Final
Mitigated Negative Declaration (17-02) for Dogwood Road at Villa Avenue El Centro, California (APN 044-450-038)

Annexation (17-02)
~~General Plan Amendment (17-02)~~
Change of Zone (17-02)

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

With Assistance from
RECON Environmental, Inc.
3111 Camino del Rio North, Suite 600
San Diego, CA 92108
P 619.308.9333

RECON Number 8757
June 10, 2022

Preface to the Final Mitigated Negative Declaration (MND)

June 10, 2022

Subsequent to the close of the public review period for the MND in January 2019, the City of El Centro amended the Land Use Element of its General Plan in 2021. Part of this broader General Plan Amendment (GPA) included the 330-acre project site that is in the City's Sphere of Influence. This separate action changed the land use designation of the eastern two-thirds of the site from Low Density Residential Use to General Manufacturing. In doing so, the entire project site is now designated for General Manufacturing use under the current General Plan, thereby eliminating the need for the GPA which was addressed in the MND in 2019. The other discretionary actions of Pre-Zoning the site from the current Urban Area zoning in the County to General Manufacturing (MG) in the City and the Annexation by LAFCO from the County to the City would still be required and were previously addressed in the Draft MND. This official land use designation change would have no effect on the impact conclusions that were presented in the Initial Study that was completed for the Draft MND that was released for public review.

The Project Description of the Final MND in Chapter 1 has been edited to eliminate references to the General Plan Amendment as a discretionary approval as it is no longer required for the project. In addition, the Draft MND noted that a future Development Agreement between the project applicant and the City of El Centro would be recorded as part of the annexation agreement for the project. While a Development Agreement is no longer being proposed, an Annexation Agreement has been finalized between the City and the property owner and is referenced as part of the Final MND. Other references to the need for a GPA have also been eliminated from the text of the MND. All changes are shown in strike out/underline. The remainder of the document remains unchanged.

Response to Public Review Comments

The Draft IS/MND was circulated for a 30-day public review comment period, beginning December 24, 2018 and ending January 22, 2019. The following letters of comment were received from agencies and organizations during the public review period. A copy of each comment letter along with corresponding staff responses is included here. Some of the comments did not address the adequacy of the environmental document; however, staff has attempted to provide appropriate responses to all comments as a courtesy to the commenter. Some of the comments received resulted in changes to the Draft MND text. These text changes are indicated by strikeout (deleted) and underline (inserted) markings in the Final MND text. Revisions to the Draft MND are intended to correct minor discrepancies and provide additional clarification. The revisions do not affect the conclusions of the document.

Letter A

CITY OF EL CENTRO

El Centro Police Department

MEMORANDUM

TO: Norma Villicana, Director of Community Development

FROM: Ray Bonillas, Police Commander

RE: Project ID: Villa 330 Acre Site Mitigated Negative Declaration (17-02)

DATE: January 2, 2019

A-1 The information and material submitted under Project Id Villa 330 Acre Site Mitigated Negative Declaration 17-02 proposes for the annexation and change in zoning of current agricultural land between the east/west boundaries of Cooley Road to Dogwood Road and the north/south boundaries of Villa Road to the Southern Pacific Railroad Tracks. The Police Department has no objections or concerns regarding this proposal at this time.

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City of El Centro
JAN 09 2019
Community Development Department

A-1 This comment by the City of El Centro Police Department states that the Police Department has not concerns or objections over the project. This comment is noted.

Letter B

LAFCO
LOCAL AGENCY FORMATION COMMISSION
IMPERIAL COUNTY

jurg heuberger, CEP
executive officer

memorandum

January 10, 2019

TO: Norma Villicana, Community Development Director

FROM: Jurg Heuberger, Executive Officer

RE: Draft Mitigated Negative Declaration, EC 1-17 Weiler Annexation

Ms. Villicana:

B-1 This memo is in response to the Draft Mitigated Negative Declaration dated December 12, 2018 for the proposed annexation of APN #044-450-038.

We have reviewed the Draft MND and based on the information provided to date, have the following comments:

B-2 A) As you know, LAFCO policy requires at a minimum proposed and detailed development plans when annexing vacant territory to a city or district and strongly discourages the annexation of vacant land until it can be demonstrated that services are needed in the near future and there is a "REAL" project. In this case we know the original project that started this is no longer "REAL" so we as discussed in our meeting need something that could justify a recommendation of approval.

B-3 B) Page 3 of the Draft MND states that the parcel would be annexed with a Development Agreement recorded against the parcel in order to further define the future development. We would need to see at least a draft DA to fully understand and be on board with a proposed project and its limitations. Does the City have a Draft DA?

B-4 C) As expressed during our meeting, staff cannot ignore the LAFCO policies nor can we recommend something that all others have been required to provide. Additionally, we are not sure how a tax agreement can be completed without this detail.

B-5 Should you have any questions or would like to schedule a meeting to discuss further, please feel free to contact my office at 760-353-4115 or jurgh@iclafco.com.

Thank you,

Jurg Heuberger

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City of El Centro
JAN 17 2019
Community Development Department

APN

PROJECT ID No.

FILE ID. No.

1122 STATE STREET, SUITE D, EL CENTRO, CA 92243 (760)-353-4115
www.iclafco.com e-mail: jurgh@iclafco.com *An equal opportunity employer*

B-1 This introductory language is noted.

B-2 The City notes the comment made by LAFCO and understands that detailed project plans are required when annexing vacant territory or district, and that LAFCO strongly discourages the annexation of vacant land until it can be demonstrated that services are needed in the near future. However, this comment does not raise an issue addressing an inadequacy of the analysis contained within the MND, and it is noted.

B-3 The project applicant will continue to negotiate with potential users. At the time site specific development is proposed for the property, additional discretionary approvals would be required by the City. Should a Development Agreement be entered into in the future, the City will provide the Development Agreement to LAFCO when it becomes available. However, an Annexation Agreement between the City and property owner has been drafted by the City and has been referenced in the Final MND. The comment does not raise an issue addressing an inadequacy of the analysis contained within the MND, and it is noted.

B-4 The comment does not raise an issue addressing an inadequacy of the analysis contained within the MND, and it is noted.

B-5 These concluding remarks are noted.

Letter C

LOZEAU DRURY LLP
T 510.836.4200
F 510.836.4205
410 12th Street, Suite 250
Oakland, Ca 94607
www.lozeaudrury.com
richard@lozeaudrury.com

Via Email and U.S. Mail

January 10, 2019

Angel Hernandez, Associate Planner
Community Development Department
City of El Centro
1275 W. Main Street
El Centro, CA 92243
angel_hernandez@cityofelcentro.org

Norma M. Villicaña Director of
Community Development Department
City of El Centro
1275 W. Main Street
El Centro, CA 92243
nvillicana@cityofelcentro.org

L. Diane Caldwell, CMC
City Clerk's Office
City of El Centro
1275 W. Main Street
El Centro, CA 92243
CityClerk@cityofelcentro.org

Re: Comment on Dogwood at Villa Annexation, aka MND 17-02, GPA 17-02, and COZ 17-02 Initial Study | Mitigated Negative Declaration

Dear Mr. Hernandez, Ms. Villicaña, and Ms. Caldwell:

C-1 I am writing on behalf of the Laborers International Union of North America, Local Union 1184 and its members living in Imperial County and/or the City of El Centro ("LiUNA"), regarding the Initial Study and Mitigated Negative Declaration ("IS/MND") prepared for the Project known as Dogwood Road at Villa Avenue aka MND 17-02, GPA 17-02, and COZ 17-02, including all actions related or referring to the proposed annexation of the site to the City of El Centro, pre-zoning of the site from County A2U (Gen Ag-Urban area) to City General Manufacturing, and amending of the General Plan to designate the site from planned Industrial/Low Density residential uses to General Manufacturing uses located at the southeast corner of Dogwood Road and Villa Ave in an unincorporated area of Imperial County adjacent to the City of El Centro on APN: 044-450-038 in Imperial County, California ("Project").

C-1 This introductory comment accurately summarizes the project description and is noted. It does not raise an issue addressing an inadequacy of the analysis contained within the MND.

C-2 After reviewing the IS/MND, we conclude the IS/MND fails as an informational document, and that there is a fair argument that the Project may have adverse environmental impacts. Therefore, we request that the City of El Centro ("City") prepare an environmental impact report ("EIR") for the Project pursuant to the California Environmental Quality Act ("CEQA"), Public Resources Code section 21000, et seq. We reserve the right to supplement these comments during public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist*., 60 Cal. App. 4th 1109, 1121 (1997).

C-3 We hereby request that the City of El Centro ("City") send by electronic mail, if possible or U.S. Mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA"), including, but not limited to:
  - Notices of any public hearing held pursuant to CEQA.
  - Notices of determination that an Environmental Impact Report ("EIR") is required for the Project, prepared pursuant to Public Resources Code Section 21080.4.
  - Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
  - Notices of preparation of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21092.
  - Notices of availability of an EIR or a negative declaration for the Project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
  - Notices of approval and/or determination to carry out the Project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
  - Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
  - Notices of determination that the Project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
  - Notice of any Final EIR prepared pursuant to CEQA.
  - Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

C-2 The City of El Centro has prepared an MND for the proposed project, as all environmental impacts identified as potentially significant within the MND (Air Quality, Biological Resources, Geology/Soils, Noise, and Transportation/Traffic) would be reduced to a less than significant level with mitigation incorporated.

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

The City is the Lead Agency under CEQA. Based on the findings of the Initial Study/Environmental Checklist for this project, the City has determined that preparation of a MND is the appropriate method by which to obtain compliance with CEQA. As such, it has been determined that an EIR is not necessary for the project.

C-3 The commenter's request to be notified of any public hearing in connection with the project, as well as any notice prepared for the project, is noted. This comment does not raise an issue addressing an inadequacy of the analysis contained within the MND.

C-4 Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092**, which requires agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

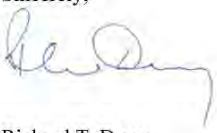
C-5 In addition, we request that the City send to us via email, if possible or U.S. Mail a copy of all Planning Commission and City Council meetings and/or hearing agendas.

Please send notice by electronic mail, if possible or U.S. Mail to:

Richard Drury
Komalpreet Toor
Hannah Hughes
Lozeau Drury LLP
410 12th Street, Suite 250
Oakland, CA 94607
510 836-4200
richard@lozeaudrury.com
komal@lozeaudrury.com
hannah@lozeaudrury.com

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,



Richard T. Drury
Lozeau Drury LLP

C-4 The commenter's request for notices of CEQA actions and notices of any public hearings pertaining to the project is noted. This comment does not raise an issue addressing an inadequacy of the analysis contained within the MND.

C-5 These concluding remarks are noted.

Letter D

IID

January 15, 2019

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

SUBJECT: MND for the Dogwood Road at Villa Avenue Industrial Development Project in El Centro, CA

Dear Ms. Villicana:

D-1 On December 19, 2018, the Imperial Irrigation District received from the City of El Centro Community Development Department, a request for comments on the Mitigated Negative Declaration for the Dogwood Road at Villa Avenue Project. The City proposes to amend its General Plan and annex an approximately 330-acre site located at the southeast corner of Dogwood Road at Villa Avenue in Imperial County, CA to allow for future industrial development within the City. The site is currently designated by the County of Imperial as Urban Area and will require processing through the Imperial County Local Agency Formation Commission to be annexed into the City of El Centro, CA.

The IID has reviewed the application and has the following comments:

D-2 1. Although no specific development is planned at this time, as projects are proposed, they will need to be reviewed on a case-by-case basis by IID for potential impacts to district's energy and water facilities and to determine the appropriate mitigation.

D-3 2. The site proposed for annexation has various energy and water facilities around its boundaries.

2.1 North of the site:
1. 161kV "A" & 92kV "B" transmission lines.
2. 161kV "M" transmission line – northwest corner of site.
3. 7.2/12.5kV "L-138" distribution circuit – north of Villa Road (overhead) & south of East Villa Rd. (underground portion).
4. Alder 12 Lateral along the north side of East Villa Rd.
5. Central Drain traverses site in a north & south alignment.

2.2 East of the site:

D-1 This introductory comment accurately summarizes the project description and is noted. It does not raise an issue addressing an inadequacy of the analysis contained within the MND.

D-2 Comment noted. This comment does not raise an issue addressing an inadequacy of the analysis contained within the MND.

D-3 The locations of energy and water facilities discussed in the comment are noted. This comment does not raise an issue addressing an inadequacy of the analysis contained within the MND.

6. Alder Canal – north & south alignment.

2.3 South of the site:
7. 92kV "E" transmission line.

2.4 West of the site:
8. Dogwood Canal.
9. 92kV "P" transmission line.
10. 7.2/12.5kV "L-94" distribution circuit.
11. IID Steam Plant
12. 34.5kV "LB" transmission line.
13. 7.2/12.5kV "L-138" distribution circuit.

D-4 3. If ensuing projects require electrical service, the developers should be advised to contact Ernie Benitez, IID service planner, at (760) 482-3405 or e-mail Mr. Benitez at eibenitez@iid.com to review the project's scope of work and initiate the electrical service application process. In addition to submitting a formal application (available at http://www.iid.com/home/showdocument?id=12923), the developer will be required to submit the electrical loads, panel size, voltage, project CAD files (electronic and hard copy), project schedule, estimated in-service date and environmental compliance documentation along with the applicable fees, permits and easements pertaining to the provision of electrical service to the project. The applicant shall be responsible for any and all costs related to providing electrical service to the project. Please note that a circuit study may be required and mitigation measures identified in the study will be the financial responsibility of the developer.

D-5 4. The Water Supply Assessment, included as appendix G of the proposed Draft Mitigated Negative Declaration, is not acceptable as presented. Please contact Ms. Justina Gamboa-Arce, IID Water Resources Planner, at (760) 339-9085 for further information on the correct preparation of the WSA. Ms. Gamboa-Arce can also be contacted at jgamboaarce@IID.com.

D-6 5. A developer may not use IID's canal or drain banks to access a project site. Any abandonment of easements or facilities shall be approved by IID based on systems (irrigation, drainage, power, etc.) needs.

D-7 6. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at http://www.iid.com/departments/real-

D-4 The City notes that if future development projects occur within the project site, they would be required to provide electrical service to the project site. This comment does not raise an issue addressing an inadequacy of the analysis contained within the MND.

D-5 As a rezone, the project is not required to conduct a full Water Supply Analysis. When a future project applicant proposes a development within the project site, the development may be subject to a Water Supply Assessment at that time. As such, a revised Water Supply Assessment is not required at this time.

D-6 Comment noted. As noted in the MND, future industrial uses may require internal reorganization of laterals depending on future building locations, but conveyance of the water through the IID canals would remain in accordance with existing easements. This comment does not raise an issue addressing an inadequacy of the analysis contained within the MND.

D-7 Comment noted. Encroachment permits would be pursued if necessary during future development within the project. This comment does not raise an issue addressing an inadequacy of the analysis contained within the MND.

estate. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements. No foundations or buildings will be allowed within IID's right of way.

D-8 7. In addition to IID's recorded easements, IID claims, at a minimum, a prescriptive right of way to the toe of slope of all existing canals and drains. Where space is limited and depending upon the specifics of adjacent modifications, the IID may claim additional secondary easements/prescriptive rights of ways to ensure operation and maintenance of IID's facilities can be maintained and are not impacted and if impacted mitigated. Thus, IID should be consulted prior to the installation of any facilities adjacent to IID's facilities. Certain conditions may be placed on adjacent facilities to mitigate or avoid impacts to IID's facilities.

D-9 8. Any new, relocated, modified or reconstructed IID facilities required for and by any future project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully analyzed. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent**.

D-10 Should you have any questions, please do not hesitate to contact me at 760-482-3609 or at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,

Donald Vargas
Compliance Administrator II

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

D-8 Comment noted. The City notes the request by IID to be consulted prior to the installation of any development adjacent to IID's facilities. This comment does not raise an issue addressing an inadequacy of the analysis contained within the MND.

D-9 The project does not propose any new, relocated, modified, or reconstructed IID facilities. This comment does not raise an issue addressing an inadequacy of the analysis contained within the MND.

D-10 These concluding remarks are noted.

Letter E

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

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

AIR POLLUTION CONTROL DISTRICT

January 16, 2019

Norma Villicaña
Director of Community Development
Community Development Department
Planning and Zoning Division
City of El Centro
1275 W. Main Street
El Centro, CA 92243

SUBJECT: Draft Mitigated Negative Declaration (17-02) including Annexation (17-02), General Plan Amendment (17-02), and Change of Zone (17-02) for the Dogwood Road at Villa Avenue Project

Dear Ms. Villicaña:

E-1 The Imperial County Air Pollution Control District ("Air District") would like to thank you for the opportunity to review the Draft Mitigated Negative Declaration for the Villa 330 Acre Site Project. The Dogwood Road at Villa Avenue Project (Project) consists of the annexation of the 330-acre site (APN 044-450-038) located at the southeast corner of Dogwood Road and Villa Avenue from the County of Imperial to the City of El Centro. The project also includes a General Plan Amendment to designate the site as General Industrial and a Pre-zone to zone the site as General Manufacturing. No specific development is proposed at this time.

E-2 After review, the Air District would like to point out that any future construction may require a Dust Control Plan from the Air District. However, the Air District is pleased that both the Draft EIR and the Air Quality Analysis acknowledge that mitigation measures will be necessary for future construction on the site. This includes adherence to Regulation VIII which regulates emissions of fugitive dust due to earth moving and construction, storage of bulk materials, carry-out and track-out, open areas, and paved and unpaved roads. Therefore, the Air District is requesting notice when any environmental impact documents are posted regarding future development/construction on the site.

E-1 This introductory comment accurately summarizes the project description and is noted. It does not raise an issue addressing an inadequacy of the analysis contained within the MND.

E-2 The City notes the Air Pollution Control District's request to be notified when any environmental impact documents are posted regarding future development and construction within the project site. This comment does not raise an issue addressing an inadequacy of the analysis contained within the MND.

E-3

Finally, Air District Rules and Regulations can be found on our website at www.co.imperial.ca.us/AirPollution under the "Planning" tab. The ICAPCD office can be reached at (442) 265-1800.

Sincerely,

Curtis Blondell
ICAPCD Environmental Coordinator

E-3: These concluding remarks are noted.

Letter F

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
PHONE (619) 688-6960
FAX (619) 688-4299
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

January 25, 2019

11-IMP-111
PM 9.49
Dogwood Road at Villa Ave. 330 Acre Site Project
MND/SCH# 2018121057

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

Dear Ms. Villicana:

F-1 Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration (MND) for the Dogwood Road at Villa Ave. 330 Acre Site Project located near State Route 111 (SR-111) and E. Evan Hewes Highway in El Centro. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

F-2 1. The existing peak hour counts at SR-111/E Evan Hewes and SR-111/Aten Road are significantly lower than the Caltrans 2017 peak hour volumes. Caltrans insists that volumes need to be taken for a minimum of three days or use Caltrans' publicized counts for the study. Based on Caltrans' analysis, the additional project volumes would cause unidentified impacts to the intersections. Below are the differences between the submitted counts and Caltrans':
   a. Caltrans peak hour volume is 2,100 between SR-111/E Evan Hewes Highway and SR-111/Aten Road, the traffic study peak hour is 1,326 in the AM and 1,506 in the PM. The AM is 37% lower and PM is 28% lower.
   b. Caltrans peak hour volume is 1,300 north of SR-111/Aten Road, the traffic study peak hour is 904 in the AM. The AM is 30% lower.
   c. Caltrans one-way peak hour volume for the AM southbound at SR-111/E Evan Hewes Highway is 1,650, the traffic study is 625. The AM is 62% lower.
   d. Caltrans one-way peak hour volume for the PM southbound at SR-111/E Evan Hewes Highway is 1,293, the traffic study is 936. The PM is 28% lower.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

F-1 This introductory comment accurately summarizes the project description and is noted. It does not raise an issue addressing an inadequacy of the analysis contained within the MND.

F-2 The counts were conducted by a professional count firm using video technology. We believe the counts are very accurate. In addition, at the time there were no published guidelines requiring 3-day counts at intersections and we are not aware of any traffic study doing that. However, despite the fact that there are no guidelines requiring multiple days of traffic counts, an additional two (2) days of traffic counts were conducted at the SR-111/ Evan Hewes intersection and these new counts are included in the appendices of the traffic study and were used in the analysis as described in the revised traffic study.

Based on the new counts at the SR-111/Evan Hewes Highway intersection, the peak hour counts at the SR-111/Aten Road intersection were about 100 trips greater than in the traffic study. Since a very good LOS B is calculated at the SR 111/Aten Road intersection based on the 2017 counts and LOS B is still calculated with the additional trips, no changes to the results of the analysis at the SR 111/Aten Road intersection would occur using the higher counts.

F-3 2. The submitted traffic impact study's electronic files (Synchro) signal timings do not reflect Caltrans existing signal timings. Caltrans found unidentified direct impacts by performing the same analysis using Caltrans signal timings and Caltrans existing volumes. The Synchro files need to be updated with Caltrans signal timing and the traffic study updated accordingly. Below is an example of the results:

Near Term Plus Phase 3:

a. SR-111/Aten Road AM, northbound left 95% queue of #676 feet which exceeds the storage of 630 feet and a delay of 71.5 seconds. Eastbound left 95% queue of 306 feet and eastbound right 95% queue of 240 feet which both exceed the 190 feet to the Old Highway 111 intersection.
b. SR-111/Aten Road PM, northbound left delay of 77.9 seconds and the southbound left having a delay of 137.3 seconds. Eastbound left 95% queue of #665 feet and eastbound right 95% queue of 508 feet which both exceed the 190 feet to the Old Highway 111 intersection.

F-4 3. The traffic impact study needs to include the intersections of Aten Road/Old Highway 111 and Aten Road/Imperial Valley College to provide an accurate representation of the area and interaction with the intersection at SR-111/Aten Road. The study needs to demonstrate that there is no impact to these intersections and not assume it. Update the Synchro files and traffic study accordingly.

F-5 4. The tables below show the additional traffic volumes due to the project for the turn lanes at SR-111/Aten Road and SR-111/E Evan Hewes Highway. These additional traffic volumes lead to the delay and queueing impacts identified in the following comments.

SR-111/Aten Road	SB Right	EB Left	EB Right	NB Left
Existing	38	32	207	359
Near Term with Project Phase 2	307	248	343	531
Near Term with Project Phase 3	438	356	404	605

SR-111/ E Evan Hewes Highway	EB Right	NB Left
Existing	116	110
Near Term with Project Phase 2	342	382
Near Term with Project Phase 3	450	513

F-6 5. The traffic impact study identified mitigation measure TRA-11 (SR-111 / E. Evan Hewes Highway – Provide a second northbound left-turn lane, a southbound right-turn overlap phase and a dedicated eastbound right-turn lane with an overlap phase) to be implemented before phase 3. Based on Caltrans analysis, measure TRA-11 would need to be implemented before phase 1. The near term plus phase 1 synchro

F-3 Signal timing plans were not obtained for the analysis, but the signal timings were based on actual field observations. The analysis results were field verified in terms of queues and delays. They match well with the analysis results.

Field observations indicate LOS A/B operations at these intersections and therefore an analysis was not warranted. In addition, the Aten Road/Imperial Valley College intersection is not located within Caltrans jurisdiction and Imperial County did not request an analysis of this intersection.

F-4 Field observations indicate LOS A/B operations at these intersections and therefore an analysis was not warranted. In addition, the Aten Road/Imperial Valley College intersection is not located within Caltrans jurisdiction and Imperial County did not request an analysis of this intersection.

F-5 The traffic volumes show in the Tables were fully analyzed in the traffic study.

F-6 The analysis was completed using Highway Capacity Manual methodologies and the project does not have an impact at the SR 111 / Evan Hewes intersection for either Phase 1 or Phase 2 in Table 9-1 of the traffic study, using this accurate methodology. In addition, intersection delay, not queue lengths, are used as the variable to determine significance.

F-6 cont.

analysis using Caltrans signal timing shows a northbound left turn queue of 810 feet which exceeds the storage capacity of 750 feet. An analysis needs to be provided to determine the adequate turn lane lengths for mitigation for all phases. The tables below show the Synchro 95% queue lengths in feet with Caltrans signal timings due to the project for the turn lanes at SR-111/Aten Road and SR-111/E Evan Hewes Highway. Highlighted impacts exceed turn lane storage/extend into the next intersection and need to be mitigated accordingly by increasing turn lane storage, adding turn lanes, or other methods.

SR-111/Aten Road AM	SB Right	EB Left	EB Right	NB Left
Existing Storage	640	190 to Old Hwy 111 intersection	190 to Old Hwy 111 intersection	630
Existing	0	75	128	301
Near Term with Project Phase 1	58	139	142	336
Near Term with Project Phase 2	77	210	123	451
Near Term with Project Phase 3	94	281	195	555

SR-111/ E Evan Hewes Highway AM	EB Right	EB Left	NB left	SB left	WB left
Existing Storage	130	130	750	530	250
Existing	86	117	231	117	175
Near Term with Project Phase 1	111	124	#810	127	184
Near Term with Project Phase 2	74	124	#1082	139	184
Near Term with Project Phase 3	134	147	#1491	151	184

SR-111/Aten Road PM	SB Right	EB Left	EB Right	NB Left
Existing Storage	640	190 to Old Hwy 111 intersection	190 to Old Hwy 111 intersection	630
Existing	0	52	209	186
Near Term with Project Phase 1	45	217	241	204
Near Term with Project Phase 2	56	392	366	251
Near Term with Project Phase 3	63	#605	449	278

F-6 cont.

