

Notice of Preparation

Notice of Preparation

To: State Clearinghouse

From: City of El Centro

1400 Tenth Street

1275 Main Street

Sacramento, CA 95814

El Centro, CA 95814

Subject: Notice of Preparation of a Draft Environmental Impact Report

The City of El Centro Planning Department will be the Lead Agency and will prepare an environmental impact report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study is attached.

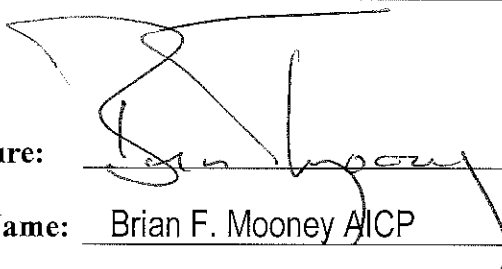
Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to Norma Villicaña, Community Development Director at the address shown above. We will need the name for a contact person in your agency.

Project Title: Change of Zone 05-07 and Tentative Subdivision Map (Lotus Ranch), El Centro

Project Applicant, if any: Gary McPhetridge

Date: 11/14/14

Signature: 

Print Name: Brian F. Mooney AICP

Title: Managing Principal

Telephone: 858-717-8100

Environmental Checklist Form

1. **Project Title:** Change of Zone No. 05-07 (Pre-Zone) and Lotus Ranch Vesting Tentative Subdivision Map
2. **Lead Agency Name and Address:** City of El Centro
1275 Main Street
El Centro, CA 92243

Responsible Agency Name and Address: Imperial County Local Agency Formation Commission
1122 State Street
El Centro, CA 92243
3. **Contact Person and Phone Number:** Norma M. Villicaña
Community Development Director
(760) 337-4545
4. **Project Location:** South of Interstate 8 (I-8) and extends south $\frac{3}{4}$ of a mile, west of La Brucherie Avenue and east of Lotus Canal and Drain (Refer to Figure 1)
5. **Project Sponsor's Name and Address:** Gary McPhetridge
Lotus Ranch LLC
P.O. Box 3350
El Centro, CA 92244
6. **General Plan Designation:** Urban Area (County of Imperial)
Low Density Residential (City of El Centro)
7. **Zoning:** County of Imperial A2U (General Agriculture - Urban)
8. **Description of Project** (*Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary*):
The proposed Lotus Ranch project consists of 213 acres south of Interstate 8 (I-8). The proposed project includes the construction of 617 single-family residential units, two (2) parks consisting of ± 5.8 acres, and offsite improvements to serve the project. It is anticipated the development would occur in three (3) major phases (Refer to Figure 2). The project would require an Annexation, Pre-Zone, Vesting Tentative Map, and Development Agreement.

An Environmental Impact Report (EIR) was previously prepared for the proposed project and circulated to all agencies in 2007. The EIR was not formally adopted by the respective governing bodies and the project has been modified. The project modifications include a reduction in residential units, the addition of parkland space, removal of a proposed school, and phasing of the project.
9. **Surrounding Land Uses and Setting** (*briefly describe the project's surroundings*):
The surrounding properties consist of I-8, Southwest High School, and rural residences to the north, agricultural land, specifically hay storage yard/cattle feed yard to the south, the Farmer Estates Subdivision which includes single-family homes, and agricultural land to the west.

The site is bordered to the north by the City's LU (Limited Use Zone, County's R-1-U (Single-Family Residential-Urban) and A1-L2U (Limited Agriculture) zones; to the west by County A2U (General Agriculture – Urban) zone; to the east by the City's R-1, (Single-Family Residential) and County's A2U zone; and to the south by the County's A3 (Heavy Agriculture) zone.

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

City of El Centro:

- Building Permit
- Grading Permit
- Public Improvements
- Pre-Zone
- Vesting Tentative Map
- Development Agreement

Imperial Irrigation District:

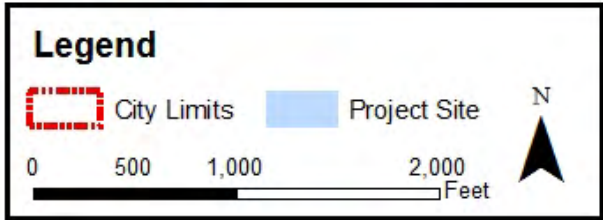
- Stormwater Approval

LAFCO:

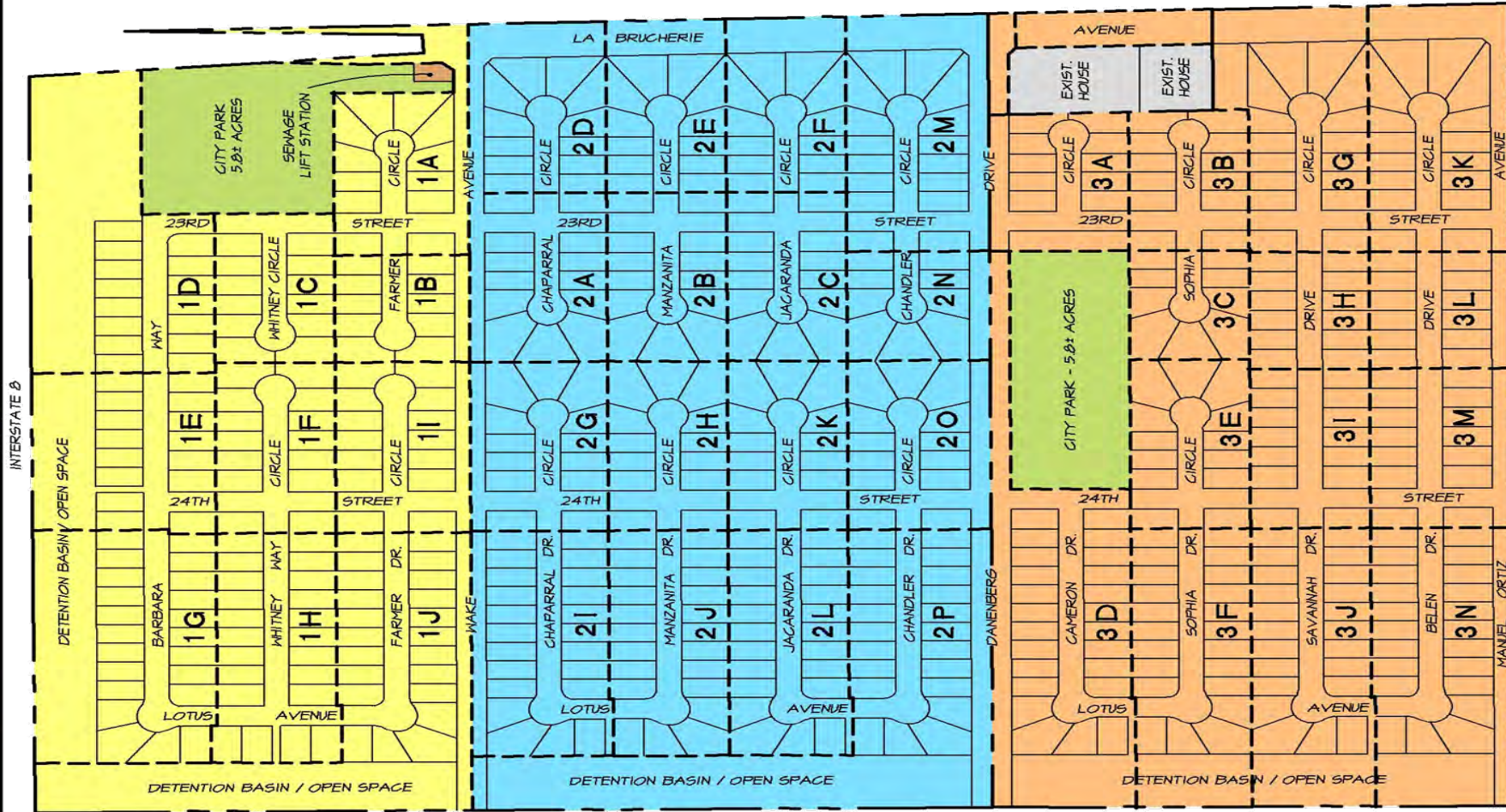
- Annexation



Figure 1- Aerial Location Map



LOTUS RANCH SUBDIVISION VESTING TENTATIVE MAP PHASING / DEVELOPMENT PLAN



UNIT 1 / PHASING

UNIT 2 / PHASING

UNIT 3 / PHASING

G-MAC DEVELOPMENT

P. O. BOX 3305
EL CENTRO, CA 92244
760 353 2222



SCALE: 1"=400'

03-03-14
SHEET 1 OF 2 SHEETS

Source: G-MAC Development (2014)



Figure 2 - Tentative Subdivision Map

LOTUS RANCH SUBDIVISION VESTING TENTATIVE MAP PHASING / DEVELOPMENT PLAN

UNIT 1	
PHASE DATA TABLE	
161.1 ACRES	
PHASING UNIT	NO. OF LOTS
1 A	12
1 B	10
1 C	12
1 D	15
1 E	15
1 F	14
1 G	22
1 H	22
1 I	14
1 J	22
TOTAL UNIT 1 = 158 LOTS	

