

**DRAFT INITIAL STUDY/  
MITIGATED NEGATIVE DECLARATION  
Town Center Village II  
Single-Family Residential and Industrial Project  
El Centro, California  
State Clearinghouse No.: xxxxx**



**Lead Agency**

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

**Prepared By**

Michael Baker International  
9635 Granite Ridge Drive, Suite 300  
San Diego, California 92123  
Contact: Bob Stark, AICP

April 2023

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# **1.0 INTRODUCTION**

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## 1.1 INTRODUCTION AND REGULATORY GUIDANCE

This document is an Initial Study (IS) with supporting environmental studies, which provides justification for a Mitigated Negative Declaration (MND) pursuant to the California Environmental Quality Act (CEQA) for the Town Center Village II Single-Family Residential and Industrial Project (proposed project).

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

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

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

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

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

## 1.2 LEAD AGENCY

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

### 1.3 PURPOSE AND DOCUMENT ORGANIZATION

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

#### 1.0 Introduction

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

#### 2.0 Project Description

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

#### 3.0 Environmental Checklist

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

#### 4.0 Document Preparers and References

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

#### Appendices

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

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# **2.0 PROJECT DESCRIPTION**

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### 2.1 PROJECT CHARACTERISTICS

**1. Project Title**

El Centro Town Center Village II Single-Family Residential and Industrial Project

**2. Lead Agency Name and Address**

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

**3. Contact Person**

Angel Hernandez, AICP, Community Development Director  
Phone Number: 760.337.3864  
Email: angel\_hernandez@cityofelcentro.org

**4. Project Location and Size**

The project site is located in the northern portion of the City of El Centro (City) in south-central Imperial County, California. The site is located south of Treshill Road and the Central Drain; east of North Imperial Avenue/South State Route 86; north of Cruickshank Drive; and west of North 8<sup>th</sup> Street. The affected County Assessor Parcel Numbers (APNs) are APNs 044-620-032, -037 through -041, -053, and -064. Regional access to the project vicinity is provided via Interstate 8 (I-8), which is located approximately 2.8 miles to the south; refer to [Figure 1, Regional/Local Vicinity Map](#). The site is located within the boundaries of the Town Center Village Project and represents the final of four planned phases of development. Refer to [Figure 2, Project Site/Surrounding Land Use](#).

**5. Project Sponsor's Name and Address**

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

**6. Existing General Plan Land Use Designation**

General Commercial, Light Manufacturing

**7. Existing Zoning**

CG-General Commercial, ML-Light Manufacturing

### 2.2 PROJECT DESCRIPTION

#### Existing Setting and Surrounding Land Uses

##### Regional Setting

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

### Local Setting

The project site lies within an urbanized area of the City, within the boundaries of the planned Town Center Village development. Refer to [Figure 2, Project Site/Surrounding Land Use](#). The project site has been previously disturbed and, in its current state, is undeveloped bare ground with limited vegetation. The topography of the project site and surrounding vicinity is relatively flat with on-site elevations ranging from approximately 52 feet below mean sea level (bmsl) to approximately 60 feet bmsl across the property (ECORP 2022b). The project site has been previously graded and does not include slopes greater than 25 percent.

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

### Surrounding Land Uses

Surrounding land uses include multifamily residential (Town Center Villa Apartments) and vacant land adjacent to the south across Cruickshank Drive. Additionally, the existing El Centro Town Center commercial retail development is located adjacent to the south (part of Phase I of the Town Center project) and includes stores such as Target, 99 Cents Only store, and Lowe's Home Improvement, among other commercial uses. Other surrounding land uses include vacant land adjacent to the north across Central Drain; vacant land adjacent to the east across N. 8<sup>th</sup> Street, followed by the Union Pacific railroad and active agricultural fields; and office land uses (San Diego Regional Center and U.S. Social Security office) and vacant land adjacent to the west followed by commercial retail development. Imperial Valley College is located approximately 3.1 miles to the east-northeast.

The Imperial County Airport is located approximately 1 mile north-northwest of the project site. An existing irrigation drain runs to the north of the project site (Central Drain) and an existing irrigation canal runs along the east side of N. 8<sup>th</sup> Street (Date Canal). A regional-serving railway (Union Pacific) extends northwest to southeast approximately 0.1 mile to the east of the site at its closest point.

The Imperial County Airport Land Use Compatibility Plan (Imperial County 1996) identifies the project site as being located within Zone B2, Extended Approach/Departure Zone. The request to rezone the subject property was reviewed by the Imperial County Airport Land Use Commission (ALUC) to determine consistency with the Imperial County Airport Land Use Compatibility Plan. At a hearing held on January 18, 2023, the Airport Land Use Commission determined that the requested rezone is inconsistent with the Airport Land Use Compatibility Plan. However, the City retains the authority to make a final consistency determination that may ultimately preside over the Airport Land Use Commission's decision as to the appropriateness of the requested rezone.

### Proposed Project

The project proposes future development of the approximately 35.8-acre site for single-family residential and light industrial development. The western approximately 18.5-acre portion of the site (western portion) is proposed for single-family residential development (104 lots total). The remaining approximately 17.3 acres of the site (eastern portion) would be developed with future

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## 2.0 PROJECT DESCRIPTION

light manufacturing uses. The affected area (proposed development footprint) is shown in [Figure 2, Project Site/Surrounding Land Use](#); refer also to [Figures 3A to 3C](#).

### Open Space/Recreation

Common open space provided on-site would meet the City's requirement of 150 square feet of common space per residential unit for the proposed R2-Single-Family Residential zone. Such areas would be for use by project residents and would provide opportunities for passive and active outdoor recreation; refer to [Figure 3B](#).

### Landscaping, Lighting, and Signage

Ornamental landscaping would be provided on-site in various locations (i.e., street frontage, entry drives, building entries, and within parking areas). All project landscaping would be consistent with City requirements for coverage and plant types, as well as irrigation systems. The use of reclaimed water for landscape irrigation is not proposed as part of the project.

The project would incorporate lighting and signage elements, as necessary, for safety, security, and locational purposes. It is anticipated that monument signs would be provided at the main entrances along Cruickshank Drive. There is existing street lighting along Cruickshank Drive, N. 8th Street, N. 10th Street, and N. 12th Street in the vicinity of the project site. Additional lighting would be installed along interior roadways and within interior surface parking areas (i.e., light manufacturing uses) for purposes of public safety and circulation. All ancillary features would comply with applicable City design standards and nighttime lighting regulations.

### Parking

The project would be designed to meet parking requirements as identified in City Zoning Ordinance Section 29-128. Each residential unit would provide 2 covered onsite parking spaces. Manufacturing/Industrial uses would provide one space per 500 square feet (SF); warehousing uses would provide 1 space per 800 SF.

### Access/Circulation

Main access to the project site would be provided along the southern boundary directly from Cruickshank Drive; refer to [Figure 3A, Site Plan](#). Access to the proposed residential use area would extend from N. 12th Street via a series of internal roadways. Access into the area proposed for light manufacturing uses would extend directly from Cruickshank Drive via two driveways.

Internal circulation would be provided via a series of linked internal drives, including existing N. 12th Street at the light manufacturing/eastern portion of the project site. Drive aisles would be constructed to minimum required widths with provision of adequate turning radii, consistent with City and fire department design requirements to ensure adequate on-site circulation and access for emergency vehicles; refer to [Figures 3A to 3C](#).

### Utilities

#### Water

Water for the project would be supplied by the City's public water system. The City receives its water supply from the Imperial Irrigation District. The project would connect to existing water lines

## 2.0 PROJECT DESCRIPTION

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in N. 12<sup>th</sup> Street, N. 8<sup>th</sup> Street, and Cruickshank Drive. No upgrades to the existing public water infrastructure system are required or proposed to serve the project as designed.

### **Sewer**

Wastewater treatment for the project would be provided by the City's existing sewer system. The project would connect to existing sewer lines in N. 12<sup>th</sup> Street and Cruickshank Drive. All of the City's wastewater is routed to and treated at the City's Wastewater Treatment Plant located at 2255 North La Brucherie Road, approximately 1.2 miles southwest of the project site. No upgrades to the existing public sewer infrastructure system are required or proposed to serve the project as designed.

### **Stormwater Facilities**

Stormwater from the project site would be routed to an existing storm drain located in N. 12<sup>th</sup> Street. Stormwater from the project site would be routed to existing storm drains located at the proposed light manufacturing/eastern portion of the project site. The storm drains outlet to an existing on-site detention basin, located north of the project boundary, just south of the Central Drain and east of N. 12<sup>th</sup> Street. This detention basin was previously constructed as part of the El Centro Town Center Village project and was sized to accommodate all planned development within the Town Center Village. No upgrades to the City's storm drain system would be required to accommodate stormwater runoff from the subject site with project implementation. Best management practices would be implemented during the construction and operational phases to ensure that stormwater quality leaving the site is maintained and that no adverse effects to off-site properties or downstream water bodies would occur.

### **Electricity and Natural Gas**

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

### **Sustainability/Energy Saving Measures**

The project would be designed to meet the requirements of the 2022 California Green Building Code. Energy-saving measures incorporated into the project design are anticipated to include such features as low-flow fixtures (i.e., faucets, showers, and toilets) in individual residential units. Additionally, the residential units would be "EV Capable" meaning each unit would be equipped with an electrical circuit raceway and adequate electric panel capacity to accommodate future installation of a dedicated circuit and charging station.

### **General Plan Land Use and Zoning**

The project as proposed would require a General Plan Amendment to change the existing General Plan land use designation on a portion of the site from General Commercial and Light Manufacturing to Single-Family Residential. The project site is currently zoned CG-General Commercial and LM-Light Manufacturing. The project proposes to rezone a portion of the property from CG and LM to R2-Single-Family Residential. The General Plan Amendment and rezone would allow for the on-site residential uses as proposed. The balance of the property would remain under the current General Plan land use and zoning designations to allow for future light manufacturing development.

### Subdivision Map

As part of the mapping actions associated with the project, the applicant proposes recordation of a subdivision map to divide a portion of Remainder Lot A (APN 044-620-053) and Lots 12 through 16 (APNs 044-620-032, -037 through 041 and -064) into 115 lots to allow for anticipated future development. A portion of Remainder Lot A and Lots 12 through 16 with a total of approximately 18.5 acres is proposed to be rezoned to R2-Single-Family Residential and would be divided into 104 lots at a minimum of 4,960 square feet per lot. The other portion of Remainder Lot A (APN 044-620-053), totaling 17.3 acres, would remain zoned for light manufacturing use and would be divided into 12 lots ranging from 45,178 square feet to 65,017 square feet. Refer to [Figures 3A to 3C](#).

## 2.3 PROJECT CONSTRUCTION

### Grading and Site Preparation

The subject site is fairly level in its current state. The project would be constructed in two phases. Phase 1 would involve 9,000 cubic yards (c.y.) of cut and 116,000 c.y. of fill. Phase 2 would require approximately 5,000 c.y. of cut and 76,000 c.y. of fill. Therefore, total grading for the project would require approximately 9,000 c.y. of cut and 116,000 c.y. of fill; an estimated 107,000 c.y. of soils would be imported to the site for use during the construction phase(s).

### Schedule

The project would be constructed in two phases. Phase 1 would include construction of the residential units and Phase 2 would involve construction of the light manufacturing uses. Construction of Phase 1 is anticipated to begin in January 2024, with Phase 2 commencing in January 2025. Each phase would last approximately 20 months.

As stated, project construction would occur in two phases. It is anticipated that the work would be completed in 8- or 10-hour shifts, with a total of five shifts per week (Monday-Friday). Overtime and weekend work may occur as necessary to meet scheduled milestones or accelerate the schedule and would comply with applicable California labor laws as well as local City regulations regulating construction activities.

### Operational Characteristics

The project would result in development of single-family residential uses on-site. It is anticipated that operational activities would be similar to those typical of such residential uses.

Future uses occupying the eastern portion of the site proposed for light manufacturing use would be consistent with the ML-Light Manufacturing zone, which is intended to provide for the development of industrial uses that include "fabrication, manufacturing, assembly, or processing of materials that are in refined form and that do not in their transformation create smoke, gas, odor, dust, noise, vibration of earth, soot or lighting to a degree that is offensive when measured at the property line of subject property. Most operations within this zone are to be conducted within enclosed buildings. The ML zone is intended to implement the light manufacturing - general industrial general plan land use designation." Operation of such uses would be anticipated to occur during typical business hours, but may vary depending on the specific use, and as allowed by the City Municipal Code for uses within the ML zone.

## 2.0 PROJECT DESCRIPTION

All parking demands would be accommodated on-site. It is not anticipated that any off-site parking would occur that may affect surrounding streets or other area land uses.

### 2.4 ANTICIPATED DISCRETIONARY ACTIONS AND APPROVALS

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

Project entitlements/discretionary actions and approvals required for the project are anticipated to include, but may not be limited to, those identified in Table 1, Required Approvals and Permits.

**Table 1: Required Approvals and Permits**

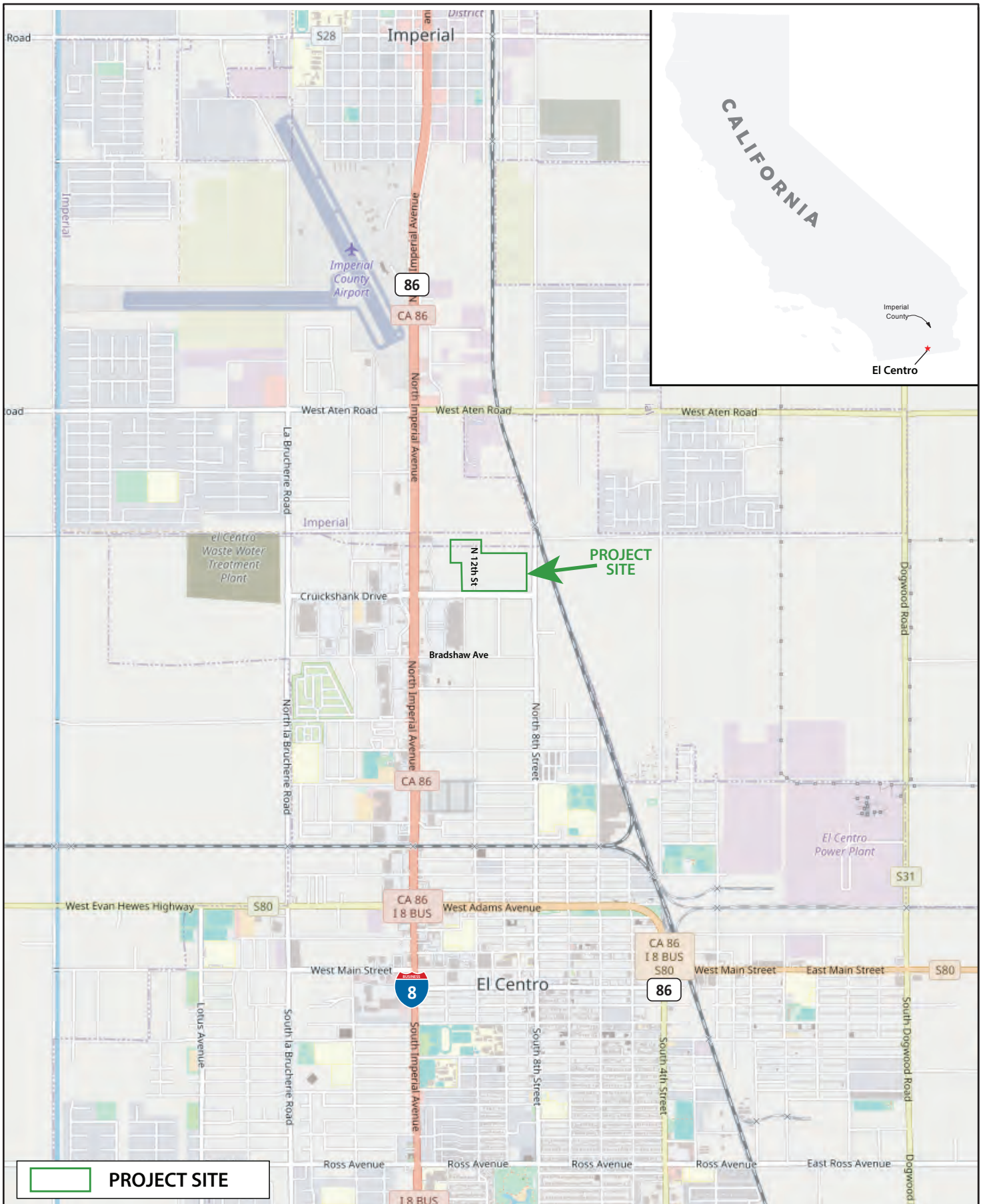
Permit/Action Required	Approving Agency	Lead/Trustee/Responsible Agency
Site Plan	City	Lead Agency
Subdivision Map	City	Lead Agency
Landscape Plan	City	Lead Agency
Mitigated Negative Declaration	City	Lead Agency
General Plan Amendment	City	Lead Agency
Rezone	City	Lead Agency
General Construction Stormwater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