SR-111/ E Evan Hewes Highway PM	EB Right	EB Left	NB Left	SB Left	WB Left
Existing Storage	130	130	750	530	250
Existing	234	111	208	164	203
Near Term with Project Phase 1	379	116	#456	181	216
Near Term with Project Phase 2	454	116	#586	223	216
Near Term with Project Phase 3 HCM 2010	580	116	#784	250	216

F-7 6. To show the impacts at SR-111/Aten Road by changing signal timing and updating existing counts, the Near Term Plus Phase 3 Synchro files were modified using Caltrans signal timing and increasing existing volumes based on Caltrans peak hour counts. This results in the following queuing issues and delays that are significant impacts and need to be mitigated accordingly by increasing turn lane storage, adding turn lanes, or other methods.

F-8 7. Standard practice is to include analysis in the traffic study of segments and intersections that have project peak hour trips of 50 or more.
   a. Per Figure 7-5 of the traffic study, at SR-111 and Aten Road there are 323 project trips that go north and 393 coming from the north.
   b. Per Figure 7-5 of the traffic study, there are 463 project trips that go south on SR-111 at E Evan Hewes Highway and 564 project trips coming from the south.

   These additional trips ranging from 323 to 564 have a high probability of significantly impacting additional Caltrans facilities that were not included in the traffic study. The SR-111 intersections and segments with more than 50 peak hour trips need to be included in the traffic impact study along with an expanded project traffic distribution figure.

If you have any questions, please contact Mark McCumsey at (619) 688-6802 or by email at mark.mccumsey@dot.ca.gov.

Sincerely,

Mark McCumsey for

JACOB ARMSTRONG, Branch Chief
Local Development and Intergovernmental Review Branch

F-7 See Response to Comment F-6.

F-8 The signal timings and existing counts are accurate for the analysis of the SR 111/ Aten Road intersection and therefore, a reanalysis of the intersection is not warranted. The study area was determined in conjunction with County of Imperial and City of El Centro staff. The closest intersection north of Aten Road is Worthington Road. This intersection is over 1.5 miles from the project and operates at a very good LOS. Therefore, an analysis was not warranted. Similarly, the nearest intersection south of Even Hewes is 1.3 miles from the site and also operates very well. So, analysis of this intersection was also not warranted.

Letter G

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Gavin Newsom
Governor

Kate Gordon
Director

January 23, 2019

Norma M. Villicana
City of El Centro
1275 Main Street
El Centro, CA 92243

Subject: Dogwood Road at Villa Avenue Annexation, General Plan Amendment and Change of Zone
SCH#: 2018121057

Dear Norma M. Villicana:

G-1 The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on January 22, 2019, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

RECEIVED
City of El Centro
JAN 31 2019
Community Development
Department

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL 1-916-445-0613 state.clearinghouse@opr.ca.gov www.opr.ca.gov

G-1 No response is necessary.

Document Details Report
State Clearinghouse Data Base

SCH# 2018121057
Project Title Dogwood Road at Villa Avenue Annexation, General Plan Amendment and Change of Zone
Lead Agency El Centro, City of

Type MND Mitigated Negative Declaration

Description The project site consists of 330 acres of land located at the southeast corner of Dogwood Road and Villa Ave in an unincorporated area of Imperial County adjacent to the City of El Centro. The project would annex the site in to the City of El Centro, pre-zone the site from County A2U (Gen ag-urban area) to City General Manufacturing, and amend the GP to designate the site from planned industrial/low density res uses to gen manufacturing uses. No specific development is proposed at this time, but future development at the site is anticipated to include infrastructure improvements and design features in order to meet regulatory requirements and provide sufficient infrastructure to serve the future development.

Lead Agency Contact

Name Norma M. Villicana
Agency City of El Centro
Phone (760) 337-4545 **Fax**
email
Address 1275 Main Street
City El Centro **State** CA **Zip** 92243

Project Location

County Imperial
City El Centro
Region
Lat / Long 32° 47' 58" N / 115° 31' 37" W
Cross Streets Dogwood Rd and Villa Ave
Parcel No. 044-450-038
Township 15S **Range** 14E **Section** 46 **Base**

Proximity to:

Highways 111, I-8
Airports
Railways Holton Interurban RR
Waterways
Schools Washington and McKinley
Land Use LU: Ag fields; Z: A2U; GPD: Planned industrial and low density

Project Issues Air Quality; Biological Resources; Noise; Traffic/Circulation

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 6; Cal Fire; Department of Parks and Recreation; California Highway Patrol; Caltrans, District 11; Department of Housing and Community Development; Office of Emergency Services, California; Native American Heritage Commission; Public Utilities Commission; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 7; State Water Resources Control Board, Division of Drinking Water; Air Resources Board, Major Industrial Projects

Date Received 12/21/2018 **Start of Review** 12/21/2018 **End of Review** 01/22/2019

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

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APPENDICES

Acronyms and Abbreviations

AB	Assembly Bill
ADT	average daily traffic
AFY	acre-feet per year
AQMD	Air Quality Management District
BMP	best management practices
CDFG Code	California Department of Fish and Game Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of El Centro
CNEL	community noise equivalent level
CO_2E	carbon dioxide equivalent
County	County of Imperial
dB(A)	A-weighted decibel
DIF	Developer Impact Fee
ECFD	El Centro Fire Department
ECPD	El Centro Police Department
ESA	Environmental Site Assessment
FAR	floor area ratio
GHG	greenhouse gas
GPA	General Plan Amendment
ICAPCD	Imperial County Air Pollution Control District
IGP	Industrial General Permit
IID	Imperial Irrigation District
IWSP	Interim Water Supply Policy
$L_{eq(8h)}$	8-hour equivalent noise level
LID	Low Impact Development
LLG	Linscott, Law & Greenspan, Engineers
LOS	level of service
MND	Mitigated Negative Declaration
MT	metric tons
MT CO_2E	metric-ton of carbon dioxide equivalent
NOx	Nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
PM_{10}	particulates 10 microns or less in diameter
$PM_{2.5}$	particulates 2.5 microns or less in diameter
project	Dogwood Road at Villa Avenue
ROG	reactive organic gases
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCAG	Southern California Association of Governments
SOI	Sphere of Influence
SR	State Route
SWPPP	Storm Water Pollution Prevention Plan
TDM	Transportation Demand Management
VMT	vehicle miles travelled
WSA	Water Supply Assessment

1.0 Introduction

1.1 Project Needs and Objectives

The approximately 330-acre project site is located in the County of Imperial (County), adjacent to the City of El Centro (City). The site was ~~is currently~~ designated by the County as Urban Area, which is an area anticipated to be annexed or incorporated into the adjacent city (i.e., El Centro). The County created this designation to reduce duplicated planning efforts and possible planning conflicts between the County and cities, and to allow cities to plan for the development of these areas. Consistent with the County designation, the site is located within the City's Sphere of Influence (SOI) and annexation of the site from the County to the City is proposed in anticipation of future development. In order to coordinate this interjurisdictional effort, the project would require processing through the Imperial County Local Agency Formation Commission pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act (Government Code §§ 56000, et seq.) (LAFCO Act).

As indicated above, the primary objective of the proposed Dogwood Road at Villa Avenue project (hereafter project) is to ~~amend the City's General Plan and~~ annex an approximately 330-acre site in order to allow for future industrial development within the City. Other project objectives are to: (1) utilize a site that has already been disturbed to reduce biological impacts; (2) locate where rail transport is readily accessible; and (3) generate additional jobs and tax revenue.

1.2 Project Location and Setting

The approximately 330-acre project site is located at the southeast corner of Dogwood Road at Villa Avenue, Imperial County, California (Figures 1 and 2). The site is currently located within the County and is directly adjacent to the City. The site is generally south of Villa Avenue, west of Cooley Road, east of Dogwood Road, and north of the Holton Interurban Railroad. The assessor's parcel number for the site is 044-450-038. The project site is relatively flat, and consists of agricultural fields, dirt roads, a sewer lift station, a segment of the concrete-lined Dogwood Canal along the western perimeter, and a segment of the unlined Central Drain Three that runs north-south across the central portion of the site (Figure 3). The canals that feed into the project site via gates are as follows: Dogwood Canal Gates 54, 54-A, 57, 57-A and 57-B; and Alder Canal Gates 95 and 99, and Alder Canal Lateral 12 Gates 96-A, 97, 97-A and 97-B. Existing surrounding uses include agricultural fields, rural residential, industrial, and the Imperial Irrigation District (IID) facility (see Figure 3; Table 1). The nearby IID facility includes power plant facilities with battery storage.

Table 1 Surrounding Land Uses			
Location	Existing Use	City's General Plan Designation[1]	Zone
North	Agricultural fields	Low Density Residential	A-2 (County)
	Rural single-family residential (Villa Lane)	Rural Residential	A-2 (County)
Northeast	Agricultural fields	Low Density Residential	A-2 (County)
East	Agricultural fields	Low Density Residential	A2U (County)
	Agricultural fields	Planned Industrial	A1U (County)
Southeast	Rock and gravel sales	~~Planned Industrial~~ General Industrial	M1 (County)
	Rural residential, portable restroom storage	Rural Residential	C2U (County)
South	Automotive repair, tire sales, sand and gravel processing, block sales, and fabrication and machining	~~Planned Industrial~~ General Industrial	Manufacturing Business Park (City)
Southwest	Vegetable growing supplies	General Industrial	General Manufacturing (City)
West	IID power plant facility	Public	Limited Use (City)
Northwest	Warehouse	Planned Industrial	A2U (County)
[1]The County General Plan designates all surrounding County land and the site as Agriculture.			

Several easements exist on-site, including:

1. City of El Centro Sewer easement (April 22, 1909)
2. Imperial County roadway easements – roadway easement 60 feet along the eastern boundary and 40 feet along the western boundary (April 21, 1922)
3. Imperial Water Company No. 1 drainage ditch easement – eastern 20 feet (June 13, 1922)
4. Imperial Irrigation District drainage ditch easement – 150-foot right-of-way (November 4, 1924)
5. Southern Sierras Power Company powerline easement – right-of-way parallel to the Southern Pacific Railroad right-of-way (July 6, 1935)
6. Imperial Irrigation District powerline easement – 90-foot wide (June 20, 1951)
7. Fred C. Smith tile drain installation and maintenance easement – along the north side (July 8, 1953)
8. City of El Centro sewer lift station easement (April 21, 2003)
9. City of El Centro temporary trunk sewer easement (April 23, 2003)

1.3 Project Description

The Dogwood Road at Villa Avenue project consists of the annexation of the site from the County to the City~~, a General Plan Amendment (GPA)~~ and a Pre-zone (Figure 4). No specific development is proposed at this time, but future development at the site is anticipated to include infrastructure improvements and design features in order to meet regulatory requirements and provide sufficient infrastructure to serve the future development. In addition, the parcel would be annexed with an Annexation ~~Development~~ Agreement between the City and the property owner recorded against the parcel in order to further define the future development. A description of these discretionary actions as well as what future development could be allowed based on the proposed land use changes is described further below. Once a site-specific development is proposed, then the City would determine if this Draft Mitigated Negative Declaration (MND) adequately covers the future action, pursuant to CEQA Guidelines Section 15162, or if additional environmental analysis is necessary.

1.3.1 General Plan Amendment

The County of Imperial previously designated ~~designates~~ the site as Urban Area, a designation that is intended to cover areas anticipated to be annexed or incorporated into neighboring cities. The site is located within the City's SOI. Per the City's previous General Plan, the western third of the site was ~~is currently~~ designated as Planned Industrial and the eastern two-thirds was ~~are~~ designated as Low Density Residential (Figure 5). The project had proposed ~~proposes~~ a GPA to remove the site from the County's General Plan (Figure 6) and to redesignate the entire site as General Industrial – General Manufacturing within the City's General Plan. Under the General Manufacturing designation, the proposed GPA would allow for a maximum floor area ratio (FAR) of 0.45:1 and an average FAR of 0.35:1. This designation specifies operations must not create "offensive, obnoxious, or dangerous conditions which are detectable beyond the boundary of the land use designation borders."

Subsequent to the release of the MND for public review in January 2019, the City amended its General Plan in 2021 to accommodate the GPA that was being sought in conjunction with the proposed project. As such, a GPA is no longer necessary for the project.

1.3.2 Pre-zone

The site is currently zoned A2U Agriculture-Urban Area by the County of Imperial (see Figure 6). As the site is not currently in the City, there is no existing City zoning for the site. The project proposes to pre-zone the site as MG General Manufacturing within the City. Per the City's Municipal Code Section, this zone does not include any minimum lot sizes or setbacks with the exception of 50-foot rear and side setbacks from adjacent residential zones. This zone allows for buildings up to 75 feet tall, with one parking space per 500 square feet required. The following is an excerpt from Municipal Code Chapter 29 - Zoning, Article II. - Zones, Division 4. - Manufacturing Zones:

> **MG general manufacturing zone.** This zone is intended to provide for the development of manufacturing, processing, fabrication, and assembly of goods and materials, which do not in their operation or maintenance create offensive, obnoxious, or dangerous conditions that are detectable beyond the boundary of the zone. Certain outdoor operations are permitted in this zone. The MG zone is intended to implement the general manufacturing - general industrial general plan land use designation.

The Municipal Code includes general manufacturing zone design standards pertaining to site planning, natural surveillance, architecture, roof treatments, parking and circulation, loading facilities, landscaping, walls and fences, screening, and lighting. The future development at the site would be in conformance with the Municipal Code and would comply with these design standards.

1.3.3 Future Development and Annexation ~~Development~~ Agreement

Based on the average FAR allowed by the ~~proposed~~ General Plan designation and proposed zoning, the ultimate buildout of the 330-acre site could include approximately 5 million square feet (MSF) of manufacturing and/or warehouse space. However, building square footage would be limited to 3 MSF via an Annexation ~~Development~~ Agreement between the City and the property owner that would be recorded against the parcel. Due to the size of the allowed development, it is reasonable to assume that future buildout of the project site would be split into multiple phases. The project is assumed to consist of three phases that each includes the addition of 1 MSF. Also, considering the size of the development, the earliest year in which development totaling 3 MSF would be reached is assumed to be 2025.

The future buildout of a general manufacturing warehouse would require water, wastewater, storm drain, dry utility, and access improvements. Since the project consists of a land use change only and no site-specific development plans are proposed, specific utility plans have not been prepared. However, the following conceptual infrastructure information is provided based on the assumption of 3 MSF manufacturing warehouse located at the project site, existing conditions, and existing regulations.

1.3.3.1 Storm Water

Future buildout of the site would be completed in compliance with the Clean Water Act, and the associated National Pollutant Discharge Elimination System (NPDES) permit program. This includes compliance with the Construction General Permit Order 2009-0009-DWQ, and the associated requirement to prepare a Storm Water Pollution Prevention Plan (SWPPP) with Best Management Practices (BMPs). In addition, the future operations would comply with the NPDES Industrial General Permit (IGP). The project would also be required to provide other water quality features and hydrology controls in accordance with regulations to ensure discharge rates remain similar to the existing conditions and to maintain water quality. Pursuant to these requirements and the likely amount of impervious area resulting

from future development consistent with the proposed zoning, an on-site retention basin may be required.

1.3.3.2 Water

Potable water is anticipated to be provided to the project by the City of El Centro via an existing 10- to 12-inch diameter pipeline from the City based on the City's Water Master Plan. The site currently is provided non-potable water by the Imperial Irrigation District (IID) via canals for agricultural use (see Section 1.2 above), with an average historic water delivery from 2003 to 2013 of 1,921 acre-feet per year (AFY). The future industrial-use development is anticipated to require industrial use water, and IID would continue to provide non-potable water to the site. Considering the current water usage at the site for agriculture and typical industrial development water usage, future industrial development of the site would reduce the non-potable water demand generated at the site (Development Design & Engineering 2017). As the demand for water would decrease with project implementation, the project would not require any off-site raw water conveyance system improvements in order to obtain adequate water supply. Non-potable water used for industrial purposes would be treated and discharged back into the IID drain in accordance with IID standards. However, the project may require canal and drain modifications in order to accommodate future industrial development on-site and off-site transportation facility improvements, as described below.

The site and surrounding area has an extensive network of IID canals and drains. The canals that feed into the project site via gates are as follows: (a) Dogwood Canal Gates 54, 54-A, 57, 57-A, and 57-B and (b) Alder Canal Gates 95, 99 and Alder Canal Lateral 12 Gates 96-A, 97, 97-A and 97-B. Due to the need to accommodate future development at the site, it is anticipated that modifications to the existing canals and drain system would be required. As no project-specific site plan has been developed at this time, it is not possible to determine the exact improvements of the future development. Improvements that may be required may include a culvert for a driveway access, fencing, and/or slope stability improvements. The future industrial uses may require internal reorganization of laterals depending on future building locations, but conveyance of the water through the IID canals would remain in accordance with existing easements. In addition, construction of an on-site waste treatment facility may be considered at a future time within the project site; however, this would require subsequent environmental review.

The proposed roadway improvements discussed below would also require improvements to the existing IID channel crossings. These improvements would include removal of the existing crossing and replacement of the crossing with a reinforced culvert adequate to support the roadway based on current standards.

1.3.3.3 Wastewater

Wastewater generated on-site would be directed into the local City sewer system. Based on the City of El Centro's Sewer Master Plan, the project site is serviced by a 20- to 24-inch diameter force main pipeline and lift station on the northwest portion of the property. All

wastewater discharges would be in accordance with NPDES permit program and the Colorado River Basin – Storm Water Programs. Construction of an on-site wastewater treatment facility may be considered at a future time within the project site; however, this would require subsequent environmental review.

1.3.3.4 Circulation and Access

Based on the traffic report prepared by Linscott, Law & Greenspan, Engineers (LLG) for the GPA, future development of the site would require frontage improvements to Dogwood Road, Villa Avenue, and Cooley Road. These improvements would be included in the Development Agreement. Below is a summary of these frontage improvements.

- Dedicate right-of-way along the project's Cooley Road frontage to the City Circulation Element standards of a 2-lane Collector.
- Dedicate right-of-way along the project's Villa Avenue frontage to the City's Circulation Element standards of a 4-lane Arterial.
- Dedicate right-of-way along the project's Dogwood Road frontage to the City's Circulation Element standards of a 6-lane Prime Arterial.
- Prior taking access from Dogwood Road, the applicant shall widen Dogwood Road to 4 lanes between Villa Road and E. Main Street.
- Improve Villa Avenue between Dogwood Road and Cooley Road to 2-lane Collector standards.

The City strives to encourage land uses that are compatible, sustainable, and beneficial to the community. Consistent with this objective and current standard practices, the City has included the following conditions in the Development Agreement for future development of the project site:

- Provide subsidized transit passes to all employees.
- Provide a shuttle from heavier populated areas to the project site.
- Provide preferred parking spaces for employees who carpool.
- Allow annual monitoring of the Transportation Demand Management (TDM) program by City staff.
- Stagger work shift times to avoid the hours of 7:00 to 8:00 a.m. and 4:00 to 6:00 p.m. in terms of start and end times.
- Provide bike lockers and showers.

In addition, it is noted that traffic mitigation improvements would be required (LLG 2018). Refer to Section 3.0 of this Draft MND for more details.

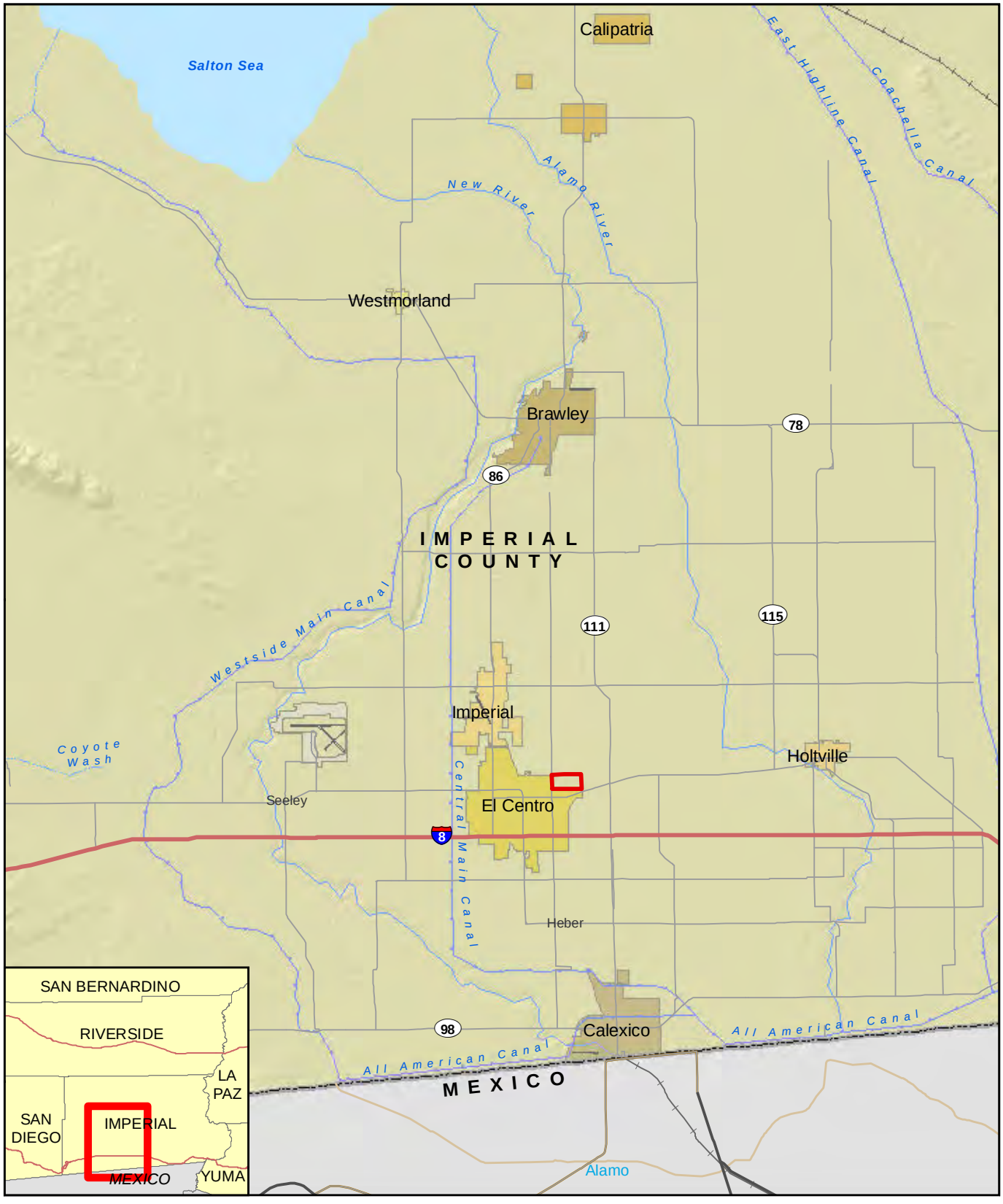

FIGURE 1

Regional Location

RECON

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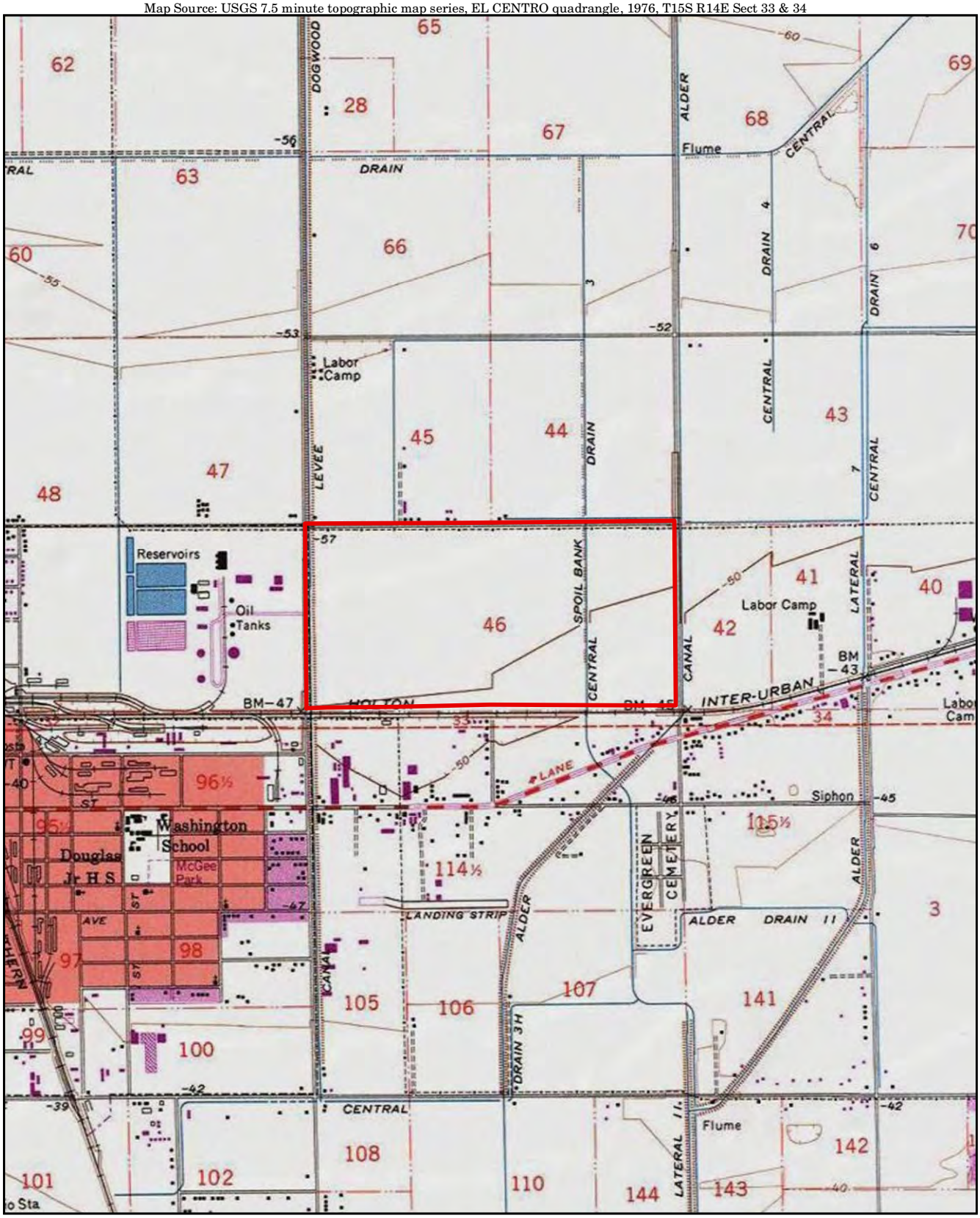
Map Source: USGS 7.5 minute topographic map series, EL CENTRO quadrangle, 1976, T15S R14E Sect 33 & 34