UNIT 2	
PHASE DATA TABLE	
177.5 ACRES	
PHASING UNIT	NO. OF LOTS
2 A	13
2 B	13
2 C	13
2 D	12
2 E	12
2 F	12
2 G	13
2 H	13
2 I	22
2 J	22
2 K	13
2 L	22
2 M	16
2 N	9
2 O	13
2 P	22
TOTAL UNIT 2 = 240 LOTS	

UNIT 3	
PHASE DATA TABLE	
174.4 ACRES	
PHASING UNIT	NO. OF LOTS
3 A	10
3 B	12
3 C	9
3 D	24
3 E	13
3 F	22
3 G	17
3 H	12
3 I	14
3 J	22
3 K	16
3 L	12
3 M	14
3 N	22
TOTAL UNIT 3 = 219 LOTS	

G-MAC DEVELOPMENT
 P. O. BOX 3305
 EL CENTRO, CA 92244
 760 353 2222

PHASING / DEVELOPMENT NOTES

1. CITY STAFF SHALL APPROVE ALL PHASING DEVELOPMENT PRIOR TO ANY DEVELOPMENT.
2. UNITS 1, 2 AND 3 MAY BE DEVELOPED SIMULTANEOUSLY AS APPROVED BY CITY STAFF.
3. PHASING WITHIN UNITS MAY BE DEVELOPED IN MULTIPLE PHASING AS APPROVED BY CITY STAFF.
4. WATER LOOP SHALL BE INSTALLED AFTER THE CONSTRUCTION OF 300 HOUSES.
5. THE DEVELOPMENT OF UNIT 3 SHALL BE OBLIGATED TO INSTALL WATER LOOP.
6. PARKS WILL BE DEVELOPED PER CITY CODE REQUIREMENT OF FIVE ACRE PER THOUSAND PERSONS.

LOT TOTAL

TOTAL UNIT 1 = 158 LOTS
TOTAL UNIT 2 = 240 LOTS
TOTAL UNIT 3 = 219 LOTS
TOTAL ALL UNITS = 617 LOTS

03-03-14
 SHEET 2 OF 2 SHEETS

Source: G-MAC Development (2014)



Figure 3 - Vesting Tentative Map

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

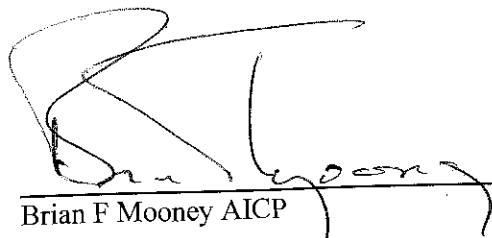
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

DETERMINATION (To be completed by the Lead Agency):

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document 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.


 Brian F Mooney AICP

11/14/14
 Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c) (3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>I. AESTHETICS -- Would the project:</p> <p>a. Have a substantial adverse effect on a scenic vista?</p> <p><u>While the proposed project would alter the existing project site, the project site and surrounding land is flat and devoid of notable scenic vistas. Therefore there will be a less than significant impact.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</p> <p><u>The project site does not contain any scenic resources and is not visible from any designated scenic highway. Therefore, there will be no impact.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>c. Substantially degrade the existing visual character or quality of the site and its surroundings?</p> <p><u>Construction of residences, public parks, detention basins, and roadways would alter the aesthetic setting of the site from its existing state of undeveloped agricultural fields. However, the project's structures would be aesthetically compatible with the residential development in the vicinity of the site. Therefore, there will be no impact.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</p> <p><u>The proposed project includes 617 dwelling units on 213 acres. Project design, including landscaping techniques, prudent lighting angles, and use of appropriate building materials will ensure that the impacts will be less than significant.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

II. AGRICULTURE AND FOREST RESOURCES.
 In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. -- Would the project:

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project site is recognized as approximately 30 percent Prime Farmland and 70 percent Farmland of Statewide Importance according to the California Department of Conservation Farmland Mapping and Monitoring Program. Therefore, this issue would have a potentially significant impact and will be further discussed in the EIR.

- b. Conflicts with existing zoning for agricultural uses or a Williamson Act contract?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project site is recognized as approximately 30 percent Prime Farmland and 70 percent Farmland of Statewide Importance according to the California Department of Conservation Farmland Mapping and Monitoring Program. Therefore, this project would have a potentially significant impact and will be addressed in the EIR.

- c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by 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"/>
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The project site does not contain any forest lands, timberland, or timberland zoned for Timberland Production. Therefore, there will be no impact.

- d. Result in the loss of forest land or conversion of forest land to non-forest use?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Because no forest land exists within the project site, there will be no loss of forest land or conversion, and therefore, no impact.

- e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project area is currently used for agricultural production. The development of the proposed project may encourage conversion of adjacent farmlands to the west, southwest, south and southeast to non-agricultural uses. Therefore, this issue would have a potentially significant impact and will be addressed in the EIR.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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III. **AIR QUALITY** -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

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

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Construction of the proposed project will follow established construction guidelines to minimize pollutant emissions. However, the operation of the proposed project would result in an increase in traffic levels for the area that would potentially result in a significant increase in emissions levels. An updated Air Quality Analysis will be prepared and will be discussed in the EIR.

- b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project will concentrate traffic and associated emissions around the proposed project area. The proposed project would have the potential to violate air quality standards or contribute to an existing or projected violation. The potential for traffic hotspots at the multiple access points would result in potentially significant impacts to air quality. An updated Air Quality Analysis will be prepared and discussed in the EIR.

- c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project, in conjunction with other projects in the surrounding area would potentially contribute to the increase of particular criteria pollutants for which the Imperial Valley is in non-attainment. Therefore, there is a potentially significant impact. An updated Air Quality Analysis shall be included as part of the EIR.

- d. Expose sensitive receptors to substantial pollutant concentrations?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project consists of residential development and is located in close proximity to other residential developments and a school site which are considered sensitive receptors. The potential increase in emissions within this region, as a result of the construction and operation of the proposed development would contribute to the generation of pollutant concentrates. Due to the project's close proximity to sensitive receptors, there would be a potentially significant impact.

- e. Create objectionable odors affecting a substantial number of people?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project would not create objectionable odors that would affect a substantial number of people. However, the proposed project is located north of a cattle yard that would create objectionable odors. Therefore, there is a potentially significant impact. The City shall require the applicant to record a notice on the title of all project residences south of Wake Avenue that advises prospective buyers of potential odor impacts.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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IV. BIOLOGICAL RESOURCES – Would the project:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project may have a substantial adverse effect on species identified as a candidate, sensitive, or special status species, by the California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife (USFWS). One species of special concern, the burrowing owl, has adapted to conditions found at the site and uses agricultural fields for foraging. Conversion of this land to residential and commercial uses may impact the burrowing owl. Therefore the proposed project would result in a potentially significant impact. An updated burrowing owl study will be completed.

- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project site is currently used for agriculture land devoid of any significant vegetation or sensitive habitat areas. Therefore, there will be no impact.

- c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project site currently consists of agricultural land. The project area is devoid of any areas defined as protected wetlands. Therefore, there will be no impact.

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project site is currently used for agriculture and devoid of any sensitive vegetation or habitat areas. One species of special concern, the burrowing owl, has adapted to conditions found at the site and uses agricultural fields for foraging. Conversion of this land to residential/commercial use may impact the burrowing owl. An updated burrowing owl study will be completed.

- 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"/>
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The proposed project site does not conflict with any ordinances or local policies, protecting biological resources. Therefore, there will be no impact.

- 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"/>
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There are no identified Habitat Conservation Plans, Natural Community Conservation Plans or other approved local, regional, or state habitat conservation plans applicable to the proposed project site. Therefore, there will be no impact.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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V. CULTURAL RESOURCES – Would the project:

- a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project site is currently used for agriculture production and is devoid of any significant known historical resources. A cultural resource constraints review for the project site was conducted by synthesizing archaeological records from the California Historical Resources Information System, feedback from the various concerned Native American tribes, and historical data available for the area. Prior to completion of the EIR, consultation with Native American Tribes will take place. Additionally, ground-disturbing activities during construction of the proposed project such as grading have the potential to unearth, damage, or destroy unknown archeological resources located on the site. In the event any archaeological resources are identified, all work will cease until a qualified archaeologist is summoned to determine whether the unearthed resource requires further study.

- b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project site is currently used for agriculture production. A cultural resources record search for the project area was previously completed and did not reveal any previously identified resources within the boundaries of the project area. In the event that buried cultural resources are discovered during construction of the proposed project, all construction activities in the immediate vicinity of the find shall cease until a qualified archaeologist can be summoned to determine whether the unearthed resource requires further study. The archeologist shall make recommendations to the City regarding specific measures that shall be implemented to protect the discovered resource, including but not limited to excavation of the finds and evaluation of the find in accordance with §15064.5 of the CEQA Guidelines. Therefore, the impact is less than significant.

- c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project site is currently used for agriculture production and is devoid of any significant known geologic site or paleontological resources. Therefore, there will be no impact.

- d. Disturb any human remains, including those interred outside of formal cemeteries?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project site consists of flat-lying, agricultural land. No human remains have been identified within the site or its vicinity. Therefore, there will be no impact.