## 2.0 PROJECT DESCRIPTION

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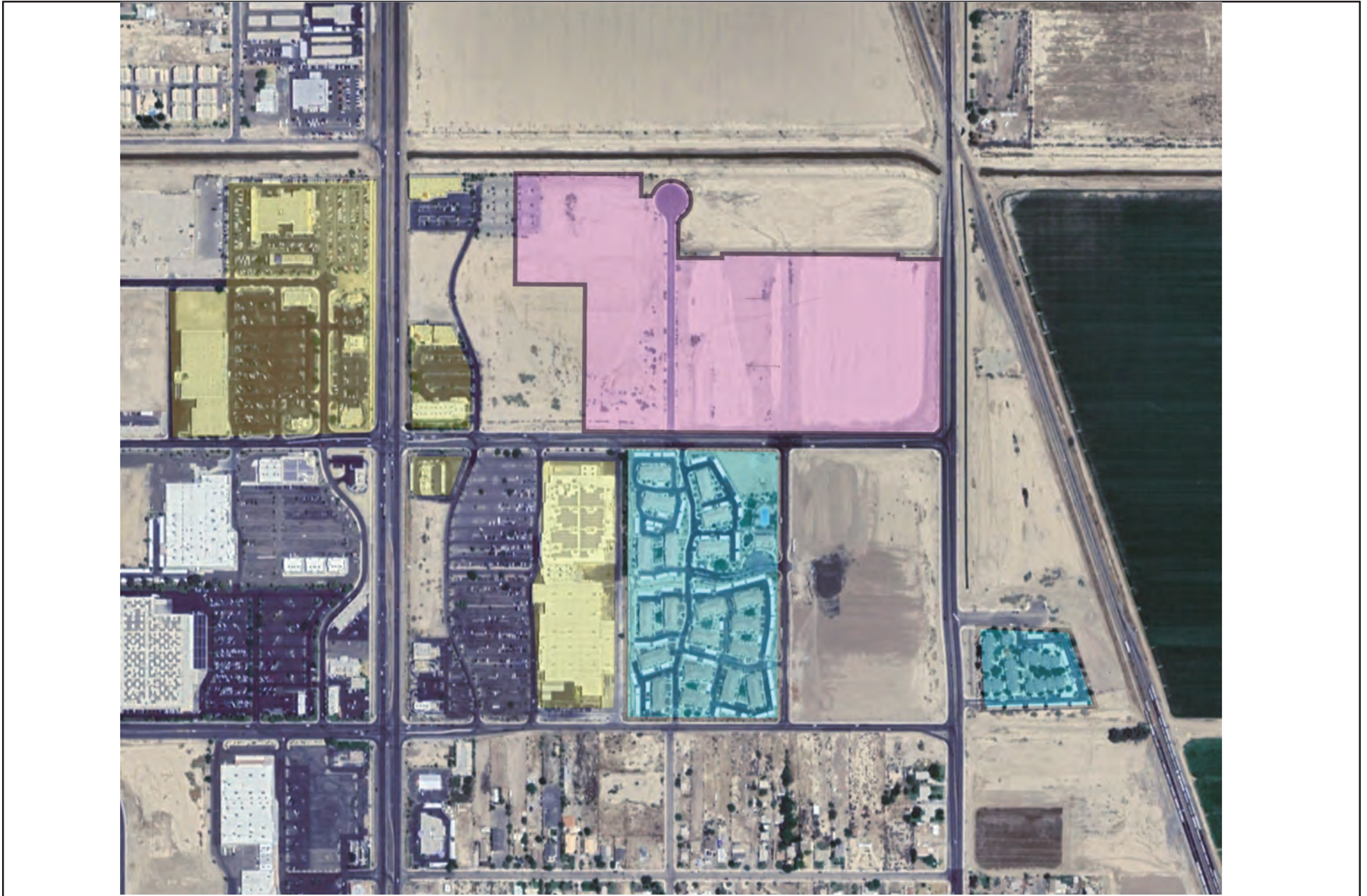


## 2.0 PROJECT DESCRIPTION

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## 2.0 PROJECT DESCRIPTION

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# TENTATIVE SUBDIVISION MAP

## EL CENTRO RESIDENTIAL AND INDUSTRIAL DEVELOPMENT

### CITY OF EL CENTRO, COUNTY OF IMPERIAL, STATE OF CALIFORNIA

#### PROJECT INFORMATION

##### PROPERTY INFORMATION

**PROPERTY OWNER** TOWN CENTER COURTYARD II, LLC  
9650 FLAIR DRIVE  
EL MONTE, CA 91731

**ENGINEER** MICHAEL INCLEDON  
INCLEDON CONSULTING GROUP  
1570 CORPORATE DRIVE, SUITE A  
COSTA MESA, CA 92626  
PCE #62390

**ASSESSORS ID NUMBERS** 044-620-032, 044-620-037, 044-620-038, 044-620-039, 044-620-040, 044-620-041,  
044-620-053, AND 044-620-054

**LEGAL DESCRIPTIONS** A PORTION OF REMAINDER LOT A AND LOTS 12, 13, 14, 15, AND 16 AS SHOWN ON EL  
CENTRO TOWN CENTER PHASE II FINAL MAP, RECORDED IN BOOK 26, PAGES 71  
THROUGH 73, INCLUSIVE, IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL  
COUNTY, PARCEL 77 OF LLA NO. 21-05, RECORDED ON 5/18/2022 AS RECORDING  
NO. 2022011125, OF OFFICIAL RECORDS, AND PARCEL 10 OF LLA NO. 21-03, AS  
RECORDED DECEMBER 15, 2021, INSTRUMENT NO. 2021031957, OF OFFICIAL  
RECORDS, RECORDS OF SAID COUNTY.

**EXISTING ZONING** ML - LIGHT MANUFACTURING  
CG - GENERAL COMMERCIAL

**PROPOSED ZONING** R1 - SINGLE FAMILY RESIDENTIAL  
ML - LIGHT MANUFACTURING

**EXISTING LAND USE** VACANT

**PROPOSED LAND USE** SINGLE FAMILY RESIDENTIAL  
LIGHT MANUFACTURING

**EXISTING TREES** THERE ARE NO EXISTING TREES ON THE SITE

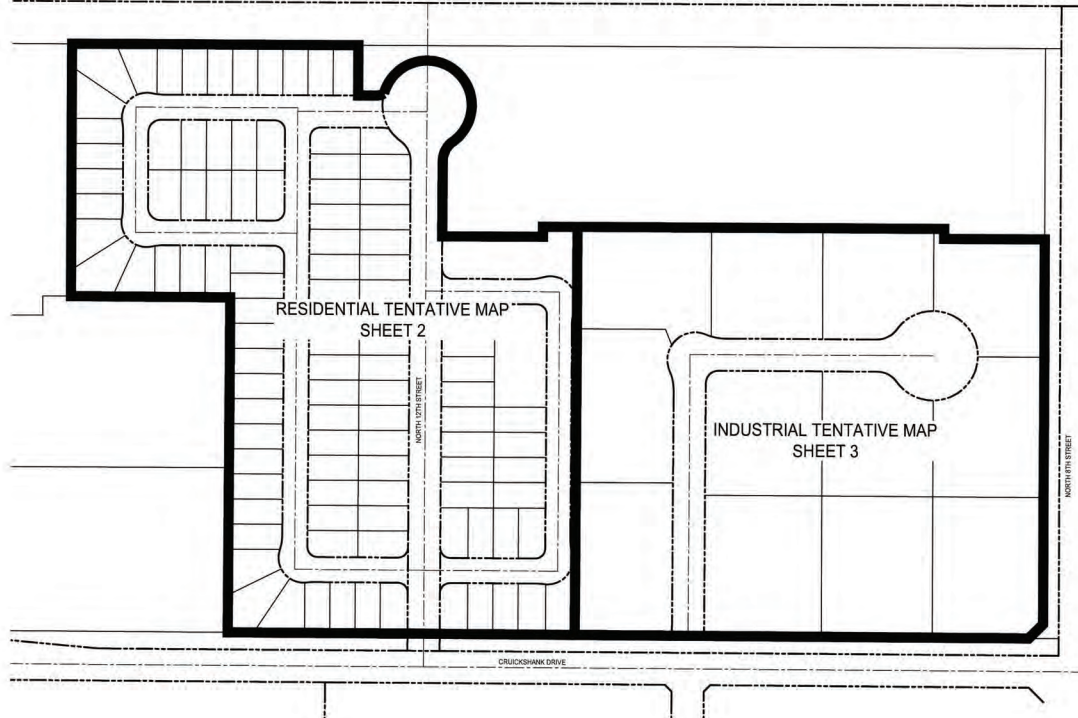
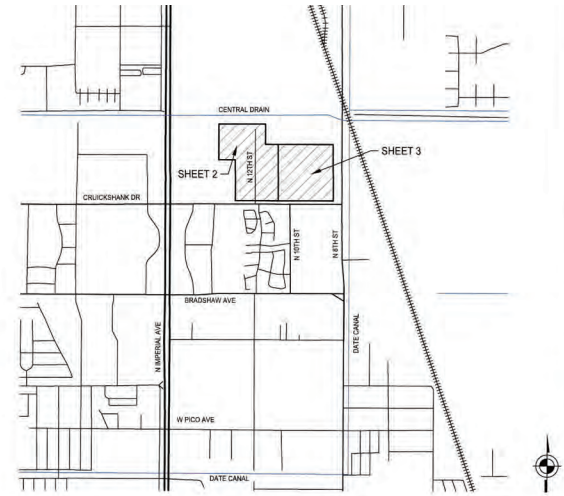
**EXISTING STRUCTURES** THERE ARE NO EXISTING STRUCTURES ON THE SITE

**DATE MAP PREPARED** MAY 2022

**FLOOD ZONE** ZONE X, ACCORDING TO FEMA FLOOD MAP NO. 06025C1725C

#### UTILITY PROVIDERS:

<b>ELECTRICITY</b> IMPERIAL IRRIGATION DISTRICT 1285 BROADWAY EL CENTRO, CA 92243 760-335-3640	<b>SEWER</b> CITY OF EL CENTRO 2255 NORTH LA BRUCHERIE EL CENTRO, CA 92243 760-337-4562	<b>BUILDING AND SAFETY DIVISION</b> CITY OF EL CENTRO 1275 MAIN STREET EL CENTRO, CA 92243 760-337-4508
<b>WATER</b> CITY OF EL CENTRO 1275 MAIN STREET EL CENTRO, CA 92243 760-337-4510	<b>GAS</b> SOUTHERN CALIFORNIA GAS COMPANY PO BOX 1626 MONTEREY PARK, CA 91754-8626 1-877-236-0092	



#### LEGEND

- PROPERTY LINE
- EASEMENT
- LOT LINE
- CENTER LINE
- STORMWATER BIORETENTION BASIN

#### SURVEY INFORMATION

**BENCHMARK**  
WEST TOP OF CURB RETURN, SOUTHWEST CORNER OF IMPERIAL AVENUE (STATE HIGHWAY 96) AND  
CRUCKSHANK DRIVE.  
ELEVATION = 48.15

AS PER LARS ANDERSEN AND ASSOCIATES, INC. PROJECT NO. 02022.00 (EL CENTRO TOWN CENTER)  
AND VESTING TENTATIVE MAP ENTITLED "TOWN CENTER VILLAGE APARTMENTS" BY BJ ENGINEERING  
AND SURVEYING, INC. JOB NO. 11-106.

**BASIS OF BEARINGS**  
THE BASIS OF BEARINGS FOR THIS SURVEY IS THE NORTHERLY LINE OF REMAINDER PARCELS A AND B  
AS SHOWN ON THE MAP TITLED "EL CENTRO TOWN CENTER" FILED IN BOOK 20, PAGE 97 OF FINAL MAPS  
IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY, SHOWN AS S 89°37'57" E.



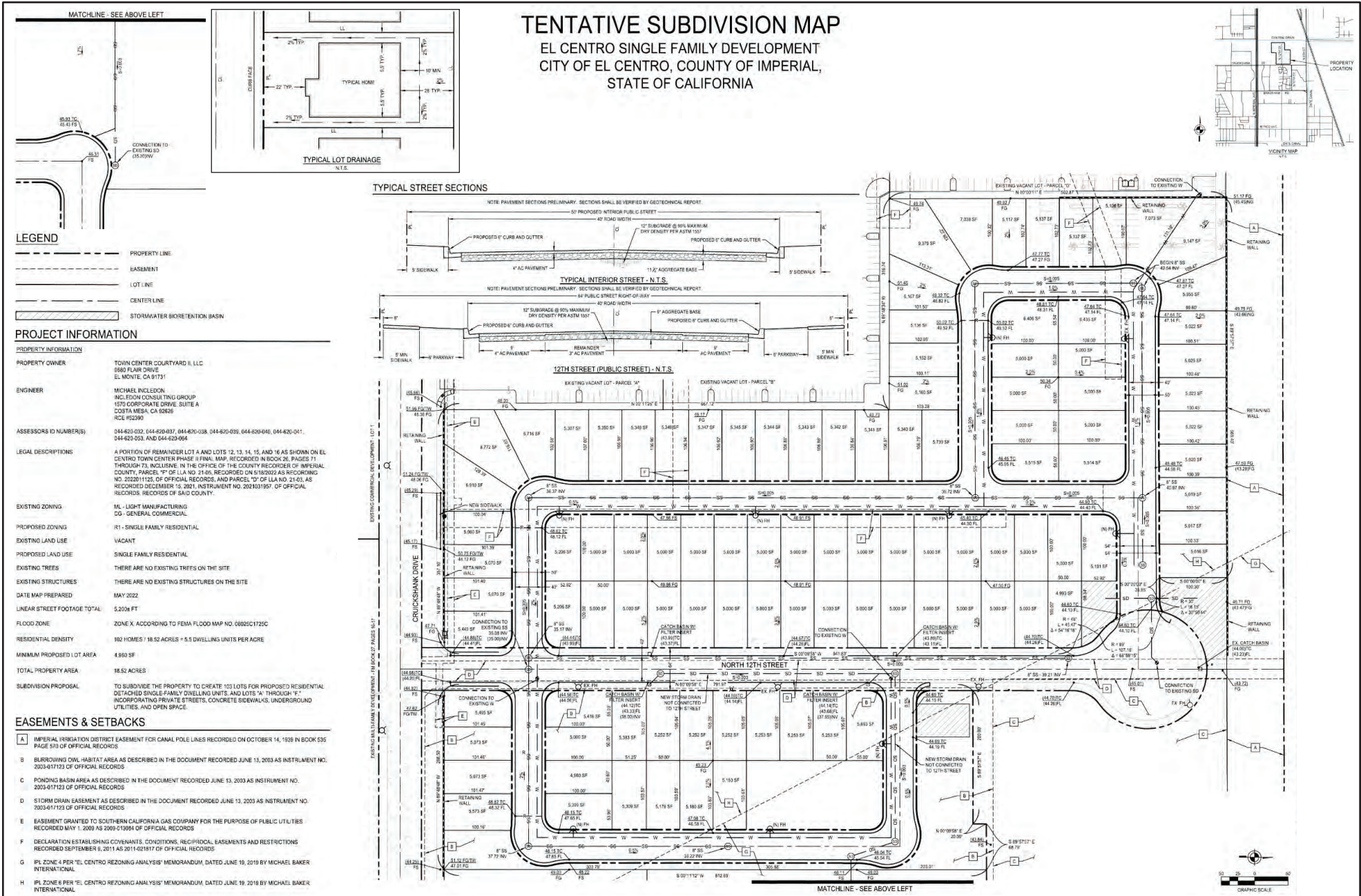


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# TENTATIVE SUBDIVISION MAP

## EL CENTRO SINGLE FAMILY DEVELOPMENT

### CITY OF EL CENTRO, COUNTY OF IMPERIAL, STATE OF CALIFORNIA



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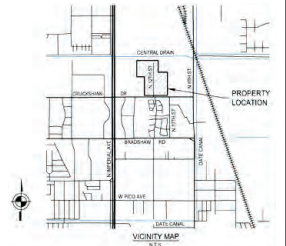
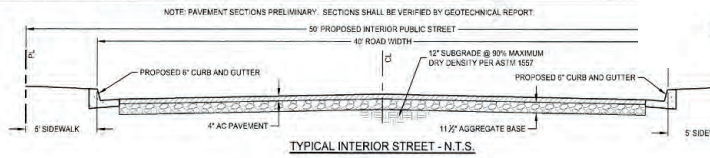


# TENTATIVE SUBDIVISION MAP

## EL CENTRO INDUSTRIAL DEVELOPMENT

### CITY OF EL CENTRO, COUNTY OF IMPERIAL, STATE OF CALIFORNIA

#### TYPICAL STREET SECTIONS



#### LEGEND

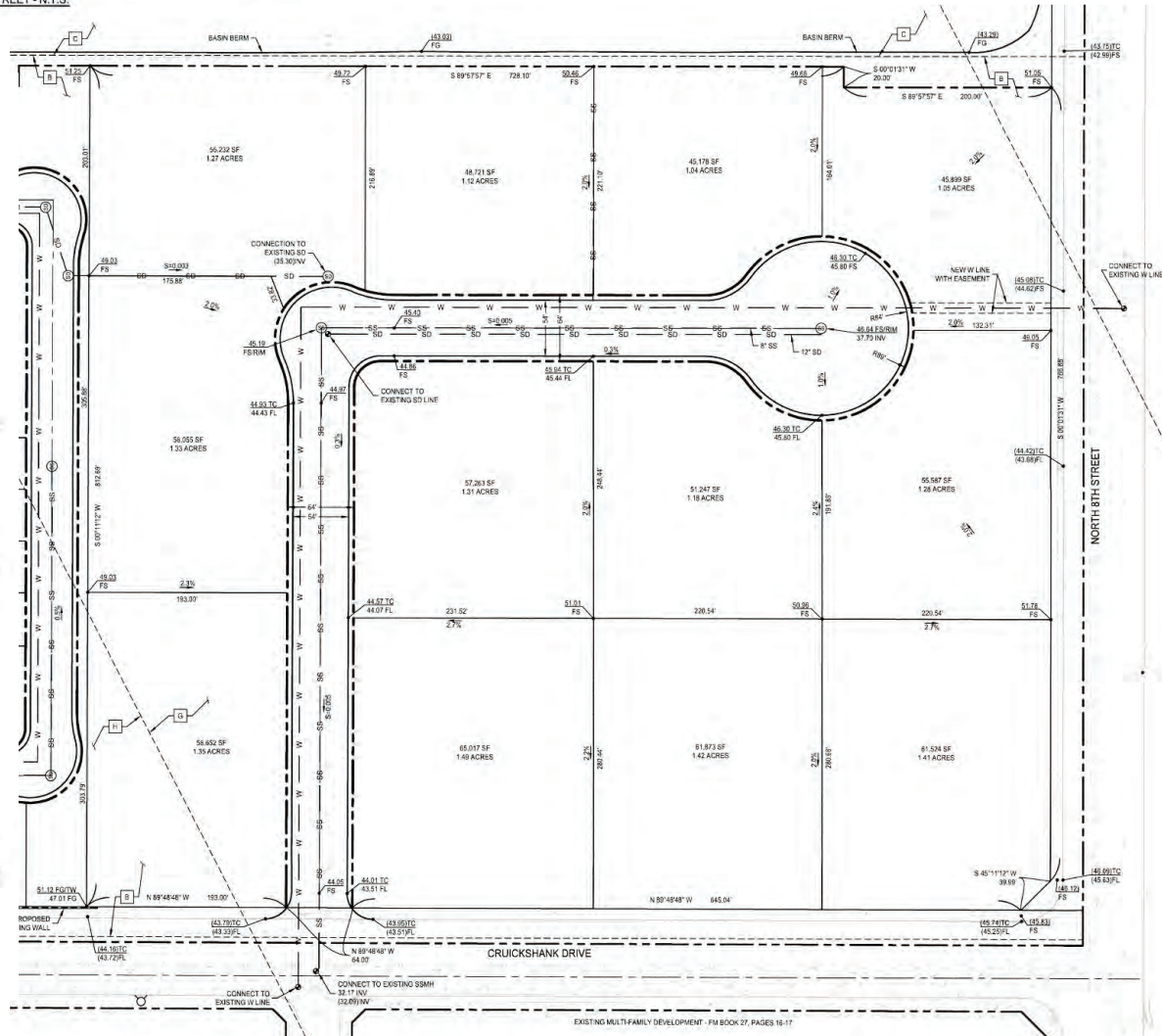
- PROPERTY LINE
- EASEMENT
- LOT LINE
- CENTER LINE