Project Boundary

FIGURE 2

Project Location on USGS Map

RECON

M:\JOBS5\8757\common_gis\fig2.mxd 7/17/2017 sab

Image source: USDA FSA NAIP (flown May 2016)

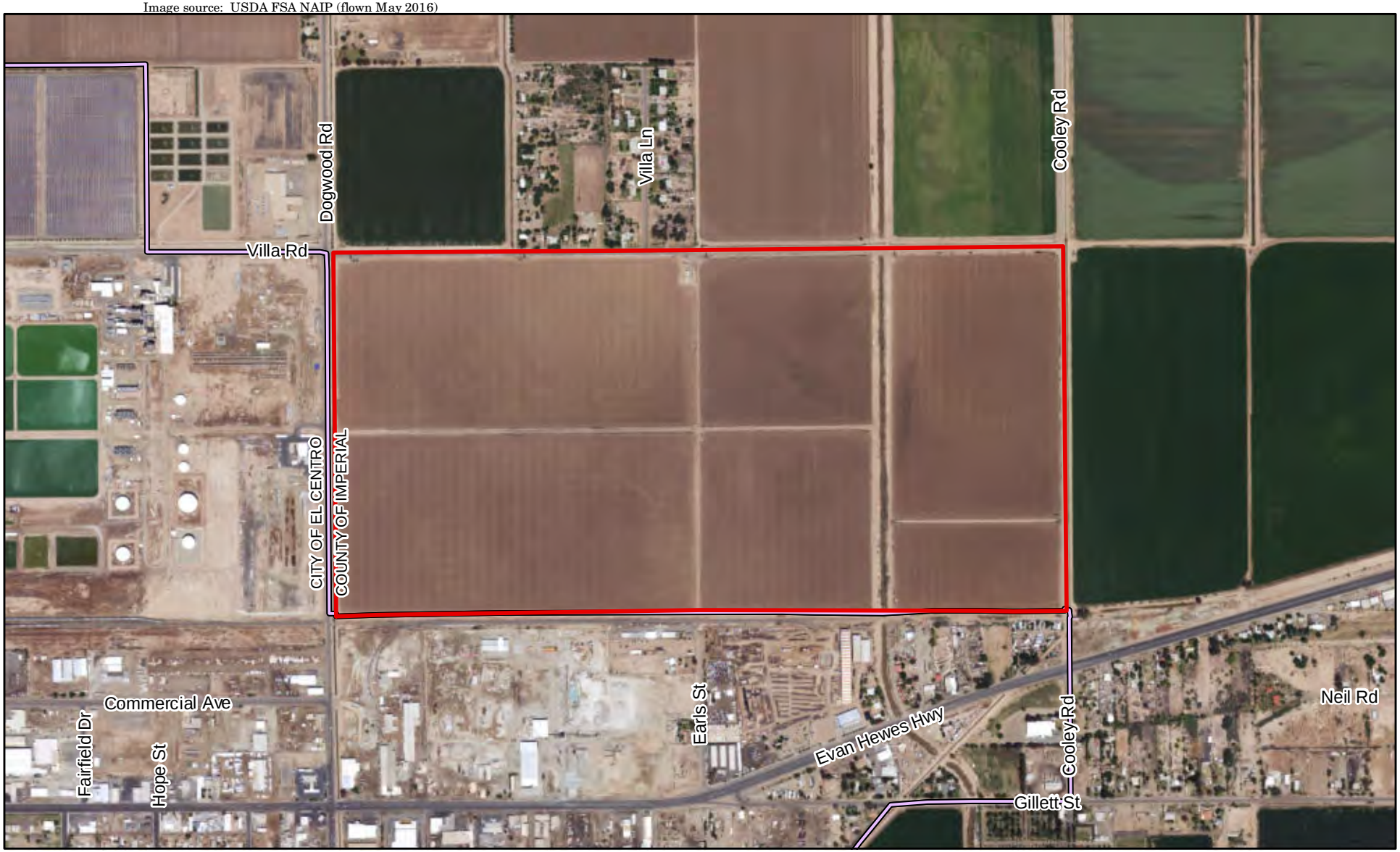


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FIGURE 3

Project Location on Aerial Photograph

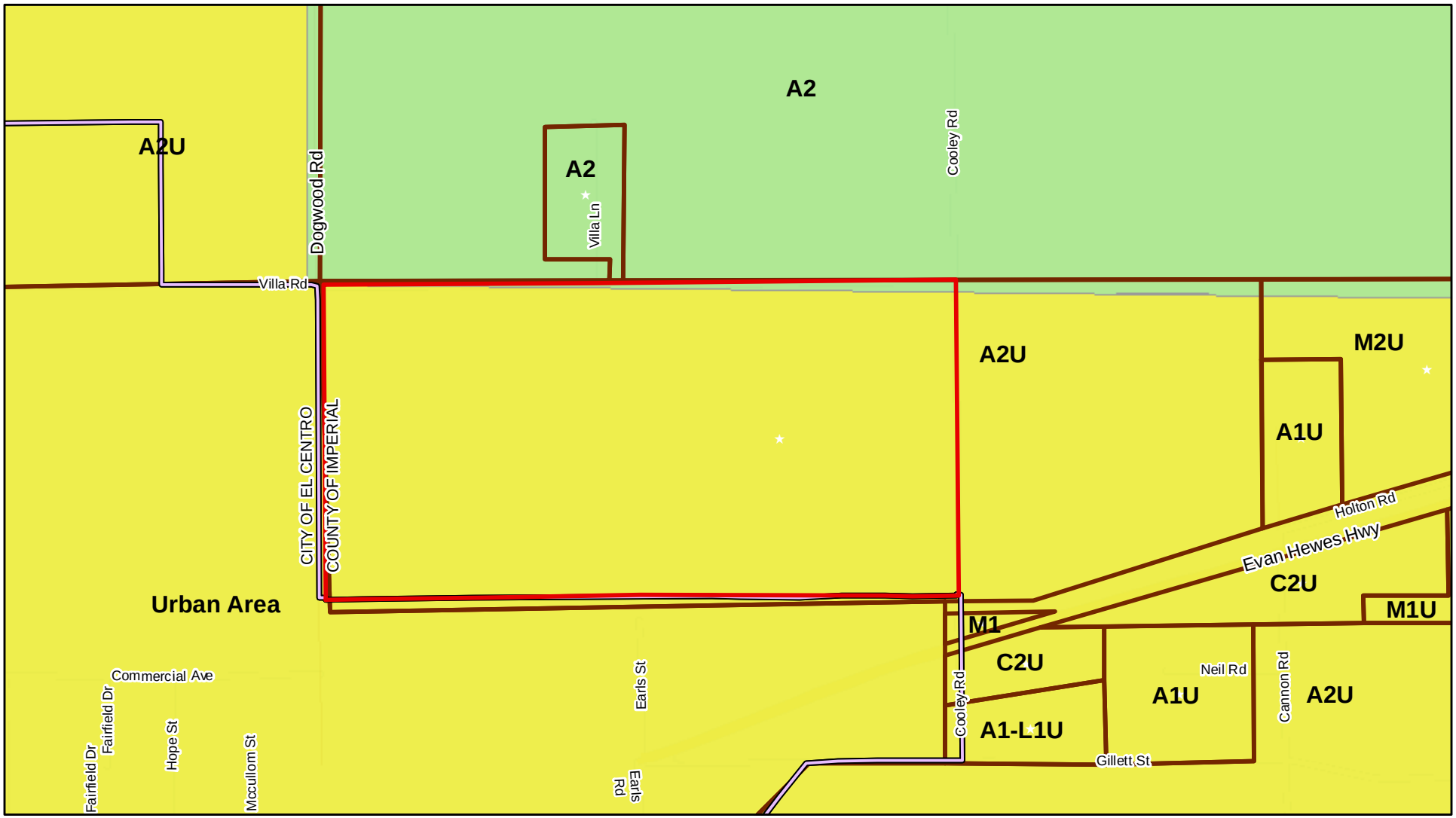

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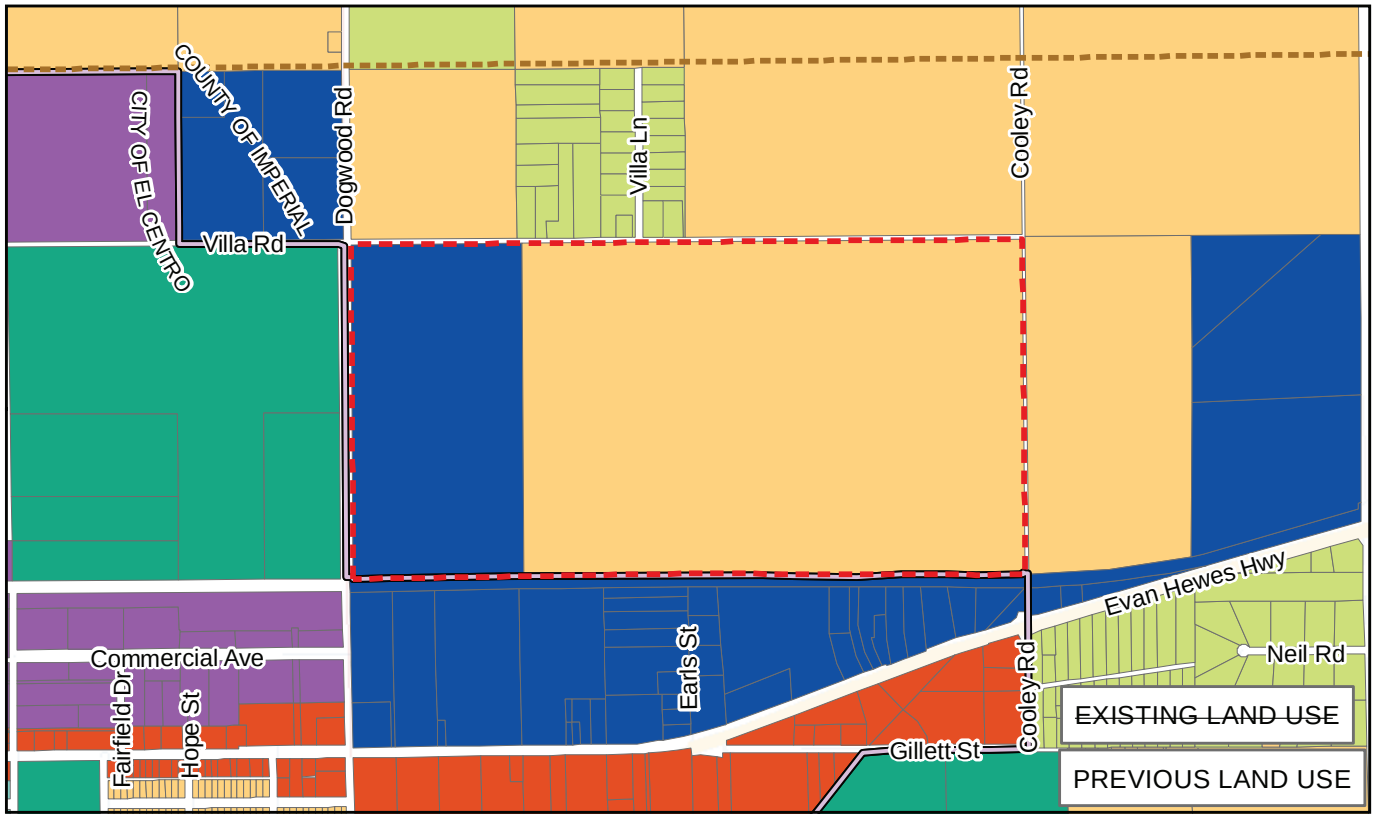
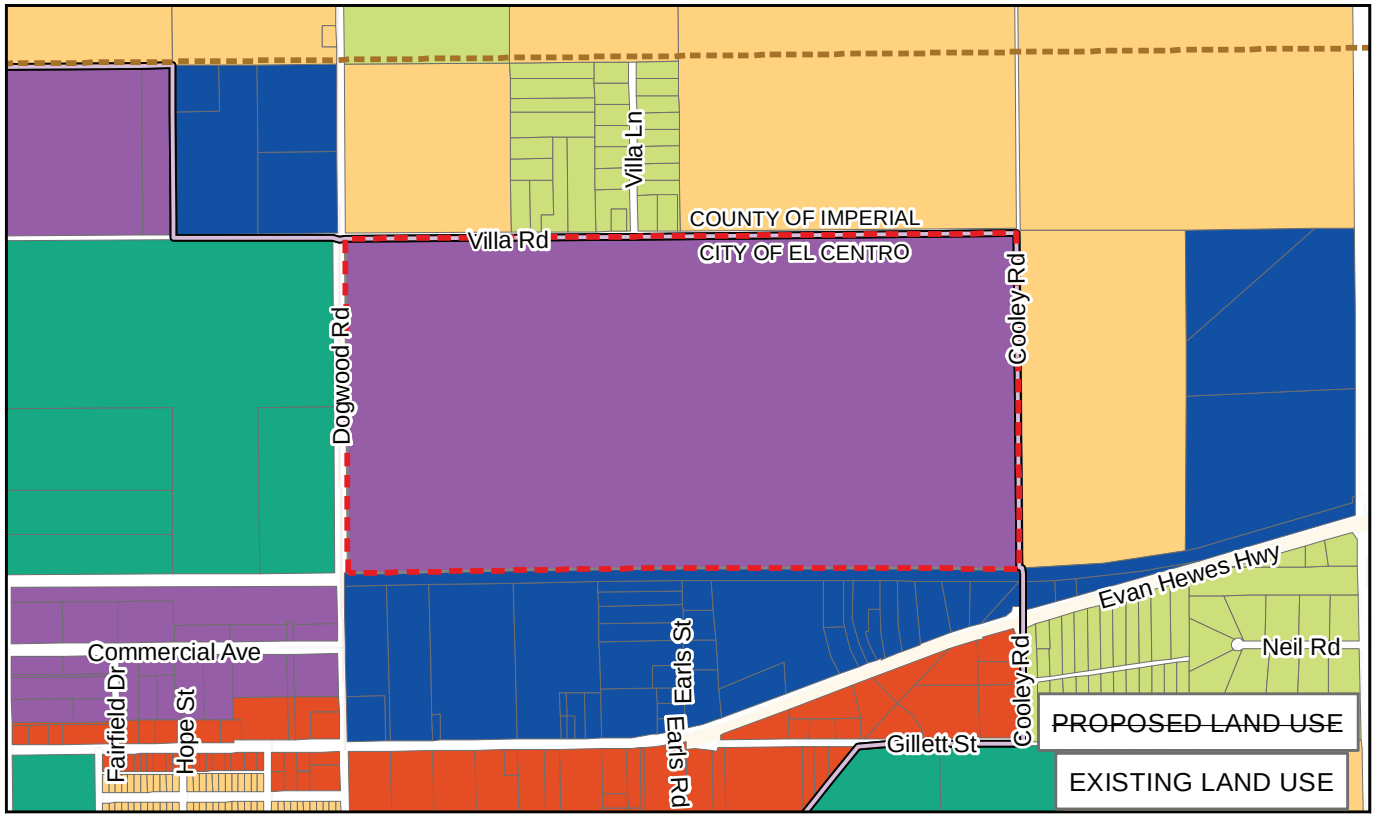
FIGURE 4
County of Imperial's Land Use Designations and Zoning





Project Boundary
City of El Centro
Sphere of Influence

El Centro Land Use
Low Density Residential
Rural Residential
General Commercial
General Industrial
Planned Industrial
Public

0 Feet 1,000

FIGURE 5

~~Existing and Proposed City of El Centro's General Plan Land Use Designation~~ Previous and Existing General Plan Land Use Designations

RECON

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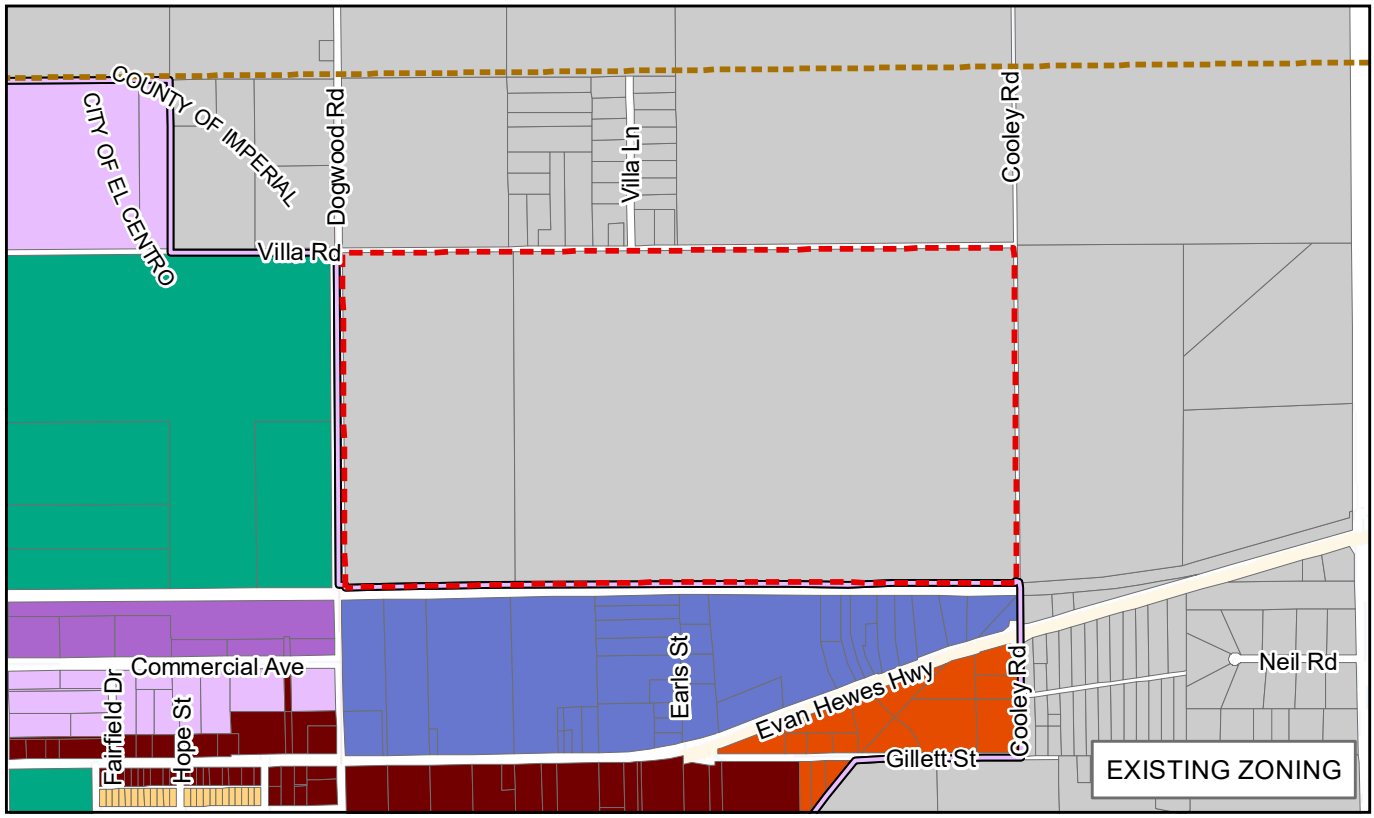

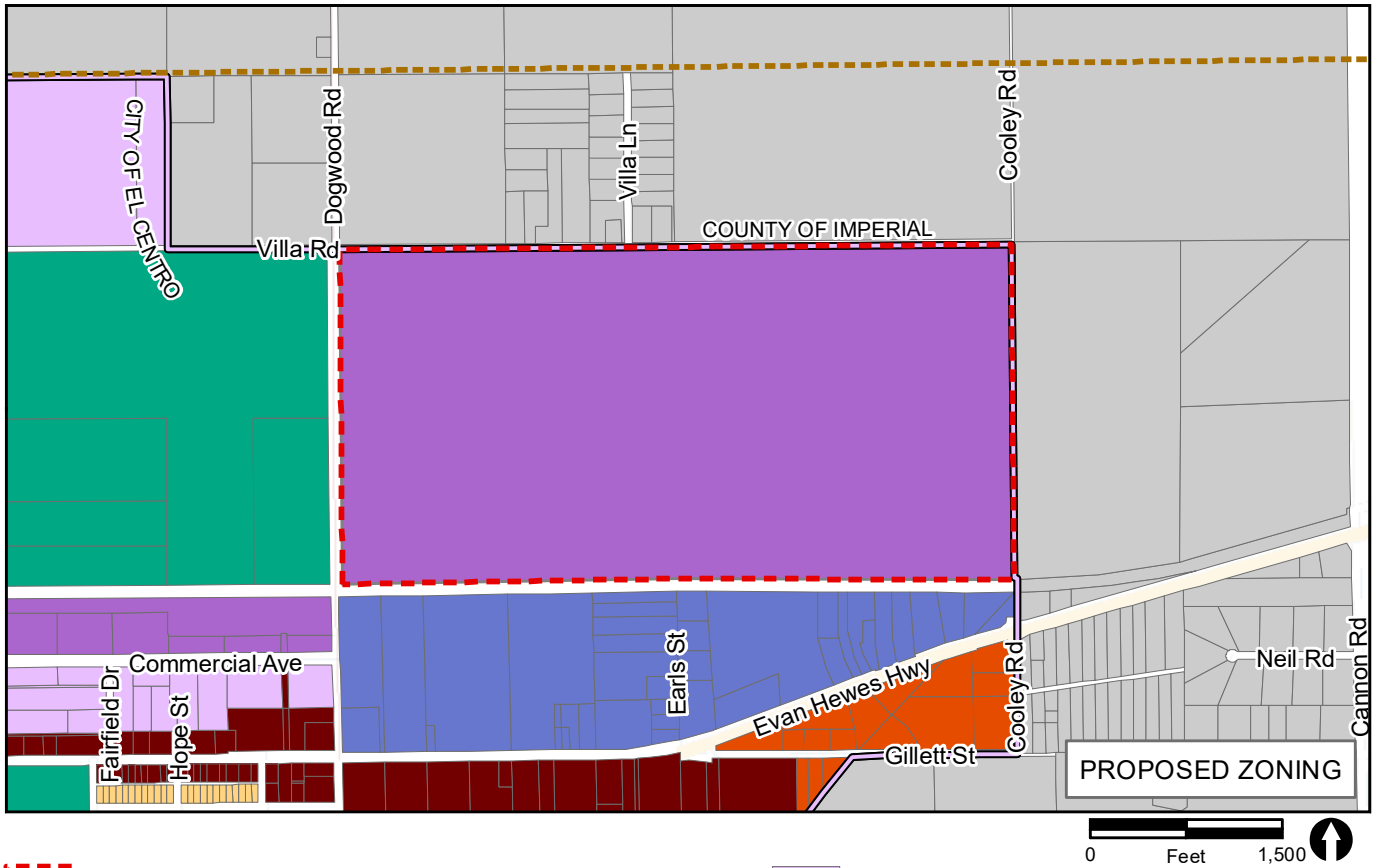

0 Feet 1,500

Project Boundary
City of El Centro
Sphere of Influence

El Centro Zoning

R1 Single-Family Residential
CG General Commercial
CH Heavy Commercial
MG General Manufacturing
ML Light Manufacturing
MBP Manufacturing Buisiness Park
LU Limited Use
County Jurisdiction

RECON

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FIGURE 6

Existing and Proposed City of El Centro Pre-zoning

2.0 Mitigated Negative Declaration

2.1 Authority to Prepare a Mitigated Negative Declaration

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

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

2.2 Results of Public Review

( ) No comments were received during the public input period.

( ) Comments were received during the public input period, but they do not address the Draft Mitigated Negative Declaration findings or the accuracy or completeness of the Initial Study. No response is necessary. The letters are attached.

(X) Comments addressing the findings of the Draft Mitigated Negative Declaration and/or accuracy or completeness of the Initial Study were received during the public input period. The letters and responses are presented at the beginning of this Final MND.

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

_____	December 24, 2018
Signature	Date of Draft MND
~~Norma Villicaña,~~ Angel Hernandez Interim Community Development Director City of El Centro	June 10, 2022 Date of Final MND

3.0 Mitigation Monitoring and Reporting Program

The following project features and mitigation measures would be implemented via the Development Agreement to reduce impacts to below a level of significance.

3.1 Air Quality

In order to provide consistency with Imperial County Air Pollution Control District (ICAPCD) air quality planning documents, the following shall be implemented upon annexation:

Air Quality Plan Consistency

MM-AIR-1: Within 6 months of project approval, the City Community Development Director shall provide a revised General Plan land use map to the Southern California Association of Governments to ensure that regional population and vehicle miles travelled (VMT) projections are updated and thereby ensure the next air quality plan updates will accurately reflect anticipated growth associated with future development of the project site.

At the time a site-specific development is brought forward, the following ICAPCD regulatory compliance measures shall be required:

Imperial County Air Pollution Control District Compliance

MM-AIR-2: Prior to the issuance of a building permit for construction on the project site, the City shall verify the Project Applicant has submitted a Mitigation Project Report and contributed to the Imperial County Air Pollution Control District (ICAPCD) Operational Development Fees Program in accordance with Rule 310 and its associated criteria.