VI. GEOLOGY AND SOILS – Would the project:

- a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project site is not located in an Alquist-Priolo Earthquake Fault Zone and no active faults or ground ruptures have been mapped underlying the site. However, the project site is within a seismically active area due to various faults that are located in the proximity of the site. A Geotechnical Study will be completed for the proposed project and will be further discussed in the EIR.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. Strong seismic ground shaking? <u>The proposed project site is susceptible to potentially strong seismic ground shaking based on the location of the proposed project. A Geotechnical investigation will be completed and included in the EIR. Design would be in accordance with the Uniform Building Code in order to mitigate any significant impacts.</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction? <u>Prior geotechnical reports in the surrounding area found the region to be potentially susceptible to liquefaction. An updated Geotechnical Study will be completed and the potential of liquefaction at the project site will be further discussed in the EIR.</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides? <u>An updated Geotechnical Study will be completed for the proposed project. The potential for landslides will be further discussed in the EIR.</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil? <u>The proposed project will increase the sealed surface area of the site and require grading. Landscaping of the site and use of appropriate construction techniques such as watering and other Best Management Practices will reduce the impact to below the level of significance. Therefore, the impact will be less than significant.</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? <u>The proposed project site is not located on an unstable geologic unit. The proposed project would not induce geologic or soil instability on or offsite. Therefore, the impact will be less than significant.</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? <u>The proposed project area does contain soils that have been identified as highly expansive. The design will be in accordance with the Uniform Building Code.</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? <u>The proposed project will not use septic tanks or alternative wastewater treatments. Therefore, there will be no impact.</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VII. GREENHOUSE GAS EMISSIONS – Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? <u>The proposed project will directly generate greenhouse gas emissions through construction and increased traffic. Mitigation measures that address the Sustainable Communities and Climate Protection Act of 2008 (S.B. 375) and the greenhouse gas reduction goals will be addressed in the EIR.</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? <u>The proposed project may conflict with the Sustainable Communities and Climate Protection Act of 2008 (S.B. 375) and the reduction of greenhouse gases will be addressed in the EIR.</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The proposed residential development project will not create any significant hazard to the public through the use of hazardous materials. Therefore, there will be no impact.

- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The proposed residential development project will not create any significant hazard to the public through the use of hazardous materials. Therefore there will be no impact.

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The proposed project is only residential development and therefore will not emit any hazardous emissions nor handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore there will be no impact.

- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The proposed project site is not listed as a hazardous material site. However, historical agricultural practices may have left trace amounts of pesticide chemicals. The levels are well below California Preliminary Remediation Goal for residential soil and handling or reuse of the soil is not restricted. Therefore, the impact will be less than significant.

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

There are no airports within two miles of the proposed project site. Therefore, there will be no impact.

- f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

There are no private airstrips within the vicinity of the proposed project. Therefore, there is no impact.

- g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The proposed project will not impair or physically interfere with an emergency response plan or emergency evacuation plan. Therefore, there will be no impact.

- h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

There are no wildlands in the vicinity of the proposed project. Therefore, there will be no impact.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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IX. HYDROLOGY AND WATER QUALITY – Would the project:

- a. Violate any water quality standards or waste discharge requirements?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Increased impervious surface mean that less surface water would be absorbed by the on-site soil and that more surface water would flow into the Lotus Drain. During construction of the proposed project, grading and construction activity that could potentially lead to pollution of the drainage system from hazardous substances (e.g., oil and gasoline) would be mitigated by utilizing the City's construction requirements. A Stormwater Pollution Prevention Plan (SWPPP) will be completed for the proposed project and Best Management Practices (BMPs) will be used to control runoff to comply with City's Stormwater Program and the NPDES General Construction Permit. These BMPs will be subject to review by the City. The operation of the proposed development shall conform to all relevant regulations governing discharge and water quality.

- b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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While development of a large sealed surface area will affect the efficiency of groundwater recharge on the site, it will not result in a net deficit in aquifer volume or a lowering of the local groundwater table. In addition, there are no groundwater wells located within the project site or surrounding project site. Therefore, there will be no impact.

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The project would entail earthwork and construction activity during construction, potentially causing soil erosion and sedimentation to the Lotus Drain. During the permanent occupational phase of the project, increased impervious surfaces would result in a decrease in the absorption of surface water by the on-site soil and an increase of surface water flowing into the Lotus Drain. Mitigation measures include temporary erosion control measures (i.e. silt fences, staked straw bales), protection of downstream drainage facilities, and establishing vegetative cover on the construction site as soon as possible after disturbance.

- d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project site is not within a 100-year flood zone or in an area that could be subject to inundation, nor would it contribute to any flooding on adjacent properties. Existing drainage and runoff is managed and the proposed project will include drainage management plans. Therefore, the impact is less than significant.

- e. 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?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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To reduce surface water and polluted runoff, the City shall require that construction contractors obtain coverage under the NPDES General Construction Permit and comply with the construction requirements of the City's Stormwater Program. Mitigation measures include temporary erosion control measures (i.e. silt fences, staked straw bales), protection of downstream drainage facilities, and establishing vegetative cover on the construction site as soon as possible after disturbance, and implementation of multiple BMPs in the form of detention basins and end-of-pipe stormwater treatment systems.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>f. Otherwise substantially degrade water quality? <u>The existing agricultural activities at the project site presently contribute to the impaired status of drainage water quality. Contributions of residential-related contaminants from the project is anticipated to be relatively low compared to existing conditions, particularly with the incorporation of detention basins and other water quality treatment BMPs as required. Therefore, the impact will be less than significant.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? <u>The proposed project is not located within a 100-year flood hazard area. Therefore, there will be no impact.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows? <u>The proposed project is not located within a 100-year flood hazard area. Therefore, there will be no impact.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? <u>The proposed project is not located in area identified as at risk from flooding due to levee or dam failure. Therefore, there will be no impact.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>j. Inundation by seiche, tsunami, or mudflow? <u>The proposed project is located inland with no substantial bodies of water nearby. Therefore, the risk of inundation by seiche, tsunami, or mudflow is considered to be low. Therefore, there will be no impact.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>X. LAND USE AND PLANNING</p>				<input checked="" type="checkbox"/>
<p>a. Physically divide an established community? <u>There are existing residential land uses within the adjacent properties to the east and agricultural uses to the west and south of the proposed project site. This project would not divide an existing agricultural or residential community, and therefore, there will be no impact.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? <u>To accommodate population growth, both the City and the County have determined that it will likely be necessary to convert existing "Important Farmland" to non-agricultural, urban uses. The City of El Centro has designated the property as Low Density Residential in their General Plan. In addition, the County has designated the project site as an Urban Area. The project is consistent with these designations, and therefore, there will be no impact.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>c. Conflict with any applicable habitat conservation plan or natural community conservation plan? <u>There are no habitat conservation plans on or near the proposed project site. Therefore, there will be no impact.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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XI. MINERAL RESOURCES – Would the project:

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No mineral resources of value to the region and the residents of the state have been identified. Therefore, there will be no impact.

- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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There are no locally important mineral resource recovery sites delineated on a local plan, specific plan or general plan, in the vicinity of the proposed project. Therefore, there will be no impact.

XII. NOISE – Would the project result in:

- a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project would incur greater noise levels as a result of the intended increase in residents and visitors and associated traffic. During construction, the noise level would likely cause localized and temporary noise impacts. Off-site residences are located over 100 feet away from construction activities and there would therefore be no significant impact to them during construction. However, if some project homes are occupied during construction of latter phases, those residents could be significantly impacted by construction noise level. Traffic noise levels from homes closest to Interstate-8 would exceed the City's acceptable levels. Mitigation measures will be incorporated to offset noise impacts.

- b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project would involve construction and landscaping activities. However these activities would not entail excessive groundborne vibration or groundborne noise level. Therefore, there would not be a significant impact.

- c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Additional noise impacts associated with traffic would raise ambient noise levels. The increased intensity of use on the site would represent a potentially significant noise impact. Mitigation measures include posting construction activity notices and construction of noise barriers to shield the homes from freeway noise.

- d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The construction and landscaping works associated with the proposed project present a potential for an increase in ambient noise levels. The increase would result in a direct impact to the adjacent residential receptors. Mitigation measures include posting construction activity notices and construction of noise barriers to shield the homes from freeway noise.

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project is not located within an airport land use plan or within two miles of a public airport that would expose people residing or working in the project area to excessive noise levels. Therefore, there will be no impact.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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- f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project site is not within the vicinity of a private airstrip. Therefore, there will be no impact.

XIII. POPULATION AND HOUSING – Would the project:

- a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project would directly induce population growth in the area by providing 617 new dwelling units. However, development of the site is within the amount of growth projected and planned by the City, so the impact is less than significant. The project would not indirectly enable growth that is not planned by the City, and therefore, the impact will be less than significant.

- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project site is currently agricultural land and would not displace existing housing. Therefore, there will be no impact.

- c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project site is currently agricultural land and the proposed project would not displace substantial numbers of people. Therefore, there will be no impact.

XIV. PUBLIC SERVICES

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

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- i. Fire Protection?