#### PROJECT INFORMATION

PROPERTY INFORMATION	
PROPERTY OWNER	TOWN CENTER COURTYARD II, LLC 8863 FLAIR DRIVE EL MONTE, CA 91731
ENGINEER	MICHAEL INCLEDON INCLEDON CONSULTING GROUP 1570 CORPORATE DRIVE, SUITE A COSTA MESA, CA 92626 RCE #52390
ASSESSORS ID NUMBER(S)	044-420-053
LEGAL DESCRIPTIONS	A PORTION OF REMAINDER LOT 4 AS SHOWN ON EL CENTRO TOWN CENTER PHASE II FINAL MAP, RECORDED IN BOOK 26, PAGES 71 THRU 73, INCLUSIVE, IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY
EXISTING ZONING	ML - LIGHT MANUFACTURING
PROPOSED ZONING	ML - LIGHT MANUFACTURING
EXISTING LAND USE	VACANT
PROPOSED LAND USE	LIGHT MANUFACTURING
EXISTING TREES	THERE ARE NO EXISTING TREES ON THE SITE
EXISTING STRUCTURES	THERE ARE NO EXISTING STRUCTURES ON THE SITE
DATE MAP PREPARED	MAY 2022
LINEAR STREET FOOTAGE TOTAL	3,100+ FT
FLOOD ZONE	ZONE X, ACCORDING TO FEMA FLOOD MAP NO. 06025C1725C
MINIMUM PROPOSED LOT AREA	4,960 SF
TOTAL PROPERTY AREA	17.26 ACRES

#### EASEMENTS & SETBACKS

- B BURROWING CIVIL HABITAT AREA AS DESCRIBED IN THE DOCUMENT RECORDED JUNE 13, 2003 AS INSTRUMENT NO. 2003-011723 OF OFFICIAL RECORDS
- C PONDING BASIN AREA AS DESCRIBED IN THE DOCUMENT RECORDED JUNE 13, 2003 AS INSTRUMENT NO. 2003-011723 OF OFFICIAL RECORDS
- G IPL ZONE 4 PER "EL CENTRO REZONING ANALYSIS" MEMORANDUM, DATED JUNE 19, 2019 BY MICHAEL BAKER INTERNATIONAL
- H IPL ZONE 6 PER "EL CENTRO REZONING ANALYSIS" MEMORANDUM, DATED JUNE 19, 2019 BY MICHAEL BAKER INTERNATIONAL



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View looking west from N. 12th Street  
(northern extent of cul-de-sac).



View looking east from northeast corner  
of adjacent (offsite) parking lot.



View looking northeast from southwest corner  
of proposed residential area.



View looking north from Cruickshank Drive  
to proposed residential area.

## 2.0 PROJECT DESCRIPTION

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View from northwest corner of proposed industrial area looking east.



View from west side of proposed industrial area looking east.



View from center of proposed industrial area looking southeast.



View from southwest corner of proposed industrial area looking south.

## 2.0 PROJECT DESCRIPTION

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**3.0 ENVIRONMENTAL  
CHECKLIST**

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## 3.0 ENVIRONMENTAL CHECKLIST

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### 3.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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



## 3.0 ENVIRONMENTAL CHECKLIST

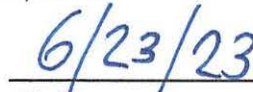
### 3.2 DETERMINATION

On the basis of this initial evaluation:

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

  
Signature

Angel Hernandez  
Printed Name

  
Date

Community Development Director  
Title

### 3.3 EVALUATION OF ENVIRONMENTAL IMPACTS

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

### 3.0 ENVIRONMENTAL CHECKLIST

#### 1. Aesthetics

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

#### DISCUSSION OF IMPACTS

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

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

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

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

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

The project would be designed in accordance with the El Centro Municipal Code to ensure that development reflects required design requirements such as for building size and height, setbacks, provision of landscaping, and common open space. Development occurring with the project would also be required to be consistent with the City's adopted Design Standards, which

### 3.0 ENVIRONMENTAL CHECKLIST

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encourage sound site development practices synonymous with that of the existing residential development surrounding the project. Additionally, the proposed buildings would be generally similar in design to other existing residential uses in the vicinity (e.g., multifamily uses located immediately to the south [Town Center Villa Apartments]) and large-scale retail development to the south/southwest/west. As such, the project would not substantially change the existing character of the area.

Furthermore, the project site is not located in one of the City's designated Visual Enhancement Areas, as identified in the City General Plan Land Use Element (City of El Centro 2021 a). The project site is currently undeveloped, previously graded land in proximity to other existing multi- and single-family residential and large-scale retail commercial uses, as well as undeveloped and agricultural use lands. As discussed under Response 1 (b) above, development of the proposed residential and light industrial uses would not substantially damage any resources having scenic quality, as the site does not support any such features.

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

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

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

Exterior lighting would be installed on the individual buildings for identification purposes (i.e., addresses or building numbers) and access. Lighting would also be installed at the access drives and in surface parking areas to ensure safe on-site circulation. Additional accent lighting may be used to illuminate informational monument signs and associated landscaping at the entrances to the single-family residential and light industrial use areas.

All project lighting would be low-level lighting shielded and directed downward to reduce potential effects on adjacent properties as well as nighttime skies. All new development in El Centro is required to meet the standards identified in Section 29-149, Lighting Standards, of the City's Zoning Code to ensure that potential adverse nighttime lighting effects are minimized.

Additionally, the project would not include the incorporation of large expanses of glass or other reflective materials such as high gloss paints, metallic surfaces, or other such features. Therefore, it is not anticipated that project elements would result in potential adverse glare effects on surrounding properties or on operations associated with the Imperial County Airport, located approximately 0.9 miles northwest of the project site.

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

### 3.0 ENVIRONMENTAL CHECKLIST

## 2. Agriculture and Forestry Resources

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

### DISCUSSION OF IMPACTS

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

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

The project site is located in an urbanized area in the City of El Centro and is generally surrounded by developed lands supporting multifamily uses, retail commercial centers, and office uses, in addition to paved roadways and public utility and infrastructure systems. Active agricultural lands are located to the east of the site, east of N. 8<sup>th</sup> Street and the Date Canal. The site is currently

### 3.0 ENVIRONMENTAL CHECKLIST

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undeveloped and has been previously graded. In addition, the site currently has a General Plan land use designation of General Commercial and Light Manufacturing and is zoned CG-General Commercial and ML-Light Manufacturing, indicating the City's anticipation for future development of the property as a non-agricultural use.

Based on a review of historical aerial photographs and maps dated 1915 to 2019, the project area has been vacant and used for agricultural purposes since at least 1953 and possibly as early as 1915. However, no structures or other development have been documented as having occurred on-site in the past.

Although the project would result in the conversion of Farmland of Local Importance to a non-agricultural use, the subject site has not been in active agricultural use in recent years. Based on such conditions, combined with current zoning and General Plan land use designations that do not anticipate future agricultural uses, as well as the surrounding urbanized setting, development of the site as proposed is not anticipated to result in the loss of valuable farmland or adversely affect the City's inventory of agricultural resources over the long term.

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

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

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

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

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

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

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

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

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

### 3.0 ENVIRONMENTAL CHECKLIST

#### 3. Air Quality

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

The following discussion is based upon the *Air Quality & Greenhouse Gas Emissions Assessment* prepared by ECORP Consulting, Inc. (2023a; see Appendix A). This document provides additional detailed discussion, background information, and other relevant information considered in the analysis.

#### DISCUSSION OF IMPACTS

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

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

CARB divides the state into air basins that share similar meteorological and topographical features. Imperial County, which extends over 4,482 square miles in the southeastern corner of California, lies in the Salton Sea Air Basin, which includes the Imperial Valley and the central part of Riverside County, including the Coachella Valley.

Clean air plans, known as State Implementation Plans (SIP), must be prepared for areas designated as nonattainment to demonstrate how the area will come into attainment of the exceeded ambient air quality standard. As identified in Table 3-1 under Response 3b), below, the project region of the Salton Sea Air Basin is classified nonattainment for federal ozone (O<sub>3</sub>) and fine particulate matter (PM<sub>2.5</sub>) standards (ECORP 2023a).

The region's SIP includes the ICAPCD air quality plans: 2018 PM<sub>10</sub> SIP, the 2018 Annual PM<sub>2.5</sub> SIP, the 2017 8-Hour Ozone SIP, 2013 24-Hour PM<sub>2.5</sub> SIP, the 2009 1997 8-hour Ozone RACT SIP, the 2009 PM<sub>10</sub> SIP, and the 2008 Ozone Early Progress Plans. These air quality attainment plans are a compilation of new and previously submitted plans, programs (such as monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls describing how the state will attain ambient

### 3.0 ENVIRONMENTAL CHECKLIST

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air quality standards. These SIPs and associated control measures are based on information derived from projected growth in Imperial County in order to project future emissions and then determine strategies and regulatory controls for the reduction of emissions. Growth projections are based on the general plans developed by Imperial County and the incorporated cities in the county, including El Centro.

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

As shown in Tables 3-3B and 3-4 below, the project would generate emissions that would be below the ICAPCD significance thresholds during both construction and operations. Since the project would result in less than significant emission impacts, it would not delay the timely attainment of air quality standards or ICAPCD air quality planning goals. The project would not conflict with or obstruct the implementation of the ICAPCD air quality plans. However, a General Plan Amendment is proposed to change the existing General Plan land use designation on a portion of the site from General Commercial and Light Manufacturing to Single-Family Residential. Thus, the project as proposed is not consistent with the El Centro General Plan and is therefore potentially inconsistent with the types, intensity, and patterns of land use assumed for the site vicinity in the ICAPCD's air quality planning efforts.

The ICAPCD air quality plans are intended to reduce emissions of criteria pollutants for which the region is in nonattainment by establishing a program of rules and regulations directed at reducing air pollutant emissions and achieving state and national air quality standards. The project is considered infill development as it proposes to develop a property in an urbanizing area in close proximity to a wide range of commercial businesses and services. As a result of proposing residential land uses in proximity to N. Imperial Avenue and its large amount of commercial services, the project can be identified for its "location efficiency." Location efficiency describes the location of the project relative to the type of urban landscape it is proposed to fit within. In general, compared to the statewide average, a project with location efficiency can realize substantial automotive vehicle mile trip (VMT) reductions, which in turn results in reduced air pollutant emissions. The project would locate residences in close proximity to existing off-site commercial uses, thereby providing commercial and work options to the future residents that would live at the project site. The location efficiency of the project site would result in synergistic benefits that would reduce vehicle trips and VMT compared to the statewide average and would result in corresponding reductions in transportation-related emissions. Additionally, due to the wide range of commercial services located along N. Imperial Avenue, the project could potentially enhance the physical design of the urban environment by instigating land use diversity and positioning more residents within close proximity to existing commercial land uses. The increases in land use diversity and mix of uses in the project area would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions, a primary goal of the ICAPCD.

For the above reasons, the proposal to amend the General Plan land use designation of the project site from General Commercial and Light Manufacturing to Single-Family Residential would be consistent with ICAPCD strategies for integrating land use and transportation in a manner that reduces regional air pollutants, and thus, is consistent with the applicable air quality management plans. Further, because the project is required to comply with applicable ICAPCD rules,



### 3.0 ENVIRONMENTAL CHECKLIST

regulations, and requirements for controlling emissions of the nonattainment air pollutants and their precursors, and since maximum daily pollutant emissions projected to result from the project are below ICAPCD significance thresholds, the project would not conflict with or obstruct implementation of any air quality plans. Impacts would be less than significant.

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

#### **Ambient Air Quality**

The US Environmental Protection Agency and CARB designate air basins or portions of air basins and counties as being in “attainment” or “nonattainment” for each of the criteria pollutants. Areas that do not meet the standards are classified as nonattainment areas. The National Ambient Air Quality Standards (other than O<sub>3</sub> and particulate matter [PM<sub>10</sub> and PM<sub>2.5</sub>] and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. The national standards for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are based on statistical calculations over one- to three-year periods, depending on the pollutant. The California Ambient Air Quality Standards are not to be exceeded during a three-year period. The attainment status for the Salton Sea Air Basin, which encompasses the project site, is included in [Table 3-1](#).

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

<b>Pollutant</b>	<b>State Designation</b>	<b>Federal Designation</b>
O <sub>3</sub>	Nonattainment	Nonattainment
PM <sub>10</sub>	Nonattainment	Attainment
PM <sub>2.5</sub>	Attainment	Nonattainment
CO	Attainment	Unclassified/Attainment
NO <sub>2</sub>	Attainment	Unclassified/Attainment
SO <sub>2</sub>	Attainment	Unclassified/Attainment

Source: ECORP 2023a; see Appendix A.

The determination of whether an area meets the state and federal standards is based on air quality monitoring data. Some areas are unclassified, which means there is insufficient monitoring data for determining attainment or nonattainment. Unclassified areas are typically treated as being in attainment. Because the attainment/nonattainment designation is pollutant-specific, an area may be classified as nonattainment for one pollutant and attainment for another. Similarly, because the state and federal standards differ, an area could be classified as attainment for the federal standards of a pollutant and as nonattainment for the state standards of the same pollutant. The region is designated as a nonattainment area for the federal O<sub>3</sub> and PM<sub>2.5</sub> standards and is also a nonattainment area for the state standards for O<sub>3</sub> and PM<sub>10</sub> (ECORP 2023a).

#### **ICAPCD Thresholds of Significance**

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

### 3.0 ENVIRONMENTAL CHECKLIST

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

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

Source: ECORP 2023a; see Appendix A.

Notes: ROG – reactive organic gas; NO<sub>x</sub> – nitric oxides; PM<sub>10</sub> – coarse particulate matter; PM<sub>2.5</sub> – fine particulate matter; CO – carbon monoxide; SO<sub>2</sub> – sulfur dioxide; lbs/day – pounds per day

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

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

#### Construction

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

Emissions associated with project implementation would be temporary and short term but have the potential to represent a significant air quality impact. Two basic sources of short-term emissions will be generated through project implementation: operation of the heavy-duty equipment (i.e., excavators, loaders, haul trucks) and the creation of fugitive dust during clearing and grading. Construction activities such as excavation and grading operations, construction vehicle traffic, and wind blowing over exposed soils would generate exhaust emissions and fugitive PM emissions that affect local air quality at various times during construction. Effects would be variable depending on the weather, soil conditions, the amount of activity taking place, and the nature of dust control efforts. The dry climate of the area during the summer months creates a high potential for dust generation. Construction activities would be subject to ICAPCD Regulation VIII (Fugitive Dust Rule) which requires taking reasonable precautions to reduce the amount of PM<sub>10</sub> entrained in the ambient air as a result of emissions generated from construction and other earth-moving activities through actions to prevent, reduce, or mitigate PM<sub>10</sub> emissions. Regulation VIII requires the project to adopt best available control measures to minimize emissions from surface-disturbing activities.

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Emissions associated with project off-road equipment, worker commute trips, and ground disturbance were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements.

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

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

Construction Year	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction Calendar Year One	3.35	26.20	53.10	0.10	6.40	2.83
Construction Calendar Year Two	175.00	38.10	99.80	0.12	12.10	4.30
Construction Calendar Year Three	171.00	13.70	47.00	0.05	6.07	1.69
<i>ICAPCD Daily Significance Threshold</i>	75	100	550	None	150	None
<b>Exceed Threshold?</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: ECORP 2023a; see Appendix A.

Notes: Pounds per day taken from the season (summer or winter) with the highest output.

As shown in [Table 3-3A](#), project reactive organic gas (ROG) emissions would exceed ICAPCD daily ROG thresholds during both the second and third calendar years of construction. Such daily emissions are primarily associated with the application of architectural coatings, including paint. Mitigation measure **AQ-1** is proposed to reduce the daily emission of ROG to a level of less than significant.

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

Construction Year	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction Calendar Year One	3.35	26.20	53.10	0.10	6.40	2.83
Construction Calendar Year Two	32.70	38.10	99.80	0.12	12.10	4.30
Construction Calendar Year Three	28.50	13.70	47.00	0.05	6.07	1.69
<i>ICAPCD Daily Significance Threshold</i>	75	100	550	None	150	None
<b>Exceed Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: ECORP 2023a; see Appendix A.