MM-AIR-3: Prior to the issuance of a grading or construction permit for the project site, the Project Applicant shall provide documentation (such as a contract or other legally binding document) to the City proving that contractors and subcontractors will implement the following measures in accordance with the ICAPCD CEQA Air Quality Handbook performance criteria:

Measures for Fugitive 10-micron Particulate Matter (PM_{10}) Control

- All disturbed areas, including bulk material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps or other suitable material such as vegetative ground cover.
- All on-site and off-site unpaved roads will be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.

- All unpaved traffic areas 1 acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emission shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.
- The transport of bulk materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks is to be cleaned and/or washed at delivery site after removal of bulk material.
- All track-out or carry-out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more.
- Movement of bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers or by sheltering or enclosing the operation and transfer line.
- The construction of any new unpaved road is prohibited unless the road meets the ICAPCD definition of a temporary unpaved road. Any temporary unpaved road shall be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emission by paving, chemical stabilizers, dust suppressants and/or watering.
- Water exposed soil with adequate frequency for continued moist soil.
- Replace ground cover in disturbed areas as quickly as possible.
- Automatic sprinkler system installed on all soil piles.
- Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site.
- Develop a trip reduction plan to achieve a 1.5 average vehicle ridership for construction employees.
- Implement a shuttle service to and from retail services and food establishments during lunch hours.
- Install pipe-grid track-out control device to reduce mud/dirt track-out from unpaved truck exit routes.

Measures for Construction Combustion Equipment

- Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel powered equipment.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum.
- Limit, to the extent feasible, the hours of operation of heavy duty equipment and/or the amount of equipment in use.
- Replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set).

- Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak hour of vehicular traffic on adjacent roadways.
- Implement activity management (e.g., rescheduling activities to reduce short-term impacts).
- Require the use of construction equipment that meets Tier 4 CARB In-Use Off- Road Diesel Fueled Fleets Regulations.

MM-AIR-4: On any given day, heavy-duty construction equipment use shall be limited to a single road segment or intersection improvement. Prior to the issuance of any road segment and intersection improvement building permit associated with the project, the applicant shall demonstrate to the satisfaction of the City Engineer that the off-site roadway improvement schedules would not overlap.

MM-AIR-5: Prior to the issuance of a grading permit for the project site, the Project Applicant shall provide documentation to the City that demonstrates payment of the in-lieu construction impact fees for off-site mitigation of NO_X emissions in excess of the ICAPCD significance threshold of 100 pounds per day and PM_{10} emissions in excess of the ICAPCD significance threshold of 150 pounds per day consistent with the ICAPCD Policy Number 5. As outlined by Policy Number 5 In-Lieu Mitigation Fee Determination methodology, the fee shall be determined by the ICAPCD based on the specific construction equipment use. Prior to any earthmoving or construction activity, the applicant shall submit to the ICAPCD a complete list of all construction equipment to be utilized during the construction phase identifying make, model, year, horsepower, and estimated hours of usage and shall pay calculated fees and/or off-site mitigation in accordance with the performance criteria identified in the ICAPCD CEQA Air Quality Handbook.

MM-AIR-6: Prior to the issuance of a grading or construction permit for the project site, the Project Applicant shall be required to demonstrate to the satisfaction of ICAPCD CEQA Air Quality Handbook performance criteria for industrial project, which consists of ensuring that the following project features have been incorporated into the site-specific entitlements issued for the project:

Measures for Operations

- Implement carpool/vanpool programs and incentives (i.e., carpool ride matching for employees, assistance with vanpool formation, provision of vanpool vehicles, etc.).
- Provide for shuttle/mini bus service such as to establish a shuttle service from residential areas to the worksite.
- Provide preferential carpool and vanpool parking.
- Construct transit facilities such as bus turnouts/bus bulbs, benches, shelters, etc. if the project is located on an established transit route.

- Design and locate buildings to facilitate transit access (i.e., locate building entrances near transit stops, eliminate building setbacks, etc.).
- Provide incentives to employees to take public transportation, walk, bike, etc.
- Provide pedestrian signalization and signage to improve pedestrian safety.
- Implement on-site circulation design elements in parking lots to reduce vehicle queuing and improve the pedestrian environment.
- Provide on-site bicycle and motorcycle parking. Such as providing weather protected bicycle parking for employees.
- Provide safe, direct access for bicyclists to adjacent bicycle routes.
- Provide shower and locker facilities to encourage employees to bike and/or walk to work – one shower and three lockers for every 25 employees.
- Provide on-site heating, refrigeration, and food vending facilities to reduce lunchtime trips.
- Increase street tree planting.
- Measures which meet mandatory, prescriptive and/or performance measures as required by Title 24.
- Use low emission fleet vehicles such as low emission vehicles, ultra-low emission vehicles, zero emission vehicles.
- Install an electrical vehicle charging station with both conductive and inductive charging capabilities.
- Use built-in energy efficient appliances, where applicable.
- Use double-paned windows.
- Use low energy parking lot and street lights.
- Use energy efficient interior lighting.

3.2 Biological Resources

At the time a site-specific development is brought forward, the following biological mitigation shall be required:

Burrowing Owl

MM-BIO-1: Prior to issuance of a grading permit for any future on- or off-site improvement, the grading plan shall identify the following mitigation requirement:

> If grading is to occur between January 1 and August 31, a preconstruction burrowing owl survey shall be performed within 3 days prior to initiating ground disturbance to survey for nesting birds.

If burrowing owls and occupied burrows are found on or near construction, the following guidelines shall be followed: during non-breeding season (September through January) or breeding season (February through August), a distance determined by a qualified biologist should be maintained between occupied burrows and construction activities. A qualified biologist may also employ the technique of sheltering in place. If this technique is employed, the sheltered area must be monitored weekly by a qualified biologist or daily when construction is within 160 feet (during non-breeding season) or 250 feet (during breeding season) of the shelter.

If occupied burrows must be removed, the following guidelines shall be followed:

- After consultation with the California Department of Fish and Wildlife (CDFW) and during non-nesting season, artificial burrows (minimum of 50 feet apart) shall be installed at a 1:1 impact to mitigation ratio in accordance with the guidelines found in the IID's Artificial Burrow Installation Manual or other applicable manuals to the satisfaction of CDFW.
- After consultation with CDFW, owls shall be excluded by installation of one-way doors into the opening of the burrows. One-way doors shall be left in place for 48 hours, if scoping indicated occupancy. Burrows shall be scoped prior to excavation. Excavation shall be done using hand tools and refilled to prevent reoccupation. After burrows are collapsed, contractor shall immediately disk down area to prevent reoccupation.
- Documentation shall be made and a report sent to CDFW.
- Foraging habitat is found on-site; CDFW's mitigation guidelines for burrowing owl requires foraging habitat determined per pair or unpaired resident bird to be provided and protected to offset the loss of foraging and burrow habitat on the project site, as determined by a qualified biologist. The off-site mitigation shall be provided based on the following performance criteria, subject to the satisfaction of the CDFW:
    - Replacement of occupied habitat with occupied habitat: 1.5 times 6.5 (9.75) acres per pair or single bird;
    - Replacement of occupied habitat with habitat contiguous to currently occupied habitat: 2 times 6.5 (13.0) acres per pair or single bird, and/or
    - Replacement of occupied habitat with suitable unoccupied habitat: 3 times 6.5 (19.5) acres per pair or single bird.

Nesting Birds

MM-BIO-2: Prior to issuance of a grading permit for any future on- or off-site improvement, the grading plan shall identify the following mitigation requirement:

If grading is to occur between January 1 and September 15, a preconstruction survey shall be performed within 3 days prior to initiating ground disturbance to survey for

nesting birds. If nesting birds are located, than avoidance measures shall be implemented as determined by a qualified biologist and in accordance with the California Department of Fish and Game Code (CDFG Code) Section 3503.

Jurisdictional Waters

MM-BIO-3: Prior to issuance of a grading permit for any on or off-site improvement that would affect the bed or bank of a channel or drain, the applicant shall either (1) provide documentation to the City that the action is covered by existing resource agency permits; (2) provide documentation of a no substantial effect determination by the resource agencies or a non-jurisdictional concurrence letter from the resource agencies, or (3) obtain appropriate Resource Agency permits, such as a 1602 streambed alteration agreement, a Section 401 water quality certification, and a Section 404 permit.

3.3 Geology/Soils

At the time a site-specific development is brought forward, the following biological mitigation shall be required:

Geotechnical Investigation

MM-GEO-1: Prior to issuance of grading permits for future development, a final development-specific geotechnical investigation shall be completed to the satisfaction of the City Engineer. The final development-specific geotechnical investigation shall address seismic design parameters related to foundation and footing requirements, expansive clay soil conditions, liquefaction, and groundwater in accordance with the California Building Code. The site preparation and grading measures identified in the final development-specific geotechnical investigation shall be identified on the grading plans prior to grading permit approval. The foundation, slab, wall, and other building design measures identified in the final development-specific geotechnical investigation shall be identified on building plans prior to building permit issuance.

3.4 Noise

At the time a site-specific development is brought forward, the following noise mitigation shall be required:

Future Exterior Use Areas

MM-NOI-1: Prior to the issuance of a building permit for the project site, the City shall require the Project Applicant to demonstrate that site design would include buildings or walls to shield any on-site noise-sensitive exterior use areas such as employee break areas from

traffic noise or would set back all exterior use areas at least (1) 21 feet from the western project site boundary and (2) 20 feet from the northern project site boundary.

If proposed development would not conform to these criteria, the City shall require (1) preparation of a noise technical analysis by a qualified professional prior to construction that illustrates noise reduction measures will reduce noise levels to 70 CNEL in exterior use areas and (2) identification of these noise reduction measures on the site plan.

Future Site Access

MM-NOI-2: With implementation of the Villa Avenue improvements (MM-TRA-3 and Feature-6), the posted speed limit for Villa Avenue shall be 25 miles per hour. Roadway improvements to Villa Avenue shall include features indicative of the reduced speed limit such as speed bumps, stop signs, crosswalks, reduced lane widths, etc. along the segment of Villa Avenue adjacent to residential uses as determined to be appropriate by the City Engineer.

Prior to the issuance of a building permit for the project site, the City shall require the Project Applicant to demonstrate that site access from Villa Avenue would be located within one-quarter mile of Dogwood Road (i.e., west of residences).

Prior to the issuance of a permit to pave Cooley Road from Aten Road to the project site, the City shall require the Project Applicant to demonstrate that secondary site access from Villa Avenue would be located within one-half mile of Cooley Road (i.e., east of residences).

If proposed development would not conform to these criteria, the City shall require (1) preparation of a noise technical analysis by a qualified professional prior to construction, and (2) noise-reduction measures are identified and included in the design.

3.5 Transportation/Traffic

At the time a site-specific development is brought forward, the following transportation/traffic mitigation shall be required:

MM-TRA-1: Prior to the construction of 300,000 square feet of development, the applicant shall install a traffic signal and restripe the Dogwood Road/East Villa Road intersection to the following:

- Southbound – provide a dedicated left-turn lane and shared thru/right-turn lane.
- Northbound – provide a dedicated left-turn lane, thru, and right-turn lane.
- Westbound – provide a dedicated left-turn lane, thru, and right-turn lane (with overlap phase).
- Eastbound – provide a dedicated left-turn lane and shared thru/right-turn lane.

MM-TRA-2: Prior to the construction of 900,000 square feet of development, the applicant shall install a traffic signal at the intersection of N. Dogwood Road and E. Commercial Street.

MM-TRA-3: Prior to issuance of the first occupancy permit, the applicant shall widen East Villa Road to 2-lane Arterial standards between N. Dogwood Road and the future Cooley Road.

MM-TRA-4: Prior to the issuance of an occupancy permit, the applicant shall either:

a. Signalize the E. Evan Hewes Highway/Old Highway State Route 111 (SR-111) intersection

OR

b. Install a raised median at the E. Evan Hewes Highway/Old Highway SR-111 intersection to limit the northbound and southbound approaches to right-turn out (northbound and southbound) movements.

MM-TRA-5: Prior to the issuance of an occupancy permit that would result in a total project square footage exceeding 1 million square feet, the applicant shall extend Cooley Road between Aten Road and the project site as a 2-lane roadway. Signalize the Cooley Road/Aten Road intersection and provide a dedicated westbound left-turn lane and two northbound lanes, one left-turn and one right-turn lane. Northbound Right-Turn Overlap (RTOL) Phasing should be provided.

MM-TRA-6: Prior to the issuance of an occupancy permit that would result in a total project square footage exceeding 1 million square feet, the applicant shall extend Cooley Road between Aten Road and the project site as a 2-lane roadway.

MM-TRA-7: Prior to issuance of the first occupancy permit that would result in a total project square footage exceeding 1 million square feet, the applicant shall provide the following at the intersection of N. Dogwood Road and East Villa Road:

- Southbound – provide a dedicated left-turn lane and shared thru/right-turn lane.
- Northbound – provide a dedicated left-turn lane, thru lane, and dual right-turn lanes.
- Westbound – provide a dedicated left-turn lane, a shared thru/left-turn lane, and a dedicated right-turn lane (with overlap phase).
- Eastbound – provide a dedicated left-turn lane and shared thru/right-turn lane.

A second southbound lane on Dogwood Road between East Villa Avenue and E. Commercial Street and a second eastbound lane on East Villa Avenue would be necessary. If Cooley Road was built between the site and E. Evan Hewes Highway, the second westbound left-turn lane at the Dogwood East Villa Road intersection and the second southbound lane on Dogwood Road would not be necessary.

MM-TRA-8: Prior to the issuance of an occupancy permit that would result in a total project square footage exceeding 1 million square feet, the applicant shall modify the signal timing at the intersection of N. Dogwood Road and E. Main Street to change the north/south approach to "protected left-turn" phasing. The north/south phasing at this intersection is

currently split phase. Split phasing is less efficient than protected left-turn phasing and is typically used where one reciprocal approach has a heavy left-turn movement and the opposing approach does not, thus, providing additional green time to that greater movement and increasing the delay at the minor approach. The left-turns at the north/south approaches are fairly balanced. Thus, changing this phase to protected left-turn phasing would improve operations at this location.

MM-TRA-9: Prior to the issuance of an occupancy permit that would result in a total project square footage exceeding 2 million square feet, the applicant shall provide a second northbound left-turn lane, a southbound right-turn overlap phase and a dedicated eastbound right-turn lane with an overlap phase at the intersection of SR-111 and E. Evan Hewes Highway.

3.6 Future Project Design Guidelines

The following design features applicable to the future development of the site shall be included in the Development Agreement:

Feature-1: Prior to issuance of the first occupancy permit, the applicant shall dedicate right-of-way along the project's Cooley Road frontage to the City Circulation Element standards of a 2-lane Collector.

Feature-2: Prior to issuance of the first occupancy permit, the applicant shall dedicate right-of-way along the project's Villa Avenue frontage to the City's Circulation Element standards of a 4-lane Arterial.

Feature-3: Prior to issuance of the first occupancy permit, the applicant shall dedicate right-of-way along the project's Dogwood Road frontage to the City's Circulation Element standards of a 6-lane Prime Arterial. .

Feature-4: Prior to the issuance of building permit that takes access from Dogwood Road, the applicant shall widen Dogwood Road to 4-lanes between Villa Road and E. Main Street.

Feature-5: Prior to issuance of the first occupancy permit, the applicant shall improve Villa Avenue between Dogwood Road and Cooley Road to 2-lane Collector standards.

Feature-6: Prior to issuance of the first occupancy permit, the applicant must provide a good faith effort to coordinate with the local transit authorities to provide a bus stop on Villa Avenue along the project frontage.

Feature-7: Prior to issuance of the first occupancy permit, the project shall provide documentation of adherence to the following TDM program to the satisfaction of the City Engineer:

1. Provide subsidized transit passes to all employees.
2. Provide a shuttle from heavier populated areas to the project site.

3. Provide preferred parking spaces for employees who carpool.
4. Allow annual monitoring of the TDM program by City staff.
5. Stagger work shift times to avoid the hours of 7:00 to 8:00 a.m. and 4:00 to 6:00 p.m. in terms of start and end times.
6. Provide bike lockers and showers.

Feature-8: Prior to issuance of building permits, the applicant shall provide payment of development impact fees (DIFs) in accordance with Municipal Code Chapter 20, Article V, Development Impact Fee.

4.0 Initial Study

1. Project Title: Dogwood Road at Villa Avenue

2. Lead Agency name and address:

   City of El Centro
   Planning Department
   1275 Main Street
   El Centro, California 92243

3. Contact person and phone number:

   Angel Hernandez, ~~Norma Villicaña,~~ Interim Community Development Director
   City of El Centro
   (760) 337-4545

4. Project location:

   Southeast Corner at Dogwood Road and Villa Avenue
   El Centro, California 92243
   APN 044-450-038

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

   Carl E. & Patricia J. Weiler Trustees
   Dubose Design Group

6. General Plan designation: General Industrial ~~(proposed)~~

7. Zoning: MG General Manufacturing (proposed)

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

   The project includes the annexation of a 330-acre site from the County of Imperial to the City of El Centro~~, a GPA to designate the site as General Industrial,~~ and a Pre-zone to MG General Manufacturing. Based on the proposed land use and zoning, future development of the site could include up to 5 MSF of manufacturing warehouse. Refer to Section 1.3 above for a complete project description.

9. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):

   County of Imperial
   Imperial Irrigation District
   Regional Water Quality Control Board

Imperial County Air Pollution Control District
Local Agency Formation Commission (Imperial County)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

☐ Aesthetics	☐ Greenhouse Gas Emission	☐ Population/Housing
☐ Agriculture and Forestry Resources	☐ Hazards & Hazardous Materials	☐ Public Services
☒ Air Quality	☐ Hydrology/Water Quality	☐ Recreation
☒ Biological Resources	☐ Land Use/Planning	☐ Tribal Cultural Resources
☐ Cultural Resources	☐ Mineral Resources	☒ Transportation/Traffic
☒ Geology/Soils	☒ Noise	☐ Utilities/Service System
		☐ Mandatory Findings Significance

DETERMINATION (To be completed by Lead Agency):

On the basis of this initial evaluation:

☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT (EIR) is required.

☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or (MITIGATED) NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or (MITIGATED) NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact answer should be explained where it is based on project specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis.)

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses", as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other California Environmental Quality Act process, an effect has been adequately analyzed in an earlier EIR or (mitigated) negative declaration. *Section 15063(c)(3)(D).* In this case, a brief discussion should identify the following:

   a. Earlier Analysis Used. Identify and state where they are available for review.

   b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c. Mitigation Measures. For effects that are "Less than Significant With Mitigation Measures Incorporated", describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a. The significance criteria or threshold, if any, used to evaluate each question; and

   b. The mitigation measure identified, if any, to reduce the impact to less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
I. AESTHETICS – Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒

No Impact.

Views

To illustrate public views in the project viewshed, a key map and four key viewpoint photos are provided as Figure 7 and Photographs 1 to 4. Below is a description of each key view.

Key View 1 – Dogwood Road at Villa Avenue looking east: This view includes the unstriped, 2-lane Villa Avenue roadway with dirt shoulders, overhead utility lines, the culvert over Dogwood Channel in the foreground, and agricultural fields in the midground; and trees associated with rural residences in the background. The area is flat, but there are no long distance views of mountains or other scenic resources that would comprehensively create a scenic vista.

Key View 2 – Villa Avenue at Cooley Road looking south: The unpaved, 2-lane dirt road adjacent to agricultural fields is visible in the foreground and midground views, with buildings and overhead utility lines interspersed with trees in the background. There are long-distant views of mountains in Mexico along the horizon.

Key View 3 – Cooley Road at the railroad looking north: This view includes the aforementioned unimproved Cooley Road, flanking agricultural fields, and a canal in the foreground and midground, with sparse trees and overhead utility lines visible in the background. There is no long-distant view of mountains or other scenic resources from this key view point.

Key View 4 – Dogwood Road at the railroad looking north: In the foreground of this view is the railroad crossing, Dogwood Road, and the Dogwood Canal. The midground includes the agricultural fields (on-site) and the IID facility, which contains a significant amount of power poles and tanks on a dirt lot. The background view includes overhead utility lines and space trees, with no long-distant view of mountains or other scenic resources.

Image source: USDA FSA NAIP (flown May 2016)

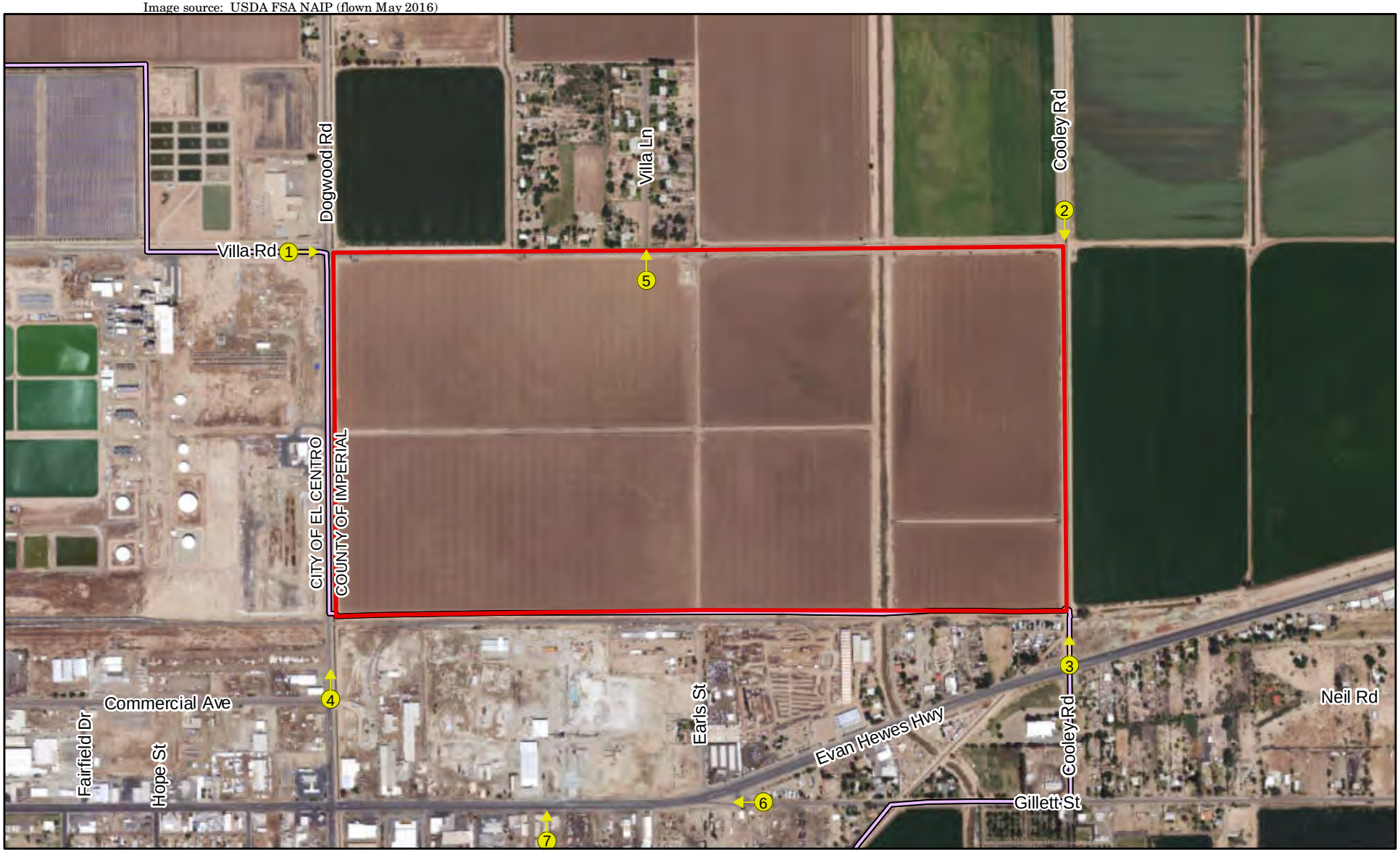

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FIGURE 7

Key Map

PHOTOGRAPH 1
Key View 1: Northwest Corner of Site
Looking East Along Villa Road

PHOTOGRAPH 2
Key View 2: Northeast Corner of the Site
Looking South Along Cooley Road

PHOTOGRAPH 3
Key View 3: Southeast Corner of the Site
Looking North Along Cooley Road

PHOTOGRAPH 4
Key View 4: Southwest of the Site
Looking North Along Dogwood Road

Character

As shown in the key views (see Photographs 1 to 4), the project site appears as a large level area of tilled soils from the surrounding public view points. Seasonally, the site would include low-lying row crops such as sugar beets. Due to the flat topography, the canals and dirt roads are not visible from the surrounding areas until the viewer is directly adjacent to those features. A substation and storage area is visible on the northern portion of the site adjacent to Villa Road. Overall, the site has a rural agricultural character similar to the surrounding area to the north and east.

The surrounding area includes a mix of agricultural, rural residential and industrial uses. The site is located on the edge of the County and City boundary where the character is in transition from agricultural use to urban uses. The surrounding agricultural uses are similar in appearance to the project site, and include unimproved dirt roadways and row crops (see Photographs 1 to 3). While some residences in the area include chain link fencing and maintained landscaping, most of the residences have inconsistent fencing, minimal landscaping and unimproved driveways that lead to a rural, non-uniform rural appearance (Photograph 5). The adjacent IID facility (see Photograph 4) and several of the industrial uses to the south (Photographs 6 and 7) along Evan Hewes Highway also include unscreened expanses of dirt, stockpiled materials, outdoor equipment and vehicle storage, manufacturing buildings, chain-link fencing, and a non-uniform appearance. Most of the industrial structures are simple with pitched roofs, corrugated metal or stucco surfaces, and minimal windows and articulation. Overall, the existing visual character is rural and the visual quality is low.