The proposed project would bring residents and structures to El Centro. This increase in structures, residents and visitors would result in an increase in demands for fire protection services. Increased demands would be serviced by the existing Fire Station. All new structures would meet current building and fire codes. The proposed 617 residential unit development would further impact the fire department's ability to deliver timely services. Therefore, the project would result in a potentially significant impact. Mitigation measures will include payment of development impact fees for construction of fire facilities and services.

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- ii. Police Protection?

The proposed project would bring residents and structures to El Centro. This increase in structures, residents and visitors would result in an increase in demands for police protection services. Increased demands would be serviced by the existing Police Station. The proposed 617 residential unit development would further impact the police department's ability to deliver timely services. Therefore, the project would result in a potentially significant impact. Mitigation measures will include payment of development impact fees for police facilities and services.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
iii. Schools? <u>The addition of the project's 617 residences would yield approximately 537 new students. In order to offset the educational impacts, the project applicant is required to pay State-mandated school impact fees.</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Parks? <u>The proposed project's 617 units would result in no adverse impact with respect to public parks service. The project includes two (2) 5.8-acre public parks which would exceed the parkland demand and contribute toward reducing the City's existing parkland deficit. Therefore, there will be a less than significant impact.</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v. Other Public Facilities? <u>No impacts to other public services are anticipated.</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XV. RECREATION –

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

The proposed project may increase the use of existing neighborhood and regional parks. The proposed project is providing two (2) 5.8-acre public parks. Therefore, there will be a less than significant impact.

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

The proposed project includes the development of parkland/retention basins along the northern and western boundary of the project site. It is anticipated that the development of parkland/.retention basins will have a less than significant impact on the environment.

XVI. TRANSPORTATION/TRAFFIC – Would the project:

- a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

It is anticipated that traffic would increase in relation to existing volumes as a result of the proposed project. An updated traffic report will be completed and discussed in the EIR.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?</p> <p><u>The proposed project is estimated to generate over 5,000 Average Daily Trips (ADT) and result in significant increases in delay to a number of intersections. An updated traffic report will be completed and mitigation measures will be incorporated. The findings of the traffic report will be further discussed in the EIR.</u></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?</p> <p><u>The proposed project would not change air traffic levels, patterns or locations. Therefore, there will be no impact.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</p> <p><u>The proposed project would not substantially increase hazards due to design features or incompatible uses. Therefore, there would be a less than significant impact.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>e. Result in inadequate emergency access?</p> <p><u>The proposed project would be required to meet the City of El Centro standards for providing adequate emergency access. Therefore, there would be no impact.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?</p> <p><u>It is not anticipated that the proposed project will conflict with adopted policies, plans, or programs supporting alternative transportation. The project will be reviewed for conformance with the adopted policies, plans, or program regarding public transit, bicycle, or pedestrian facilities for consistency.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XVII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
<p>a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</p> <p><u>The proposed project is not anticipated to exceed the wastewater treatment requirements. Therefore, there will be no impact.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</p> <p><u>The proposed project would increase demand for wastewater services and the developer would be required to pay the standard sewer capacity fees. The wastewater treatment plant has a capacity of 8 million gallons per day and has sufficient capacity to treat the wastewater generated as a result of the proposed project.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</p> <p><u>The proposed development will utilize existing storm water drainage facilities and is not anticipated to exceed current capacity. Therefore, a less than significant impact is anticipated.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?</p> <p><u>There are adequate water supplies available from existing entitlements and resources for the projected requirements of the proposed development, however, in compliance with state law, the project requires a water supply assessment that will be included as part of the EIR.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?</p> <p><u>There is anticipated capacity within the El Centro treatment plant for additional sewage. Therefore, there is no impact anticipated.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?</p> <p><u>Solid waste from the proposed project will be handled by the City's contracted solid waste provider, CR&R. CR&R has confirmed that they have adequate landfill capacity to serve the project.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>g. Comply with federal, state, and local statutes and regulations related to solid waste?</p> <p><u>The solid waste from the proposed development will be disposed of in compliance with federal, state, and local statutes and regulations. Therefore, there will be no impact.</u></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE –

<p>a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The proposed project is to be sited on agricultural land within which no important biological or cultural resources are anticipated, with the exception of the burrowing owl. This sensitive species has adapted to conditions found at the site and uses agricultural fields for foraging. Conversion of this land to residential and commercial uses may impact the burrowing owl. However mitigation measures can be implemented that would passively remove the burrowing owls from the project site. Therefore, the proposed project would result in a potentially significant impact prior to mitigation.

<p>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)?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The development of the proposed project in conjunction with proposed annexations into the City and approved commercial and residential development in the surrounding area would have potentially significant cumulative impacts to air quality, greenhouse gases, public services, and traffic and circulation.

Issues (and Supporting Information Sources):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?



The development of the proposed project in conjunction with proposed annexations into the City and approved commercial and residential development in the surrounding area would have potentially significant cumulative impacts to air quality, greenhouse gases, public services, and traffic and circulation.

Note: Authority cited: Sections 21083, 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080, 21083.05, 21095, Pub. Resources Code; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

Revised 2014

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**Community Development
Department**



*Serious drought.
Help save water!*

November 19, 2014

11-IMP-8
PM 36.45
Lotus Ranch
NOP

Norma Villicana
City of El Centro
1275 Main Street
El Centro, CA 95814

Dear Ms. Villicana:

The California Department of Transportation (Caltrans) received a copy of Notice of Preparation (NOP) for the proposed Lotus Ranch Draft Environmental Impact Report (DEIR) located near Interstate 8 (I-8). Caltrans has the following comments:

- The Future City circulation network and Imperial Transportation Plan identifies an interchange at Austin Road and I-8. The Austin Road/I-8 interchange should be analyzed in the Horizon Year traffic scenario.
- The Imperial County Transportation Plan Concept identifies widening I-8 to a 6-lane facility between Forrester Road and SR-111. The appropriate set-back requirements should be conditioned to accommodate future widening of I-8 along the projects northern boundary.
- Grading for this proposed project which would modify existing drainage and increase runoff to I-8 will not be allowed.
- All lighting within this project should be placed and/or shielded so as not to be hazardous to vehicles traveling on I-8.
- Caltrans will not be held responsible for any noise impacts to this development, including from the ultimate configuration of I-8.
- All signs visible to traffic on I-8 need to be constructed in compliance with County and State regulations.

Traffic Study

A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures. The study should use as a guideline the Caltrans Guide for the Preparation of Traffic Impact Studies. Minimum contents of the traffic impact study are listed in Appendix "A" of the TIS guide. www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

The geographic area examined in the traffic study should include as a minimum all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.

A focused analysis may be required for project trips assigned to a State highway facility that is experiencing significant delay, such as where traffic queues exceed ramp storage capacities. A focused analysis may also be necessary if there is an increased risk of a potential traffic accident.

All freeway entrance and exit ramps where a proposed project will add a significant number of peak-hour trips that may cause any traffic queues to exceed storage capacities should be analyzed. If ramp metering is to occur, a ramp queue analysis for all nearby Caltrans metered on-ramps is required to identify the delay to motorists using the on-ramps and the storage necessary to accommodate the queuing. The effects of ramp metering should be analyzed in the traffic study. For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive.

The data used in the TIS should not be more than 2 years old.

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

Mitigation measures to State facilities should be included in TIS. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any "fair share" monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Control Evaluation (ICE) policy (Traffic Operation Policy Directive 13-02). Alternative intersection design(s) will need to be considered in accordance with the ICE policy; therefore, please refer to the policy for more information and requirements.
<http://www.dot.ca.gov/hq/traffops/signtech/signdel/policy/13-02.pdf>

Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement.

Ms. Norma Villicana
November 19, 2014
Page 3

If you have any questions on the comments Caltrans has provided, please contact Marisa Hampton of the Development Review Branch at (619) 688-6954.

Sincerely,



JACOB M. ARMSTRONG, Chief
Development Review Branch

File

McCABE UNION ELEMENTARY SCHOOL DISTRICT

701 WEST McCABE ROAD • EL CENTRO, CALIFORNIA 92243
McCABE SITE: PHONE: (760) 352-5443 • COREMAN SITE: PHONE (760) 335-5200

AMANDA BROOKE
Superintendent
ARLYN ATADERO
Asst. Superintendent
LAURA DUBBE
Principal
ARMANDO LOPEZ
Asst. Principal

BOARD OF TRUSTEES
Judy Tagg, President
Mike McFadden, Clerk
Chris Legakes, Member
Chip Corfman, Member
Mark Larson, Member

November 20, 2014

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City of El Centro

DEC 18 2014

**Community Development
Department**

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

Subject: Comments on Notice of Preparation of a Draft Environmental Impact
Report for the Lotus Ranch Subdivision

Thank you for the opportunity to provide comments on the Notice of Preparation (NOP) for the Lotus Ranch Subdivision.

The project proposes 617 single-family residential units. When this project was first proposed in 2005 the plans included an optional school site. The current plans do not include a school. The school was removed several years ago based on school sites proposed in other developments. To date it is questionable as to whether those developments are viable options for students. Therefore it would be prudent for the Lotus Ranch Developer to readdress the option of a school within this subdivision. Using the McCabe Union Elementary School District's student generation rate this subdivision would yield approximately 516 students in grades K-8.