Notes: Pounds per day taken from the season (summer or winter) with the highest output.

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

#### Operation

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

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Project implementation would result in long-term operational emissions of criteria air pollutants such as PM<sub>10</sub>, PM<sub>2.5</sub>, carbon monoxide (CO), and sulfur dioxide (SO<sub>2</sub>) as well as O<sub>3</sub> precursors such as ROG and nitrogen oxides (NO<sub>x</sub>). Project-generated increases in emissions would be predominantly associated with motor vehicle use. Operational air pollutant emissions were based on the project site plans and the estimated traffic trip generation rates provided by Michael Baker International (2023b; see Appendix F). Long-term operational emissions attributable to the project are identified in Table 3-4 and compared to the operational significance thresholds promulgated by the ICAPCD.

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

Emission Source	Pollutant (pounds per day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summer Emissions</b>						
Area	41.5	0.33	38.5	0.01	0.05	0.06
Energy	0.27	4.78	3.63	0.03	0.37	0.37
Mobile	7.46	4.74	49.0	0.10	3.20	0.61
<b>Total:</b>	<b>49.3</b>	<b>9.85</b>	<b>91.1</b>	<b>0.14</b>	<b>3.62</b>	<b>1.04</b>
<i>ICAPCD Daily Significance Threshold</i>	137	137	550	150	150	550
<b>Exceed ICAPCD Region Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Winter Emissions</b>						
Area	35.6	--	--	--	--	--
Energy	0.27	4.78	3.63	0.03	0.37	0.37
Mobile	5.73	5.27	35.0	0.09	3.20	0.61
<b>Total:</b>	<b>41.6</b>	<b>10.1</b>	<b>38.6</b>	<b>0.12</b>	<b>3.57</b>	<b>0.98</b>
<i>ICAPCD Daily Significance Threshold</i>	137	137	550	150	150	550
<b>Exceed ICAPCD Region Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: ECORP 2023a; see Appendix A.

Notes: Operational emissions based off of Traffic Impact Study prepared by Michael Baker International (2023b; see Appendix F).

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

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

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

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## 3.0 ENVIRONMENTAL CHECKLIST

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### **Construction-Generated Air Contaminants**

Construction-related activities would result in temporary, short-term emissions of diesel particulate matter (DPM), ROG, NO<sub>x</sub>, CO, and PM<sub>10</sub> from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g., clearing, grading); soil hauling truck traffic; paving; and other miscellaneous activities. The El Centro portion of the Salton Sea Air Basin is listed as a nonattainment area for the federal O<sub>3</sub> and PM<sub>2.5</sub> standards and is also a nonattainment area for the state standards for O<sub>3</sub> and PM<sub>10</sub>. Thus, existing O<sub>3</sub> and PM<sub>2.5</sub> levels in the project portion of the air basin are at unhealthy levels during certain periods. However, as shown in [Table 3-3B](#), the project would not exceed the ICAPCD significance thresholds for construction emissions.

The health effects associated with O<sub>3</sub> are generally associated with reduced lung function. Because the project would not involve construction activities that would result in O<sub>3</sub> precursor emissions (ROG or NO<sub>x</sub>) in excess of the ICAPCD thresholds, the project is not anticipated to substantially contribute to regional O<sub>3</sub> concentrations and the associated health impacts.

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

Particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Particulate matter exposure has been linked to a variety of problems, including premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms such as irritation of the airways, coughing, or difficulty breathing. For construction activity, DPM is the primary toxic air contaminant of concern. Based on the emission modeling conducted, the maximum on-site construction-related daily emissions of exhaust PM<sub>2.5</sub>, considered a surrogate for DPM, would be 2.83 pounds/day during construction during the first year of construction; 4.30 pounds/day during the second year of construction; and 1.69 pounds/day during the third year of construction (ECORP 2023a; see Appendix A). PM<sub>2.5</sub> exhaust is considered a surrogate for DPM because more than 90 percent of DPM is less than 1 microgram in diameter and therefore is a subset of particulate matter under 2.5 microns in diameter (i.e., PM<sub>2.5</sub>). Most PM<sub>2.5</sub> derives from combustion, such as use of gasoline and diesel fuels by motor vehicles. As with O<sub>3</sub> and NO<sub>x</sub>, the project would not generate emissions of PM<sub>10</sub> or PM<sub>2.5</sub> that would exceed the ICAPCD's thresholds. Accordingly, the project's PM<sub>10</sub> and PM<sub>2.5</sub> emissions are not expected to cause an increase in related regional health effects for these pollutants.

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

### **Operational Air Contaminants**

Operation of the proposed project would not result in substantial sources of air toxics. No stationary sources are associated with the proposed project operations, nor would the project attract additional mobile sources that spend long periods queuing and idling at the site. Operational emissions are expected to be generated by vehicles traveling to/from the single-family homes and individual warehouse units. As shown in [Table 3-3B](#), on-site project emissions would not result

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## 3.0 ENVIRONMENTAL CHECKLIST

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in emissions of criteria pollutants over the ICAPCD thresholds. Therefore, the project would not result in a significant concentration of pollutants at nearby sensitive receptors.

### ***Naturally Occurring Asbestos***

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

### ***Carbon Monoxide Hot Spots***

It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when idling at congested intersections. Concentrations of CO are a direct function of the number of vehicles, length of delay, and traffic flow conditions. Under certain meteorological conditions, CO concentrations close to congested intersections that experience high levels of traffic and elevated background concentrations may reach unhealthy levels, affecting nearby sensitive receptors. Given the high traffic volume potential, areas of high CO concentrations, or "hot spots," are typically associated with intersections that are projected to operate at unacceptable levels of service during the peak commute hours. However, transport of this criteria pollutant is limited, and CO disperses rapidly with distance from the source under normal meteorological conditions. Furthermore, vehicle emissions standards have become increasingly more stringent in the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the Salton Sea Air Basin (within which the project site lies) is designated as in attainment. Detailed modeling of project-specific CO "hot spots" is not necessary, and thus, this potential impact is addressed qualitatively.

A CO "hot spot" would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. The analysis prepared for CO attainment in the South Coast Air Quality Management District's (SCAQMD) 1992 Federal Attainment Plan for Carbon Monoxide in Los Angeles County and a Modeling and Attainment Demonstration prepared by the SCAQMD as part of the 2003 Air Quality Management Plan can be used to demonstrate the potential for CO exceedances of these standards. The SCAQMD conducted a CO hot spot analysis as part of the 1992 CO Federal Attainment Plan at four busy intersections in Los Angeles County during the peak morning and afternoon time periods. The intersections evaluated were Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection evaluated was at Wilshire Boulevard and Veteran Avenue, which has a traffic volume of approximately 100,000 vehicles per day. Despite this level of traffic, the CO analysis concluded that there was no violation of CO standards (ECORP 2023a). In order to establish a more accurate record of baseline CO concentrations affecting the South Coast Air Basin, a CO "hot spot" analysis was conducted in 2003 at the same four busy intersections in Los Angeles at the peak morning and afternoon time periods. This "hot spot" analysis did not predict any violation of CO standards. The highest one-hour concentration was measured at 4.6 ppm at Wilshire Boulevard and Veteran Avenue and the highest eight-hour concentration was measured at 8.4 ppm at Long Beach Boulevard and Imperial Highway. Thus, there was no violation of CO standards (ECORP 2023a).

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

According to the traffic analysis prepared for the project (Michael Baker International 2023b), the project is anticipated to generate 1,728 daily trips on average. Because the proposed project would not increase traffic volumes at any intersection to more than 100,000 vehicles per day, or even 44,000 vehicles per day, there is no likelihood of the project traffic exceeding CO values. CO "hot spots" are not an environmental impact of concern for the project. Localized air quality impacts related to mobile source emissions would not be a concern.

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

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

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

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

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

#### **Construction**

During construction, the project presents the potential for generation of objectionable odors in the form of diesel exhaust in the immediate vicinity of the site. However, these emissions are short term in nature and would rapidly dissipate and be diluted by the atmosphere downwind of the emission sources. Additionally, odors would be localized and generally confined to the construction area. Given that there are no natural topographic features (e.g., canyon walls) or

## 3.0 ENVIRONMENTAL CHECKLIST

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man-made structures (e.g., tall buildings) that would potentially trap such emissions, construction-related odors would occur at magnitudes that would not affect substantial numbers of people.

### **Operation**

Criteria for evaluation of odor impacts are found in Table 3 of the ICAPCD's CEQA Air Quality Handbook (ICAPCD 2017). The ICAPCD's Handbook identifies certain land uses as potential sources of odors. Land uses commonly considered to be potential sources of obnoxious odorous emissions include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. It is not anticipated that the project would result in such uses associated with odors. Therefore, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant.

### **Mitigation Measures**

**AQ-1** Prior to the issuance of construction-related permits for the project, the applicant shall demonstrate to the satisfaction of the City of El Centro Community Development Department that the following measures will be implemented during project construction.

- The project shall use low volatile organic compound (VOC) architectural coating for interior applications that do not exceed a VOC content of 10 grams per liter, for exterior applications that do not exceed a VOC content of 50 grams per liter, and for parking applications that do not exceed a VOC content of 100 grams per liter.

Timing/Implementation: Prior to commencement of and during project construction

Enforcement/Monitoring: City of El Centro Community Development Department

### **Level of Significance after Mitigation**

Less than significant.



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#### 4. Biological Resources

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

The following discussion is based upon the *Biological Resources Letter Report* prepared by Michael Baker International (2023a; see Appendix B) and the *Results of Burrowing Owl Habitat Assessment and Focused Survey for Burrowing Owl in the City of El Centro, Imperial County, California*, prepared by ECORP Consulting, Inc. (ECORP 2023b; see Attachment A of Appendix B).

#### DISCUSSION OF IMPACTS

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

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

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- California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) within five miles of the project area
- CDFW Special Animals Lists
- US Fish and Wildlife Service (USFWS) Critical Habitat Portal and Information for Planning and Consultation (IPaC) Trust Resource List
- California Native Plant Society (CNPS) Electronic Inventory of Rare and Endangered Plants
- Calflora Information on California Plants

### **Site Survey Results**

A site survey conducted on September 10, 2022, confirmed that the site appears to have been previously graded and disturbed. On-site topography is relative flat and devoid of vegetation except for a few locations with scattered opportunistic plants that are common in disturbed areas. The property has little ecological value but was determined to have the potential to support transient species that are known to used disturbed lands. No jurisdictional wetlands or waterways were identified within the project footprint (Michael Baker 2023a).

### **Habitats and Vegetation Communities**

Habitat and land cover within the survey area are not considered sensitive biological resources. On-site vegetation is almost nonexistent, and when present, consists primarily of small patches of mustard and grass species (ECORP 2022a; see Attachment A of Appendix B).

### **Special-Status Species**

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

1. Listed, proposed, or candidates for listing under the federal Endangered Species Act (50 Code of Federal Regulations [CFR] 17.11;
2. Listed or proposed for listing under the California Endangered Species Act (Fish and Game Code [FGC] 1992 Section 2050 et seq.; 14 California Code of Regulations [CCR] Section 670.1 et seq.);
3. Designated as Species of Special Concern by the CDFW;
4. Designated as Fully Protected by the CDFW (FGC Sections 3511, 4700, 5050, 5515); and,
5. Species that meet the definition of rare or endangered under CEQA (14 CCR Section 15380), including CNPS List Rank 1b and 2.

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

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### **Special-Status Plant Species**

No special-status plant species were observed within the survey area during the field assessment. All special-status plants were determined unlikely to occur within the survey area, or in adjacent areas that could be potentially influenced by the project, due to the lack of suitable habitat and/or other conditions such as soil or elevation (Michael Baker 2023a).

### **Special-Status Wildlife Species**

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

The disturbed project site provides habitat for burrowing owl; however, on-site soils are not suitable for burrowing. Some disturbed lots surrounding the project site have more suitable soils for burrowing. The species has been previously recorded within 5 miles of the site with the closest being approximately 1.3 miles away, to the southeast (ECORP 2022a).

A modified protocol burrowing owl survey and burrowing owl habitat assessment was conducted for the site on February 1, 2022. No burrowing owls, burrowing owl burrows, or sign of the species (e.g., bones of prey, whitewash, or pellets) that would indicate that this species was or has been present in the within the survey area were observed or detected. In addition, no small mammal burrows, or burrows of any kind were observed or detected during the survey. The substrate present throughout the survey area consisted of dry cracked soils that appeared to be regularly inundated with water and dried out. Wildlife observed during the survey consisted only of bird species observed flying over or around the survey area and a single piece of domestic dog scat. Since no burrowing owls or recent burrowing owl sign were observed within the survey area, the area is currently considered to be unoccupied by burrowing owls under current conditions. Based on the soils present and the lack of vegetation or small mammal burrows, the site is considered unsuitable for burrowing owl habitation (ECORP 2022a).

During a subsequent site survey on September 10, 2022, no sign of burrowing owl was observed and no mammal burrows or berms were observed throughout the entirety of the survey area. Although suitable habitat was presumed for burrowing owl, the results of the focused assessment and survey indicated occurrence of the species is unlikely (Michael Baker 2023a).

Although no burrowing owl or potential burrows were identified during the field survey, conditions could change by the time project construction activities begin. Additional vegetation could grow on-site if not maintained and provide suitable nesting habitat for ground dwelling/sparse shrub nesting birds. Because recent occurrences of burrowing owl have been recorded in the project area, a preconstruction survey is recommended. Mitigation measure **BIO-1** is therefore proposed to require a preconstruction survey of the site if construction activities are to occur within the breeding season to ensure that disturbance to any nesting or breeding avian species are avoided and/or minimized to the extent feasible.

With incorporation of mitigation measure **BIO-1**, the project would not have the potential to have a substantial adverse effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Impacts would be reduced to less than significant.

### 3.0 ENVIRONMENTAL CHECKLIST

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

Sensitive habitats include those that are of special concern to resource agencies and those that are protected under CEQA, FGC Section 1600, and Section 404 of the Clean Water Act. No waters of the state or waters of the United States occur within the project site. The project site is highly disturbed and habitat is characterized by bare areas with scattered ruderal, non-native vegetation that typically has limited ecological value (Michael Baker 2023a). Therefore, no impact to riparian habitat or other sensitive natural communities would occur with project implementation.

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

Project implementation would not result in the loss of jurisdictional waters of the state and waters of the United States. No waters of the state or United States occur within the project site (Michael Baker 2023a). As a result, no impact to federally protected wetlands would occur.

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

Native bird species and their nests are protected under the Migratory Bird Treaty Act of 1918 (16 United States Code 703-712). Potential nesting habitat within the project area is limited to birds that nest on the ground and in open, sparsely vegetated habitat. The project area provides limited foraging habitat for migratory bird species and raptors. Lands in the project vicinity (i.e., to the west/southwest) support limited ornamental, landscaped trees and shrubs that could potentially provide nesting habitat for migratory bird species and, in some locations, for raptors; however, they are situated adjacent to highly trafficked areas (i.e., roads and structures). Therefore, raptor species are not expected to use these trees for nesting, nor anticipated to be directly affected by project construction activities. Disturbed areas within lands buffering the project site appear to be consistently tended (i.e., graded lot) or contain limited vegetation; therefore, foraging habitat is of low quality for raptors. No nests or potential nest sites were observed within the survey area during the field survey; however, it may be possible for nesting birds to establish on the property (Michael Baker 2023a).

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

However, there is potential for migratory and nesting birds to be impacted by project activities. Although no nesting birds were identified during the field survey, conditions could change by the time project construction activities begin. Vegetation could grow on-site and, if not maintained, could provide nesting habitat for ground dwelling/sparse shrub nesting birds. Direct and/or indirect impacts may occur during project construction if a nest is physically disturbed or destroyed, or if breeding or nesting activities are disrupted or cease due to noise or increased human activity. Mitigation measure **BIO-1** is proposed to ensure that direct and indirect impacts to migratory species would be reduced to less than significant.

### 3.0 ENVIRONMENTAL CHECKLIST

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

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

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

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

#### **Mitigation Measures**

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

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

Buffers will be marked (flagged or fenced with environmentally sensitive area fencing) around any active nests and periodic monitoring by the qualified biologist will occur to ensure the project does not result in the failure of the nest. The buffer(s) will be maintained around each nest until the nest becomes inactive as determined by the qualified biologist. At the discretion of the qualified biologist, if a nesting bird appears to be stressed as a result of project activities and the buffer does not appear to provide adequate protection, additional minimization measures may need to be implemented.

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

### 3.0 ENVIRONMENTAL CHECKLIST

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

Timing/Implementation: Prior to commencement of and during project construction

Enforcement/Monitoring: City of El Centro Community Development Department

#### ***Level of Significance after Mitigation***

Less than significant.

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#### 5. Cultural Resources

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

The following discussion is based upon the *Cultural Resources Inventory* prepared by ECORP Consulting, Inc. (2022b; see Appendix C).

#### DISCUSSION OF IMPACTS

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

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

To evaluate the potential for the presence of historical resources, ECORP requested a records search for the property at the South Coastal Information Center of the California Historical Resources Information System at San Diego State University on July 25, 2022; refer to Appendix C for the results. The purpose of the records search was to determine the extent of previous surveys conducted within a 1-mile radius of the project site and whether previously documented pre-contact or historic-period archaeological sites, architectural resources, or traditional cultural properties exist within the area.

As part of the investigation, relevant databases were searched for potential historical records within the project area. Both the National Register Information System and the Built Environmental Resource Directory for Imperial County did not list any eligible or listed properties within the project area or 1-mile vicinity. The nearest California Historical Landmark, as listed by the Office of Historic Preservation, is #944: Site of Fort Romulado, Pacheco, located approximately 5 miles northwest of the project area. A search of the Caltrans Bridge Local and State Inventories indicated that no historic bridges are located within the project area or 1-mile vicinity. According to a search of historic General Land Office land patent records, the project area was included as a portion of Imperial County land granted to California by the federal government via the California Enabling Act of 1853 (ECORP 2022b).