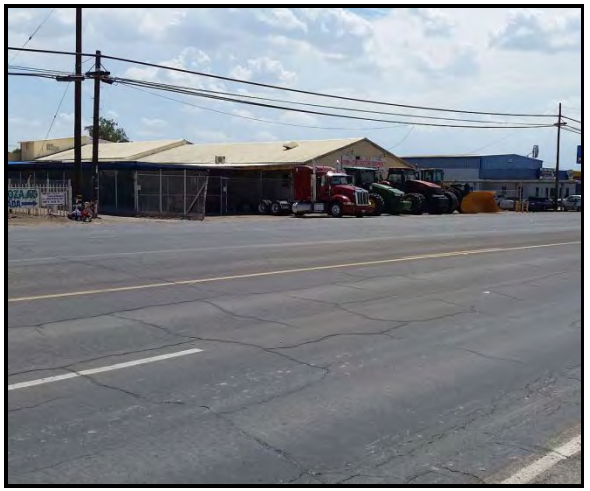
Scenic Resources and Vistas

The viewshed area consists of agricultural fields, rural residential, and industrial uses with low aesthetic value. The sparse mature trees and agricultural fields provide some scenic value; however, the overall scenic value provided is low. In conclusion, no significant scenic resources or vistas exist in the project viewshed.

Project Impacts

The proposed GPA and Annexation (project) would allow for future development that would convert the on-site agricultural fields to a large warehouse or warehouses with surface parking. Other possible features include a detention basin, rooftop and/or ground solar, and associated infrastructure. As indicated above, the agricultural fields provide scenic value, but the scenic value provided is intermittent and low quality. The proposed structures would block views looking across the site, including the views along Villa Road looking south towards the horizon. While future development would block views and remove the agricultural fields that provide some scenic value, this impact to scenic vistas would be a less than significant considering the existing low quality of the scenic resources and vistas.

PHOTOGRAPH 5
Community Character 1:
Residential along Villa Lane



PHOTOGRAPH 6
Community Character 2:
Commercial along
Evan Hughes Highway

PHOTOGRAPH 7
Community Character 3:
Industrial/Commercial along
Evan Hughes Highway

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

No Impact. While there are Eligible State Scenic Highways, there are no officially designated State Scenic Highways in Imperial County (California Department of Transportation 2017). Eligible highways include Interstate 8 and Highway 98 west of their intersection, Highway 78 to the east of Highway 86, and a portion of Highway 111 north of the Salton Sea. The project site is not located in the viewshed of any of these eligible highways. As the site is not within a scenic highway viewshed, no impact associated with obstructed views from a scenic highway would result. Thus, future development consistent with the project would have no impact to scenic resources within a state scenic highway.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐

Less than Significant Impact. As discussed above in Section I(a), the site currently consists of flat agricultural fields in an area containing patches of rural residential, agricultural fields, and industrial uses. The vicinity is a transition area from agricultural to industrial uses. The character of the area is rural and the existing visual quality is low. Refer to Section I(a) above for additional details regarding the existing visual appearance.

The proposed project would consist of a land use change to allow for the potential future construction of a manufacturing and warehouse facility. Such a development may include surface parking, a large warehouse or several large warehouse structures, detention basin, potential IID substation, rooftop and ground solar, and roadway improvements. The future development would be constructed in compliance with the Municipal Code building standards, including Chapter 29, Article II, Division 4. - Manufacturing Zones design standards. These design standards include site planning, natural surveillance, architecture, roof treatments, parking and circulation, loading facilities, landscaping, walls and fences, screening, and lighting. The future development at the site is assumed to be in conformance with the Municipal Code and would comply with these design standards. Contrary to many of the existing industrial sites that were constructed prior to the enactment of these Municipal Code design standards, the future development at the site would be required to screen equipment and loading areas, provide visual setbacks, provide articulated architectural style, and include landscaping. Adherence to these standards would ensure the project would not substantially degrade the existing visual quality of the site or surroundings.

The future development consistent with the project would convert the site character from rural agricultural to an urbanized industrial development. Considering the allowed FAR and that the development would be subject to the zoning code design standards, the future industrial manufacturing development would be substantially larger with a more modern appearance relative to the existing industrial developments in the area. While this would result in a change in character, this change is not considered an adverse effect. While this would contrast with the surrounding character, this change would not result in degradation of character.

Overall, the future development of the site would not degrade visual quality or character. Thus, impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Less than Significant Impact. The site is currently undeveloped, and would allow for future development of a manufacturing facility on-site. All lighting associated with future site development would be required to comply with the City's illumination requirements (Chapter 29, Article II, Division 4. - Manufacturing Zones design standards, (l) Lighting), which specifically states "[a]ll lighting shall be shielded to confine light spread within the site boundaries and "sky-glow" impacts" and that "[l]ighting shall be maintained at all times to the standards approved for the site." With adherence to the City's Municipal Code that specifically requires lighting be shielded, lighting impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact

II. AGRICULTURAL/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 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 forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. – Would the project:

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

Less than Significant Impact.

Direct Conversion

The Farmland Mapping and Monitoring Program classifies approximately three-fourths of the site as Farmland of Statewide Importance and the remaining fourth as Prime Farmland (California Department of Conservation 2017). While the project would convert Prime Farmland and Farmland of Statewide Importance to a non-agricultural use, this loss of farmland was addressed in previous environmental documents.

The City and the County both recognize the importance of farmland resources. As such, both jurisdictions have addressed the preservation of farmland in their respective general plans. As a part of this planning, the jurisdictions have addressed where farmland preservation should occur and where lands may be converted to an urban use. The adopted County General Plan states that conversion of an agricultural site to a non-agricultural use is allowed "for annexation to a city, where needed for use by a public agency, for renewable energy purposes, in accordance with the Renewable Energy and Transmission Element; where a mapping error may have occurred, or where a clear long term economic benefit to the County can be demonstrated through the planning and environmental review process." Thus, the proposed change from agricultural to urban uses would be consistent with the County General Plan policies regarding the conversion of farmland, as it would provide a long-term economic benefit to the County.

The City's General Plan designates the site as ~~Planned Industrial~~General Industrial ~~and Low Density Residential~~, and the site was pre-zoned for such uses as well. This designation was established in the ~~2003~~ 2021 General Plan update, and the associated loss of agricultural use was addressed in the associated environmental document. As the agricultural land conversion was previously addressed in the City's 2003 General Plan EIR, and no additional conversion beyond that previously considered would occur, direct impacts are less than significant.

Indirect Conversion

Development projects near or adjacent to Farmland have potential to result in indirect conversion of adjacent land, as proposed uses could introduce a land use compatibility issue that would restrict agricultural operations. The Farmland Mapping and Monitoring Program classifies the sites to the northwest, northeast, and east as Farmland of Statewide Importance and Prime Farmland (California Department of Conservation 2017). The remaining areas to the south, west, and north are designated as Urban and Built-up Land or Other Land. The surrounding areas designated as Farmland of Statewide Importance or Prime Farmland are currently in agricultural use. Thus, the project is adjacent to Farmland to the north and east, and has potential to indirectly affect those agricultural resources.

The potential impact of locating urban uses in proximity to existing agricultural uses was also addressed in the 2003 General Plan EIR, and mitigation was identified to reduce this potential to less than significant. The relevant mitigation measure identified in the General Plan EIR is the provision of buffers between agricultural and non-agricultural uses (Implementation Program COS-2). The remaining General Plan EIR mitigation measures related to residential uses do not apply, as the implementation of the project would remove

the residential designation on the western third of the site and would not allow for future residential on-site. Thus, providing buffers would avoid potential compatibility issues that could result in indirect conversion of agricultural land. Currently, the existing roadways and canals adjacent to the site on the north and east provide a buffer of approximately 90 to 95 feet to the north and 130 to 135 feet to the east. While these existing buffers would be adequate to avoid potential compatibility issues between industrial and agricultural uses, it is noted that the proposed noise mitigation NOI-1 would require setbacks from the roadways that would further separate proposed industrial and existing agricultural uses. Considering the limitation of proposed uses to industrial and the buffers, future development of the project site would not result in the conversion of nearby agricultural uses due to land use incompatibility issues.

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

No Impact. Imperial County filed non-renewal on all Williamson Act contracts, effective January 2011; however, pursuant to Government Code Section 51246 the contracts remain in full force and effect until the contracts terminate (California Department of Conservation 2016). The project site and adjacent agricultural areas are not covered by a Williamson Act contract (California Department of Conservation 2017). Therefore, the project would not conflict with zoning for agricultural use or Williamson Act Contract.

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

No Impact. The project site is not zoned as forest land or timberland and does not include any forest land or timberland. No impact to forest land or timberland would occur.

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

No Impact. See response to II(c) above.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact. See responses to II(a to c) above.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact

III. AIR QUALITY

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

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

Less than Significant Impact with Mitigation Incorporated. The following analysis is based on an Air Quality Analysis prepared by RECON Environmental in 2018 (RECON 2018a; Appendix A).

The ICAPCD is the air district responsible for the project area. The project site is in non-attainment areas for federal and/or state air quality standards for ozone, particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}), and particulate matter with an aerodynamic diameter of 2.5 microns or less ($PM_{2.5}$). Thus, the ICAPD has developed the following air quality plans to address air quality in the basin:

- Imperial County 2009 State Implementation Plan for Particulate Matter Less than 10 Microns in Aerodynamic Diameter;
- Imperial County 2013 State Implementation Plan for the 2006 24-Hour $PM_{2.5}$ Moderate Non-attainment Area; and
- Imperial County 2017 State Implementation Plan for the 2008 8-Hour Ozone Standard.

The primary concern for assessing consistency with air quality plans is whether the project would induce growth that would result in a net increase in air emissions that exceeds the assumptions used to develop the plan. The basis for the air quality plans is the population growth and regional VMT projections, which are based in part on the land uses established by local general plans. As such, projects that propose development that is consistent with the local land use plans would be consistent with growth projections and air quality plans emissions estimates. In the event that a project would result in development that is less dense than anticipated by the growth projections, the project would be considered consistent with the air quality plans. In the event a project would result in development that results in

greater than anticipated growth projections, the project would result in air emissions that may not have been accounted for in the air quality plans and thus may obstruct or conflict with the air quality plans.

The project would be consistent with the existing land use designation as amended in the 2021 GPA. ~~for the western third of the project site; however, it would change the land use designation for the eastern two-thirds of the project site from Low Density Residential to Planned Industrial.~~ As detailed in the Air Quality Analysis, the previous Low Density Residential designation would ~~this would~~ result in additional air emissions as compared to development under the existing land use designations and would thereby result in air emissions that were not accounted for in the air quality plans (RECON 2018a). Impacts would be significant prior to mitigation. The mitigation measures AIR-1 and AIR-2 would address the project's inconsistency with the ICAPCD air quality plans (See Section 3.0).

MM-AIR-1 would require the change in land use be reported to the Southern California Association of Governments so that the regional population and VMT projections may be updated for use in the next air quality plan updates. The provision of this information would assist ICAPCD in revising the air emission forecasts.

MM-AIR-2 would require the Project Applicant for any future development proposal consistent with the General Plan Amendment and Annexation to contribute to the ICAPCD Operational Development Fee Mitigation Program. The ICAPCD Operational Development Fee Mitigation Program is designed to assist in the off-site mitigation of air emissions resulting from new land development in the Imperial County. Through contribution to this program, the project would offset ozone precursors and PM_{10} emissions. Therefore, impacts would be reduced to a level that is less than significant with mitigation incorporated.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐

Less than Significant with Mitigation Incorporated. Future development consistent with the 2021 General Plan Amendment and proposed Annexation could result in the generation of air emissions during both construction and operation. Construction impacts are short term and result from fugitive dust, equipment exhaust, and indirect effects associated with construction workers and deliveries. Mobile source emissions would originate from traffic generated by the project site. Area source emissions would result from the use of natural gas, consumer products, as well as applying architectural coatings and landscaping activities.

As detailed in the project Air Quality Analysis, potential emissions due to construction and operation of future development of the project site were calculated using the California Emissions Estimator Model Version 2016.3.2 program and emissions due to construction of the roadway improvements were calculated using the Road Construction Emissions Model

Version 8.1.0 (RECON 2018a). As shown in Table 2, construction emissions would exceed the applicable ICAPCD significance thresholds for oxides of nitrogen (NO_X) and PM_{10}. As shown in Table 3, operational emissions would exceed the applicable ICAPCD significance thresholds for reactive organic gases (ROG), NO_X, and PM_{10}. Therefore, future development consistent with the GPA and Annexation would potentially contribute to an air quality violation and would be significant. Mitigation measures AIR-2, AIR-3, AIR-4, AIR-5, and AIR-6 would reduce these potentially significant impacts to below a level of significance, as described below.

Table 2
Summary of Worst-case Construction Emissions
(pounds per day)

Year	Pollutant				
	ROG	NO_X	CO	PM_{10}	$PM_{2.5}$
Future Project Site Development					
Year 1	58	308	226	11,358	1,140
Year 2	57	209	199	11,357	1,140
Year 3	57	205	192	11,357	1,140
Year 4	56	192	185	11,357	1,140
Year 5	55	191	181	11,357	1,140
Maximum Daily Project Site	58	308	226	11,358	1,140
Off-Site Roadway Improvements					
Intersection Signalizations	1	10	10	1	<1
Turn Lane Installations	2	17	16	1	1
Improving Villa Avenue	2	23	16	1	1
Improving Cooley Road	2	20	15	1	1
Improving Dogwood Road	2	19	15	1	1
Maximum Daily Off-Site	5	50	41	3	2
Maximum Daily Emissions					
Maximum Daily	63	**358**	268	**11,360**	1,143
Significance Threshold	*75*	*100*	*550*	*150*	-
Exceeds Threshold?	**No**	**Yes**	**No**	**Yes**	-

SOURCE: RECON 2018a.
NOTE: Totals may vary due to independent rounding.
ROG = reactive organic gas; NO_X = oxides of nitrogen; CO = carbon monoxide;
PM_{10} = particulate matter with an aerodynamic diameter 10 microns or less;
$PM_{2.5}$ = particulate matter with an aerodynamic diameter 2.5 microns or less

Table 3 Summary of Worst-case Operations Emissions (pounds per day)						
Year	Pollutant					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Phase 1 - 1 MSF Total						
Mobile	11	60	114	0	8,644	863
Area	26	9	7	0	1	1
Total	37	69	121	0	8,645	864
Significance Threshold	*55*	*55*	*550*	*150*	*150*	-
Exceeds Threshold?	**No**	**Yes**	**No**	**No**	**Yes**	-
Phase 2 - 2 MSF Total						
Mobile	21	120	227	1	17,289	1,726
Area	52	17	15	0	1	1
Total	74	138	242	1	17,290	1,727
Significance Threshold	*55*	*55*	*550*	*150*	*150*	-
Exceeds Threshold?	**Yes**	**Yes**	**No**	**No**	**Yes**	-
Phase 3 - 3 MSF Total						
Mobile	32	181	341	1	25,933	2,589
Area	79	26	22	0	2	2
Total	111	207	363	1	25,935	2,591
Significance Threshold	*55*	*55*	*550*	*150*	*150*	-
Exceeds Threshold?	**Yes**	**Yes**	**No**	**No**	**Yes**	-

SOURCE: RECON 2018a.
NOTE: Totals may vary due to independent rounding.
ROG = reactive organic gas; NO_X = oxides of nitrogen; CO = carbon monoxide;
PM_{10} = particulate matter with an aerodynamic diameter 10 microns or less.

Mitigation measure AIR-3 would require implementation of all on-site construction mitigation measures recommended by ICAPCD; mitigation measure AIR-4 would require that the Project Applicant avoid simultaneous construction of road improvements; and mitigation measure AIR-5 would further require the Project Applicant contribute to the Carl Moyer Program consistent with Policy Number 5 In-Lieu Mitigation Fee Determination methodology to mitigate remaining construction emissions.

Mitigation measure AIR-6 would require implementation of all on-site operation mitigation measures recommended by ICAPCD; and mitigation measure AIR-2 would further require the Project Applicant contribute to the ICAPCD Operational Development Fee Mitigation Program to mitigate remaining operational emissions.

As future development of the site would be required to fund local air emission offsets that would reduce emissions in the air basin, construction and operation would not result in a net increase in emissions that would contribute to an air quality violation. Air impacts would be reduced to a level that is less than significant.

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

Less than Significant with Mitigation Incorporated. Refer to response III(b) above. Construction and operation emissions would be offset through contribution to local air emission offsets programs, thus, the future development would not result in a net increase in criteria pollutant emissions that would contribute to an air quality violation. Impacts would be reduced to a level that is less than significant with mitigation incorporated.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

Less than Significant Impact. Sensitive receptors in the vicinity of the project site include residential uses existing on eight properties to the north of Villa Avenue and the Palm Villa Mobile Home Park located near the southeast corner of the project site. Future development of the project site may expose sensitive receptors to increased pollutant concentrations including diesel particulate matter (DPM) from construction equipment use and hauling trips, and CO hotspots from traffic generated by future development of the project site.

As detailed in the project Air Quality Analysis (RECON 2018a), air dispersion modeling was performed to assess cancer risk associated with DPM generated by future project construction. Cancer risks were estimated to be 2.9 in one million. Incremental cancer risk from DPM exposure is anticipated to be below ICAPCD's ten in one million threshold for all receptors.

Localized CO concentrations are a direct function of motor vehicle activity at signalized intersections (e.g., idling time and traffic flow conditions), particularly during peak commute hours and meteorological conditions. Under specific meteorological conditions CO concentrations may reach unhealthy levels with respect to local sensitive land uses. Projects may contribute to localized CO concentrations that exceed ambient air quality standards ("hotspots") if they result in increased average delay at signalized intersections operating at or below level of service (LOS) E or causing an intersection that would operate at LOS D or better without the project to operate at LOS E or F. With incorporation of intersection improvements required by mitigation from the Transportation Impact Analysis prepared by LLG (2018), future development of the project site would not result in or contribute intersection traffic volumes that result in a CO hotspot. Therefore, traffic generated by future

development of the project site would not result in the exposure of sensitive receptors to substantial CO concentrations.

The project would not result in, or expose, sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

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

Less than Significant Impact. A potential odor impact would occur if the project would include development of sensitive receptors such as residential uses in the vicinity of existing odor sources or if the project would generate include odor sources that may affect a substantial number of persons.

The project site would be zoned General Manufacturing. As specified in the City Code of Ordinances Section 29-68 this zone is intended to provide for the development of manufacturing, processing, fabrication, and assembly of goods and materials, which do not in their operation or maintenance create offensive, obnoxious, or dangerous conditions that are detectable beyond the boundary of the zone. Additionally, as specified by ICAPCD Rule 407, "no person shall discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons."[1]

During construction, diesel equipment may generate some nuisance odors. Sensitive receptors near the project site include residential uses to the west and south of the project site; however, exposure to odors associated with project construction would be short term and temporary in nature.

Certain outdoor operations are permitted in the General Manufacturing zone. As general manufacturing uses are generally indoors there is limited likelihood for the generation of substantial odors at nearby properties. Land uses in the vicinity of the project site are generally industrial or agricultural. Residential uses exist on eight properties to the north of Villa Avenue (40 feet north of the project site boundary) and at the Palm Villa Mobile Home Park (100 feet south of the southeast boundary of the project site). The prevailing wind condition in Imperial County is westerly-northwesterly from fall through spring, however a secondary southeasterly wind condition is also evident (ICAPCD 2017); monthly average wind speeds in El Centro vary from 5.5 mph in November to 10.0 mph in April (Western Regional Climate Center 2017).

[1]The ICAPCD definition of "air contaminant" is inclusive of any discharge into the atmosphere that is odorous. Enforcement is applicable to odors emanating from any source other than agricultural operations.

Odors generated from construction would be temporary and intermittent and would largely dissipate at short distances from the source. Based on the distance from the project and the nature of allowed activities, the project would not create objectionable odors affecting a substantial number of people. Additionally, generation of objectionable odors which cause annoyance to a substantial number of people during operation would be prohibited by City Code development performance standards and ICAPCD rules. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES				
Would the project:				
a. Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	☐	☒	☐	☐

Less than Significant with Mitigation Incorporated. To address biological resources, a Biological Resources Technical Report was completed by Barrett's Biological Surveys in July 2017 (Barrett 2017). This effort included two general biological site surveys as well as a habitat assessment for Western Burrowing Owl conducted by qualified local biologists. The following analysis is based on the Biological Resources Technical Report (Barrett 2017) as well as current regulations (Appendix B).

The approximately 330-acre project site consists of agricultural lands surrounded by residential, industrial, and agricultural uses. Existing vegetation located on-site includes ruderal vegetation consisting of weedy plants, such as saltcedar, Russian thistle, and white horse nettle. The off-site roadway improvement areas consist of disturbed areas, with or near canals.

The only sensitive species located on-site was burrowing owl. Both burrowing owls and burrows were located within the project boundary along the IID Central Drain Three that runs north-south in the central area of the site. Burrowing owls are a designated CDFW species of concern. No other candidate, sensitive, or special status species were observed on-site. Given the presence of burrowing owls, the proposed project could result in adverse impacts to a special status species, resulting in a potentially significant impact. To avoid this impact, at the time a site-specific development proposal is brought forward, the project applicant would be required to implement Mitigation Measure BIO-1. This mitigation measure requires the completion of preconstruction burrowing owl surveys and, if needed, nest avoidance, relocation measures, and compensatory habitat mitigation in accordance with the CDFW protocol. Mitigation in accordance with the CDFW protocol would ensure impacts to burrowing owls would be less than significant.

There is potential for bird species protected by the CDFG Code Section 3503 to nest on-site. Thus, future grading and construction activities have the potential to result in significant impacts to protected nesting birds. To ensure compliance, any future development proposal would be required to implement Mitigation Measure BIO-2. This mitigation requires the completion of preconstruction nesting bird surveys and, if needed, nest avoidance measures. Mitigation in accordance with the CDFG Code Section 3503 requirements would ensure impacts to nesting birds would be less than significant.

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

Less than Significant with Mitigation Incorporated. Based on the findings of the Biological Resources Technical Report, the site may contain wetland or non-wetland waters under the jurisdiction of the Army Corps of Engineers, Regional Water Quality Control Board, and/or the California Department of Fish and Wildlife. More specifically, the on-site channels and drains are potentially jurisdictional. As no specific project is proposed at this time, it is speculative to identify specific impacts to these potentially jurisdictional habitats. None-the-less, future development affecting on- and off-site channels and drains would be required to comply with existing regulations that ensure impacts would be reduced to below a level of significance. These regulations include the Clean Water Act Section 404, and Fish and Game Code 1602. Mitigation measure BIO-3 is proposed to ensure future development would be in compliance with these regulations. With the implementation of BIO-3, significant impacts to jurisdictional habitats would be avoided and impacts would be less than significant.

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

Less than Significant with Mitigation Incorporated. Refer to above response. Based on the findings of the Biological Resources Technical Report, the project could result in impacts to jurisdictional habitat. Thus, mitigation measure BIO-3 would be required to ensure future development would be in compliance with these regulations and ensure impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒

No Impact. The project site does not serve as a nursery site. The area is not within or near an established wildlife corridor. The project would result in no impact related to wildlife corridors or nursery sites.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. 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. The proposed improvements would not conflict with any of these plans because the project site is not within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
V. CULTURAL RESOURCES				
Would the project:				
a. Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?	☐	☐	☒	☐

Less than Significant Impact. A Cultural Resource Survey was conducted by RECON Environmental, Inc. for the project on August 18, 2017 (RECON 2017; Appendix C). The following analysis is based on the results of this survey as well as existing regulations.

A record search was obtained from the South Coast Information Center, which identified 26 cultural resources and six historic addresses within a one-mile radius of the project site. None of the historic addresses were within or adjacent to the project site. Five of the cultural resources were mapped within or adjacent to the project site, and are as follows:

- P-13-009015 (a segment of the Alder Canal)
- P-13-009091 (a section of Central Drain Three)
- P-13-009092 (a segment of an unnamed east-west canal)
- P-13-009016 (a portion of a power line)
- P-13-009037 (a segment of the Holton Interurban Railroad)

A field search of the project site was also conducted by RECON archaeologist and Native American monitors from Red Tail Monitoring on August 1 and 2, 2017. The five historic sites were identified (see list above), along with two additional resources; Dogwood Canal (8757-HCL-1) and on-site concrete canals.

Of these seven nearby and on-site resources, the following four have potential to be affected by the project due to their location: Dogwood Canal (8757-HCL-1), a section of Central Drain Three (P-13-009091), on-site concrete canals, and a segment of the Holton Interurban Railroad (P-13-009037). These four potentially affected resources were evaluated for historical significance based on the four state criteria listed in CEQA. Due to the lack of association with a historical event, important historical persons, distinctive characteristics, or potential to yield significant historical information, the Dogwood Canal, Central Drain Three, and the on-site concrete canals were determined to not be significant historical resources. However, the Holton Interurban Railroad line is a significant historical resource under CEQA, as it qualifies under the second criterion due to its association with W. F. Holt and the development of the Holton Power Company in 1903–1904.