We agree with the NOP's conclusion that the project would have a Potentially Significant impact on schools and we would appreciate the inclusion of a school alternative. Because of the potential for significant impact on schools, we request that this alternative receive the same level of analysis as the proposed project. We would like to offer our support in defining the school alternative to ensure that the EIR alternative is as accurate as possible and to define the kinds of issues the District must address to conclude that the site is suitable for a school.

The following is a brief description for a 16+ acre school site:

- 600 students in grades K-8
- Classroom Buildings

- Library/Media Center
- Administrative Facilities
- Support Facilities
- Playground Area
- Asphalt play Area

A conceptual layout of the school can be provided to help with any additional details in the EIR.

The hours of operation are expected to be 6:30 a.m. to 5:00 p.m., with occasional evening programs. The District is more than willing to explore Joint Use of the facilities or other organizations.

As you are aware, a school site will ultimately require approvals from the California Department of Education and the Department of Toxic Substances Control. These agencies have very stringent requirements and the District needs to be involved in the City's EIR process to ensure that the ultimate school site is an approvable site under the State's requirements. The City should be aware of the special school siting requirements so that any potential "fatal flaws" are identified at the earliest possible stage. The following are the most important of the State's criteria:

- Adjacent/near roadways with high traffic volume
- Within 1,500 feet of railroad tracks
- Within two miles of an airport runway
- Close to high-voltage powerlines
- Close to high-pressure lines, including natural gas, gasoline, petroleum, sewer or water lines
- Contaminants in soil or groundwater
- On or near a fault zone or active fault
- Subject to 100-year flood or dam inundation
- Hazardous air emissions or hazardous material handlers located within ¼ mile
- Subject to liquefaction, landslides or other geologic hazards

If you have any questions about these criteria and how they may be applied to this site or you identify possible site constraints as a result of this process, please contact the undersigned. It is the District's intent to assist the City and ensure that the ultimate school site will meet the State's criteria.

We look forward to working with the City and developers of the project to create an enriching neighborhood elementary school.

Sincerely,


Amanda Brooke
Superintendent


Cc:

NOV 21 2014

Memorandum

Community Development
Department

To: Norma Villicaña, Community Development Director

From: Kenneth Herbert, Fire Chief 

Date: November 21, 2014

Re: Change of Zone 05-07 and Tentative Subdivision Map (Lotus Ranch), El Centro

I have reviewed the documents sent to my office from Brian F. Mooney AICP regarding the above referenced project. I made minor changes to the following:

Public Services

Fire Protection

The proposed project would bring residents and structures to El Centro. This increase in structures, residents and visitors would result in an increase in demands for fire protection services. Increased demands would be serviced by the existing Fire Stations located at 1910 N. Waterman Avenue, 775 State Street, and 900 S. Dogwood Avenue. All new structures would meet current building and fire codes. The proposed 617 residential unit development would further impact the fire department's ability to deliver timely services. Therefore, the project would result in a potentially significant impact. Mitigation measures will include payment of development impact fees for construction of fire facilities and services.

Regarding the map:

Street names should line up with existing North South and East West City streets. This assists emergency responders with locating properties within their response area.



December 5, 2014

AMENDED

Brian F. Mooney
City of El Centro
1275 Main Street
El Centro, CA 92243

RE: SCH # 2014111045 Change of Zone 05-07 and Tentative Subdivision Map (Lotus Ranch), El Centro, Imperial County.

Dear Mr. Mooney,

The Native American Heritage Commission (NAHC) has reviewed the Notice of Preparation (NOP) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- ✓ Contact the appropriate regional archaeological Information Center for a record search. The record search will determine:
 - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check. **USGS 7.5-minute quadrangle name, township, range, and section required**
 - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached.**
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) Guidelines §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered cultural items that are not burial associated, which are addressed in Public Resources Code (PRC) §5097.98, in consultation with culturally affiliated Native Americans.
 - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, PRC §5097.98, and CEQA Guidelines §15064.5(e), address the process to be followed in the event of an accidental discovery of any human remains and associated grave goods in a location other than a dedicated cemetery.

Sincerely,

Katy Sanchez

Katy Sanchez
Associate Government Program Analyst

CC: State Clearinghouse

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City of El Centro

DEC 11 2014

Community Development
Department

**Native American Contacts
Imperial County
December 5, 2014**

Ewiiapaayp Tribal Office
Robert Pinto Sr., Chairperson
4054 Willows Road Diegueno/Kumeyaay
Alpine , CA 91901
wmicklin@leaningrock.net
(619) 445-6315 ✓
(619) 445-9126 Fax

Kwaaymii Laguna Band of Mission Indians
Carmen Lucas
P.O. Box 775 Diegueno-Kwaaymii
Pine Valley , CA 91962 Kumeyaay
(619) 709-4207 ✓

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
8 Crestwood Road Diegueno/Kumeyaay
Boulevard , CA 91905
gparada@lapostacasino.com
(619) 478-2113 ✓
(619) 478-2125

Ewiiapaayp Tribal Office
Will Micklin, Executive Director
4054 Willows Road Diegueno/Kumeyaay
Alpine , CA 91901
wmicklin@leaningrock.net
(619) 445-6315 ✓
(619) 445-9126 Fax

Manzanita Band of Kumeyaay Nation
Leroy J. Elliott, Chairperson
P.O. Box 1302 Diegueno/Kumeyaay
Boulevard , CA 91905
ljbirdsinger@aol.com
(619) 766-4930 ✓
(619) 766-4957 Fax

Manzanita Band of Mission Indians
ATTN: Keith Adkins, EPA Director
P.O. Box 1302 Kumeyaay ✓
Boulevard , CA 91905
(619) 766-4930
(619) 766-4957 Fax

Campo Band of Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1 Diegueno/Kumeyaay
Campo , CA 91906
chairgoff@aol.com
(619) 478-9046 ✓
(619) 478-5818 Fax

Manzanita Band of the Kumeyaay Nation
Nick Elliott, Cultural Resources Coordinator
P.O. Box 1302 Kumeyaay
Boulevard , CA 91905
nickmepa@yahoo.com
(619) 766-4930 ✓
(619) 925-0952 Cell
(919) 766-4957 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed SCH # 2014111045 Change of Zone 05-07 and Tentative Subdivision Map (Lotus Ranch), El Centro, Imperial County.

 **Native American Contacts**
Imperial County
December 5, 2014 

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator
240 Brown Road Diegueno/Kumeyaay
Alpine , CA 91901
frbrown@viejas-nsn.gov
(619) 884-6437

Kumeyaay Cultural Repatriation Committee
Bernice Paipa, Vice Spokesperson
P.O. Box 937 Diegueno/Kumeyaay
Boulevard , CA 91905
bernicepaipa@gmail.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed SCH # 2014111045 Change of Zone 05-07 and Tentative Subdivision Map (Lotus Ranch), El Centro, Imperial County.

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City of El Centro

DEC 15 2014

Community Development
Department



T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
richard@lozeaudrury.com

Via Email and U.S. Mail

December 8, 2014

Diane Caldwell, City Clerk
City of El Centro
1275 Main Street
El Centro, CA 92243
dcaldwell@cityofelcentro.org

Mayor Cheryl Viegas-Walker
City of El Centro
1275 Main Street
El Centro, CA 92243
cwalker@cityofelcentro.org

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

Brian F. Mooney, Director
El Centro Community Development Dept.
Planning and Zoning Division
1275 Main Street
El Centro, CA 92243
bmooney@cityofelcentro.org

Adriana Nava, AICP, Associate Planner
El Centro Community Development
Department
1275 W. Main Street
El Centro, CA 92243
anava@cityofelcentro.org

Re: **CEQA and Land Use Notice Request for the Lotus Ranch Project (SCH 2014111045)**

Dear All:

I am writing on behalf of the Laborers International Union of North America, Local Union 1184 and its members living in Imperial County ("LiUNA"), regarding the Lotus Ranch Project (SCH #2014111045), including all actions referring or related to the construction of 617 single-family residential units, two parks, and offsite improvements on 213 acres south of Interstate 8, west of La Brucherie Avenue, in El Centro ("Project").

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

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

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

Please send notice by mail and electronic mail to:

Richard Drury
Stacey Osborne
Lozeau Drury LLP
410 12th Street, Suite 250
Oakland, CA 94607
richard@lozeaudrury.com; stacey@lozeaudrury.com

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

Sincerely,



Stacey Osborne
Paralegal
Lozeau | Drury LLP



Edmund G. Brown Jr.
Governor

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



Ken Alex
Director

Notice of Preparation

December 9, 2014

To: Reviewing Agencies

Re: Change of Zone 05-07 and Tentative Subdivision Map (Lotus Ranch), El Centro
SCH# 2014111045

Attached for your review and comment is the Notice of Preparation (NOP) for the Change of Zone 05-07 and Tentative Subdivision Map (Lotus Ranch), El Centro draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

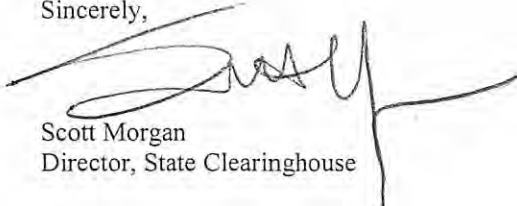
Please direct your comments to:

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

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,



Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

Document Details Report
State Clearinghouse Data Bas

SCH# 2014111045
Project Title Change of Zone 05-07 and Tentative Subdivision Map (Lotus Ranch), El Centro
Lead Agency El Centro, City of

Type NOP Notice of Preparation
Description The proposed Lotus Ranch project consists of 213 acres south of I-8. The proposed project includes the construction of 617 single-family residential units, two parks consisting of 5.8 acres, and offsite improvements to serve the project. It is anticipated the development would occur in three major phases. The project would require Annexation, Pre-Zone, Vesting Tentative Map, and Development Agreement.