Thirty previous cultural resource investigations have been conducted within 1 mile of the project area between 1977 and 2020. No previous cultural resources investigations overlap the project area and the records search indicated that the project area has not been previously surveyed as part of a cultural resources technical study; refer to Appendix C for a list of previous cultural

### 3.0 ENVIRONMENTAL CHECKLIST

resource investigations. The California Historical Resources Information System records search determined that two previously recorded cultural resources are located within 1 mile of the project site: one historic period railroad grade and wall, and one historic-period road (refer to [Table 5-1](#)). No previously recorded resources are located on the project site (ECORP 2022b; Appendix C).

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

Primary Number	Site Number	Age/Period	Site Description	Within Project Area?
P-13-8682	CA-IMP-8166	Historic	Niland to Calexico Railroad Grade and Wall	No
P-13-14314	--	Historic	Villa Road	No

Source: ECORP 2022b; refer to Appendix C.

A field survey was conducted on August 18 and 19, 2022, by ECORP personnel. No pre-contact or historic-period cultural resources were identified during the field survey (ECORP 2022b).

In August 2022, ECORP contacted the Imperial County Historical Society at the Imperial Valley Pioneer Museum, which was identified as the closest historical society, to determine if the historical society maintains information regarding historically significant events, people, or resources in the project vicinity. As of the date of ECORP's report, such information had not been received from the Imperial County Historical Society.

According to a review of historical aerial photograph and maps, dated 1915 to 2019, the project area has been vacant and used for agricultural purposes since at least 1953 and possibly as early as 1915. No evidence of structures or historic-period resources were identified in the project area (ECORP 2022b).

Based on the above findings, the project would not disturb any known historical resources as defined under CEQA or historic properties as defined by Section 106 of the National Historic Preservation Act. The project would not cause a substantial adverse change in the significance of a known historical resource pursuant to CEQA Guidelines Section 15064.5.

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

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

The project area lies within Imperial Valley, which is a part of the Salton Trough. As the North American continental plate and Eastern Pacific Rise began spreading several million years ago, the Salton Trough began sinking. This land remains exposed due to sediment that has been deposited by the Colorado River. The underlying geology of the project area has been mapped as Holocene alluvium. Therefore, a moderate potential exists for buried pre-contact archaeological sites in the project area.

According to the US Department of Agriculture's Natural Resources Conservation Service Web Soil Survey website, two soil types are located within the project area: Imperial-Glenbar silty clay loams (115), wet, 0 to 2 percent slopes; and Imperial silty clay, wet. The top 12 inches of soil contain a



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silty clay, and a stratified silty clay loam extends 60 inches beneath the surface. Imperial-Glenbar silty clay loams (115) and Imperial, silty, wet are described as non-flooding moderately well-drained soils, primarily found in basin floors (ECORP 2022b).

As stated above, a records search of the California Historical Resources Information System at the South Coastal Information Center revealed that 30 cultural resources investigations were conducted in or within 1 mile of the project area. Two cultural resources were previously recorded within 1 mile of the project area as a result of these investigations; refer to [Table 5-1](#). However, no cultural resources have been previously identified on the project site. A search of the Sacred Lands File was also completed by the California Native American Heritage Commission (NAHC) on September 12, 2022, and resulted in a negative finding, meaning that no Native American Sacred Lands have been recorded in the project area. Additionally, according to the *Handbook of North American Indians*, the closest Native American villages were Mountain Spring, formerly located approximately 32 miles southwest of the project area, and La Rumerosa, formerly located approximately 35 miles southwest of the project area (ECORP 2022b).

Additionally, a field survey of the project area was conducted on August 18 and 19, 2022. No cultural resources were identified or recorded as a result of the field survey (ECORP 2022b).

However, as mentioned, project ground-disturbing activities could potentially encounter previously undiscovered archaeological resources, due to the history of the area. Though no pre-contact cultural resources have been previously recorded in the project area or its 1-mile vicinity, a moderate potential for subsurface cultural deposits still exists due the presence of alluvium throughout the Salton Sink and the likelihood of pre-contact archeological sites located along the shorelines of ancient Lake Cahuilla (ECORP 2022b).

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

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

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

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

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### **Mitigation Measures**

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

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

Timing/Implementation: During project construction

Enforcement/Monitoring: City of El Centro Community Development Department

### **Level of Significance after Mitigation**

Less than significant.

### 3.0 ENVIRONMENTAL CHECKLIST

#### 6. Energy

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

The following discussion is based upon the *Energy Consumption Assessment* prepared by ECORP Consulting, Inc. (2023b; see Appendix D).

The Imperial Irrigation District (IID) provides electricity to all of Imperial County, including the project site, along with parts of Riverside and San Diego Counties (IID 2023). Nearly 60 percent of its power is supplied locally using hydroelectric facilities, a steam-generating facility, several gas turbines, and a diesel unit. The Southern California Gas Company provides natural gas services to the project area. Southern California Gas services approximately 21.8 million customers, spanning roughly 24,000 square miles of California (SCG 2023).

**DISCUSSION OF IMPACTS**

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

The four sources of energy that are relative to the proposed project are electricity, natural gas, the equipment-fuel necessary for project construction, and the automotive fuel necessary for project operations. Energy use quantification was based on project-specific information such as the estimated traffic trip generation rates and project site plans.

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

Energy consumption associated with the project is summarized in Table 6-1.

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**Table 6-1: Project Energy and Fuel Consumption**

Energy Type	Annual Energy Consumption	Percentage Increase Countywide
Electricity Consumption <sup>1</sup>	9,378,358 kilowatt-hours	0.63 percent
Natural Gas <sup>1</sup>	180,114 therms	0.43 percent
<b>Automotive Fuel Consumption</b>		
Project Construction Calendar Year One <sup>2</sup>	114,286 gallons	0.05 percent
Project Construction Calendar Year Two <sup>2</sup>	171,626 gallons	0.08 percent
Project Construction Calendar Year Three <sup>2</sup>	63,520 gallons	0.03 percent
Project Operations <sup>3</sup>	206,865 gallons	0.09 percent

Source: ECORP 2023b; see Appendix D.

<sup>1</sup> CalEEMod; <sup>2</sup> Climate Registry 2016; <sup>3</sup> EMFAC2021 (CARB 2022)

In Table 6-1, the project increases in electricity and natural gas consumption are compared with all uses in Imperial County in 2021, the latest data available. The project increases in automotive fuel consumption are compared with the countywide fuel consumption in 2021, the most recent full year of data.

Project operation would include electricity and natural gas usage from lighting, space and water heating, and landscape maintenance activities. As shown in Table 6-1, the annual electricity consumption due to operations would be 9,378,358 kWh, resulting in an approximate 0.63 percent increase in the typical annual electricity consumption attributable to all residential uses in Imperial County. Furthermore, the project's increase in natural gas usage of 0.43 percent across all uses in Imperial County would also be negligible. For these reasons, the project would not result in the inefficient, wasteful, or unnecessary consumption of building energy.

Fuel necessary for project construction would be required for the operation and maintenance of construction equipment and the transportation of materials to the project site. The fuel expenditure necessary to construct the physical building and infrastructure would be temporary, lasting only as long as project construction. As indicated in Table 6-1, the project's gasoline fuel consumption during the one-time construction period is estimated to be 114,286 gallons of fuel during the first calendar year of construction, 171,626 gallons of fuel during the second calendar year of construction, and 63,520 gallons of fuel during the third calendar year of construction. This would increase the annual countywide gasoline fuel use in the county by 0.05 percent, 0.08 percent and 0.03 percent, respectively. As such, project construction would have a nominal effect on local and regional energy supplies. No unusual project characteristics would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or the state. Construction contractors would purchase their own gasoline and diesel fuel from local suppliers and would judiciously use fuel supplies to minimize costs due to waste and subsequently maximize profits. Additionally, construction equipment fleet turnover and increasingly stringent state and federal regulations on engine efficiency combined with state regulations limiting engine idling times and requiring recycling of construction debris, would further reduce the amount of transportation fuel demand during project construction. For these reasons, it is expected that construction fuel consumption associated with the project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature.

The project's residential component is estimated to generate approximately 1,028 daily trips and the industrial component of the project is estimated to generate 700 daily trips; refer also to

### 3.0 ENVIRONMENTAL CHECKLIST

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Section 17, Transportation and Appendix F. As indicated in Table 6-1, this would be a consumption of approximately 206,865 gallons of automotive fuel per year, which would increase the annual countywide automotive fuel consumption by 0.09 percent. The amount of operational fuel use was estimated using CARB's EMFAC2021 computer program, which provides projections for typical daily fuel usage in Imperial County. This analysis conservatively assumes that all automobile trips projected to arrive at the project during operations would be new to Imperial County. Further, a conservative approach was taken for vehicle trip estimation to ensure potential impacts due to operational gasoline usage were adequately accounted. Fuel consumption associated with vehicle trips generated by the project would therefore not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

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

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

The project has been designed in a manner that is consistent with relevant energy conservation plans aimed at encouraging development that results in the efficient use of energy resources. The project would be built to the Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6, of the California Code of Regulations. Title 24 was established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 is updated approximately every three years. The most recent 2022 update (effective January 1, 2023) to the Energy Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. The 2022 Energy Standards are a major step toward meeting zero net energy.

Additionally, the California Green Building Standards Code (CalGreen, Title 24, Part 11 of the California Code of Regulations) establishes mandatory green building standards for all buildings in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. The project would be designed consistent with such requirements to ensure that energy efficiency is achieved as required. Furthermore, the project would be consistent with the City's General Plan Conservation and Open Space Element, specifically Energy Conservation Implementation Program action COS-20, Implement State Energy Performance Requirements, which encourages project proponents to incorporate energy conservation techniques through the implementation of state energy performance standards.

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

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#### 7. Geology and Soils

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

#### DISCUSSION OF IMPACTS

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

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

### 3.0 ENVIRONMENTAL CHECKLIST

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

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

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

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

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

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

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

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

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

### 3.0 ENVIRONMENTAL CHECKLIST

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

iv) *Landslides?* **No Impact.**

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

The topography of the project site and surrounding vicinity is relatively flat with on-site elevations ranging from approximately 52 feet bmsl to approximately 60 feet bmsl across the property (ECORP 2022b). The project site has been previously graded and does not include slopes greater than 25 percent. Further, signs of landslides are not present on-site. Therefore, no significant impact from exposure of people or structures to potential adverse effects from landslides would occur.

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

Soil erosion is most prevalent in unconsolidated alluvium and surficial soils and in areas that have slopes. Erosive soils are generally found in areas of steep slope where runoff velocity is greater and vegetative cover is low. According to the US Department of Agriculture's Natural Resources Conservation Service Web Soil Survey website, two soil types are located within the project area: Imperial-Glenbar silty clay loams, wet, 0 to 2 percent slopes; and Imperial silty clay, wet (ECORP 2022). These soils are classified as torrifluvents and result from fluvial deposition during flooding events in arid alluvial plains.

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

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

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

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



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### ***On- or Off-Site Landslide***

Refer to Response 7(a)iv), above. The occurrence of bluff failure and mudslides in the Imperial Valley is generally limited to slopes and embankments of the rivers and canals (El Centro 2003). The project site is generally level and does not support any slopes or hillsides; a dirt berm is present in the southwest portion of the area proposed for light manufacturing uses. Due to such conditions, the project site is not considered to be susceptible to landslides. Furthermore, the project as designed would be required to comply with structural standards set forth by both the City and the state. Impacts in this regard would be less than significant.

### ***Lateral Spreading***

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

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

### ***Liquefaction***

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

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

### ***Collapse***

Neither natural nor man-made subsurface features that encourage collapse, including mines, aggregate extraction operations, or karst topography, are known to underlie or occur adjacent to the project site. Therefore, mandatory compliance with applicable state and local design and

### 3.0 ENVIRONMENTAL CHECKLIST

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engineering codes and regulations would ensure that impacts related to unstable or collapsible soils would be less than significant.

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

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

In general, much of the near surface soils in the Imperial Valley consist of silty clays and clays which are moderate to highly expansive (Landmark Consultants 2007). As indicated above, the project site is underlain by Imperial-Glenbar silty clay loams and Imperial silty clay (ECORP 2022). Based on the clay content, such soils have the potential to be expansive as they exhibit a moderate to high swell potential.

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

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

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

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

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

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

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#### 8. Greenhouse Gas Emissions

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

The following section is based on the *Air Quality & Greenhouse Gas Emissions Assessment* prepared by ECORP Consulting, Inc. in February 2023 (2023a; see Appendix A).

#### DISCUSSION OF IMPACTS

Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O). Human-caused emissions of these GHGs in excess of natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming (ECORP 2023a). Refer to Appendix A for additional discussion of global warming and climate change.

To date, neither the ICAPCD nor the City have adopted GHG significance thresholds applicable to potential development. Section 15064.7(c) of the CEQA Guidelines specifies that a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the lead agency's decision is supported by substantial evidence. Thus, in the absence of any GHG emissions significance thresholds, the projected emissions are compared to the ICAPCD-recommended 100,000-metric ton of CO<sub>2</sub>e threshold established by the Mojave Desert Air Quality Management District. This ICAPCD-recommended threshold is appropriate as the Mojave District GHG thresholds were formulated based on similar geography and climate patterns as found in Imperial County. Therefore, the 100,000-metric ton of CO<sub>2</sub>e threshold is appropriate for analysis of the proposed project. The project was also assessed for consistency with regulations or requirements adopted by the 2008 Climate Change Scoping Plan and subsequent updates.

Where GHG emission quantification was required, emissions were modeled using CalEEMod, version 2022.1. CalEEMod is a statewide land use emissions computer model designed to quantify potential GHG emissions associated with both construction and operations from a variety of land use projects.

Construction-generated GHG emissions were calculated using a combination of model defaults for Imperial County, project site plans, and specific data provided by the project applicant including equipment used, duration of specific construction phases, and the amount of soil movement required. Operational GHG emissions were calculated using a combination of model defaults for Imperial County and an estimated project trip generation rate of 1,728 average daily trips (Michael Baker International 2023b; see Appendix F).

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

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

#### Construction

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

**Table 8-1: Construction-Related Greenhouse Gas Emissions**

Emissions Source	CO <sub>2</sub> e (Metric Tons/Year)
Construction Calendar Year One	1,160
Construction Calendar Year Two	1,742
Construction Calendar Year Three	653
<i>Significance Threshold</i>	100,000
<b>Exceed Significance Threshold?</b>	<b>No</b>

Source: ECORP 2023a, see Appendix A; CalEEMod version 2022.1.

Notes: Construction-generated air pollutant emissions were calculated using a combination of model defaults for Imperial County, project site plans, and specific data provided by the project applicant including equipment used, duration of specific construction phases, and the amount of soil movement required (9,000 c.y. of cut material and 116,000 c.y. of fill material). Refer to Attachment A of Appendix A for Model Data Outputs.

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

#### Operations

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

**Table 8-2: Operational-Related Greenhouse Gas Emissions**

Emission Source	CO <sub>2</sub> e (Metric Tons/Year)
Area Source	13
Energy	2,909
Mobile	1,571
Waste	257
Water	418
Refrigerant	3,309
<b>Total</b>	<b>8,476</b>
<i>Significance Threshold</i>	100,000
<b>Exceed Significance Threshold?</b>	<b>No</b>

Source: ECORP 2023a, see Attachment A of Appendix A; CalEEMod version 2022.1.

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Operational emissions were calculated using a combination of model defaults for Imperial County and an estimated project trip generation rate of 1,728 average daily trips. Refer to Attachment A of Appendix A for Model Data Outputs.

As shown in Table 8-2, the project would generate approximately 8,476 metric tons of CO<sub>2</sub>e per year during operations, which is below the significance threshold of 100,000 metric tons of CO<sub>2</sub>e per year. Therefore, impacts would be less than significant.

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

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

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

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

While there are no established protocols or thresholds of significance for that future year analysis, CARB forecasts that compliance with the current Scoping Plan puts the state on a trajectory toward meeting these long-term GHG goals, although the specific path to compliance is unknown. Additionally, CARB has indicated that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, SB 32, and Executive Order S-03-05.

As discussed, the project is consistent with GHG emission reduction measures in the Scoping Plan and would not conflict with the state's trajectory toward future GHG reductions. In addition, as the specific path to compliance for the state in regard to the long-term goals will likely require

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development of technology or other changes that are not currently known or available, specific additional mitigation measures for the project would be speculative and cannot be identified at this time. The project's consistency would assist in meeting the City's contribution to GHG emission reduction targets in California.

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

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#### 9. Hazards and Hazardous Materials

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

#### DISCUSSION OF IMPACTS

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

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

None of these uses are proposed by the project; rather, the project would consist of single-family residential uses including 104 single-family units and approximately 17.3 acres of future light manufacturing uses. Project construction is not anticipated to involve the transport, use, or disposal of hazardous materials aside from those normally associated with construction and maintenance activities. Small amounts of hazardous materials would be used during construction activities (equipment maintenance, vehicle fuels, solvents, etc.). Similarly, limited amounts of hazardous materials may be used for landscape and building maintenance over the long term.

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The use of limited quantities may also occur with operation of the anticipated light manufacturing type uses. Although specific uses that would occupy the proposed industrial space offered by the project are unknown at this time, such uses would be consistent with those allowed by the ML-Light Manufacturing zone unless otherwise approved by the City. All such uses would be required to comply with applicable regulations aimed at minimizing or avoiding the potential for release for exposure to hazardous materials or substances during use, handling, transport, or disposal.

Therefore, any use of hazardous materials for both the residential and light industrial uses would occur in compliance with applicable federal, state, and local standards associated with the use, handling, and/or disposal of hazardous materials. As such, the project would not create a hazard to the public or to the environment. Impacts would be less than significant in this regard.