Future construction within the project site would likely cause alterations to the existing railroad track, as it is possible that construction of a spur track from the Holton Interurban Railroad into the project site could occur. The existing portion of the Holton Interurban Railroad is over 100 years old and appears to have been in almost continuous use. As such, it has been subject to maintenance, upgrades, and modifications to bring it up to current standards and needs. The current tracks, sleepers, and ballast are replacements resulting from regular maintenance of the tracks, so their replacement in a small section of the route would not be a significant adverse effect on this historical resource. A spur line to the industrial area south of the project has been constructed since 1979, altering the original configuration of the route segment being evaluated. Alteration of the siding would not be a significant adverse effect to the integrity or significance of the railroad, resulting in a less than significant impact.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒

No Impact. A field search of the project site was conducted by RECON archaeologist and Native American monitors from Red Tail Monitoring on August 1 and 2, 2017. No previously unrecorded prehistoric archaeological resources were found during the site survey. In addition, the record search did not yield any previously recorded archaeological resources within the project site or its vicinity. In addition, the integrity of the project area has been compromised through previous agricultural uses and development. Due to these conditions and results of the survey, the potential for unknown significant subsurface archaeological resources to be present is considered low, and future development of the site would have no impact to significant archaeological resources.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

No Impact. The soils on-site consist of silty clay and silty clay loams of the Imperial, Imperial-Glenbar, and Meloland-Holtville soil groups (Landmark Consultants, Inc. 2017), which have a low potential to yield significant paleontological resources. In addition, the integrity of the project area has been compromised through previous agricultural and urban uses. Overall, the potential for significant paleontological resources to be present on-site is considered low, and future development of the site would have no impact to significant paleontological resources.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Disturb human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

No Impact: No cemeteries, formal or informal, have been identified on-site or within the project vicinity. In addition, the project would be required to comply with California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5) that require proper handling of human remains. Compliance with these regulations would ensure any unforeseen human remains would not be impacted.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
VI. GEOLOGY/SOILS				
Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐

Less than Significant Impact. A Geotechnical Report was prepared by Landmark Consultants, Inc. dated September 2017 for the project (Appendix D). The following geology and soils analysis is based on this report.

The project site is located in the seismically active area of Imperial Valley in the southern California region, which contains numerous faults associated with the San Andreas fault system. The San Andreas fault system includes the San Andreas, San Jacinto, and Elsinore fault zones. The Imperial fault, located within this region as well, represents a transition from the more continuous San Andreas fault to a more echelon pattern of the faults under the Gulf of California.

In relation to the project site, the nearest mapped Alquist-Priolo fault zone is the Imperial fault approximately 2.9 miles to the east of the project site. No known fault ruptures or faults are located within the project site. Thus, future development within the project site would not expose people to an increased risk involving rupture of a known earthquake fault. A less than significant impact related to the exposure of people or structures to an earthquake-related rupture would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
ii) Strong seismic ground shaking?	☐	☒	☐	☐

Less than Significant Impact With Mitigation Incorporated. As indicated above, the site is located in the seismically active Imperial Valley of the southern California region. As such, the project site is considered likely to be subjected to moderate to strong ground motion from earthquakes in the region, especially from earthquakes along the Imperial, Brawley, and Superstition Hills faults.

Ground motions are dependent primarily on the earthquake magnitude and distance to the rupture zone. Acceleration magnitudes are also dependent upon attenuation by rock and soil deposits, direction or rupture, and type of fault. As a result, ground motions may vary considerably in the same general area. Based on these factors, the Geotechnical Report (Landmark Consultants, Inc. 2017) determined that the maximum considered earthquake geometric mean peak ground acceleration value for the project site is 0.66g.

The project consists of the annexation of the site from the County to the City, a GPA and a Pre-zone. While no specific development is proposed at this time, any future development within the project site would be required to comply with the California Building Codes. In addition, future development within the project site would be required to comply with the City of El Centro General Plan, which includes policies related to seismicity and Implementation Programs S-1 to S-3 related to seismic safety. The City's General Plan policies include the following:

- **City Seismicity Policy 1.1**: Reduce the risk of impacts from seismic hazards by applying proper development engineering, building construction, and retrofitting requirements.

- **City Seismicity Policy 1.2**: Restrict land uses in areas determined to be subject to seismic hazards and require adequate environmental review and mitigation measures for development proposed within a geological hazard area.

In compliance with the City's General Plan policies and implementation programs (S-1 to S-3), any future development proposal within the project area shall implement mitigation measure GEO-1. GEO-1 requires that future site development comply with a project-specific geotechnical report that addresses these building codes. With adherence to the California Building Code and the associated recommendations set forth in a project-specific geotechnical report, potential risks associated with strong seismic ground shaking would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
iii) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐

Less than Significant Impact with Mitigation Incorporated. Liquefaction generally occurs when granular soil below the water table is subjected to vibratory motions, such as those produced by earthquakes. Four conditions are generally required for liquefaction to occur: the soil must be saturated; the soil must be loosely packed; the soil must be relatively cohesionless; and groundshaking of sufficient intensity must occur to function as a trigger mechanism. All four of these conditions exist to some degree within the project site. As such, there is the potential for liquefaction induced settlements and ground failure.

As indicated in the response above, the project proposes land use changes, but no site-specific development. To ensure compliance with the California Building Code and in accordance with the City's policies, future development proposals within the project site would be required to implement mitigation measure GEO-1. GEO-1 requires that future site development comply with a project-specific geotechnical report that addresses these building codes, included seismic requirements. With adherence to the California Building Code and the associated recommendations set forth in a project-specific geotechnical report, potential risks associated with liquefaction would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
iv) Landslides?	☐	☐	☐	☒

No Impact. The site is in a relatively flat area and is not located along any bluffs. No ancient landslides are shown on geologic maps and no indications of landslides were observed during the site investigation (Landmark Consultants, Inc. 2017). Future buildout of the project site would not result in any impacts related to landslides.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

Less than Significant Impact. The site is currently vacant, relatively flat, and the surface primarily consists of silty clay and silty clay loams of the Imperial, Imperial-Glenbar, and Meloland-Holtville soil groups (Landmark Consultants, Inc. 2017). The project consists of the annexation of the site from the County to the City, a GPA and a Pre-zone. While no specific development is proposed at this time, any future construction activities would temporarily disturb on-site soils, thereby increasing the potential for soil erosion to occur. In addition, future development would increase impervious area, which has potential to result in an increase in runoff volume and rates.

The City's General Plan Implementation Program PF-12 and S-6 require the implementation of BMPs in accordance with the NPDES Permit and proper drainage facilities to handle runoff. This program is implemented via the City's Municipal Code grading regulations that require the preparation of an erosion control plan prior to the issuance of a grading permit (Article XIX, section 7-124) and that any future construction implement BMPs to control soil erosion ((Article VII, Division 1, Section 22-707; Ord. No. 15-05, §1, 4-21-15). As compliance with these regulations ensure that no significant soil erosion impacts would occur and future development at the project site would be subject to these regulations, the project would have a less than significant impact related to substantial soil erosion.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐

Less than Significant Impact with Mitigation Incorporated. Refer to responses VI(i) to VI(iv), above. In addition to those previously identified conditions, it is noted that the native surface clays have a moderate to high swell potential, as the clay is expansive when wetted and can shrink with moisture loss. Future grading and construction at the site would be required to comply with the California Building Code. As indicated above, future development proposals within the project site would implement mitigation measure GEO-1 to ensure compliance and avoid potential impacts related to unstable soils. With the implementation of mitigation measures GEO-1, future development within the project site would have a less than significant impact related to soil stability.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☒	☐	☐

Less than Significant Impact with Mitigation Incorporated. Refer to responses VI(i) to VI(iv) and V(c), above. The surface soils within the project site consist primarily of silty clay and silty clay loams of the Imperial, Imperial-Glenbar, and Meloland-Holtville soil groups. Subsurface soils consist of silty clay and clay to a depth of 8 feet, while medium dense to dense silty sand and silt are encountered from 8 to 19 feet (Landmark Consultants, Inc. 2017). Due to the clay content, the surface soils, they have potential to be considered expansive, as they exhibit a moderate to high swell potential.

As indicated in the response above, the project proposes land use changes, but no site-specific development. To ensure compliance with the California Building Code and in accordance with the City's policies, future development within the project site would be required to implement mitigation measure GEO-1. GEO-1 requires that future site development comply with a project-specific geotechnical report that addresses these building codes, including seismic requirements. With adherence to the California Building Code and the associated recommendations set forth in a project-specific geotechnical report, potential risks associated with expansive soils would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

No Impact. No septic tanks are proposed, nor would septic tanks be used in conjunction with future development for the project site.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS				
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Less than Significant Impact. A GHG Analysis report (RECON 2018b; Appendix E) was completed to address the change in GHG emissions that would result from implementation

of the future development allowed by the proposed project. The following analysis is based on this report.

Currently, the site generates GHG emissions primarily through agricultural water usage, which is on average 1,921 acre-feet per year. Buildout of the project site under the General Manufacturing land use designation would result in GHG emissions during both construction and operation of future facilities. GHG sources during construction would primarily consist of employee trips, construction equipment use, hauling, and water use. Operational emission sources were assumed to include vehicular trips, energy use, area-source emissions (landscape equipment), water usage, and solid waste.

GHG emissions associated with buildout of the project site were calculated using the California Emissions Estimator Model Version 2016.3.2 program and emissions due to construction of the roadway improvements were calculated using the Road Construction Emissions Model Version 8.1.0 (RECON 2018b). Future development of the site could result in annual equivalent emissions of 11,403 metric tons (MT) of carbon dioxide equivalent (CO_2E) upon buildout of Phase 1; 22,058 MT CO_2E upon buildout of Phase 2; and 32,713 MT CO_2E upon buildout of Phase 3.

No GHG emission significance threshold has been formally adopted by the City or the Imperial County Air Pollution Control District. To assess the significance of the project GHG emissions, the adopted Antelope Valley Air Quality Management District (AQMD) and Mojave Desert Air Pollution Control District (APCD) threshold was utilized. The AQMD and APCD GHG emissions significance threshold is 100,000 short tons of CO_2E per year (90,718 metric tons). This threshold was determined to be the appropriate threshold based on the similar climate conditions, similar land use patterns, and proximity relative to the ICAPCD. Refer to the GHG Analysis and the 2016 California Environmental Quality Act (CEQA) and Federal Conformity Guidelines and Mojave Desert APCD's 2016 California Environmental Quality Act (CEQA) and Federal Conformity Guidelines for additional information regarding this threshold.

Buildout of the project site with 3 MSF of manufacturing warehouse uses would result in emissions that would be less than the significance threshold, the project's contribution of GHG emissions to cumulative emissions would be less than cumulatively considerable, and impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Less than Significant Impact. State GHG emissions reduction policy was established by Executive Orders S-3-05 and B-30-15 and subsequently codified by Assembly Bill (AB) 32 and Senate Bill (SB) 32. As directed by AB 32 and SB 32, CARB developed the Original Scoping Plan that outlined the state regulatory programs needed to reach these goals and

has subsequently updated the Scoping Plan. As detailed in the project GHG Analysis, the project would not conflict with state regulatory programs intended to reduce GHG emissions (RECON 2018b).

Regional GHG emissions reduction policy includes the Southern California Association of Governments' (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is intended to create more compact communities in existing urban areas, providing neighborhoods with efficient and plentiful public transit, abundant and safe opportunities to walk, bike and pursue other forms of active transportation, and preserving more of the region's remaining natural lands.

Future development of the project site would be required to include a TDM in accordance with the City's standard practice that would reduce single-passenger vehicle ridership and encourage other modes of transportation. These required measures include preparation of a TDM plan (see Section 3.0, Mitigation Monitoring and Reporting Program), provision of shower and locker facilities, bicycle and motorcycle parking, extension of sidewalks, construction of a transit stop, and improvements to on-site circulation elements. Through incorporation of these features the future development of the project site would support achievement of the goals of the 2016 RTP/SCS. Therefore, the project would not conflict with the 2016 RTP/SCS.

The project would not conflict with state or regional GHG emissions reduction policies. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
VIII. HAZARDS/HAZARDOUS MATERIALS				
Would the project:				
a. Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

Less than Significant Impact. A Phase I Environmental Site Assessment (ESA) was prepared by GS Lyon Consultants, Inc. dated September 2017 for the project site (Appendix F). The following hazards and hazardous materials analysis is based on this report.

The ~~proposed GPA and~~ Annexation project would allow for the future development of warehouses and general manufacturing buildings. As indicated in the Phase I ESA, the potential for asbestos containing materials (ACM) and lead-based paint existing at the project site is very low due to lack of on-site structures and development. Residues of currently available pesticides and currently banned pesticides, such as DDT/DDE, may be represented in near surface soils due to the past use of the site as agricultural fields. However, the concentration of these pesticides are typically less than 25 percent of the current regulatory threshold within the Imperial Valley, and is therefore not considered a

significant environmental hazard. Aboveground storage tanks were located within the sewer lift station and fenced area that are adjacent to the north boundary of the project site. No other operations that use, treat, store, dispose of, or generate hazardous materials or petroleum products were observed on-site. Per the Phase I ESA (GS Lyons Consultants 2017), no recognized environmental conditions have been identified in connection with the subject property that would warrant further environmental study (Phase II analysis) at this time.

During construction, small amounts of hazardous materials may be used on-site such as fuels, lubricants, solvents, and architectural coating materials. During the operational phase, hazardous materials may be used for cleaning and maintenance as well as manufacturing activities.

Hazardous materials and wastes would be managed and used in accordance with all applicable federal, state, and local laws and regulations. This includes handling of any soils with potential for ACMs and lead-based paint contamination in accordance with California Occupational Safety and Health Administration requirements. In addition, disposal of any contaminated material would be in accordance with state and County regulations.

All future activities that would involve hazardous materials would be required to comply with the Imperial County Certified Unified Program Agency (CUPA) requirements. The County Certified Unified Program Agency has developed a Hazardous Waste Generator and Tiered Permitting Program, Hazardous Materials Release Response Plans and Inventory Program, California Accidental Release Prevention program, Underground Storage Tanks program, and Aboveground Storage Tanks programs (California Department of Toxic Substances Control 2017). This would include obtaining a Hazardous Materials Inventory that is certified annually and a Hazardous Materials Business Plan that is certified tri-annually if the hazardous materials quantities exceed those amounts identified in Health and Safety Code Chapter 6.95, Section 25503.5, and a Risk Management Plan pursuant to the CalARP Program if quantities exceed those listed in California Code of Regulations, Title 19, Division 2, Chapter 4, Section 2770.5. These regulations are intended to address proper transport, handing, use, storage, and disposal of hazardous materials as well as methods to address accidental spills in order to avoid impacts to people and the environment. With regulatory compliance, hazards impacts to the public and the environment would be less than significant.

	Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

Less than Significant Impact. See response to VIII(a) above.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒

Less than Significant Impact. The project site is not located within ¼ mile of a school. The closest school is Washington Elementary School, located approximately ½ mile southwest of the project site. Therefore, no impact would result.

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

No Impact. The Phase I ESA included a hazardous materials site database search, and determined the site is not on a list of hazardous materials. In addition, listed sites in the area do not pose a threat to the future development of the site as warehouses and industrial buildings. Thus, no impact related to a hazardous material site would occur.

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

No Impact. The project site is located 2.75 miles from the Imperial County Airport. According to the Imperial County Airport Land Use Compatibility map (County of Imperial 2017), the project site is located outside of all Imperial County Airport land use compatibility zones. Thus, future development of the project site would not result in any impact related to safety hazards or airport land use compatibility.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐

Less than Significant Impact. The project is located approximately 0.4 mile north of the Douthitt private airport. Considering the southwest to northeast runway configuration, distance and location relative to the project site, and the nature of air traffic associated with that airport, the location of the project is not anticipated to result in a safety hazard for people working onsite. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

No Impact. The project would not interfere with the implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. The City of El Centro SEMS Multihazard Functional Plan addresses the City's planned response. The project would not impair implementation of this plan. The future development of the site would result in paving of additional roadways as well as roadway improvements that would improve access in accordance with the General Plan. The future allowed development would be subject to City regulations regarding street design, site access, and internal emergency access. Therefore, there would be no impacts associated with the physical interference of an emergency evacuation plan.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

No Impact. The project site is located in an agricultural and urban setting. The site is not proximate to large areas of wildland, and thus people would not be exposed to wildland fires.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
IX. HYDROLOGY/WATER QUALITY				
Would the project:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒

No Impact. The project consists of the annexation of the site from the County to the City~~, a GPA~~ and a Pre-zone. While no specific development is proposed at this time, any future development would be required to comply with all applicable water quality standards. Any future development within the project site would be subject to the federal and state Clean Water Act, which is established through compliance with the requirements of the NPDES General Permit for the City of El Centro (Municipal Permit), State Water Resources Control Board Order No. 2013-0001-DWG. In addition, any future proposal to recycle industrial-use water on-site and discharge it into the IID canals would be required to comply with the Industrial General Permit 2014-0057-DWQ. The project would be required to comply with the City's storm water requirements (Ordinance Chapter 22, Article VII), which consist of the City's Jurisdictional Runoff Management Plan (City of El Centro 2015) and the associated City of El Centro Post-Construction Storm Water Best Management Practice Standards Manual for Development Projects. More specifically, any future development allowed by the project would be required to implement BMPs in accordance with the City Municipal Code (Article VII, Division 1, Section 22-707). As the project would be required to comply with City and state regulations, the project would not violate any water quality standards or waste discharge requirements.

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

Less than Significant Impact. While no specific development is proposed at this time, future development within the project site would not require the construction of wells or the use of groundwater as a water source. Water service to future development would be provided by IID. Future construction within the project site would result in additional hardscape that would incrementally reduce groundwater recharge; however, this would have negligible effects to the groundwater levels. Thus, the project would have a less than significant impact on groundwater levels.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐

Less than Significant Impact. Any proposed future construction and development activities would be required to comply with City and state regulations [see response IV(a) above], which include runoff controls to prevent substantial erosion and siltation. Future development would be required to prepare a project-specific hydrology and storm water quality report and a SWPPP, and adhere to all City storm water requirements. With adherence to these measures and City storm water requirements, no adverse impacts to the downstream conveyance system would occur.

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

Less than Significant Impact. See response to IX(c), above. Currently, the site is in agricultural use. As the fields are at a lower elevation than the surrounding roadways and surrounded by a small berm that prevents water from flowing to adjacent properties, the majority of the site runoff percolates into the ground or is discharged into IID drains.

Future development at the project site would result in an increase in impervious surfaces, which reduce percolation and increase the potential for site runoff. The City has adopted a storm water protection program in accordance with the Water Resources Control Board through Order No. 2013-0001-DWG. As required by Municipal Code (Article VII - Storm Water Regulations, Use and Storm Sewer Construction), future development would be required to comply with the City of El Centro Jurisdictional Runoff Management Program and its associated Best Management Practice Manual (City of El Centro 2015). Per the BMP Manual, future development of the site must comply with the Low Impact Development (LID) Design Standards and hydromodification management requirements that reduce runoff. The BMP Manual (City of El Centro 2015) specifically states "[p]ost-project runoff for Hydromodification Projects shall not exceed estimated pre-project peak flow rate for the 10-year, 24-hour storm." To demonstrate this, the City requires the submittal of a project-specific Water Quality Management Plan (WQMP) that shows compliance with the requirements of the Post-Construction Storm Water Standards Manual. In addition, future activities would be subject to inspections to ensure compliance as well as adherence to the

City of El Centro Post-Construction Storm Water Best Management Practice Standards Manual for Development Projects (City of El Centro 2015).

While runoff rates would be controlled in accordance with City regulations, there is potential for the discharge location to change. Currently, runoff percolates or is discharged into IID drains. Per the IID standard policy, industrial water users would possibly be required to sign a contract that limits the amount of water discharged into IID drains. Thus, there is potential that runoff may be required to be redirected. However, future development must also meet all City standards for flood control and applicable flood control standards from IID. The El Centro Service Area Plan (City of El Centro 2016) addresses drainage facilities for the City, and identifies that drainage facilities shall either be met through the continued provision of the improvements identified in the 2009 City of El Centro Master Plan of Drainage and that "new development projects address potential drainage issues and provide adequate facilities to convey storm flow."

As future development of the site would be required to comply with aforementioned water and hydrology regulations, future development at the site would not alter the rate of surface runoff or drainage patterns in a manner that would result in on or off-site flooding. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐

Less than Significant Impact. See response to IX(c), above. While no specific development is proposed at this time, any future development would be required to comply with the City's storm water regulations during construction and after construction, including measures to control runoff rates and control pollution in runoff. During construction, future development would be required to comply with the Construction General Permit Order 2009-0009-DWQ, and the associated requirement to prepare a SWPPP with BMPs. In addition, the future operations would comply with the NPDES IGP and the City's storm water protection program as discussed in response IX(c) above. As discussed above, compliance with these regulations ensure that storm water runoff rates are controlled to existing conditions levels, and, therefore, the project would not exceed the capacity of the existing or planned storm water drainage systems. Based on typical development, if would be feasible for future development to control runoff rates via on-site retention basins in accordance with the City's 2005 Retention Basin Standards. These regulations also require that potential sources of water pollution be identified for the future development and requires those pollutants of concern be addressed through BMPs. Thus, project impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f. Otherwise substantially degrade water quality?	☐	☐	☒	☐

Less than Significant Impact. See responses to IX(a and c), above. Any future development within the project site would be required to comply with all City storm water quality standards during and after construction. A less than significant impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒

No Impact. Per the Federal Emergency Management Agency Flood Insurance Map number 06025C2075C dated September 26, 2008, the project site is not located within a 100-year flood hazard area. Therefore, no impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
h. Place within a 100-year flood hazard area, structures that would impede or redirect flood flows?	☐	☐	☐	☒

No Impact. See response to IX(g). The project site is not located within a 100-year flood hazard area. No impact would occur.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒

No Impact. See response to IX(g). The project site is not located in a floodplain and would not expose people to risk associated with flooding.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

No Impact. The distance between the project site and the coast preclude damage due to seismically induced waves (tsunamis). The existing site is located in an urban and agricultural area and is relatively flat. It would not be susceptible to inundation by seiche or mudflow.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
X. LAND USE/PLANNING				
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒

No Impact. The project would change the ~~General Plan~~ land use ~~designation~~ for the site from an agricultural use to an industrial use. As the site is located in an area transitioning from rural and agricultural uses to an urbanized area, this change would not divide an established community. In addition, no public roadways exist on the sites that provide connections through the community. Thus, the project would not physically divide an established community.

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

Less than Significant Impact. The project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. The project consists of the annexation of the site from the County of Imperial to the City of El Centro, and would include a ~~GPA and~~ Pre-zone. The site is currently within the City of El Centro Sphere of influence, and ~~, and is designated as Planned Industrial and Rural Residential by the City. The project would change the land use designation to Industrial use, and~~ would include a pre-zone to MG General Manufacturing. While no specific building or site plans are proposed at this time, future development would be required to comply with all City land use plans, policies, and regulations. This includes the Manufacturing Zones design standards (Municipal Code Chapter 29, Article II, Division 3, Manufacturing Zone Sections 29-68), as

well as Building and Construction Regulations (Municipal Code Chapter 7). Thus, there are no land use plan or policy conflicts that would result in environmental impacts. Further analysis is provided below.

County of Imperial General Plan

The County designates the site for Agricultural Use. Per the adopted County General Plan (County of Imperial 2015), this "category is intended to preserve lands for agricultural production and related industries including aquaculture (fish farms), ranging from light to heavy agriculture." However, this category does allow for other uses including residential uses at a density of one residence per 40 acres; commercial uses with a 1:1 FAR for agricultural sales; agricultural industrial uses; renewable energy uses; and open space/recreational uses.

The County General Plan goes on to state that "[n]o land shall be removed from the Agriculture category except for annexation to a city, where needed for use by a public agency, for renewable energy purposes in accordance with the Renewable Energy and Transmission Element, where a mapping error may have occurred, or where a clear long term economic benefit to the County can be demonstrated through the planning and environmental review process."

The project consists of the annexation of the site from the County to the City ~~, a GPA~~ and a Pre-zone. As such, the project would be consistent with the provisions of the County's General Plan, which state that "no land shall be removed from the Agriculture category except for annexation to a city . . ." Since the project involves the annexation of land within the Agriculture category into the City of El Centro, it would be consistent with the County's General Plan. Future development of the site consistent with the 2021 ~~proposed~~ GPA would also likely provide the benefit of creating jobs in a region with a current unemployment rate of 22.6 percent (United States Bureau of Labor Statistics 2017a). Thus, the proposed annexation would be consistent with the County of Imperial General Plan.

County of Imperial Zoning

The County of Imperial Zoning Ordinance (Title 9, Division 5: Zoning Areas Established) has zoned the site as A-2-U, or General Agriculture. The purpose of the A-2 designation is to designate areas that are intended primarily for agricultural uses and agricultural related compatible uses.

The project consists of the annexation of the site from the County to the City. Thus, the County's Zoning would no longer apply to the site with the implementation of the project. No inconsistency would occur. Furthermore, the proposed pre-zoning would not create land use conflicts with the surrounding land uses in the County.

City of El Centro General Plan

The site is located within the City's Sphere of Influence and was included in the City's 2021 ~~2003~~ General Plan~~.~~ Update. The City had previously designated the site for Planned

Industrial and Low Density Residential. Per the previous ~~adopted~~ City General Plan, the Planned Industrial designation "provides for the development of a wide range of industrial, manufacturing, select business and related establishments in a park-like setting and which do not in their operation or maintenance create offensive, obnoxious, or dangerous conditions. A maximum floor area ratio of 0.45:1 is allowed." The Low Density Residential designation "provides for the development of single-family home and accessory buildings. Uses such as mobile and modular homes, accessory dwelling units, public facilities and others which are compatible with and oriented toward serving the needs of low density single-family neighborhoods may also be allowed." This designation allows for a maximum density of 6 dwelling units per net acre.

As noted, the project site was included in the 2021 General Plan Update which ~~The project proposes a~~ accommodated a GPA to redesignate the site as General Industrial – General Manufacturing. Per the General Plan, this designation would allow for a maximum FAR of 0.45:1 and an average FAR of 0.35:1. This designation specifies operations must not create "offensive, obnoxious, or dangerous conditions which are detectable beyond the boundary of the land use designation borders."

A consistency analysis with the General Plan Land Use Element applicable goals and polices is provided below.