Lead Agency Contact

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

Project Location

County Imperial
City El Centro
Region

Cross Streets

Lat / Long

Parcel No.

Township

Range

Section

Base

Proximity to:

Highways

Airports

Railways

Waterways

Schools

Land Use

Project Issues

Reviewing Agencies Resources Agency; Department of Conservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 6; Department of Housing and Community Development; Native American Heritage Commission; California Highway Patrol; Caltrans, District 11; Air Resources Board; Regional Water Quality Control Board, Region 7

Date Received 11/18/2014 **Start of Review** 11/18/2014 **End of Review** 12/17/2014

NOP Distribution List

County: Imperial

SCH# 2014111045

Resources Agency

Resources Agency
Nadell Gayou

Dept. of Boating &
Waterways
Nicole Wong

California Coastal
Commission
Elizabeth A. Fuchs

Colorado River Board
Lisa Johansen

Dept. of Conservation
Elizabeth Carpenter

California Energy
Commission
Eric Knight

Cal Fire
Dan Foster

Central Valley Flood
Protection Board
James Herota

Office of Historic
Preservation
Ron Parsons

Dept of Parks & Recreation
Environmental Stewardship
Section

California Department of
Resources, Recycling &
Recovery
Sue O'Leary

S.F. Bay Conservation &
Dev't. Comm.
Steve McAdam

Dept. of Water
Resources
Resources Agency
Nadell Gayou

Fish and Game

Depart. of Fish & Wildlife
Scott Flint
Environmental Services
Division

Fish & Wildlife Region 1
Donald Koch

Fish & Wildlife Region 1E
Laurie Harnsberger

Fish & Wildlife Region 2
Jeff Drongesen

Fish & Wildlife Region 3
Charles Armor

Fish & Wildlife Region 4
Julie Vance

Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation
Program

Fish & Wildlife Region 6
Tiffany Ellis
Habitat Conservation
Program

Fish & Wildlife Region 6 I/M
Heidi Sickler
Inyo/Mono, Habitat
Conservation Program

Dept. of Fish & Wildlife M
George Isaac
Marine Region

Other Departments

Food & Agriculture
Sandra Schubert
Dept. of Food and
Agriculture

Depart. of General
Services
Public School Construction

Dept. of General Services
Anna Garbeff
Environmental Services
Section

Delta Stewardship
Council
Kevan Samsam

Housing & Comm. Dev.
CEQA Coordinator
Housing Policy Division

Independent
Commissions, Boards

Delta Protection Commission
Michael Machado

OES (Office of Emergency
Services)
Marcia Scully

Native American Heritage
Comm.
Debbie Treadway

Public Utilities
Commission
Leo Wong

Santa Monica Bay
Restoration
Guangyu Wang

State Lands Commission
Jennifer Deleong

Tahoe Regional Planning
Agency (TRPA)
Cherry Jacques

Cal State Transportation
Agency CalSTA

Caltrans - Division of
Aeronautics
Philip Crimmins

Caltrans - Planning
HQ LD-IGR
Terri Pencovic

California Highway Patrol
Suzann Ikeuchi
Office of Special Projects

Dept. of Transportation

Caltrans, District 1
Rex Jackman

Caltrans, District 2
Marcelino Gonzalez

Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North

Caltrans, District 4
Erik Alm

Caltrans, District 5
Larry Newland

Caltrans, District 6
Michael Navarro

Caltrans, District 7
Dianna Watson

Caltrans, District 8
Mark Roberts

Caltrans, District 9
Gayle Rosander

Caltrans, District 10
Tom Dumas

Caltrans, District 11
Jacob Armstrong

Caltrans, District 12
Maureen El Harake

Cal EPA

Air Resources Board

All Other Projects
Cathi Slaminski

Transportation Projects
Nesamani Kalandiyur

Industrial/Energy Projects
Mike Tollstrup

State Water Resources Control
Board
Regional Programs Unit
Division of Financial Assistance

State Water Resources Control
Board
Jeffery Werth
Division of Drinking Water

State Water Resources Control
Board
Student Intern, 401 Water Quality
Certification Unit
Division of Water Quality

State Water Resources Control
Board
Phil Crader
Division of Water Rights

Dept. of Toxic Substances
Control
CEQA Tracking Center

Department of Pesticide
Regulation
CEQA Coordinator

Regional Water Quality Control
Board (RWQCB)

RWQCB 1
Cathleen Hudson
North Coast Region (1)

RWQCB 2
Environmental Document
Coordinator
San Francisco Bay Region (2)

RWQCB 3
Central Coast Region (3)

RWQCB 4
Teresa Rodgers
Los Angeles Region (4)

RWQCB 5S
Central Valley Region (5)

RWQCB 5F
Central Valley Region (5)
Fresno Branch Office

RWQCB 5R
Central Valley Region (5)
Redding Branch Office

RWQCB 6
Lahontan Region (6)

RWQCB 6V
Lahontan Region (6)
Victorville Branch Office

RWQCB 7
Colorado River Basin Region (7)

RWQCB 8
Santa Ana Region (8)

RWQCB 9
San Diego Region (9)

Other _____

Conservancy

December 15, 2014

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City of El Centro

DEC 18 2014

**Community Development
Department**

City of El Centro Planning Department
1275 West Main Street
El Centro, CA 92243

ATTN: Norma Villicaña, Planning Director

SUBJECT: Lotus Ranch Notice of Preparation (NOP)

Dear Ms. Villicaña:

Thank you for the opportunity to Comment on the Lotus Ranch NOP (LAFCO Project No. EC 3-05).

As you know this project has the potential to create an island if/when the project formerly known as Miller-Burson, located west of the Lotus subdivision proceeds. At this time we understand that while that project has not been annexed, it still has all the necessary City approvals as a project and it would only require an annexation for it to proceed. If that project has been withdrawn we would still have the concerns.

Relative to the NOP and the attached Initial Study, we offer the following comments.

Page 1: At the bottom we believe the Farmers Estates subdivision is to the east and not west as indicated in the last paragraph?

Page 3: It is not clear whether this application includes the existing residences located along the western boundary LaBrucherie Rd? If so are they owned by the same people and if not, we would need some verification that the owners are in agreement to the annexation.

Page 3: To the south of this proposed project is a hay storage processing facility. As you know there have been some recent hay fires with these types of yards and we would expect within the EIR to have a substantive discussion on the impacts of this facility on the project and vice versa. This should be covered under section II, Agriculture as well as section XIV Public Services.

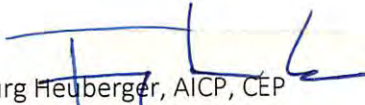
Page 4: This project now seems to be geared to "phasing" however within this NOP phasing is not detailed. We would appreciate more detail on the phasing plan. We may want to consider the annexation in phases also?

Page 18: Section XIV, Public Services, you indicate no impacts on other public facilities. We are not questioning this; however a Municipal Service Plan, which we understand is being updated at this time, will hopefully address this. That MSR must be done before we can consider this annexation.

Thank you again for the opportunity to comment at this point. We look forward to working with you on the Draft EIR and an opportunity to further comment as appropriate at that time. LAFCO would also appreciate an opportunity to review the pre-draft EIR to assist the City in the preparation of the EIR since LAFCO ultimately will need to consider the EIR in its deliberations.

If you have any questions please feel free to contact us.

Sincerely,


Jurg Heuberger, AICP, CEP
Executive Officer to LAFCO

CC: Files: 50.000, 50.004, 50.018, EC 3-05

JH\DEB\S:\LAFCO\EI Centro\EC 3-05 Lotus Ranch\Ltr to EC re_Response to NOP 12-15-14.docx



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Executive-ES

December 15, 2014

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

SUBJECT: NOP of an EIR for Lotus Ranch Project

Dear Ms. Villicana:

On November 19, 2014 we received from the City of El Centro Planning Department a Notice of preparation (NOP) for a Draft Environmental Impact Report (EIR) for the Lotus Ranch Project and the project's required Change of Zone No. 05-07 (Pre-Zone) and Vesting Tentative Map. The project consists of the construction of 617 residential units, two parks and offsite improvements to serve the project. The project is located south of Interstate 8 extending south $\frac{3}{4}$ of a mile, west of La Brucherie Avenue and east of the Lotus Canal and Drain, in El Centro, CA.