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

### **Construction**

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

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

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

### **Operation**

The project proposes single-family residential and light manufacturing uses, sewer/water and other utility connections, and access/circulation improvements typical of such development. Due to their nature, these uses are not generally expected to involve the routine transport, use, or disposal of hazardous substances or materials in substantial quantities; however, such activities may be associated with daily operations of the light manufacturing uses, depending on the specific uses ultimately occupying the available space.

Once the project is operational, hazardous material use associated with the residences, light industrial uses, landscaping, and maintenance activities would generally be limited to private use



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of commercially available cleaning products, landscaping pesticides and fertilizers, and use of various other commercially available substances, as well as those materials or substances required in operation of specific light manufacturing uses established on-site. Development of the site is therefore anticipated to result in use of commercially available potentially hazardous materials or chemicals. The use of these substances is expected to occur in relatively small quantities and to be typical of that for residential and light industrial uses and associated landscape maintenance. All such use would be subject to applicable federal, state, and local health and safety laws and regulations intended to minimize health risk to the public.

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

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

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

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

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

Research of the California Department of Toxic Substances Control (DTSC) Cortese List Data Resources revealed that the project site is not located on a site listed as a hazardous materials site (DTSC 2023; SWRCB 2023). The Cortese List indicates that the project site contains no above- or belowground storage tanks, soil stains, or other types of potential hazards to the public. Therefore, no impact would occur.

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

The Imperial County Airport Land Use Commission (ALUC) has established a set of land use compatibility criteria for lands surrounding the county's airports. The Imperial County Airport Land Use Compatibility Plan (ALUCP; Imperial County 1996) identifies the project site as being located within Zone B2, Extended Approach/Departure Zone. Uses within Zone B2 are considered to be subject to significant risk and noise exposure. However, as indicated by Figure 5.10-1, Imperial County Airport Noise Impact Area, of the City's General Plan EIR (City of El Centro 2021b), the site is located outside of the noise contours for the airport, and therefore, significant noise effects on future residents of the development from airport operations are not anticipated; refer to [Figure 5, Operational Noise Levels](#).

The 1996 Imperial County ALUCP indicates that the majority of residential development is incompatible within a B2 zone, with exception of some low-density residential developments that are potentially compatible with restrictions. The request to rezone the subject property as proposed is subject to review by the Imperial County ALUC to determine consistency with the Imperial County ALUCP. The ALUC heard the project on January 18, 2023, and made the

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determination that the residential use proposed with the project would be incompatible with the ALUCP. However, the City retains the authority to make a final consistency determination that may ultimately preside over the ALUC's decision as to the appropriateness of the requested rezone. In the case of such a determination, it is not anticipated that the project would result in a safety hazard or excessive noise for people residing or working in the project area.

Additionally, the project as designed would not exceed height standards as set forth in Chapter 29 of the Code of Ordinances of the City of El Centro for the R2 and ML zones, and therefore would not support any structural elements (i.e., greater than 150 feet in height) with the potential to obstruct or otherwise affect airport operations, thus avoiding a potential safety hazard. The proposed uses would not adversely affect airport operations or result in a safety hazard for people working or residing in the area.

The project is also subject Federal Aviation Administration (FAA) review for the potential to obstruct or interfere with flight operations at the Imperial Valley Airport. The FAA conducted an aeronautical study of the project under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77 [Aeronautical Study No. 2022-AWP-18660-OE; 2022-AWP-18661-OE; 2022-AWP-18662-OE; 2022-AWP-18663-OE; 2022-AWP-18664-OE; and, 2022-AWP-18665-OE (residential site) and 2022-AWP-18676-OE; 2022-AWP-18677-OE; 2022-AWP-18678-OE; and, 2022-AWP-18679-OE (light industrial site)]. The FAA responded on October 13, 2022 and on October 27, 2022 with a Determination of No Hazard to Air Navigation for the residential use area and the light industrial use area, respectively. The FAA therefore determined that on-site structures as proposed would not exceed obstruction standards and would not be a hazard to air navigation. The applicant is required to file FAA Form 7460-2, Notice of Actual Construction or Alteration, within 5 days after construction reaches its greatest height.

Based on the above discussion, the project is not anticipated to result in a safety hazard or excessive noise for people residing or working in the project area. Impacts would be less than significant.

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

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

During construction, materials would be placed within the project boundaries adjacent to the active on-site area of construction to avoid any access conflicts in case of emergency evacuations. Direct access to the project site would be from Cruickshank Drive. The project does not propose any components that would be anticipated to obstruct or conflict with emergency response or evacuation during project operations. No off-site roadway improvements are proposed that would alter existing circulation patterns.

Any improvements needed to provide adequate access to the site would be subject to City review for the potential to interfere with emergency evacuation routes to ensure that access and circulation are maintained during the construction and operational phases. Additionally, the

### 3.0 ENVIRONMENTAL CHECKLIST

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project would be subject to site plan review by City emergency services personnel to ensure that it would not result in components that potentially interfere with an emergency response plan or an emergency evacuation plan. Impacts are considered to be less than significant.

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

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

Similar to existing conditions, the project would be served by the City of El Centro Fire Department. The nearest fire station is located at 1910 N. Waterman Avenue, approximately 0.6 miles southwest of the site. Existing fire protection services are adequate to serve the project as proposed with applicant payment of the required development impact fees; no new facilities or personnel would be required as the direct result of project implementation. Therefore, it is not anticipated that the project would expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires. Impacts would be less than significant.

10. Hydrology and Water Quality

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

**DISCUSSION OF IMPACTS**

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

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

The majority of stormwater discharges are considered nonpoint sources and are regulated by an NPDES Municipal General Permit or Construction General Permit. The Colorado River RWQCB

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

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

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

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

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

The City does not utilize its groundwater supply for consumption, as the underlying groundwater is too brackish in quality for human consumption and agricultural uses. Water service for the project would be supplied from the City's public water supply system rather than from

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groundwater, which would not result in a net deficit of aquifer volume or lowering of the groundwater table. Therefore, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

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

Refer to Response 10(a), above. No rivers or streams are present on the project site, and therefore, no such features would be altered with the proposed development. The project would have the potential to result in additional sources of polluted runoff, including through construction and operational activities associated with the proposed residential and light manufacturing development, including parking lots and other on-site improvements. Stormwater runoff from the project site would be routed to an existing off-site detention basin, located north of the project boundary, just south of the Central Drain and east of N. 12<sup>th</sup> Street. The basin was constructed as part of the El Centro Town Center Phase I project and subsequently expanded to accept the increased flows. The detention basin has been designed to adequately accommodate stormwater runoff resulting with future development of the project site. Construction of additional on-site or off-site detention basins for the treatment of stormwater is therefore not proposed or required with project implementation.

Although future development of the subject property would result in the addition of impervious surfaces on-site, the project would not substantially change existing drainage patterns, nor increase the rate or volume of stormwater runoff from the subject property. As stated, the project would be subject to the City's requirements for stormwater treatment (Ordinance Chapter 22, Article VII) which consist of the JRMP and the Post-Construction Stormwater Best Management Practice Standards Manual for Development Projects (City of El Centro 2018). Additionally, the project would implement BMPs in conformance with Article VII, Division 1, Section 22-707 to 22-709 of the City's Municipal Code. All proposed stormwater infrastructure improvements and site grading would be subject to City discretionary review and approval of a grading permit application. With conformance to such requirements, it is not anticipated that the project would result in substantial erosion or siltation on- or off-site. Project impacts would be less than significant.

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

See Response 10(c)i., above for project-specific discussion. The project site is located in Zone X (Other Areas) as illustrated on Federal Emergency Management Act (FEMA) Map Panel 06025C1725C, which is outside of the FEMA-mapped 100-year floodplain (FEMA 2008) and therefore not susceptible to flooding. Development of the site would not substantially change existing drainage patterns on-site or off-site, and no increase in the rate or amount of surface runoff would occur with the project. Impacts would be less than significant in this regard.

- c)iii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which*

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would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? **Less than Significant Impact.**

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

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

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

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

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

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

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

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

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

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

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

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



11. Land Use and Planning

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

**DISCUSSION OF IMPACTS**

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

Under existing conditions, surrounding land uses include a drainage channel (Central Drain) and vacant land to the north; and vacant land followed by agricultural land to the east. Office uses (San Diego Regional Center San and U.S. Social Security office) and vacant land are located to the west. Commercial retail development is located farther to the west and includes businesses such as a Broken Yolk Café and Social Security Administration. To the south across Cruickshank Drive exist multifamily residential (Town Center Villa Apartments), vacant land, and the El Centro Town Center (part of the Phase I of the Town Center project) and includes such stores as Target, 99 Cents Only store, and Lowe's Home Improvement.

The proposed single-family development would be consistent with similar residential uses in the area to the southwest and east, and would not result in a land use that would conflict with or disrupt surrounding development patterns. Additionally, the anticipated light industrial uses would generally be similar in appearance and operations as the existing large-scale commercial retail uses located in the project vicinity.

The project does not propose any off-site roadway improvements, nor the construction of new off-site roads within the surrounding area. Further, the project does not require or propose the closure or redesign of any existing area roadways. Additionally, utility lines (i.e., water, sewer) would be extended into the site from existing lines currently located in adjacent streets, thereby avoiding substantial disruption along local roadways during the construction phase. All utility lines serving the site would be undergrounded and would therefore not create a barrier or obstruction on-site or in the surrounding area.

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

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

The project as proposed would require a General Plan Amendment to change the existing General Plan land use designation for a portion of the project site from General Commercial and Light Manufacturing to Single-Family Residential. The project would also rezone this portion of the property from CG-General Commercial and ML-Light Manufacturing to R2-Single-Family Residential. Although City approvals would be required to allow for the project as proposed,

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with such approvals, the project would not conflict with a land use plan, policy, or regulation applicable to the project site relative to land use and zoning.

The project would be required to demonstrate conformance with the Single-Family Residential Zones design standards identified in City Municipal Code Chapter 29, Article II, Division 2, Residential Zones, and Division 4, Manufacturing Zones, as well as with Municipal Code Chapter 7, Building and Construction Regulations. Project design would be subject to the development standards identified for the applicable zones relevant to architectural and site design, parking and circulation requirements, wall and fence design, landscaping, and exterior lighting, among other elements, to ensure compatibility and avoid potential conflict with surrounding land uses.

The Imperial County Airport Land Use Compatibility Plan (Imperial County 1996) identifies a portion of the project site as being located within Zone B2, Extended Approach/Departure Zone. However, according to the City's General Plan Update Program EIR (City of El Centro 2021 b), no portion of the City is located within an airport noise contour that would exceed the City's noise compatibility standard for the most sensitive land uses (60 dBA CNEL); refer to [Figure 5, Operational Noise Levels](#). As designed, project elements would not exceed height standards as set forth in Chapter 29, Zoning, of the City's Municipal Code for the R2 zone or the ML-Light Manufacturing zone, and therefore, the project would not support features (i.e., greater than 150 feet in height) with the potential to obstruct or conflict with airport operations or indirectly interfere with public safety as a result.

The 1996 Imperial County ALUCP indicates that the majority of residential development is incompatible within a B2 zone, with exception of some low-density residential developments that are potentially compatible with restrictions. The request to rezone the subject property as proposed is subject to review by the Imperial County ALUC to determine consistency with the Imperial County ALUCP. The ALUC heard the project on January 18, 2023, and made the determination that the residential use proposed with the project would be incompatible with the ALUCP. However, the City retains the authority to make a final consistency determination that may ultimately preside over the ALUC's decision as to the appropriateness of the requested rezone.

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

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

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#### 12. Mineral Resources

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

#### DISCUSSION OF IMPACTS

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

The City of El Centro is generally built out with urban uses that are typically incompatible with surface mining and mineral extraction activities. Further, the General Plan does not provide for mining activity to occur (City of El Centro 2021a). No mineral resources that would be of value to the region or to residents of the state have been identified on the project site (DOC 2018b). Therefore, no impact would occur.

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

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

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#### 13. Noise

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

The following analysis is based upon the *Noise Impact Assessment* prepared by ECORP Consulting, Inc., dated February 2023 (see Appendix E). More detailed background information on the fundamentals of noise, human response to noise levels, noise effects, and other such technical aspects are provided in Appendix E. The following represents a summary of the findings of the *Noise Impact Assessment*.

#### DISCUSSION OF IMPACTS

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

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

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

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

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

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

#### City of El Centro Noise Limits

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

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

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

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

Source: EORP 2023c; see Appendix E.

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

#### Federal Interagency Committee on Noise (FICON)

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

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

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

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, cemeteries, libraries, and some passive recreation areas would each be considered noise- and vibration-sensitive and may warrant unique measures for protection from intruding noise. The nearest sensitive receptors to the project site are residents of the Town Center Villa Apartments, located south of the project site across Cruickshank Drive.

The project site consists of flat undeveloped land and is surrounded mainly by commercial and residential land uses, as well as vacant and agricultural use lands. The most common and significant source of noise in the City of El Centro is mobile noise generated by transportation-related sources as well as aircraft noise from overflying aircraft landing at and taking off from the Imperial County Airport, located approximately 1 mile to the northwest of the project site. Other sources of noise are the various land uses (i.e., residential, commercial and agricultural) that generate stationary-source noise.

#### Existing Ambient Noise Levels

To quantify existing ambient noise levels in the project area, four short-term (15-minutes) noise measurements were taken on September 9, 2022. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the project site during the daytime. Additionally, three short-term (30-minutes) noise measurements had already been taken at the location of the existing Town Center Villa Apartments on October 1, 2020. Although the Town Center Villa Apartments were not developed at the time of the October 2020 measurements, such measurements are incorporated herein due to the close proximity to the project site and to supplement the noise measurements taken in September 2022 (see Appendix E for a depiction of noise measurement locations). As shown in [Table 13-2](#), the ambient recorded noise levels over the course of the noise measurements taken ranged from 40.1 dBA to 56.5 dBA  $L_{eq}$ .

**Table 13-2: Existing (Baseline) Noise Measurements**

Location Number	Location	$L_{eq}$ dBA	$L_{min}$ dBA	$L_{max}$ dBA	Time
<b>Proposed Project (September 9, 2022)</b>					
1	North end of project site adjacent to Central Drain (on-site)	42.9	37.9	81.7	1:01 p.m. – 1:16 p.m.
2	West end of project site adjacent to Social Security Administration building (on-site)	40.1	39.1	49.7	1:33 p.m. – 1:48 p.m.
3	N 12 <sup>th</sup> Street and Cruickshank Drive intersection (on-site)	56.5	54.5	76.0	1:58 p.m. – 2:13 p.m.
4	Across Cruickshank Drive from the project site adjacent to N 10 <sup>th</sup> Street (off-site)	53.6	39.5	72.6	2:20 p.m. – 2:35 p.m.

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Location Number	Location	Leq dBA	Lmin dBA	Lmax dBA	Time
<b>Additional Measurements (October 1, 2020)</b>					
1	Corner of Bradshaw Avenue and 10 <sup>th</sup> Street	55.7	45.7	75.6	7:27 a.m. – 7:57 a.m.
2	Residential complex on 8 <sup>th</sup> Street across from Town Center IV project site	61.3	46.6	75.6	8:04 a.m. – 8:34 a.m.
3	Intersection of 10 <sup>th</sup> Street and Cruickshank Drive	52.0	36.6	79.2	8:45 a.m. – 9:15 a.m.

Source: ECORP 2023c; see Attachment A of Appendix E for noise measurement outputs.

Notes: Leq is the average acoustic energy content of noise for a stated period of time. Thus, the Leq of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. Lmin is the minimum noise level during the measurement period and Lmax is the maximum noise level during the measurement period.

#### Existing Roadway Noise Levels

Existing roadway noise levels were calculated for the roadway segments in the project vicinity. This task was accomplished using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) and traffic volumes from the Transportation Impact Study (Michael Baker International 2023; see Appendix F). The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by Caltrans. Available Caltrans data shows that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along these roadway segments are provided in [Table 13-3](#).

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

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway
<b>Cruickshank Drive</b>		
West of Imperial Avenue	Commercial	57.2
Between Imperial Avenue and 10 <sup>th</sup> Street	Residential and Commercial	58.0
Between 10 <sup>th</sup> Street and 8 <sup>th</sup> Street	Residential	55.7
<b>Imperial Avenue</b>		
North of Cruickshank Drive	Commercial	65.1
South of Cruickshank Drive	Commercial	63.2
<b>10<sup>th</sup> Street</b>		
South of Cruickshank Drive	Residential and Commercial	43.3
<b>8<sup>th</sup> Street</b>		
North of Cruickshank Drive	Residential	60.5
South of Cruickshank Drive	Residential	56.4

Source: ECORP 2023c; see Appendix E.

Notes:

1. Traffic noise levels were calculated by ECORP using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified in the Transportation Impact Study included in Appendix F. Attachment B of Appendix E includes traffic noise modeling assumptions and results.

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As shown, the existing traffic-generated noise levels on project-vicinity roadways currently range from 43.3 to 65.1 dBA CNEL at a distance of 100 feet from the roadway centerline. The CNEL is a 24-hour average noise level with a 5 dBA “weighting” during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA “weighting” during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. It should be noted that the modeled noise levels depicted in [Table 13-3](#) may differ from measured levels in [Table 13-2](#) because the measurements represent noise levels at different locations around the project site and are also reported in different noise metrics (e.g., noise measurements are the  $L_{eq}$  values and traffic noise levels are reported in CNEL).

#### **Construction**

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

Nearby noise-sensitive land uses consist of an apartment complex located south of the project site fronting onto Cruickshank Drive. Multifamily residences are also located across 8<sup>th</sup> Street to the east of the project site.

The project is proposed to be constructed in two phases with the proposed residential units being constructed in Phase I and the proposed warehouse buildings constructed in Phase 2. Section 17.1-8 of the City's Municipal Code states that it is unlawful for any person to operate construction equipment at any construction site on Sundays, and days appointed by the president, governor, or the City Council for a public holiday. In addition, it is unlawful for any person to operate construction equipment at any construction site on Mondays through Saturdays except between the hours of 6:00 a.m. and 7:00 p.m.