General Plan Goal or Policy	Project Consistency
Land Use	
Policy 1.1: Ensure that new development is consistent and compatible with the existing character of the community and meets development standards	**Consistent.** The site is located in an area where the community character transitions from rural agricultural to industrial uses. The project would allow for the future development of general manufacturing uses within this transition area. Future development would be required to meet the City's development standards.
Policy 1.9: Prevent the intrusion of all incompatible uses that would negatively affect industrial areas and opportunities for industrial growth.	**Consistent**. The site is currently designated by the City for rural residential and planned industrial uses. The project would allow for the entire site to be utilized for general manufacturing uses. While industrial and residential uses may be collocated with design measures to avoid land use conflicts, the proposal to change the entire site to industrial uses would reduce potential land use conflicts.
Policy 1.10: Use lower intensity industrial uses as a transition between heavier industrial use and non-industrial use.	**Consistent**. The future development at the site would include industrial development located in a transition area from rural residential and agricultural uses, to industrial uses. In accordance with the General Plan General Manufacturing designation, future development intensity is animated to be at the average 0.35 FAR with a maximum 0.45 FAR allowed.

General Plan Goal or Policy	Project Consistency
Land Use	
Policy 1.11: Require new industrial development to provide adequate circulation and access that does not negatively impact adjacent residential areas. Where needed, industries should have access to railroad lines.	**Consistent**. The future development within the project site would include all needed circulation improvements, would mitigate all traffic impacts to below a level of significance, and would include access to railroad lines. Access would be limited in a manner to not impact nearby residential uses.
Policy 1.14: Require new development adjacent to open drains and canals to underground these facilities to ensure the public safety. The undergrounding of facilities shall be done in concordance and coordination with the IID.	**Consistent.** This policy was intended to address the potential safety issue associated with proposing a new development that would increase the number of children present around open-water drainage facilities. As the project does not propose residential or other uses that would result in a significant amount of children being present, undergrounding of drainage facilities is not necessary to comply with this policy. The future development is anticipated to include fencing around the open-water drainage facilities, which is considered adequate to address public safety for an general manufacturing use (see Section 1.3, Project Description).
Land Use Goal 2: Control and direct growth so that new development is compatible with existing development and occurs in appropriate locations when adequate public services and facilities are available.	**Consistent.** Surrounding uses include rural residential, agricultural, and industrial uses. As detailed above, the proposed manufacturing uses would be compatible with surrounding uses. The project site is located in an area where existing services are available or where planned improvements would occur that would be adequate to serve buildout consistent with the zone. This includes the location of the project site adjacent to a railroad line, and where raw water service and energy is available from IID. The site is also located in the City's Sphere of Influence area and development of the site was considered in the City's 2016 City Services Area Plan. This includes plans to provide Police and Fire Department services for the project site (see Section IV, Public Services, below). Future development would provide payment of Developer Impact Fees towards planned public service and facility improvements, as well as access improvements and traffic mitigation measures to reduce impacts to below a level of significance.

General Plan Goal or Policy	Project Consistency
Land Use	
Policy 3.3: Promote and encourage an overall improvement in visual appearance for all commercial and industrial areas.	**Consistent.** The project would convert the site from agriculture to industrial use. The design of the future development would be subject to the City's zoning and development regulations, including Municipal Code building standards (Chapter 29, Article II, Division 4. - Manufacturing Zones design standards). These design standards include site planning, natural surveillance, architecture, roof treatments, parking and circulation, loading facilities, landscaping, walls and fences, screening, and lighting.

The General Plan also includes an Urban Development Program to direct growth. ~~over the next 20 years (2004 to 2024).~~ This program designates three tiers of growth areas in the City Sphere of Influence, consisting of Tiers I, II, and III. Tier I was considered within the current service area, Tier II was considered within the planned urban service area for the future 10 years, and Tier III was within the future urban service area. The project site is located within a Tier III area. In accordance with the Tier III requirements presented in the General Plan, this initial study has included a traffic impact analysis, a preliminary analysis of sewer and water service needs based on the City's Master Plan and the project Water Supply Assessment (Appendix G), and analysis of drainage and flood control facilities based on adopted policies. Based on these analyses, the project was determined to have a less than significant impact on public services and facilities. It is also noted that subsequent to the preparation of this General Plan element, the City completed the El Centro Service Area Plan (City of El Centro 2016), which addresses the public service needs for the buildout of the City's Sphere of Influence. Thus, a specific Community Facilities Study for the project is not required.

City of El Centro Zoning

The site is currently not subject to the City of El Centro Zoning Code. With the implementation of the project, the site would be pre-zoned for MG General Manufacturing uses. The following is an excerpt from Municipal Code Chapter 29 - Zoning, Article II. - Zones, Division 4. - Manufacturing Zones:

> MG general manufacturing zone. This zone is intended to provide for the development of manufacturing, processing, fabrication, and assembly of goods and materials, which do not in their operation or maintenance create offensive, obnoxious, or dangerous conditions that are detectable beyond the boundary of the zone. Certain outdoor operations are permitted in this zone. The MG zone is intended to implement the general manufacturing - general industrial general plan land use designation.

The Municipal Code includes general manufacturing zone development standards pertaining to site planning, natural surveillance, architecture, roof treatments, parking and circulation, loading facilities, landscaping, walls and fences, screening, and lighting. The future development at the site would be in conformance with the Municipal Code and would comply with these design standards.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

No Impact. The project site is in active agricultural use, and is not located within any habitat conservation plan or natural community conservation plan.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XI. MINERAL RESOURCES				
Would the project?				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

No Impact. Implementation of the project would not result in loss of availability of a known mineral resource, as the site does not contain any known significant mineral resources. In addition, the site is not designated or zoned for mineral extraction uses.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

No Impact. See response to XI(a), above.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XII. NOISE				
Would the project result in:				
a. Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐

Less than Significant with Mitigation Incorporated. The following noise analysis is based on the Noise Analysis report prepared by RECON in September 2018 (Appendix H). This report addresses construction noise (on-site and off-site roadway), land use compatibility, and on-site stationary noise sources, as summarized below.

Project Site Development Construction

Section 17.1-8 of the City's Noise Abatement and Control Ordinance establishes an 8-hour equivalent noise level ($L_{eq(8h)}$) limit of 75 A-weighted decibels (dB[A]) as measured at the property line of a residential use.

Future construction details are not currently known; however, standard construction equipment such as bulldozers, graders, and loaders is expected. As detailed in the Noise Analysis, construction noise levels could reach 59 dB(A) $L_{eq(8h)}$ at the residential property line of properties to the north of Villa Avenue and construction noise levels could reach 58 dB(A) $L_{eq(8h)}$ at the property line of Palm Villa Mobile Home Park. Construction noise levels would comply with Section 17.1-8 of the City's Noise Abatement and Control Ordinance. Impacts would be less than significant.

Off-site Roadway Improvements

Future development of the site consistent with the General Plan ~~Amendment~~ would require improvements to local roadways. Specific improvements include intersection signalizations, construction of additional intersection turn lanes, construction of a new roadway, and widening of two existing roadways. Specific roadway construction details are not known at this time and were estimated based on previous experience.

As detailed in the Noise Analysis, intersection signalizations and construction of additional turn lanes involve frequent non-equipment tasks such as measurement, demarcation, electrical work, and traffic control and, therefore, do not typically generate substantial noise levels.

Construction of a new roadway or widening of existing roadways would also involve grading, laying and compacting subgrade layers, asphalt paving, and roadway striping; however, would require greater use of heavy duty equipment. As detailed in the Noise Analysis:

- Improving Villa Avenue to a 2-lane Arterial between Dogwood Road and Cooley Road would result in noise levels reaching up to 71 dB(A) $L_{eq(8h)}$ at the eight residences directly north of Villa Avenue.

- Improving Cooley Road to a paved 2-lane road from Aten Road to the project site would result in noise levels reaching up to 67 dB(A) $L_{eq(8h)}$ at the residence at the southeast corner of Cooley Road and Cruickshank Road.

- Improving Dogwood Road from Villa Avenue to Commercial Avenue to include a second southbound lane would not involve construction in the vicinity of a residential property

Construction noise levels associated with off-site roadway improvements would comply with Section 17.1-8 of the City's Noise Abatement and Control Ordinance. Impacts would be less than significant.

Land Use Compatibility

The City's Land Use Compatibility Standard for general manufacturing uses is a community noise equivalent level (CNEL) of 70 dB(A). As detailed in the Noise Analysis, buildout of the local circulation network identified in the City General Plan would result in noise levels that exceed 70 CNEL within the westernmost 21 feet of the project site and the northernmost 20 feet of the project site. Mitigation Measure NOI-1 would require future development exterior use areas be set back or shielded from major roadways to prevent noise compatibility conflicts.

With incorporation of mitigation measure NOI-1, future buildout of the project site would not include development of uses that conflict with the City Land Use Compatibility Standards. Impacts associated with potential traffic noise compatibility would be reduced to less than significant.

On-Site Generated Noise (Stationary Noise)

The proposed project site zoning designation, General Manufacturing, accommodates a wide variety of uses associated with manufacturing, processing, fabrication, assembly of goods and materials, and other industrial uses. Noise sources would vary widely depending on the type of use that is developed. Common noise sources of concern for such uses include, but not be limited to, HVAC equipment, air handlers, cooling towers, boilers, generators, loading bay activities, and truck traffic. Additional noise sources would also be likely to be associated with any connections to the railway that runs along the southern project site boundary.

City policies are in place to control noise and reduce noise conflicts between various land uses. Given future development would be required to comply with Municipal Code Section 17.1 that limits noise generation, impacts would be less than significant.

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

Less than Significant Impact. During construction, use of standard construction equipment associated with project site development and off-site roadway improvements would generate limited groundborne vibration. The project is not anticipated to include any substantial sources of groundborne vibration such as explosive blasting. Due to the size of the project site and as public right-of-way and the Holton Interurban Railroad Parcel would buffers construction activities from any adjacent structures, construction activities associated with project site development would not be anticipated to result in substantial vibration at adjacent structures. Due to building setbacks and as standard roadway construction does not generally result in vibration impacts, construction activities associated with off-site roadway improvements would not be anticipated to result in substantial vibration at adjacent structures. Impacts associated with project construction would be less than significant.

No specific development is proposed at this time; however, vibration sources may be present upon buildout of the project site. These vibration sources may vary widely depending on the type of use that is developed. The City has policies in place to control vibration and reduce noise conflict between various land uses. Given that no specific vibration source is proposed and that enforcement of the Municipal Code Section 29-156 limits groundborne vibration, impacts would be less than significant.

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

Less than Significant Impact with Mitigation Incorporated. As identified in the Transportation Impact Analysis, future development would result in up to 11,460 trips per day (LLG 2018). Thus, the project would increase traffic volumes on local roadways and thereby contribute to an increase in ambient noise levels due to vehicle traffic.

As the City has not established criteria for assessing traffic noise increases, this analysis is based on the 12 dB(A) screening level threshold standard set by the Caltrans' Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction Projects (Traffic Noise Protocol; Caltrans 2011).

As detailed in the Noise Analysis, project-generated traffic would contribute to traffic noise increases over 12 dB(A) along the segment of Villa Avenue from Dogwood Road to Cooley Road and along the segment of Cooley Road from Aten Road to the project site (RECON 2018c). Traffic noise along Cooley Road would attenuate to normally acceptable levels within

the proposed right-of-way for Cooley Road and, in addition, there are no noise-sensitive uses along Cooley Road. Thus, the traffic noise increase along Cooley Road would result in less than significant impacts. Traffic noise level increases along Villa Avenue would also exceed 12 dB(A). As noise-sensitive uses (residences) are located along this segment and noise would exceed the 12 dB(A) threshold at the residential property line, noise impacts would be potentially significant.

Mitigation measure NOI-2 would require that project access driveways be situated to direct project traffic away from residential uses along Villa Avenue. With the implementation of this measure, noise impacts would be reduced to a level that is less than significant.

	Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project?	☐	☐	☒	☐

Less than Significant Impact. Temporary increases in noise would occur during project construction. Refer to response XII(a). Construction noise levels are not projected to exceed 75 dB(A) L_{eq} at the property lines. Construction activities would generally occur over the period between 7:00 a.m. and 5:00 p.m. on weekdays. Although the existing adjacent residences would be exposed to construction noise levels that may be heard above ambient conditions, the exposure would be temporary and would not exceed the City's standards. As construction activities would comply with Section 17.1-8 of the City's Noise Abatement and Control Ordinance, temporary increases in noise levels from construction activities would be less than significant.

	Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e.	For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport would the project expose people residing or working in the area to excessive noise levels?	☐	☐	☒	☐

Less than Significant Impact. The project is located approximately 1.5 miles south of the Imperial County Airport; the project site is located outside the affected noise area for the airport. Therefore, noise impacts would be less than significant.

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

No Impact. The project site is not located within the vicinity of a private airstrip that would expose workers on-site to excessive noise.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XIII. POPULATION/HOUSING				
Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐

Less than Significant Impact. The project would not permit new housing that would directly increase population. As infrastructure already exists in the area and future infrastructure improvements required to serve buildout of manufacturing uses on the site would only serve the proposed project, the proposed infrastructure improvements are not anticipated to result in substantial population growth. However, the project could have the potential to increase population in the region by creating new jobs. For this analysis, "substantial" growth is defined as growth that would exceed the planned growth for the region and would result in the need for additional housing beyond that currently anticipated. This potential impact related to growth is addressed further below.

Buildout of the 330-acre project site consistent ~~with the proposed GPA and~~ Annexation ~~Development~~ Agreement could occur over a five-year period and generate a significant number of jobs. The employees would be anticipated to reside within the City, as well as within the surrounding incorporated cities, unincorporated County of Imperial, and potentially Mexico.

For the year 2015, the SCAG 2016-2040 RTP/SCS (SCAG 2016) estimated that the County would support approximately 282,000 people in the year 2040. This would equate to an approximate annual growth rate of 4,000 people per year over the 25-year time period (total increase of 100,000 people).

With unemployment rates in Imperial County running at approximately 22.6 percent as of September 2017 (United States Bureau of Labor Statistics 2017a), it can be expected that a portion of the jobs potentially created by this project would be taken by residents already living within the region. As of September 2017, the City of El Centro contained approximately

19,900 unemployed persons (United States Bureau of Labor Statistics 2017b). It is anticipated that the project would serve as an employment opportunity for this already existing labor force.

Considering the planned growth of the region of 4,000 people a year and the existing 19,900 unemployed people in the County, the future generation annual jobs (e.g., 500 to 1,000 jobs) for five years is not anticipated to result in growth that would exceed the planned growth in the region or hesitate housing beyond that currently anticipated. The existing population base is expected to be able to provide sufficient labor in order to serve the project's needs. Thus, population growth associated with the project would be less than significant.

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

No Impact. The project site does not contain existing housing. Therefore, the project would not displace existing housing or residents, and would not necessitate the construction of replacement housing elsewhere. No impacts would result.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

No Impact. See response to XIII(b), above.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact

XIV. PUBLIC SERVICES

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

i) Fire Protection	☐	☐	☒	☐

Less than Significant Impact. The City of El Centro Fire Department (ECFD) would provide fire service to the project site. The ECFD includes fire and emergency medical services, fire administration, and fire prevention. The ECFD operates out of three stations: Station 1 (775 State Street), Station 2 (900 S. Dogwood Avenue), and Station 3 (1910 N. Waterman Avenue). The nearest fire station is Station 2, located approximately one

mile south. The City has approximately 41 uniformed personnel, 4 non-uniformed personnel, and various vehicles and equipment (City of El Centro 2016). The City also has mutual aid agreements with surrounding jurisdictions, including the Imperial County Fire Department.

The adopted standards for an emergency response for the City's Fire Department are based on the National Fire Protection Association Standard 1720, which requires the following response times be met 90 percent of the time:

- Turnout times
    - Emergency Medical Service – 60 seconds
    - Fire – 60 seconds
    - Special Operations – 80 seconds
- Response Times
    - Basic Life support with Automated External Defibrillator – 240 seconds
    - Advance Life Support – 480 seconds

Per the City's Service Area Plan, the ECFD average fire response time was 4:08 minutes for all emergency calls (City of El Centro 2016). Considering the 240 seconds threshold is approximately 4 minutes, the 4 minute and 8 second response time is considered an acceptable response time.

The City also has a fire staffing goal, which is to have 10 sworn and uniformed personnel available to respond to calls at any time. The City currently meets this goal with the 41 sworn personnel and 3 non-uniformed personnel and the project would not result in any decrease in staffing levels. Thus, the City is expected to continue to meet this staffing goal with the implementation of the project.

The project would annex into the City of El Centro's jurisdictional limits and would replace the agricultural uses with general manufacturing uses, resulting in an incremental increase in demand for fire and emergency medical services. However, this incremental increase was already planned for within the City's Service Area Plan (City of El Centro 2016) as the site is located within the City's Sphere of Influence and was designated for development by the General Plan. Per the City's Service Area Plan, the existing Fire Station 3 was constructed to serve the northwestern portion of the City in anticipation of growth in the northern sphere of influence area, which is where the project is located. No additional station would be required to provide service to the site.

It is acknowledged that the City's Service Area Plan (2016) identifies a need for an additional fire station to serve growth planned in the southern Sphere of Influence area; however, the project is not located within that area. Regardless, the future development allowed by the project would be required to provide payment of DIFs prior to building permit issuance (Municipal Code Chapter 20, Article V, Development Impact Fee). The City completes ongoing monitoring of fire service levels and makes adjustment to services based on the performance criteria above. Thus, this program ensures that City's funding will be adequately allocated to meet the fire service performance criteria above.

Overall, no additional fire facilities would be required to provide service to the project. Thus, implementation of the project would result in a less than significant impact to fire service.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
ii) Police Protection	☐	☐	☒	☐

Less than Significant Impact. Police protection services in the project area would be provided by the City of El Centro Police Department (ECPD). The police operate from the ECPD at 150 North 11th Street, approximately 2 miles west.

The City's performance standards are to achieve 1.75 sworn officers per 1,000 City residences and a minimum of five police personnel on duty. In addition, the City strives to have one non-sworn personnel per sworn officer and one patrol car for ever two sworn officers. The City Police Department has 52 sworn officers, 24 non-sworn personnel, and 37 vehicles. Based on the analysis completed in the Service Area Plan (City of El Centro 2016) analysis that identifies 43,856 residents, the City currently needs 77 sworn officers, 30 non-sworn officers, and 39 patrol vehicles. Thus, the City is not currently meeting their police staffing goals.

The City does not have response time goals, but it is noted that response times are 3 to 5 minutes for crimes in progress, 10 to 11 minutes for crimes just occurred, and 15 to 16 minutes for crimes past occurred (City of El Centro 2016).

The project site would be annexed into the City of El Centro's jurisdictional limits and ultimately replace the undeveloped agricultural site with a manufacturing facility, resulting in an incremental increase in demand for police services. As indicated previously, the project site is within the City's Sphere of Influence and designated for development. Thus, this incremental increase was already planned for within the City's Service Area Plan (City of El Centro 2016).

The Services Plan Analysis identified a future need for a new central station and two new substations, with one of the substations intended to provide service to new development in the northern City Sphere of Influence area where the project is located. As no location or specific development plans are known, the environmental impact of future police stations would be speculative to analyze and no further discussion is provided herein.

The analysis also identifies a need for additional staffing and patrol vehicles. Additional staffing and patrol vehicles would not result in physical environmental impacts. The future police department staffing, vehicle, and stations needs would be financed through the City's General Fund, DIF program, and grants (City of El Centro 2016). In accordance with regulations, future development would require payment of developer impact fees prior to building permit issuance (Municipal Code Chapter 20, Article V, Development Impact Fee), which would go to the provision of police services. Similar to fire services, the City completes

ongoing monitoring of police service levels and makes adjustment to services based on the performance criteria above.

While the project would result in an incremental increase in police service needs, this need has been addressed by the 2016 Services Plan Analysis that assumed future development of the project site. Thus, a less than significant impact would occur.

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

No Impact. The project would ultimately result in the site land use changing from agriculture uses to general manufacturing uses. The project does not propose any residential land use that would generate future demand for schools. The project would provide a substantial number of annual new jobs during a phased buildout which would be filled by existing residents in the region and accommodated by planned growth (see Section XIII, Population/Housing). In accordance with SB 50, all future planned residential growth would be required to provide payment of school fees. Imposition of the statutory fees constitutes full and complete mitigation (Government Code §65995(b)). Therefore, the project would result in no impact.

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

No Impact. As a General Manufacturing use, the project would not increase the demand for, or use of, local parks and there would be no impact. The project would provide a substantial number of annual new jobs during a phased buildout which would be filled by existing residents in the region and accommodated by planned growth (see Section XIII, Population). The project would be in conformance with Municipal Code Chapter 20, Article V, Development Impact Fee, which establishes the public facility fees for the City of El Centro. This article requires that all new residential or nonresidential development pay a fee for the purpose of assuring that the public facility standards established by the City are met with respect to the additional needs created by such development. Therefore, there would be no impact to parks.

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

Less than Significant Impact. The project would be in conformance with Article V of Chapter 20 of the City of El Centro Municipal Code, which establishes the public facility fees

for the City of El Centro. Public facilities fees paid at the time of building permit issuance for future development would contribute to and offset any increase in demand for public services or facilities. As the project would not require the construction of new facilities, impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XV. RECREATION				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒

No Impact. As a General Manufacturing use, the project would not directly increase the demand for neighborhood, regional parks, or other recreational facilities. There would be no impact.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

No Impact. As a General Manufacturing use, the project would not require the construction of or expansion of neighborhood or regional parks, or other recreational facilities. There would be no impact.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC				
Would the project?				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐

Less than Significant Impact. The analysis below is based on a Traffic Impact Analysis (TIA) prepared for the project by LLG in 2018 (Appendix I).

Methodology

The analysis includes a near-term direct impact analysis for three project generation forecasts: Phase 1 was assumed to develop 1 MSF; Phase 2 was assumed to develop 2 MSF; and Phase 3 was assumed to develop 3 MSF. A level of service (LOS) analysis was completed consistent with the City's standard methodology. Impact significance was determined based on the City's operational goal of LOS C and the peak hour operational goal of LOS D. *Existing Conditions*

In order to assess traffic impacts associated with the project, the TIA assessed the existing street network within the project vicinity, or the study area. The TIA analyzed existing conditions at nine intersections and along eight roadway segments. All study area intersections and roadway segments currently operate at acceptable LOS C or better.

Project Trip Generation

The manufacturing trip generation rate is 3.82 daily end trips (average daily traffic [ADT]) per thousand square feet, which equals 3,820 ADT for Phase I (1 MSF), 7,640 ADT for Phase

2 (2 MSF), and 11,460 ADT for Phase 3 (3 MSF). Table 4 summarizes the project trip generation for future phased development of the site.

Table 4
Project Trip Generation

Land Use[1]	Size[2]	Daily Trip Ends (ADTs)[3]		AM Peak Hour					PM Peak Hour				
		Rate[4]	Volume	Rate	In:Out Split%	Volume In	Volume Out	Volume Total	Rate	In:Out Split%	Volume In	Volume Out	Volume Total
M	1 MSF	3.82/ KSF	3,820	0.73/ KSF	78:22	569	161	730	0.73/ KSF	36:64	263	467	730
M	2 MSF	3.82/ KSF	7,640	0.73/ KSF	78:22	1,139	321	1,460	0.73/ KSF	36:64	526	934	1,460
M	3 MSF	3.82/ KSF	11,460	0.73/ KSF	78:22	1,708	482	2,190	0.73/ KSF	36:64	788	1,402	2,190

SOURCE: LLG 2018.
[1]Manufacturing
[2]MSF = million square feet
[3]Trip-ends are one-way traffic movements, either entering or leaving
[4]KSF = thousand square feet

Cumulative Projects

Cumulative projects are other projects in the study area that will add traffic to the nearby circulation system in the near future. Cumulative projects considered in this analysis include Rosswood, Imperial Valley Commons, Palmilla Assisted Living Facility, 4th Street Properties, Stonefield, Town Center Village Apartments, El Centro Town Center Commercial/Manufacturing Project, Victoria Ranch Subdivision 5A, Willowbend, Citrus Grove, Linda Vista, PMB Medical Building, and El Centro Aquatic Center. Refer to the TIA (LLG 2018; Appendix I) for additional details.

Analysis of Near-Term Scenarios

Traffic volumes from the 13 identified cumulative projects were added to existing traffic volumes. In addition, a growth rate of 2 percent per year (3 years) was added to existing + cumulative projects traffic volumes traffic volumes to forecast the Near-Term without Project traffic volumes.