The Imperial Irrigation District (IID) has reviewed the NOP and has the following comments:

1. Project proponent should be advised to contact IID Energy Customer Operations and Planning Section at (760) 482-3402 or (760) 482-3300 for information regarding electrical service for the project.
2. IID Water facilities that will be impacted include the Lotus Canal and Lotus Drain located along the western project boundary. The Lotus Drain No. 1 is located in the center of the propose project.
3. Figure 2 of the NOP does not locate and identify existing IID Water facilities. In the future Draft EIR, please include IID canals and drains in the proposed project's figures and maps.
4. The Draft EIR should also include an explanation on how the proposed project will manage storm water runoff.

5. All flows discharging into IID's drains will have to be in conformance with the laws and regulations of Imperial County and the various State and Federal agencies having jurisdiction over water quality control.
6. The project includes detention basins located along the Lotus Drain and Lotus Canal. To assess the impacts and determine appropriate mitigation, the project will require a comprehensive IID hydraulic drainage system analysis. IID's hydraulic drainage system analysis includes an associated drain impact fee.
7. When a development plans a storm water detention facility, it must be designed such that it does not induce seepage from, nor create instability in adjacent Imperial Irrigation District facilities. See Imperial Irrigation District's Developer Project Guide for detailed information regarding drainage and water detention facilities. Consequently, a planning review will be required for the project in accordance with IID Water Department developer guidelines. Draft designs should be submitted to IID Water Engineering Services before finalization to identify impacts to IID facilities.
8. The IID's Developer Project Guide can be accessed through the District's website at <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2328>. For additional information regarding IID Water Department planning review contact IID Water Engineering Services, at (760) 339-9265.
9. On page 15 of the Environmental Checklist, under the Hydrology and Water Quality Section, subsections a) and c), the project's mitigation measures for water quality standards, waste discharge requirements, alterations of existing drainage patterns and erosion are discussed; however, the project's plans for surface runoff water should be discussed in detail in the upcoming Draft EIR. The project's draft Storm Water Pollution Prevention Plan (SWPPP) should be submitted to the IID Water Engineering Section for review prior to submittal to Regional Water Quality Control Board (RWQCB). The SWPPP should abide by the content requirements as set forth in Section A of RWQCB's Construction General Permit.
10. On page 16 and 17 of the Environmental Checklist, under the Hydrology and Water Quality Section, subsections d) and f) are labeled as "less than significant impact". We request that they be revised to "potentially significant unless mitigation incorporated".
11. IID's canal or drain banks may not be used to access the project site. Any abandonment of easements or facilities shall be approved by IID based on systems' (Irrigation, Drainage, Power, etc.) needs.

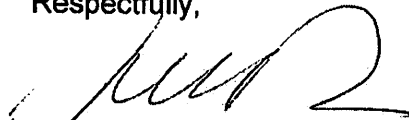
12. If fences are installed at proposed project boundaries, IID Water Department Engineering Services should be consulted prior to finalization of the fencing plan. The fencing plan consultation will address IID's right-of-way for safety purposes and allow access for IID operation and maintenance activities. Fences should be installed at the boundary of IID's right of way for safety and allow access for IID operation and maintenance activities.
13. If any additional crossings or modification to the existing ones are needed, then the project proponent will be responsible for the cost of these improvements and IID will design and construct them. If based on the traffic, turning lanes or any other improvements to roads are required that impact an IID drain, then pipelining a segment of the drain will be required. The applicant will be responsible for the cost of the pipeline and IID will design and construct it.
14. It is important that the project proponent be made aware of IID's draft Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP) which is being implemented in accordance with the IID Water Conservation and Transfer Project permit and EIR/EIS requirements. Regarding the draft HCP/NCCP plan provisions related to IID's operation and maintenance of its canal and drain systems, and project proposed impacts to those systems, the project proponent should coordinate with IID by contacting Bruce Wilcox at (760) 339-9735.
15. Any construction or operation on IID property or within its existing and proposed right of way or easements will require an encroachment permit, including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities (e.g. power lines). An encroachment permit application is included in the IID's *Developer Project Guide 2008* (available at: <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2328>). In addition Instructions for the completion of IID encroachment applications can be found at <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2335>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.
16. In addition to IID's recorded easements, IID claims, at a minimum, a prescriptive right of way to the toe of slope of all existing canals and drains. Where space is limited and depending upon the specifics of adjacent modifications, the IID may claim additional secondary easements/prescriptive rights of ways to ensure operation and maintenance of IID's facilities can be maintained and are not impacted and if impacted mitigated. Thus, IID should be consulted prior to the installation of any facilities adjacent to IID's facilities. Certain conditions may be placed on adjacent facilities to mitigate or avoid impacts to IID's facilities.

Ms. Norma Villicana
December 15, 2014
Page 4

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

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

Respectfully,



Donald Vargas
Environmental Analyst

Kevin Kelley – General Manager
Kristine Fontaine – Asst. General Manager & Interim Portfolio Management Officer
Tina Shields – Interim Planning and Water Conservation Manager, Water Dept.
Mike Pacheco – Interim Operations and Maintenance Manager, Water Dept.
Carl Stills – Manager, Energy Dept.
Vance Taylor – Asst. General Counsel
Tom King – Deputy Energy Manager, Engineering & Operations
Paul G. Peschel – Manager Planning & Engineering, Energy Dept.
Angela Evans - Manager Distribution Services & Maintenance Operations
Juan Carlos Sandoval – Asst. Mgr., Transmission Expansion Development, Energy Dept.
Michael P. Kemp – Superintendent, Real Estate & Environmental
Shayne Ferber – Asst. Supervisor, Real Estate
Vikki Dee Bradshaw – Environmental Compliance Officer



COUNTY OF
IMPERIAL

DEPARTMENT OF
PUBLIC WORKS

155 S. 11th Street
El Centro, CA
92243

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DEC 18 2014

Community Development
Department

December 18, 2014

Mrs. Norma Villicaña, AICP Community Development Director
City of El Centro Community Development Department
1275 W. Main St.
El Centro, CA 92243

Attention: Mrs. Norma M. Villicaña AICP Community Development Director.

SUBJECT: **Notice of Preparation of a Draft Environmental Impact Report for a change of Zone 05-07 and Tentative Subdivision Map (Lotus Ranch);** south of Interstate 8 (I-8) and extends south ¾ of a mile, west of La Brucherie Avenue and east of Lotus Canal and Drain.

Dear Mrs. Villicaña:

This letter is in response to your copy of the Notice of Preparation of a Draft Environmental Impact Report of a Change of Zone 05-07 and Tentative Subdivisions Map (Lotus Ranch) package received on November 17, 2014 by this Department. The project proposes to construct 617 single-family residential units, two (2) parks and offsite improvements to serve the project and will be annexed to the City of El Centro.

Department staff has reviewed the package information and the following comments shall be Address:

1. La Brucherie Road shall be annexed to the city of El Centro in it's entirely from the current City limits to South side of the project Limits.
2. The updated traffic study shall be submitted to the Imperial County for review and comments. The following intersections and road segments shall be included in the traffic study:
 - Intersection of Austin Road and McCabe Road.
 - Intersection of McCabe Road and La Brucherie Road.
 - Intersection of McCabe Road and Clark Road.
 - La Brucherie Road segment from I-8 to McCabe Road.
 - McCabe Road segment from Austin Road to Hwy 86.

INFORMATIVE:

1. The applicant for Encroachment Permits in County Roads and Right of Way is responsible for researching, protecting, and preserving survey monuments per the Professional Land Surveyor's Act (8771 (b)). This shall include a copy referenced survey map and tie card(s) (if applicable) for all monuments that may be impacted.

2. An encroachment permit shall be secured from the Department of Public Works for any and all new, altered or unauthorized existing driveway(s) to access properties through surrounding roads. **(Per Imperial County Code of Ordinances, Chapter 12.10.020 B).**

Should you have any questions, please do not hesitate to contact this office. Thank you for the opportunity to review and comment on this project.

Respectfully,

William S. Brunet, PE
Director of Public Works

By:



Manuel Ortiz, P.E.
Assistant County Engineer

SOUTHERN CALIFORNIA



ASSOCIATION OF GOVERNMENTS

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(213) 236-1825

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Deborah Robertson, Baito

Transportation

Alan Wagner, San Bernardino
Associated Governments

December 18, 2014

Ms. Norma M. Villicaña
Community Development Director
City of El Centro
1275 Main Street
El Centro, California 92243
Telephone: (760) 337-4545
E-mail: nvillicana@cityofelcentro.org

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City of El Centro**

DEC 18 2014

**Community Development
Department**

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for Change of Zone No. 05-07 (Pre-Zone) and Lotus Ranch Vesting Tentative Subdivision Map [SCAG NO. IGR8279]

Dear Ms. Villicaña,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for Change of Zone No. 05-07 (Pre-Zone) and Lotus Ranch Vesting Tentative Subdivision Map ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for Change of Zone No. 05-07 (Pre-Zone) and Lotus Ranch Vesting Tentative Subdivision Map. The proposed project would construct 617 single-family residential units, two (2) parks totaling 5.8 acres, and offsite improvements to serve the proposed development on an approximately 213-acre site south of Interstate 8, in the City of El Centro, County of Imperial, and California.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to sunl@scaag.ca.gov providing, at a minimum, the full public comment period for review. If you have any questions regarding the attached comments, please contact Lijin Sun, Esq., Senior Regional Planner, at (213) 236-1882 or sunl@scaag.ca.gov. Thank you.