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

The anticipated short-term construction noise levels generated for the necessary construction equipment are provided in [Table 13-4](#). Consistent with Federal Transit Authority (FTA) recommendations for calculating construction noise, construction noise was measured from the center of the project site, which is 400 feet from the Town Center Villa Apartments located south of the project site fronting Cruickshank Drive (ECORP 2023c).



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

Equipment	Estimated Exterior Construction Noise Level at Closest Noise Sensitive Receptor (dBA Leq)	Construction Noise Standards (dBA Leq)	Exceeds Standards?
<b>Phase 1</b>			
Site Preparation	67.0	75	No
Grading	67.6	75	No
Building Construction	67.5	75	No
Paving	65.8	75	No
<b>Phase 2</b>			
Site Preparation	67.0	75	No
Grading	67.6	75	No
Building Construction	67.5	75	No
Paving	65.8	75	No

Source: ECORP 2023c; see Appendix E.

Notes: Construction equipment and timing provided by the project applicant. Consistent with FTA recommendations for calculating construction noise, construction noise was measured from the center of the project site, which is approximately 400 feet from the nearest sensitive receptor.

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

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

#### Off-Site Construction Worker Trips

Project construction would result in additional traffic on adjacent roadways over the construction period. According to the California Emissions Estimator Model, used to predict the number of construction-related automotive trips, the maximum number of project construction trips traveling to and from the project site during a single construction phase would not be expected to exceed 486 daily trips in total. According to the 2013 Caltrans Technical Noise Supplement to the Traffic Noise Analysis Protocol, a doubling of traffic on a roadway is required to result in an increase of 3 dB (outside of the laboratory, a 3 dBA change is considered a just-perceivable difference).

The project site is accessible from Cruickshank Drive via Imperial Avenue. According to the *Traffic Impact Study* (see Appendix F) prepared for the project, the roadway segment on Cruickshank Drive, east of Imperial Avenue, currently accommodates 4,207 average daily vehicle trips. Therefore, project construction would not result in a doubling of traffic, and its contribution to existing traffic noise would therefore not be perceptible. Additionally, it is noted that construction is temporary, and construction worker trips would cease upon completion of the project. A less than significant impact would occur in this regard.

#### **Operation**

Noise-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging,

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libraries, and some passive recreation areas would each be considered noise sensitive and may warrant unique measures for protection from intruding noise. The nearest noise-sensitive land uses are the Town Center Village Apartments located south of the project site across Cruickshank Drive.

#### Operational Off-site Traffic Noise

Future traffic noise levels throughout the project vicinity (i.e., vicinity roadway segments that traverse noise-sensitive land uses) for the project were modeled based on the traffic volumes identified in the *Transportation Impact Study* (Michael Baker International 2023b; see Appendix F) to determine the noise levels along project vicinity roadways. [Table 13-5](#) shows the calculated off-site roadway noise levels under existing traffic levels compared to future buildout of the project. The calculated noise levels as a result of the project at affected sensitive land uses were compared to the FICON recommendation for evaluating the impact of increased traffic noise.

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

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway		Noise Standard (dBA CNEL)	Exceed Standard
		Existing Conditions	Existing + Project Conditions		
<b>Cruickshank Drive</b>					
West of Imperial Avenue	Commercial	57.2	59.1	>5	No
Between Imperial Avenue and 10 <sup>th</sup> Street	Commercial and Residential	58.0	59.2	>5	No
Between 10 <sup>th</sup> Street and 8 <sup>th</sup> Street	Residential	55.7	55.9	>5	No
<b>Imperial Avenue</b>					
North of Cruickshank Drive	Commercial	65.1	65.2	>1.5	No
South of Cruickshank Drive	Commercial	63.1	63.3	>3	No
<b>10<sup>th</sup> Street</b>					
South of Cruickshank Drive	Commercial and Residential	43.3	44.7	>5	No
<b>8<sup>th</sup> Street</b>					
North of Cruickshank Drive	Residential	60.5	60.5	>3	No
South of Cruickshank Drive	Residential	56.4	56.4	>5	No

Source: ECORP 2023c; see Appendix E.

Notes: Traffic noise levels were calculated by using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified in the *Transportation Impact Study* (see Appendix F). Traffic noise modeling assumptions and results are included in Attachment B of Appendix E.

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

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### Operational On-site Noise

#### *Project Land Use Compatibility*

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

A normally acceptable noise standard for residential land uses is 59 dBA CNEL or under. As previously stated, noise measurements were taken to quantify existing ambient noise levels in the project area. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the project site and are considered representative of the noise levels throughout the day. As shown in Table 13-2, the ambient noise levels recorded closest to the project site range from 40.1 dBA to 56.5 dBA (ECORP 2023c).

Additionally, the roadway segment on Cruickshank Drive between Imperial Avenue and 10<sup>th</sup> Street as well as the roadway segment on Cruickshank Drive between 10<sup>th</sup> Street and 8<sup>th</sup> Street, which traverse adjacent to the project site, have a calculated existing roadway noise level of 58.0 dBA CNEL and 55.7 dBA CNEL, respectively, at 100 feet from the centerline of the road, which extends onto the site.

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

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

### **Construction**

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

Construction-related ground vibration is normally associated with impact equipment such as pile drivers, jackhammers, and the operation of some heavy-duty construction equipment, such as dozers and trucks. It is noted that pile drivers would not be necessary during project construction. Vibration decreases rapidly with distance and it is acknowledged that construction activities would occur throughout the project site and would not be concentrated at the point closest to sensitive receptors. Groundborne vibration levels associated with construction equipment are summarized in Table 13-6.

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**Table 13-6: Representative Vibration Source Levels for Construction Equipment**

Equipment Type	Peak Particle Velocity at 25 Feet (inches per second)
Large Bulldozer	0.089
Pile Drive	0.170
Loaded Trucks	0.076
Hoe Ram	0.089
Jackhammer	0.035
Small Bulldozer/Tractor	0.003
Vibratory Roller	0.210

Source : ECORP 2023c; see Appendix E.

The City of El Centro does not regulate vibrations associated with construction. However, for comparison purposes, the Caltrans *2020 Transportation and Construction Vibration Guidance Manual* recommended standard of 0.3 inch per second peak particle velocity (PPV) with respect to the prevention of structural damage for older residential buildings is used as a threshold. This is also the level at which vibrations may begin to annoy people in buildings. Consistent with FTA recommendations for calculating construction vibration, construction vibration was measured from the center of the project site (ECORP 2023c). The nearest structure of concern to the construction site, with regard to groundborne vibrations, is a commercial building fronting Imperial Avenue, located approximately 300 feet to the west of the western boundary of the project site.

Based on the representative vibration levels presented for various construction equipment types in Table 13-7 and the construction vibration assessment methodology published by the FTA (*2018 Transit Noise and Vibration Impact Assessment*), potential project construction vibration levels were estimated. Table 13-7 presents the anticipated project generated vibration levels at a distance of 300 feet.

**Table 13-7: Construction Vibration Levels at 300 Feet**

Receiver PPV Levels (inches/second) <sup>1</sup>					Peak Vibration	Threshold	Threshold Exceeded?
Large Bulldozer, Caisson Drilling, & Hoe Ram	Loaded Trucks	Jackhammer	Pile Driver	Vibratory Roller			
0.0021	0.0018	0.0008	0.0040	0.0050	0.0050	0.3	No

Source: ECORP 2023c; see Appendix E.

Notes: Based on the Vibration Source Levels of Construction Equipment included in Table 13-6 (ECORP 2023c). Distance to the nearest structure of concern is approximately 300 feet measured from the center of the project site.

As shown in Table 13-7, vibration as a result of construction activities would not exceed 0.3 PPV at the nearest structure. Thus, project construction would not exceed the recommended threshold. The project would result in a less than significant impact related to construction vibration levels.

#### Operation

Project operations would not include the use of any stationary equipment that would result in excessive vibration levels. While the project may accommodate heavy-duty trucks due to the warehouse space, these vehicles can only generate groundborne vibration velocity levels of 0.006 PPV at 50 feet under typical circumstances. Therefore, the project would result in negligible groundborne vibration impacts during operations and impacts would be less than significant.

### 3.0 ENVIRONMENTAL CHECKLIST

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

The Imperial County Airport is located approximately 1 mile northwest of the project site. The Imperial County Airport Land Use Commission has established a set of land use compatibility criteria for lands surrounding the county's airports. The Imperial County Airport Land Use Compatibility Plan (Imperial County 1996) identifies a small northern portion of the City, which includes the project site, as falling within the 55 dBA CNEL noise contour of the Imperial County Airport Noise Impact Area.

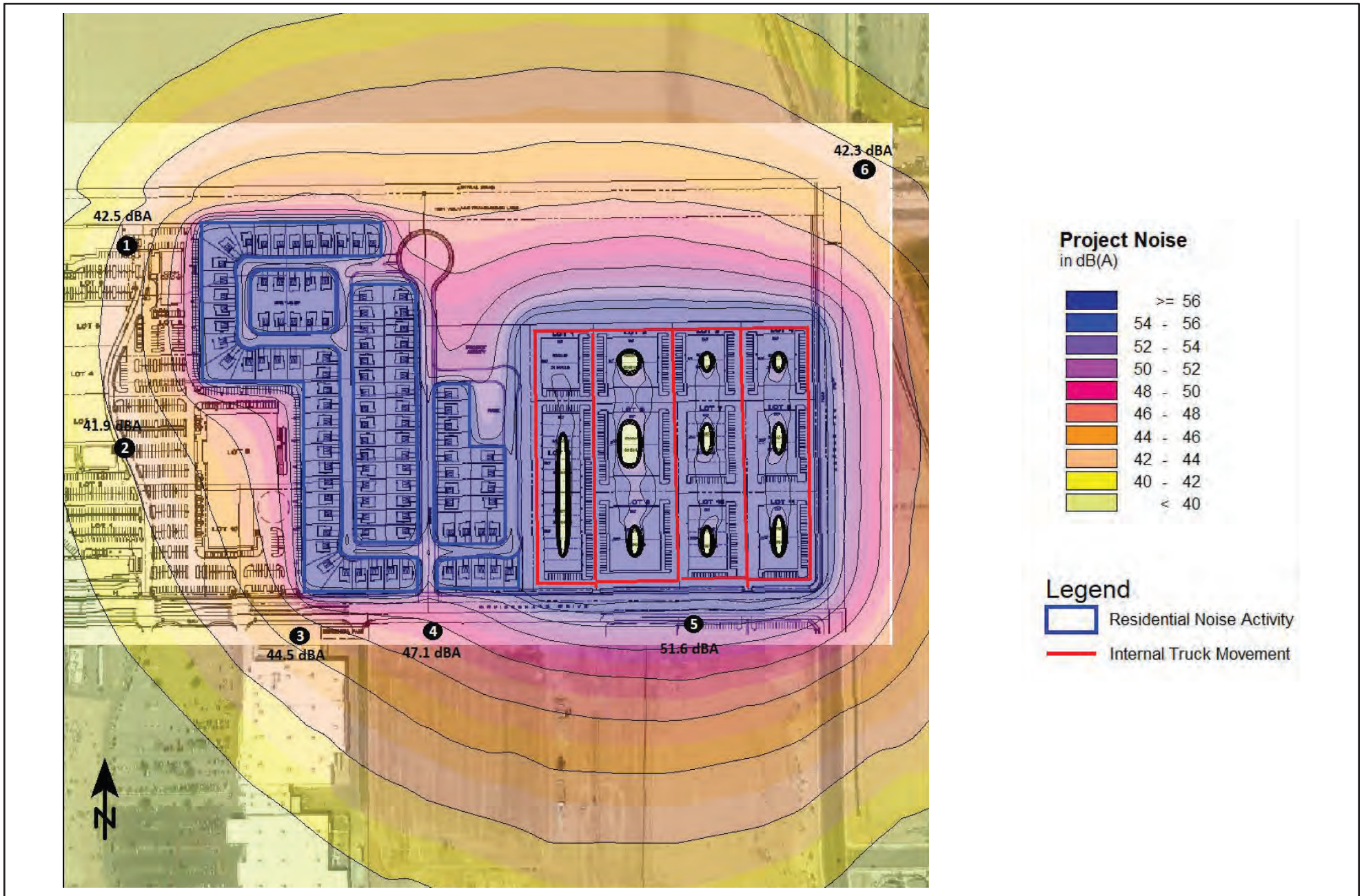
According to the City's General Plan Update Program EIR (City of El Centro 2021 b), no portion of the City is located within the airport noise contour that would exceed the City's noise compatibility standard for the most sensitive land uses (60 dBA CNEL); refer to [Figure 5, Operational Noise Levels](#). Therefore, significant noise effects on residents of the proposed development from airport operations are not anticipated.

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

### **3.0 ENVIRONMENTAL CHECKLIST**

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### **3.0 ENVIRONMENTAL CHECKLIST**

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### 3.0 ENVIRONMENTAL CHECKLIST

#### 14. Population and Housing

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

#### DISCUSSION OF IMPACTS

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

The project as proposed would require a General Plan Amendment to change the existing General Plan land use designation on a portion of the site from General Commercial and Light Manufacturing to Single-Family Residential. The project would also rezone this portion of the property from CG-General Commercial and ML-Light Manufacturing to R2-Single-Family Residential. The existing Light Manufacturing land use and ML-Light Manufacturing zoning would continue to apply to the remainder of the property, which is proposed to be subdivided to allow for future light manufacturing development.

Although the project would change the current land use type from commercial and light manufacturing to residential, development of the subject site was anticipated by the City as Phase II of the Town Center Village project and therefore does not represent unplanned growth. Further, the project as proposed would result in single-family uses similar to the multifamily uses which have been constructed along N. 10<sup>th</sup> Street, just to the south of the site across Cruickshank Drive. With implementation, the project would provide new housing opportunities within an area of the City where planned development is currently underway and expanding.

The project would allow for development of 104 single-family residential units. Based upon the current estimated persons per household for the City of El Centro (3.72 persons per household), an estimated 379 residents would be housed by the development (US Census Bureau 2022). The population generated by future development of the site as proposed would therefore not represent substantial population growth within the City. Additionally, it is assumed that many residents that would live in the proposed development would be existing residents of the City of El Centro who would relocate to the site. It is also anticipated that some of the future residents would be students attending Imperial Valley College, located approximately 3.5 miles north east of the project site, who may be either local residents or residents from surrounding communities.

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

### 3.0 ENVIRONMENTAL CHECKLIST

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

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

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

### 3.0 ENVIRONMENTAL CHECKLIST

#### 15. Public Services

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

#### DISCUSSION OF IMPACTS

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

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

The project would be served by the El Centro Fire Department (ECFD). The ECFD provides emergency and disaster response to mitigate fire, emergency medical, hazardous materials, and other incidents within its boundaries as well as to other jurisdictions via a mutual aid agreement. Fire Station No. 3 is nearest to the project site, located approximately 0.6 miles southwest at 1910 N. Waterman Avenue.

It is not anticipated that the addition of 104 single-family residential units and future development of the approximately 17.3 acres of light manufacturing uses to the ECFD service area would require the construction of new or expansion of existing facilities to provide service to the project as proposed. The ECFD maintains a staffing standard providing that 10 sworn and uniformed personnel are available to respond to calls at any given time throughout the day or night (City of El Centro 2016). There is currently no standard that dictates the total number of personnel on staff relative to City population.

The ECFD has adopted standards for fire and emergency response performance based on the National Fire Protection Association Standard 1710 (2020 Edition) - Standard for the Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments. The ECFD standards require that they meet such adopted response times at least 90 percent of the time.

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

### 3.0 ENVIRONMENTAL CHECKLIST

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fund fire protection services in the City. Additionally, the ECFD operates and shall continue to operate under mutual aid agreements with other agencies as needed for assistance and backup (City of El Centro 2016).

With the payment of development impact fees, the project would not result in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable fire protection service ratios, response times, or other performance objectives. Impacts would be less than significant.

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

Police protection services for the project site would be provided by the El Centro Police Department (ECPD). The ECPD is headquartered at 150 N. 11<sup>th</sup> Street, approximately 1.5 miles south of the project site.

The project as proposed would present an increase in demand on ECPD personnel and resources due to the increased intensity of use on the site with future development of 104 new single-family units and new light manufacturing uses on approximately 17.3 acres. A greater number of homes, residents, occupants, and expanded light manufacturing uses in the project area would be a potential source of additional calls for police protection services.

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

The project would consist of 104 residential units, which are estimated to house a future population of approximately 379 residents, assuming 3.72 persons per household (US Census Bureau 2022). The increase in demand for the provision of law enforcement generated by an additional 379 residents within the El Centro community is not considered to be substantial.

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

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

*c) Schools? **Less than Significant Impact.***

Residents in the City of El Centro are served by three school districts in a total of 24 schools geographically dispersed throughout El Centro. These districts are the El Centro Elementary School District, the McCabe Union School District, and the Central Union High School District. One charter school is located in the City and is authorized by the El Centro Elementary School District (ECESD n.d.). School-age students residing in the proposed residential units would enroll in El Centro Elementary School District for grades kindergarten through 8<sup>th</sup> grade and Central Union High School District for grades 9 to 12.

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To assist in determining suitable future school locations, inclusion of a school site into a development or identification of a proper site within City limits may be required if a certain threshold number of units of new residential development is surpassed. Schools in the City are generally constructed for a school year enrollment of 600 students. The three school districts have their own student yield rates (average number of students per dwelling unit) that range from 0.21 to 0.66 students per dwelling unit (City of El Centro 2016). According to the Office of Public School Construction, the state yield is 0.69 students per dwelling unit. To standardize the student yield rate, the City's Service Area Plan utilizes the state rate of 0.69 students per dwelling unit. Therefore, each school of 600 students supports an estimated 870 residential units. The estimated 870 units serve as the threshold number considered to require a proposed development project to incorporate a school on-site or to identify a site within the City's limits.

The 104 single-family units proposed with the project would yield an estimated 72 students (at 0.69 students/dwelling unit). As such, the project would not trigger the need for a new school facility in this regard.