Near Term plus Phase 1

Intersection Operations

Under the near-term conditions, all intersections would operate acceptably. As shown in Table 5, with the addition of Phase 1 traffic, the following two intersections would operate at unacceptable levels:

- Intersection #3. N. Dogwood Road/East Villa Road – LOS F (AM and PM Peak Hours) (*Impact TRF-1*)
- Intersection #4. N. Dogwood Road/E. Commercial Avenue – LOS E (PM Peak Hour) (*Impact TRF-2)*

Table 5 Near-term + Phase 1 Development Intersection LOS								
			Near-term without Project		Near-term + Phase 1 Development			
Intersection	Control Type[1]	Peak Hour	Delay[2]	LOS[3]	Delay[2]	LOS[3]	Δ[4]	Significant Impact?
1. N. Dogwood Road/ Aten Road	Signal	AM	10.5	B	14.0	B	3.5	None
		PM	12.0	B	16.0	B	4.0	None
2. SR-111/Aten Road	Signal	AM	16.2	B	17.6	B	1.4	None
		PM	16.6	B	17.8	B	1.2	None
3. N. Dogwood Road/East Villa Road	MSSC/Signal	AM	14.7	B	**269.8**	**F**	**255.1**	**Yes**
		PM	17.0	C	**805.6**	**F**	**788.6**	**Yes**
4. N. Dogwood Road/ E. Commercial Ave	MSSC/Signal	AM	11.8	B	19.3	C	7.5	None
		PM	15.0	B	**35.9**	**E**	**20.9**	**Yes**
5. N. Dogwood Road/ E. Main St	Signal	AM	27.2	C	36.3	D	9.1	None
		PM	32.2	C	36.8	D	4.6	None
6. E. Evan Hewes Hwy/ N. Earls Street	MSSC	AM	13.0	B	17.2	C	4.2	None
		PM	12.4	B	15.1	C	2.7	None
7. E. Evan Hewes Hwy/Cooley Road	MSSC	AM	11.4	B	13.2	B	1.8	None
		PM	12.6	B	15.9	C	3.3	None
8. E. Evan Hewes Hwy/Old Hwy 111	MSSC/Signal	AM	16.4	C	23.5	C	7.1	None
		PM	18.3	C	27.5	D	9.2	None
9. E. Evan Hewes Hwy/SR-111	Signal	AM	21.6	C	26.3	C	4.7	None
		PM	25.9	C	32.2	C	6.3	None

SOURCE: LLG 2018.
[1]MSSC – Minor Street Stop Controlled Intersection
[2]Delay = average delay expressed in seconds per vehicle
[3]LOS = level of service
[4] Δ is the increase in delay from project

Roadway Segment Operations

Under the near-term conditions, all roadway segments would operate acceptably. As shown in Table 6, the addition of Phase 1 traffic would cause the following two segments to operate unacceptably:

- N. Dogwood Road (Commercial Avenue to Main Street) – LOS D (*Impact TRF-3*)
- East Villa Road (N. Dogwood Road to Cooley Road) – LOS F (*Impact TRF-4*)

Table 6
Near-term + Phase 1 Development
Segment LOS

Segment	Roadway Classification	LOS E Capacity[1]	Near-term without Project			Near-term + Phase I Development				
			ADT[2]	V/C[3]	LOS[4]	ADT	V/C	LOS	Δ[5]	Significant Impact?
N. Dogwood Road										
Aten Road to East Villa Road	2-Lane Collector	12,000	6,360	0.530	B	7,660	0.638	C	0.108	None
East Villa Road to E. Commercial Avenue	2-Lane Collector	12,000	5,960	0.497	A	8,370	0.698	C	0.201	None
Commercial Avenue to Main Street	2-Lane Collector	12,000	7,000	0.583	B	**9,290**	**0.774**	**D**	**0.191**	**Yes**
South of E. Main Street	2-Lane Arterial	18,000	6,520	0.632	A	6,900	0.383	A	0.021	None
E. Main Street/E. Evan Hewes Highway										
N. Dogwood Road to N. Earls Street	4-Lane (U) Arterial	27,000	6,770	0.251	A	8,300	0.307	A	0.057	None
N. Earls Street to Cooley Road	4-Lane (U) Arterial	27,000	6,450	0.239	A	7,980	0.296	A	0.057	None
Cooley Road to Old Highway 111	4-Lane (U) Arterial	27,000	5,770	0.214	A	7,300	0.270	A	0.057	None
East Villa Road										
N. Dogwood Road to Cooley Road	2-Lane Local	2,000	500	0.250	A	**4,320**	**2.160**	**F**	**1.910**	**Yes**

SOURCE: LLG 2018.
[1]Capactities based on City of El Centro & County of Imperial Roadway Classification tables
[2]ADT= average daily traffic
[3]V/C = volume-to-capacity ratio
[4]LOS = level of service
[5]Δ is the increase in delay from project

Near Term plus Phase 2

Intersection Operations

Under the near-term conditions, all intersections would operate acceptably. As shown in Table 7, with the addition of Phase 2 traffic to the near-term conditions, the following intersection would operate at an unacceptable level:

- Intersection #8. E. Evan Hewes Highway/Old Highway 111 – LOS E (PM Peak Hours) (*Impact TRF-5*)

Table 7
Near-term + Phase 2
Intersection LOS

Intersection	Control Type[1]	Peak Hour	Near Term without Project		Near-Term + Phase 2 Development			
			Delay[2]	LOS[3]	Delay[2]	LOS[3]	Δ[4]	Significant Impact?
1. N. Dogwood Road/ Aten Road	Signal	AM	10.5	B	10.9	B	0.4	None
		PM	12.0	B	12.4	B	0.4	None
2. SR-111/Aten Road	Signal	AM	16.2	B	42.9	D	26.7	None
		PM	16.6	B	28.1	C	11.5	None
3. N. Dogwood Road/ East Villa Road	MSSC/ Signal	AM	14.7	B	34.8	C	20.1	None
		PM	17.0	C	43.6	D	26.6	None
4. N. Dogwood Road/ E. Commercial Ave	MSSC/ Signal	AM	11.8	B	8.8	A	-3.0	None
		PM	15.0	B	16.3	B	1.3	None
5. N. Dogwood Road/ E. Main Street	Signal	AM	27.2	C	38.4	D	11.2	None
		PM	32.2	C	41.6	D	9.4	None
6. E. Evan Hewes Hwy/N. Earls Street	MSSC	AM	13.0	B	20.2	C	7.2	None
		PM	12.4	B	17.0	C	4.6	None
7. E. Evan Hewes Hwy/Cooley Road	MSSC	AM	11.4	B	14.3	B	2.9	None
		PM	12.6	B	18.2	C	5.6	None
8. E. Evan Hewes Hwy/Old Hwy 111	MSSC/ Signal	AM	16.4	C	29.0	D	12.6	None
		PM	18.3	C	**35.6**	**E**	**17.3**	**Yes**
9. E. Evan Hewes Hwy/SR-111	Signal	AM	21.6	C	39.7	D	18.1	None
		PM	25.9	C	42.7	D	16.8	None

SOURCE: LLG 2018.
[1]Minor Street Stop Controlled Intersection
[2]Average delay expressed in seconds per vehicle
[3]LOS = level of service
[4]Delta is the increase in delay from project

Roadway Segment Operations

As indicated above, all roadway segments would operate acceptably under the near-term conditions. As shown in Table 8, the addition of Phase 2 traffic would cause the following three segments to operate unacceptably:

- N. Dogwood Road (East Villa Road to E. Commercial Avenue) – LOS D (*Impact TRF-6*)
- N. Dogwood Road (Commercial Avenue to Main Street) – LOS E (*Impact TRF-3*)
- East Villa Road (N. Dogwood Road to Cooley Road) – LOS F (*Impact TRF-4*)

Table 8
Near-term + Phase 2 Development
Segment LOS

Segment	Roadway Classification	LOS E Capacity[1]	Near-term without Project			Near-term + Phase 2 Development				
			ADT[2]	V/C[3]	LOS[4]	ADT	V/C	LOS	Δ[5]	Significant Impact?
N. Dogwood Road										
Aten Road to East Villa Road	2-Lane Collector	12,000	6,360	0.530	B	6,670	0.556	B	0.026	None
East Villa Road to E. Commercial Avenue	2-Lane Collector	12,000	5,960	0.497	A	**10,010**	**0.834**	**D**	**0.338**	**Yes**
Commercial Avenue to Main Street	2-Lane Collector	12,000	7,000	0.583	B	**10,820**	**0.902**	**E**	**0.318**	**Yes**
South of E. Main Street	2-Lane Arterial	18,000	6,520	0.632	A	7,280	0.404	A	0.042	None
E. Main Street/E. Evan Hewes Highway										
N. Dogwood Road to N. Earls Street	4-Lane (U) Arterial	27,000	6,770	0.251	A	9,060	0.336	A	0.085	None
N. Earls Street to Cooley Road	4-Lane (U) Arterial	27,000	6,450	0.239	A	8,740	0.324	A	0.085	None
Cooley Road to Old Highway 111	4-Lane (U) Arterial	27,000	5,770	0.214	A	8,060	0.299	A	0.085	None
East Villa Road										
N. Dogwood Road to Cooley Road	2-Lane Local	2,000	500	0.250	A	**5,080**	**2.540**	**F**	**2,290**	**Yes**
Cooley Road										
Aten Road to East Villa Road	2-Lane Collector	10,000	-	-	-	3,060	0.306	A	-	None

SOURCE: LLG 2018.
[1]Capactities based on City of El Centro & County of Imperial Roadway Classification tables
[2]ADT= average daily traffic
[3]V/C = volume-to-capacity ratio
[4]LOS = level of service
[5]Δ is the increase in delay from project

Near Term plus Phase 3 Intersection and Roadway Segment Operations

Intersection Operations

As indicated above, all intersections would operate acceptably under the near-term conditions. As shown in Table 9, with the addition of Phase 3 traffic to the near-term conditions, the following three intersections would operate unacceptably:

- Intersection #3. N. Dogwood Road/East Villa Road – LOS F (AM and PM peak hours) (*Impact TRF-1*)
- Intersection #5. N. Dogwood Road/E. Main Street – LOS F (AM peak hour), LOS E (PM peak hour) (*Impact TRF-7*)
- Intersection #9. E. Evan Hewes Highway/SR-111 – LOS E (PM peak hours) (*Impact TRF-8*)

Table 9
Near-term + Phase 3
Intersection LOS

Intersection	Control Type[1]	Peak Hour	Near-Term without Project		Near-Term + Phase 3 Development			
			Delay[2]	LOS[3]	Delay[2]	LOS[3]	Δ[4]	Significant Impact?
1. N. Dogwood Road/ Aten Road	Signal	AM	10.5	B	11.3	B	0.8	None
		PM	12.0	B	12.6	B	0.6	None
2. SR-111/Aten Road	Signal	AM	16.2	B	26.7	C	10.5	None
		PM	16.6	B	39.2	D	22.6	None
3. N. Dogwood Road/ East Villa Road	MSSC/Signal	AM	14.7	B	**111.7**	**F**	**97**	**Yes**
		PM	17.0	C	**117.5**	**F**	**100.5**	**Yes**
4. N. Dogwood Road/ E. Commercial Ave	MSSC/Signal	AM	11.8	B	14.4	B	2.6	None
		PM	15.0	B	43.4	D	28.4	None
5. N. Dogwood Road/ E. Main St	Signal	AM	27.2	C	**112.4**	**F**	**85.2**	**Yes**
		PM	32.2	C	**68.9**	**E**	**36.7**	**Yes**
6. E. Evan Hewes Hwy/N. Earls St	MSSC	AM	13.0	B	26.2	D	13.2	None
		PM	12.4	B	20.5	C	8.1	None
7. E. Evan Hewes Hwy/Cooley Road	MSSC	AM	11.4	B	16.4	C	5.0	None
		PM	12.6	B	22.8	C	10.2	None
8. E. Evan Hewes Hwy/Old Hwy 111	MSSC/Signal	AM	16.4	C	13.5	B	-2.9	None
		PM	18.3	C	13.2	B	-5.1	None
9. E. Evan Hewes Hwy/SR-111	Signal	AM	21.6	C	36.0	D	14.4	None
		PM	25.9	C	**63.4**	**E**	**37.5**	**Yes**

SOURCE: LLG 2018.
[1]Minor Street Stop Controlled Intersection
[2]Average delay expressed in seconds per vehicle
[3]LOS = level of service
[4]Delta is the increase in delay from project

Roadway Segment Operations

As indicated above, all roadway segments would operate acceptably under the near-term conditions. As shown in Table 10, the addition of Phase 3 traffic would cause the following three segments to operate unacceptably:

- N. Dogwood Road (East Villa Road to E. Commercial Avenue) – LOS F (*Impact TRF-7*)
- N. Dogwood Road (Commercial Avenue to Main Street) – LOS F (*Impact TRF-3*)
- East Villa Road (N. Dogwood Road to Cooley Road) – LOS F (*Impact TRF-4*)

Table 10
Near-term + Phase 3 Development
Segment LOS

Segment	Roadway Classification	LOS E Capacity[1]	Near-term without Project			Near-term + Phase 3 Development				
			ADT[2]	V/C[3]	LOS[4]	ADT[2]	V/C[3]	LOS4	Δ[5]	Significant Impact?
N. Dogwood Road										
Aten Road to East Villa Road	2-Lane Collector	12,000	6,360	0.530	B	6,820	0.568	B	0.038	None
East Villa Road to E. Commercial Avenue	2-Lane Collector	12,000	5,960	0.497	A	**12,030**	**1.003**	**F**	**0.506**	**Yes**
Commercial Avenue to Main Street	2-Lane Collector	12,000	7,000	0.583	B	**12,730**	**1.061**	**F**	**0.478**	**Yes**
South of E. Main Street	2-Lane Arterial	18,000	6,520	0.632	A	7,670	0.426	A	0.064	None
E. Main Street/E. Evan Hewes Highway										
N. Dogwood Road to N. Earls Street	4-Lane (U) Arterial	27,000	6,770	0.251	A	10,210	0.378	A	0.127	None
N. Earls Street to Cooley Road	4-Lane (U) Arterial	27,000	6,450	0.239	A	9,890	0.366	A	0.127	None
Cooley Road to Old Highway 111	4-Lane (U) Arterial	27,000	5,770	0.214	A	9,210	0.341	A	0.127	None
East Villa Road										
N. Dogwood Road to Cooley Road	2-Lane Local	2,000	500	0.250	A	**7,380**	**3.690**	**F**	**3.440**	**Yes**
Cooley Road										
Aten Road to East Villa Road	2-Lane Collector	10,000	-	-	-	4,580	0.458	B	0.152	None

SOURCE: LLG 2018.
[1]Capactities based on City of El Centro & County of Imperial Roadway Classification tables
[2]ADT= average daily traffic
[3]V/C = volume-to-capacity ratio
[4]LOS = level of service
[5]Δ is the increase in delay from project

Conclusion

In the near-term, all intersections and segments in the study area would operate acceptably. Future development of the project site would result in eight locations where roadway segments and intersections would operate unacceptably (Table 11). Changes in operations from acceptable to unacceptable are considered significant impacts. To mitigate these impacts, future development would be required to implement mitigation measures MM-TRA-1 to TRA-7, as outlined in the MMRP (Section 3.0). With the implementation of these measures, roadways and intersections would operate acceptably and impacts would be reduced to below a level of significance.

Table 11
Traffic Impact Summary

Impact	Project Phase 1	2	3	Mitigation Measure[1]	Level of Significance after Mitigation
Impact 1 - Intersection #3. N. Dogwood Road/ East Villa Avenue	X		X	TRA-1	LS
Impact 2 - Intersection #4. N. Dogwood Road/ E. Commercial Avenue	X			TRA-2	LS
Impact 3 - N. Dogwood Road (Commercial Avenue to Main Street)	X	X	X	TRA-1 and TRA-2	LS
Impact 4 - East Villa Road (N. Dogwood Road to Cooley Road)	X	X	X	TRA-3	LS
Impact 5 - Intersection #8. E. Evan Hewes Highway/ Old Highway 111		X		TRA-4	LS
Impact 6 - N. Dogwood Road (East Villa Road to E. Commercial Avenue)		X	X	TRA-5	LS
Impact 7 - Intersection #5. N. Dogwood Road/ E. Main Street			X	TRA-6	LS
Impact 8 - Intersection #9. E. Evan Hewes Highway/ SR-111			X	TRA-7	LS

SOURCE: LLG 2018.
[1]See MND Section 3.0, Mitigation Monitoring and Reporting Program for the detailed mitigation measures.
LS = less than significant

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

Less than Significant with Mitigation Incorporated. See response to XVI(a) above.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒

No Impact. The project site is located 2.75 miles from the Imperial County Airport. According to the Imperial County Airport Land Use Compatibility map (County of Imperial 2017), the project site is located outside of all Imperial County Airport land use compatibility zones. Thus, the project would have no impact related to safety hazards or airport land use compatibility.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒

No Impact. The future development allowed by the proposed GPA would include roadway frontage improvements as well as improvements pursuant to Mitigation Measures TRA-1 to TRA-7. No site-specific development plans have been completed. Roadway designs would comply with the City's standards, which are intended to avoid hazardous roadway design features. Thus, the project would result in no impact related to a design feature hazard.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Result in inadequate emergency access?	☐	☐	☐	☒

No Impact. See response to XVI(a) and (d) above. The project access and internal access would be required to comply with City standards, which are intended to ensure adequate emergency access. Thus, the project would result in no impact related to a design feature hazard.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

Less than Significant Impact. The City's General Plan Circulation Element has the following transit, bicycle and pedestrian facility policies that are relevant for private development projects:

General Plan Policy	Consistency
Policy 2.2: Encourage the increased use and expansion of public transportation opportunities.	**Consistent.** Future development shall be required to develop and implement a TDM program that includes subsidized transit passes, which would promote this policy. (See Project Features)
Policy 2.3: Provide for the location of necessary transit infrastructure, such as bus stops, in major activity centers.	**Consistent.** Future applicants for site development shall be required to pursue a transit stop along Villa Road. (See Project Features)
The project would include a Transportation Demand Management program consistent with the City's policies regarding non-vehicular modes of transportation.	**Consistent.** Future applicants for site development shall be required to include a TDM consistent with the City's requirements. (See Project Features)
Policy 2.4: Support ridesharing services and other similar alternative modes of transportation.	**Consistent.** To support ride sharing, future development shall be required to include preferred parking spaces for carpools. In addition, future development would be required to implement a shuttle system to local transit stops and large population areas. (See Project Features)
Policy 3.3: Encourage the incorporation of bicycle facilities, such as bike lockers and showers at workplaces, and bicycle racks on buses, to facilitate bicycle travel.	**Consistent.** Future applicants for site development shall be required to provide a TDM program that includes bike lockers and showers, which would promote this policy. (See Project Features)

As indicated in the matrix above, the future development on the site would be consistent with the applicable City transit, bicycle and pedestrian facility policies. No impact would occur.

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

Less than Significant Impact. No tribes have requested formal notification of proposed projects within the City under the provisions of AB 52. On August 4, 2017, a letter was sent to the Native American Heritage Commission (NAHC) requesting a list of tribes culturally affiliated with the project area and a Sacred Lands File Search pursuant to Senate Bill 18 requirements for projects that involve a General Plan Amendment. The NAHC responded with a letter identifying that sites have been located with the project's area of potential effect and a list of tribes with traditional lands or cultural places within the project area. On August 16, 2017, letters were sent to the culturally affiliated tribes identified by the NAHC under Senate Bill 18. On August 23, 2017, one letter was received from the Viejas Band of Kumeyaay Indians indicated a potential for sacred sites. As such, the City consulted with the tribe to discuss the potential resource to determine how to avoid impacts. After further discussion, it was determined that no known tribal resource is located within the proposed improvement areas. Thus, consultation was concluded.

As indicated in response V(a), the project site is not eligible for listing on either the state or local register of historical resources. As no significant tribal resources have been identified on the project site, impacts to tribal resources would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XVIII. UTILITIES/SERVICE SYSTEMS				
Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐

Less than Significant Impact. A Water Supply Assessment (WSA) was conducted for the project site, which assumed a conservative scenario of 5 MSF industrial development on the project site (Development Design & Engineering 2017). As shown in the WSA analysis, future development consistent with the General Plan Amendment would utilize less water than currently utilized for agricultural uses at the project site. More specifically, a general manufacturing facility would have a net amount of water consumption equivalent to 175 acre-feet for construction and 670 AFY for the general manufacturing operations compared to the historical agricultural water consumption use on the site of 1,921 AFY. Considering the project would result in less water usage and discharge than the existing use, it is not anticipated that the discharge of treated wastewater into the IID drain system would result in an exceedance of the current discharges.

The City of El Centro would also supply potable water for future employee use with minimal amounts (less than 50 AFY) discharged into the City's wastewater system (Development Design & Engineering 2017). The project site would be serviced by a 20- to 24-inch pipe located on the northern and western portion of the property. According to the City's Sewer Master Plan (Carollo 2008) and a Water, Wastewater, and Storm Water Rate Study (Dynamic Consulting Engineers, Inc. 2012), the City treats its own wastewater at the El Centro Wastewater Facility, which has a capacity to accommodate 8.0 million gallons of wastewater per day. In addition, the City's wastewater demand has been decreasing despite continued growth in the City, and the City is anticipated to continue to have increased connections at a rate of 1 percent per year. Therefore, the project is not anticipated to result in an exceedance of treated wastewater amounts that would go back into the City's wastewater system. Any future development of the site would be required to provide payment of capacity fees prior to issuance of Certificate of Occupancy. Impacts would be less than significant.

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

Less than Significant Impact. See response to XVIII(a) above. No new or expanded wastewater treatment facilities would be required to serve future buildout of the project site.

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

Less than Significant Impact. See response to IX(c), Hydrology/Water Quality above. The project consists of the annexation of the site from the County to the City, a GPA and a Pre-zone. Since no construction or development activities are planned at this time, the project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site. Any future development within the project site would be required to prepare a project-specific hydrology report.

Future buildout of the site would be completed in compliance with the Clean Water Act, and the associated NPDES permit program. This includes compliance with the Construction General Permit Order 2009-0009-DWQ, and the associated requirement to prepare a SWPPP with BMPs. In addition, the future operations would comply with the NPDES IGP. These requirements include measures to ensure discharge rates remain similar to the existing conditions and to maintain water quality.

Thus, the project would not result in the need for new or expanded storm drain facilities that could lead to additional significant environmental effects. Impacts would be less than significant

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐

Less than Significant Impact. The City of El Centro receives its water supply from the IID. The IID has adopted an Interim Water Supply Policy (IWSP; IID 2009) for new non-agricultural projects. The IWSP sets aside 25,000 AFY of Colorado River water supply to serve IWSP. According to the Water Supply Assessment (Development Design & Engineering 2017), any future development of the site consistent with the proposed GPA could create a water demand of approximately 175 acre feet for construction, 2,492 AFY for operation (non-potable), and 50 AFY for employee use (treated). Of the total 2,492 AFY of proposed operational water consumption, it is anticipated that a future project could reclaim and recycle 75 percent and purchase the remaining 25 percent equivalent to 670 AFY. A purchase of 670 AFY represents 2.8 percent of the remaining IWSP balance of 23,800 AF. Thus, the possible water consumption of 175 AF for construction and 670 AFY for operation is not anticipated to require a need for additional entitlements. In addition, the proposed land use

change and future general manufacturing facility is expected to have a decreased net amount of water consumption compared to the historical agricultural water consumption use of 1,921 AFY. Thus, the IID would have sufficient water supplies available to serve the project site if developed with uses consistent with the proposed GPA.

The project site would also be serviced by the City of El Centro's treated water supply. As stated above, the City's water is provided by the IID. Per the Water System Master Plan (Carollo 2008), the Colorado River Water Delivery Agreement of October 2003 allows the IID to receive 3.1 million acre-feet of water per year. Considering a possible projected potable water demand of 50 AFY, the project is not anticipated to require a need for additional entitlements. Thus, the City would have enough water supplies available to serve the site

Considering the above-mentioned factors, the project would have sufficient water supplies, and a less than significant impact would occur.

	Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

Less than Significant Impact. See response for Utilities/Service Section (a). Impacts would be less than significant.

	Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☒☐

Less than Significant Impact. The proposed land use change would ultimately allow for 3,000,000 square feet of manufacturing space that would increase the solid waste generated by the site. Based on an industry standard generation rate of 1.24 tons per year per 1,000 square feet for manufacturing uses, the proposed project would generate 3,720 tons per year. Solid waste service to the site is provided by CR&R Waste Services, who has a material recovery, transfer, and disposal center located in the City of El Centro (599 East Main Street). CR&R owns and operates the South Yuma County Landfill (SYCL) in Arizona and currently transports all waste from El Centro to the South Yuma County Landfill. No waste is disposed in Imperial County. The City of El Centro has renewed its contract with CR&R through 2027. The total design/permitted capacity for the SYCL is 46,825,430 cubic yards. Currently, the landfill is operating in Phase I of its development, which has a design/permitted capacity of 19,305,000 cubic yards. Currently, the SYCL under Phase I of its development has more than 14 million cubic yards of remaining capacity (Maria Lazaruk, pers. comm. 10/18/2018).

In an effort to address landfill capacity and solid waste concerns, the California Legislature passed the Integrated Waste Management Act in 1989 (Assembly Bill 939), which mandated that all cities reduce waste disposed of in landfills from generators within their borders by 50 percent by the year 2000. Recently chaptered Assembly Bill 341 has increased the diversion target to 75 percent (CalRecycle 2015). The City of El Centro has Municipal Code regulations to ensure compliance with these targets. These regulations include Municipal Code Chapter 12, Articles I and II requires collection, transportation, and disposal of solid waste and green waste. Future development within the project site would be required to comply with these regulations.

While future development of the project site would increase the solid waste generated by the site, future development would be required to comply with recycling regulations and CR&R would continue to transport solid waste to the South Yuma Landfill, which has capacity to accept the waste generated by the project. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g. Comply with federal, state, and local statutes and regulation related to solid waste?	☐	☐	☒	☐

Less than Significant. See response for Utilities/Service Section (f). Impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Less than Significant with Mitigation. The project would potentially affect burrowing owls, which is a designated CDFW species of concern. In addition, potentially jurisdictional waters exist on-site. With the implementation of the biological mitigation identified in Section 3.0, the project impacts would be less than significant. Refer to Section IV, Biological Resources, for additional details.

No impacts to historical resources would occur. Refer to Section V, Cultural Resources, for additional details.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable futures projects)?	☐	☒	☐	☐

Less than Significant Impact with Mitigation. The proposed use would be consistent with the City's planning policies and the regional planned growth. However, the proposed project was determined to result in significant cumulative traffic impacts. See Section XVI, Transportation/Traffic, for more details. With the implementation of the traffic mitigation identified in Section 3.0, the project impacts would be less than significant.

Issue	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

No Impact. Neither construction nor operation of the project would create conditions that would significantly impact human beings.

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