capacity to handle existing flows. As such, the facility operates at approximately 50 percent capacity (City of El Centro 2016). It is anticipated that the WWTP and delivery system would meet demand of growth through 2026, as well as that future expansion would be required when the monthly flow reaches 6.4 mgd, or 80 percent of the plant's capacity of the 8.0 mgd. Planned improvements to expand the WWTP and delivery system were considered during the 2016 update of the City's Sewer Master Plan. It is anticipated that provision of wastewater collection to the ultimate service area will require additional treatment capacity and extension of the wastewater collection and transmission system. The City has acknowledged such conditions and improvements may be required on a project-by-project basis by developers to identify the need for any upgrades (City of El Centro 2016).

The proposed project would connect to an existing 36-inch sewer line located in N. 10th Street. No expansion of or upgrades to existing facilities would be required to adequately serve the proposed residential uses.

In general, the City of El Centro drains in a northeasterly direction and is tributary to the Salton Sea. The City maintains its Drainage Master Plan to ensure that stormwater facilities are maintained over time and that new development is adequately served. The City reviews specific drainage needs on a project-by-project basis. Stormwater from the project site would be routed to an existing storm drain located in N. 10th Street. This storm drain outlets to an existing off-site detention basin, located north of the project site at the southwest corner of the intersection of N. 8th Street and Treshill Road. This detention basin was previously constructed as part of the El Centro Town Center Village project and was sized to accommodate all planned development within the Town Center Village. Further, drainage design for the project would not result in a change in stormwater volume, rate, or direction of flow from the site following project implementation; refer to Section 10, Hydrology and Water Quality. Therefore, no upgrades to the City's storm drain system would be required to accommodate stormwater runoff from the subject site with project implementation.

Electricity would be provided by IID. Lands adjoining the subject site are currently served by IID and the project would connect to the existing system for service. Natural gas is provided by Southern California Gas Company and telecommunication services currently exist in the area. Such services would be extended to the site to support project operation. No expansion or upgrades to these utility systems are required to serve the project site.

Therefore, the project would not require or result in the relocation or reconstruction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Impacts in this regard would be less than significant.

3.0 ENVIRONMENTAL CHECKLIST

- b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years? Less than Significant Impact.*

The project site is currently undeveloped, and therefore, project-related development would increase demand for City water services. The City of El Centro would provide sewer services to the project site through connections to an existing line.

As stated above, the existing storage and conveyance capacity of the City's water storage system of 21 mgd is sufficient for the daily water demand and peak flow requirements through the planning horizon year 2025 and can be expanded as needed to serve future development (City of El Centro 2016). The system is considered to have adequate capacity to accommodate anticipated near-term development, and the City continues to make periodic improvements to modernize the facilities and materials over time. Future water demand with buildout of the City and the City's sphere of influence lands will reach an average daily demand of 28 mgd and a maximum daily demand of 44.8 mgd. As stated above, the City's system can be expanded in 21 mgd increments to provide the maximum daily demand of 42 mgd and ultimately 63 mgd; such expansions would be considered when the maximum daily demand approaches 21 mgd (City of El Centro 2016).

The project consists of 180 residential units, which are estimated to house a population of approximately 673 residents, with 3.74 persons per household assumed (US Census Bureau 2019). Daily per capita water demand for the City of El Centro is estimated at 194 gallons per day (IID 2021). Therefore, the project would generate additional demand for an estimated 130,562 gpd over existing conditions. Based on the service capacity of the City's existing and planned water systems, it is anticipated that existing and future water supplies would be adequate to serve the proposed development.

As stated above, the City purchases its untreated water from the IID. The City's Water System Master Plan indicates that the Colorado River Water Delivery Agreement of October 2003 allows the IID to receive 3.1 million acre-feet of water per year (City of El Centro 2008). Therefore, the existing and future water supply is considered adequate to accommodate the increased population and associated water demand anticipated with the proposed project. Impacts would be less than significant.