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

d) **Parks? *Less than Significant Impact.***

An increase in the use of existing parks and recreational facilities typically results from an increase in housing or population in an area. The residential use portion of the project is anticipated to generate 379 residents. It is anticipated that a portion of project residents and employees of the light industrial uses would already reside in other areas in the City, and therefore, would not represent new residents of the City. Such relocation or redistribution of existing occupants or employees within the City would reduce potential new demands on the City's recreational resources. Further, employees of the light industrial uses would not be expected to substantially increase daily demands on area recreational uses and facilities.

The City General Plan Public Facilities Element identifies the goal of providing 3 acres of public parkland per 1,000 residents (City of El Centro 2004b). Therefore, the project would result in new demand for an additional approximately 1.1 acres of parkland (City of El Centro 2016).

Common open space would be provided within the residential use area to meet the City's requirement of 150 square feet of common space per residential unit for the proposed R2-Single-Family Residential zone. Such space could be used for both passive and active outdoor recreation; refer to [Figure 3B, Site Plan – Single-Family Residential](#).

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

To make up for the existing parkland demand and to accommodate anticipated future population increase, the City requires that new development include provision of additional public parks and recreational facilities to the maximum extent allowed by law in accordance with Public Facilities Policy 1.2 of the General Plan (City of El Centro 2004b). The City would require the project applicant to pay a fair-share park impact fee in lieu of the dedication of parkland in conformance with Section 24, Article V of the City of El Centro Code of Ordinances. With the

### 3.0 ENVIRONMENTAL CHECKLIST

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payment of development impact fees, the proposed project would not result in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable park service ratios or other performance objectives. Impacts would be less than significant.

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

The nearest City library to the subject site is the City of El Centro Public Library, approximately 0.9 miles southwest at 1140 N. Imperial Avenue. Services provided by the library include circulation of library materials such as books, magazines and video and audio recordings; reference service; internet access; word processing stations; copy machines; a publicly available conference room; children's reading programs; vocal, acting, and speaking workshops for children and adults; and tax preparation assistance for senior citizens.

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

The project would construct 104 single-family units, whose residents would place demand on existing City library facilities. As the project is expected to generate 379 residents, the project would create demand for an additional approximately 114 to 190 square feet of library space. It is not anticipated that employees of the light industrial uses would substantially increase demands on the City's library facilities due to their relatively limited nature and intensity.

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

16. Recreation

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

**DISCUSSION OF IMPACTS**

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

An increase in the use of existing parks and recreational facilities typically results from an increase in housing or population in an area. As stated above, the residential use portion of the project is anticipated to generate 379 residents. It is anticipated that a portion of project residents and employees of the light industrial uses would already reside in other areas within the City of El Centro, and therefore, would not represent new residents of the City. Such relocation or redistribution of existing occupants or employees within the City would reduce potential new demands on the City's recreational resources. Further, employees of the light industrial uses would not be expected to substantially increase daily demands on area recreational uses and facilities, due to their relatively limited scale and intensity.

Common open space would be provided within the residential use area to meet the City's requirement of 150 square feet of common space per residential unit for the proposed R2-Single-Family Residential zone. Such space could be used for both passive and active outdoor recreation; refer to Figure 3B, Site Plan – Single-Family Residential.

Further, the City would require the project applicant to pay a fair-share park impact fee in lieu of the dedication of parkland in conformance with Section 24, Article V of the City of El Centro Code of Ordinances, prior to issuance of a certificate occupancy in order to offset the impacts of increased demand on park and recreational facilities. With the payment of parkland impact fees, project impacts on park and recreational facilities would be less than significant.

Therefore, it is not anticipated that the project would substantially increase demands on existing area neighborhood or regional parks or other recreational facilities, or contribute to a substantial deterioration of such facilities as a result. Impacts would be less than significant.

### 3.0 ENVIRONMENTAL CHECKLIST

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

Refer to Response 16(a), above. The project proposes limited on-site active and passive recreational space that would be available for use by residents of the development and that would meet City requirements for the provision of common space. The potential physical effects that may result with construction of the proposed recreational space are discussed throughout this IS/MND and, where necessary, mitigation measures are provided to ensure that impacts are reduced to less than significant.

It is not anticipated that the project would directly require the construction or expansion of off-site recreational facilities that may have an adverse physical effect on the environment. Therefore, impacts are considered to be less than significant in this regard.



### 3.0 ENVIRONMENTAL CHECKLIST

#### 17. Transportation

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

The following evaluation is based on the *Transportation Impact Study* prepared for the project by Michael Baker International (2023b; see Appendix F).

#### DISCUSSION OF IMPACTS

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

Within the project vicinity, there are no sidewalks provided on either side of Imperial Avenue. Sidewalks are provided on both sides of Cruickshank Drive between Imperial Avenue and N. 8th Street. Sidewalks are provided on both sides of N 8th Street north and south of Cruickshank Drive. North of Cruickshank Drive, sidewalks are only provided on the west side of 8th Street. Between Cruickshank Drive and Bradshaw Avenue, sidewalks are provided on both sides of N 10th Street. Sidewalks are provided on both sides of N 12th Street north of Cruickshank Drive.

Within the project vicinity, Class II bike lanes are provided on Cruickshank Drive and N 8th Street; Class II bicycle lanes are provided along the project's frontage on Cruickshank Drive. According to the City's *Active Transportation Plan* (2019), no Class II or Class III bike routes are planned along Imperial Avenue.

Imperial Valley Transit (IVT) operates the local bus service within the City of El Centro and provides access to employment centers, shopping centers, hospitals, the library, and government offices, as well as Imperial Valley College. The El Centro Green Line travels along Cruickshank Drive, which allows transfer at the transit station located at State Street and 7th Street. This transit station also serves the Citywide Blue Line as well as other regional IVT bus routes connecting Imperial, Brawley, Calexico, and the rest of Imperial Valley. The nearest bus stop to the project site is located on Cruickshank Drive, approximately 500 feet east of Imperial Avenue/SR 86. Due to COVID-19, reduced services were implemented in March 2020, until further notice. According to the IVT Riders Guide, the Green Line follows the Saturday schedule on weekdays providing service between 7:38 AM and 5:03 PM. No changes to the existing bus stop are proposed with the project.

All off-site roadway improvements would be designed in conformance with City regulations and engineering requirements. As such, the project would not impact existing or proposed

### 3.0 ENVIRONMENTAL CHECKLIST

transportation facilities, such as sidewalks, bicycle lanes, or public transportation stops. The project does not propose any features that would be inconsistent with applicable policies of the City's General Plan, *Active Transportation Plan*, or other relevant plans addressing the circulation system.

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

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

As a result of SB 743, which was signed into law in 2013, the evaluation of transportation impacts under CEQA shifted from an analysis of delay and operations to that of vehicle miles traveled (VMT). VMT is a measure of the total number of miles driven for various purposes and is sometimes expressed as an average per trip or per person. In June 2022, the City of El Centro prepared and adopted new *Transportation Study Guidelines* (TSG) for evaluating VMT impacts under CEQA, which comply with SB 743. Therefore, the VMT analysis prepared for the project herein is based on the City's TSG.

The Institute of Transportation Engineers *11<sup>th</sup> Edition Trip Generation Manual* (2021) rates were utilized to calculate the vehicular trips forecast to be generated by the project. [Table 17-1](#) summarizes the project's trip generation.

**Table 17-1: Proposed Project Trip Generation**

Land Use	Intensity	Daily Trips	AM Peak Hour Trips		PM Peak Hour Trips	
			Total	In : Out	Total	In : Out
Single-Family Residential	102 DU	1,028	76	20 : 56	101	64 : 37
Manufacturing	17.26 AC	700	86	74 : 12	86	34 : 52
<b>Total</b>		<b>1,728</b>	162	94 : 68	187	98 : 89

Source: Transportation Impact Study, Michael Baker International, 2023b; see Appendix F.

DU = Dwelling Unit

AC = Acres

The City's TSG includes screening criteria for all land development projects. According to the TSG, a project that meets at least one of the screening criteria would not be required to prepare a detailed VMT analysis and would be presumed to have a less than significant VMT impact. [Table 17-2](#) summarizes the screening criteria outlined in the City's TSG.

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**Table 17-2: VMT Screening Criteria Evaluation**

ID	VMT Screening Criteria	Description	Screening Evaluation	Criteria Met? (Yes/No)
1	Small Residential and Employment Projects	Projects that generate less than 110 daily trips.	The project generates 1,728 daily trips which exceeds the 110 daily trip threshold.	No
2	Projects Located in a VMT-Efficient Area	Projects that are located within a VMT efficient area (15% or more below the base year average VMT/Capita or VMT/Employee) based on the applicable location-based screening map produced by the City of El Centro found in Appendix C of the TSG.	On the VMT per Capita map, the project is located within the 50% to 85% of Regional Mean area. On the VMT per Employee map, the project is located within the 50% to 85% of Regional Mean area.	<b>Yes</b>
3	Locally Serving Retail Projects	Local serving retail projects less than 50,000 square feet and that would serve the local community.	The project is not considered a locally serving retail project.	No
4	Local Serving Public Facilities and Community Purpose Facilities	Public facilities that serve the surrounding community or public facilities that are passive uses such as transit centers, public schools, libraries, post offices, police and fire facilities, parks and trailheads, government offices, passive public uses, including communication and utility buildings, water sanitation, and waste management, and other public uses as determined by the City.	The project is not considered a public facility.	No
5	Redevelopment Projects with Greater VMT Efficiency	Redevelopment project that replaces existing uses and results in a net decrease in VMT.	The project is not a redevelopment project since the site is vacant and undeveloped.	No
6	Affordable Housing	Any portion of the project that is composed of deed-restricted affordable housing units.	The project is not constructing any affordable units.	No

Source: Transportation Impact Study, Michael Baker International, 2023b; see Appendix F.

As described in Table 17-2 above, the project is located within a VMT Efficient Area according to VMT per Capita and VMT per Employee maps included in Appendix C of the City's TSG. Since at least one of the VMT screening criteria is satisfied, a detailed VMT analysis is not required and the project is presumed to have a less than significant transportation impact.

Therefore, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b). Impacts would be less than significant.

### 3.0 ENVIRONMENTAL CHECKLIST

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

The project design does not propose any features that would potentially increase hazards along local roadways. All off-site roadway improvements would be designed in conformance with City engineering requirements and would not introduce roadway design or features (i.e., sharp curves, dangerous intersections, or other hazardous features) that could result in transportation-related hazards or safety concerns.

The residential portion of the project would be served by four driveways off of N. 12th Street extending from Cruickshank Drive. The industrial portion would be served by one driveway off of Cruickshank Drive. These access points would be designed in accordance with the City's street standards that ensure safe ingress/egress. Additionally, as appropriate, on-site structures would be set back from adjacent access roadways as required by the City's Zoning Code to ensure that views at the driveways are uninhibited. Proposed landscaping and signage at the project driveways should also be designed so as not to obstruct drivers' views when exiting the site.

The project would result in future development of the subject site with single-family residential and light manufacturing uses. No uses that would involve farm equipment or heavy machinery are anticipated at this time, although operation of the light manufacturing uses may involve periodic transport of materials and supplies to/from the site in larger vehicles, such as semi-trailers. However, the movement of such vehicles on- and off-site would be adequately accommodated through conformance with City design standards and would not interfere with area circulation patterns.

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

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

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

All construction would be staged on-site and would not interfere with emergency access to the site. As noted above, the project site would have multiple ingress/egress points along Cruickshank Drive and from N. 12th Street. The project vicinity is accessible via a number of existing local roads (i.e., N. 8th Street, N. Imperial Avenue, Cruickshank Drive), with alternative roads allowing access in the event of an emergency. Emergency vehicle access would be maintained throughout construction activities, in accordance with the City's construction specifications. Further, construction activities would not be permitted to impede emergency access to any local roadways or surrounding properties. A traffic control plan would be prepared to ensure that adequate access and circulation is maintained on all surrounding streets during the project construction phase. As such, construction impacts are considered to be less than significant.

Internal circulation would be provided via a series of linked internal drives, including existing N. 12th Street and proposed on-site roads within the residential and light manufacturing use areas. All on-site drive aisles would be constructed to minimum required widths with provision of adequate turning radii, consistent with City and fire department engineering design requirements, to ensure adequate on-site circulation and access for emergency vehicles is provided.

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

### 3.0 ENVIRONMENTAL CHECKLIST

#### 18. Tribal Cultural Resources

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

The following discussion considers the findings of the *Cultural Resources Inventory Report* prepared by ECORP Consulting, Inc. (2022b; see Appendix C).

#### DISCUSSION OF IMPACTS

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

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

The project site is currently undeveloped. As discussed in Section 5, Cultural Resources, the site does not support any listed or eligible historical or cultural resources, as defined by Public Resources Code Section 5020.1(k). A cultural resources inventory was conducted for the project by ECORP Consulting (2022b; Appendix C). ECORP requested a records search for the property at the South Coastal Information Center of the California Historical Resources Information System at San Diego State University. No previously recorded resources were identified within the project area. In addition, ECORP contacted the California Native American Heritage Commission (NAHC) to request a search of the Sacred Lands File for the area of potential effect (APE). The search was negative and no Native American cultural resources were identified within the project area. Additionally, the entire project area was field surveyed on August 18 and 19, 2022. No cultural or tribal cultural resources were identified as a result of the field survey.

### 3.0 ENVIRONMENTAL CHECKLIST

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Pursuant to AB 52, the City initiated consultation with culturally affiliated tribes by sending initial notification letters on October 10, 2022. The City received two letters in response. The Ft. Yuma Quechan Tribe responded on October 27, 2022 indicating that the Tribe did not wish to provide further comment on the project; therefore, consultation with this Tribe is considered to be closed.

The City also received a letter from the San Pasqual Band of Mission Indians in response to the notifications sent. The Tribe indicated that while the project site does not lie within the boundaries of the recognized San Pasqual Indian Reservation, it does lie within the boundaries of the territory that the Tribe considers to be its Traditional Use Area. The Tribe therefore requested formal government-to-government consultation pursuant to AB 52 and requested access to any cultural resource reports that have been generated for the project. The City provided a copy of the *Cultural Resources Inventory Report* (ECORP 2022b) prepared for the project to the San Pasqual Band on January 26, 2023. Consultation with the Tribe remains ongoing.

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

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

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

#### **Mitigation Measures**

Implement Mitigation Measure **CUL-1**.

#### **Level of Significance after Mitigation**

Less than significant.

### 3.0 ENVIRONMENTAL CHECKLIST

#### 19. Utilities and Service Systems

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

#### DISCUSSION OF IMPACTS

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

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

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

### 3.0 ENVIRONMENTAL CHECKLIST

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

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

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

In general, the City of El Centro drains in a northeasterly direction and is tributary to the Salton Sea. The City maintains its Drainage Master Plan to ensure that stormwater facilities are maintained over time and that new development is adequately served. The City reviews specific drainage needs on a project-by-project basis. Stormwater from the project site would be routed to an existing storm drain located in N. 10<sup>th</sup> Street. This storm drain outlets to an existing off-site detention basin, located north of the project boundary, just south of the Central Drain and east of N. 12<sup>th</sup> Street. This detention basin was previously constructed as part of the El Centro Town Center Village project and was sized to accommodate all planned development within the Town Center Village. Further, drainage design for the project would not result in a change in stormwater volume, rate, or direction of flow from the site following project implementation; refer to Section 10, Hydrology and Water Quality. Therefore, no upgrades to the City's storm drain system would be required to accommodate stormwater runoff from the subject site with project implementation.

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

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

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

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



### 3.0 ENVIRONMENTAL CHECKLIST

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

The project would allow for development of 104 single-family residential units. Based upon the current estimated persons per household for the City of El Centro (3.72 persons per household), an estimated 379 residents would be housed by the development (US Census Bureau 2022). Daily per capita water demand for the City of El Centro is estimated at 194 gallons per day (IID 2021). Therefore, the proposed residential uses would generate additional demand for an estimated 73,526 gpd over existing conditions. Based on the service capacity of the City's existing and planned water systems, it is anticipated that existing and future water supplies would be adequate to serve the proposed development.

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

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

Refer to Response 19(a), above. The project would result in construction of 104 single-family units and approximately 17.3 acres of light manufacturing uses which would increase demands on the City's water treatment facilities. It is anticipated that the City's water treatment plant is adequate to accommodate future planned growth through the year 2026. Additional improvements are anticipated by the City to expand the WWTP as needed to ensure that adequate capacity is maintained.

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

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

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

### 3.0 ENVIRONMENTAL CHECKLIST

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

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

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

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

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

Refer to Response 19(d), above. The project would be served by an existing waste handling service, provided by CR&R Waste Services. CR&R operates consistent with federal, state, and local statutes and regulations, and the landfill serving the project would also conform to all applicable statutes and regulations. Therefore, the project would result in a less than significant impact.

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#### 20. Wildfire

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

#### DISCUSSION OF IMPACTS

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

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

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

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

### 3.0 ENVIRONMENTAL CHECKLIST

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

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

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

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

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

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

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

Refer to Response 20(a), above. The site is not located in or near lands classified as being in a Very High Fire Hazard Severity Zone and is designated as having a low fire hazard risk relative to Local Responsibility Areas (CalFire n.d.). Additionally, the project site is relatively flat, and no slopes that may be subject to slope instability, flooding, or landslides after a fire event are present, nor are such conditions present on adjoining lands. Development of the site as designed would not result in an increase in runoff quantities or rates from the site.

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

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

### 3.0 ENVIRONMENTAL CHECKLIST

#### 21. Mandatory Findings of Significance

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

#### DISCUSSION OF IMPACTS

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

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

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

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

### 3.0 ENVIRONMENTAL CHECKLIST

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

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

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

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

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

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**4.0 DOCUMENT PREPARERS  
AND REFERENCES**

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## 4.0 DOCUMENT PREPARERS AND REFERENCES

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### DOCUMENT PREPARERS

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