- c) *Would the project result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? Less than Significant Impact.*

Refer to Response 19(a), above. The project would result in construction of 180 multi-family units which would not substantially increase demands on the City's water treatment facilities. It is anticipated that the City's water treatment plant is adequate to accommodate future planned growth through the year 2026. Additional improvements are anticipated by the City to expand the WWTP as needed to ensure that adequate capacity is maintained.

Therefore, the project would not result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Impacts would be less than significant.

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- d) *Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Less than Significant Impact.*

AB 939 established the California Integrated Waste Management Act of 1989 (PRC Sections 42900–42927) which required all California cities and counties to reduce the volume of solid waste deposited in landfills by 50 percent by the year 2000. It also requires that cities and counties continue to remain at 50 percent or higher for each subsequent year. The act is intended to reduce, recycle, and reuse solid waste generated to the maximum extent feasible.

The act requires each California city and county to prepare, adopt, and submit to the California Department of Resources Recycling and Recovery (CalRecycle) a source reduction and recycling element (SRRE) that demonstrates how the jurisdiction will meet the act's mandated diversion goals. Each jurisdiction's SRRE must include specific components as defined in PRC Sections 41003 and 41303. In addition, the SRRE must include a program for management of solid waste generated in the jurisdiction consistent with the following hierarchy: (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. The SRRE is required to emphasize and maximize the use of all feasible source reduction, recycling, and composting options in order to reduce the amount of solid waste to be disposed of by transformation and land disposal (PRC Sections 40051, 41002, and 41302).

The City of El Centro Municipal Code identifies certain regulations to ensure compliance with the state's waste reduction targets (i.e., AB 939). Chapter 12, Articles I and II, require the collection, transportation, and disposal of solid waste and green waste. The project would be required to comply with such City regulations to reduce the amount of waste generated on-site.

Solid waste collection services for the City of El Centro are provided by CR&R Waste Services. Solid waste is collected and disposed of at the South Yuma County Landfill in Arizona. Solid waste from project construction activities would be delivered to the South Yuma County Landfill, which has capacity to accommodate solid waste from the project. During project operations, the project would enable the collection and sorting of solid waste materials for diversion in order to ensure compliance with statewide mandates and reduce waste delivered to the affected landfill.

Therefore, the project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

- e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste? Less than Significant Impact.*

The project would be served by an existing waste handling service, provided by CR&R Waste Services. CR&R operates consistent with federal, state, and local statutes and regulations and the landfill serving the project would also conform to all applicable statutes and regulations. Therefore, the project would result in a less than significant impact.

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20. Wildfire

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

DISCUSSION OF IMPACTS

- a) *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan? Less than Significant Impact.*

Refer to Response 9(f), under Hazards and Hazardous Materials, above. The City of El Centro participates in implementation of the Imperial County Multi-Jurisdictional Mitigation Plan (MJMP), which is intended to provide guidance for responding to emergency situations through a coordinated system of emergency service providers and facilities. The MJMP addresses planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The plan focuses on potential large-scale disasters that represent unique situations requiring unusual emergency responses. Such threats addressed by the plan include major earthquakes, hazardous materials incidents, flooding, transportation, civil unrest, and threats to national security.

During construction, materials would be placed within the project boundaries adjacent to the current phase of construction to avoid any access conflicts in case of emergency evacuations. Direct access to the project site would be from N. 8th Street and from N. 10th Street. Any improvements needed to provide adequate access to the site would be subject to City review for the potential to interfere with emergency evacuation routes to ensure that access and circulation are maintained during the construction phase. The project does not propose any components that would be anticipated to obstruct or conflict with emergency response or evacuation during project operations. Additionally, the project would be subject to site plan review by City emergency services personnel to ensure that it would not result in components that potentially interfere with an emergency response plan or an emergency evacuation plan.

No revisions to emergency response operations or evacuation plans would be required as a result of the project. The provision of emergency services to the site and surrounding properties would

3.0 ENVIRONMENTAL CHECKLIST

not be impacted as primary access to all major roads would be maintained with project implementation. Therefore, the project would not impair or physically interfere with an adopted emergency response or evacuation plan. Impacts would be less than significant.

- b) *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? Less than Significant Impact.*

The project site is not located within an area designated as having a high risk for wildfire potential. The site is not identified as being located in a Very High Fire Hazard Severity Zone (VHFHSZ); however, the site is identified as a Local Responsibility Area (LRA). Similarly, all surrounding lands within the vicinity of the site are designated as having a very low risk for wildfire hazard (CalFire 2020). The project site is relatively flat and is generally void of vegetation. Limited landscaping for visual enhancement purposes is proposed with the project; however, such plantings would not substantially change or increase the potential risk for wildfire.

The project would not exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

- c) *Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? No Impact.*

Refer to Response 20(a), above. The installation or maintenance of associated infrastructure (such as roads, fuel breaks, power lines or other utilities) that may exacerbate fire risk would not occur with the project as proposed. Additionally, the Fire Department, as part of the City's discretionary review process, would review all project plans to ensure that adequate fire suppression, fire access, and emergency evacuation are maintained. Adherence to standard City policies relative to fire risk and prevention would ensure that no impact occurs. No impact would occur.

- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? No Impact.*

Refer to Response 20(a), above. The site is not located in or near lands classified as being in a VHFHSZ and is designated as having a low fire hazard risk relative to LRAs. Additionally, the project site is relatively flat, and no slopes that may be subject to slope instability, flooding, or landslides after a fire event are present, nor are such conditions present on adjoining lands. Development of the site as designed would not result in a change in runoff quantities or rates from the site.

Additionally, the City has adopted the most recent Uniform Building Code, Uniform Mechanical Code, Uniform Fire Code, and the National Electric Code. These codes identify structural requirements for existing and new buildings and are designed to ensure structural integrity during seismic and other hazardous events, and to prevent injury, loss of life, and substantial property damage. To protect public safety, all planned development in El Centro is subject to these structural codes.

As designed, and with conformance to adopted regulations intended to maintain public safety, the project would not expose people to flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. No impact would occur.

21. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
21. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION OF IMPACTS

a) *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory? Less than Significant Impact with Mitigation Incorporated.*

The analysis provided herein determined that the project has the potential to directly or indirectly impact sensitive species, namely burrowing owl and/or nesting birds. Mitigation requiring preconstruction biological surveys and construction worker education would be implemented to ensure potential impacts are reduced to less than significant. Refer to mitigation measures **BIO-1** and **BIO-2** in Section 4, Biological Resources. Additionally, mitigation measure **CUL-1** would be implemented to ensure that project impacts to unknown cultural and/or tribal cultural resources, including human remains, are reduced to less than significant; refer to Section 5, Cultural Resources, and Section 18, Tribal Cultural Resources.

b) *Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects? Less than Significant Impact.*

A cumulative impact could occur if the project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably

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foreseeable future projects for each resource area. No direct significant impacts were identified for the proposed project that could not be mitigated to a less than significant level. However, when combined with other projects within the vicinity, the project may result in a contribution to a potentially significant cumulative impact.

The proposed project does not include any agricultural resources that could be impacted, and the project would have no effect on population and housing or recreation. In addition, impacts would be less than significant for aesthetics, air quality, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, minerals, noise, public services, transportation, utilities and service systems, and wildfire. As a result, cumulative impacts related to these resources would not occur.

Biological resources, cultural resources, and tribal cultural resources impacts that are generated by construction activities would be short term and limited by a temporary construction period. Mitigation measures are proposed to reduce project impacts to less than significant. As a result of the evaluation provided herein, there is no substantial evidence that, after mitigation, there are cumulative effects associated with the proposed project. Impacts would be less than significant.

c) *Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? No Impact.*

In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in the following sections: Aesthetics; Air Quality; Geology and Soils; Hazards and Hazardous Materials; Hydrology and Water Quality; Noise; Population and Housing; and Transportation and Traffic. As a result of this evaluation, no potentially significant effects to human beings were identified. No impact would occur.

4.0 DOCUMENT PREPARERS AND REFERENCES

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