Sincerely,

Ping Chang,
Program Manager, Land Use and Environmental Planning

¹ SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

COMMENTS ON THE NOTICE OF PREPARATION OF
A DRAFT ENVIRONMENTAL IMPACT REPORT FOR
CHANGE OF ZONE NO. 05-07 (PRE-ZONE) AND LOTUS RANCH VESTING
TENTATIVE SUBDIVISION MAP [SCAG NO. IGR8279]

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS.

2012 RTP/SCS Goals

The SCAG Regional Council adopted the 2012 RTP/SCS in April 2012. The 2012 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see <http://rtpscs.scag.ca.gov>). The goals included in the 2012 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2012 RTP/SCS are the following:

SCAG 2012 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and non-motorized transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format. Suggested format is as follows:

SCAG 2012 RTP/SCS Goals		
	Goal	Analysis
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness.</i>	<i>Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why DEIR page number reference</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region.</i>	<i>Consistent: Statement as to why Not-Consistent: Statement as to why or Not Applicable: Statement as to why DEIR page number reference</i>
etc.		etc.

RTP/SCS Strategies

To achieve the goals of the 2012 RTP/SCS, a wide range of strategies are included in SCS Chapter (starting on page 152) of the RTP/SCS focusing on four key areas: 1) Land Use Actions and Strategies; 2) Transportation Network Actions and Strategies; 3) Transportation Demand Management (TDM) Actions and Strategies and; 4) Transportation System Management (TSM) Actions and Strategies. If applicable to the proposed project, please refer to these strategies as guidance for considering the proposed project within the context of regional goals and policies. To access a listing of the strategies, please visit <http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf> (Tables 4.3 – 4.7, beginning on page 152).

Regional Growth Forecasts

At the time of this letter, the most recently adopted SCAG forecasts consists of the 2020 and 2035 RTP/SCS population, household and employment forecasts. To view them, please visit <http://scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf>. The forecasts for the region and applicable jurisdictions are below.

Adopted SCAG Region Wide Forecasts			Adopted City of El Centro Forecasts		
	Year 2020	Year 2035		Year 2020	Year 2035
Population	19,663,000	22,091,000	Population	50,300	61,300
Households	6,458,000	7,325,000	Households	15,700	19,300
Employment	8,414,000	9,441,000	Employment	31,400	38,000

MITIGATION

SCAG staff recommends that you review the SCAG 2012 RTP/SCS Final Program EIR Mitigation Measures for guidance, as appropriate. See Chapter 6 (beginning on page 143) at: <http://rtpscs.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf>

As referenced in Chapter 6, a comprehensive list of example mitigation measures that may be considered as appropriate is included in Appendix G: *Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects*. Appendix G can be accessed at: http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf

Connie L. Valenzuela
Agricultural Commissioner
Sealer of Weights and Measures

Linda S. Evans
Assistant Agricultural Commissioner/
Asst. Sealer of Weights and Measures



852 Broadway
El Centro, CA 92243

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E-mail: agcom@co.imperial.ca.us

January 15, 2015

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

Attention Ms. Norma M. Villicaña, Community Development Director

Subject: Change of Zone No. 05-07 (Pre-Zone) and Lotus Ranch Vesting Tentative Subdivision Map

Dear Ms. Villicaña:

This letter is in response to the Lotus Ranch package received on January 13, 2015. The applicant is proposing a development of 617 single-family residential units including two (2) parks and three (3) retention basins to be completed in three (3) phases.

This development will remove approximately 213 acres of Prime and Statewide Importance farmland. Dahlia 23A North and Dahlia 25 North and South have a crop history that includes alfalfa, broccoli, onions, onion seed, sudan grass and wheat. Removing this land from agriculture will increase the cumulative effect of reduced acreage and agricultural production that will impact the valley economy.

The subdivision will be adjacent to established agricultural businesses consisting of a hay storage yard, a feedlot and a hay compressing facility on the south side and farmland on the west side. The Lotus Ranch Subdivision will have significant impact on the adjacent established agricultural businesses. These operations are in business 24/7. These businesses meet Federal, State and County regulations regarding day and night requirements for noise, light and air quality for rural businesses not located next to a residential area. By allowing residential units to be built adjacent to the agricultural businesses, restrictions would be imposed on the businesses to meet residential standards for daytime and nighttime noise, lighting and air quality thereby holding the Ag businesses to a standard that is not currently required of them by the County General Plan and which could not be met.

The Initial Study signed on November 14, 2014 determined that there is a Potentially Significant Impact for the following categories Agriculture, Air Quality, and Noise. We agree the EIR should study and find solutions to mitigate these issues. Some might include buffer zones or tall barriers (as determined by the EIR studies) on the south and west sides of the proposed residential subdivision.

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City of El Centro

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Community Development
Department

The residential units will be impacted by the noise, lights and air quality including the odor from the feedlot. This could result in lowering the property value of the houses. Some of the impacts to the residential subdivision would include:

- All-night loading and shipping activities which result in high levels of noise from semis and other farm equipment, and lights
- Odors from the feedlot 24/7
- Yard lights on the entire property for safety reasons
- Proximity of hay stacks creating a possible fire hazard for the homes.

If you have any questions, please contact me.

Sincerely,



Connie L. Valenzuela
Agricultural Commissioner



January 21, 2015

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

RE: Lotus Ranch Scoping Comments

Dear Ms. Villicana:

Our company owns a property which is located immediately northwest of the proposed Lotus Ranch project. Our property is commonly known as the Miller Burson subdivision and is located just north of Interstate 8 and just west of Southwest High School and the Lotus Lane community. The assessor's parcel number is 052-280-008.

The City of El Centro approved a tentative subdivision map for our Miller Burson property on May 6, 2009, which includes 485 residential lots, two detention basins, two public parks and a school site. The development of our property has been unable to proceed due to a number of issues associated with its annexation into the City of El Centro. Specifically, the residents of Lotus Lane have needs which must be addressed prior to their neighborhood and our project being annexed to the City. We would like to express that the annexation of Lotus Lane is becoming more of a regional planning matter, than an issue to be resolved by Lotus Ranch, Miller Burson, or any other project working alone.

Technically under LAFCO guidelines, if a property is annexed to the city and creates an un-annexed "island" of another property, the island property must also be annexed. Neither the Miller Burson property nor the Lotus ranch property will by themselves create an island of the Lotus Lane community, however together they will.

We acknowledge that the city is not responsible for sponsoring or promoting annexations, however, in this case we believe that cooperation and collective action is required so that neither the approved Miller Burson subdivision nor Lotus Ranch will be permanently prevented from developing by the annexation

**P.O. Box 9731 | Rancho Santa Fe, CA 92067
Phone (760) 685-0660 | Fax (866) 645-2218**

needs of the Lotus Lane community. In other words, if Miller Burson were already annexed, then the Lotus Ranch if annexed would create an island of the Lotus Lane community. Conversely, if Lotus Ranch were already annexed then Miller Burson when annexed would create an island of the Lotus Lane community. Sound planning practices would indicate that this should not be merely a foot race to see which project is annexed first at the expense of the other.

Since the City has already approved the Miller Burson tentative subdivision map five years ago and the project has been unable to proceed through annexation, it might be argued that it is premature to approve an additional large project south of Interstate 8. However, since both of these projects are well positioned as future expansion areas for the city, and in order that the city may continue to grow as economic conditions improve, we would recommend several potential solutions as follows:

- Require that Lotus Ranch and Miller Burson be annexed concurrently so there will be an increased number of residential units to share costs required for the simultaneous annexation of the Lotus Lane community, thereby meeting their needs and avoiding the island effect. or;
- The city should apply to LAFCO for the annexation of the Lotus Lane community, so the costs may be quantified and spread over numerous future developments on the Southwest side of the City. and;
- The city may wish to pursue governmental grants for the purpose of pursuing the annexation of the Lotus Lane community.

Thank you for the opportunity to provide these comments as they relate to the entitlement process of Lotus Ranch. We are available for any dialogue or meetings the city may wish to convene for the furtherance of these discussions.

Sincerely,



Brent Grizzle, CEO
MFC Imperial I LLC

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES
Planning / Building & Safety / Parks & Recreation



HAND DELIVERY AT "SCOPING MEETING"

January 21, 2015

City of El Centro
1275 Main Street
El Centro, CA 92243

Attention: Norma Villicaña, Community Development Director

Subject: Response to City of El Centro's Notice of Preparation (NOP) for Preparation of a Draft Environmental Impact Report for the Proposed Lotus Ranch, Zone Change 05-07 and the Tentative Subdivision

Dear Ms. Villicana:

The Planning & Development Services Department received the City of El Centro's Notice of Preparation for the preparation of a Draft Environmental Impact Report (DEIR) for the above Zone Change and Tentative Subdivision Map for the Lotus Ranch project for review and comment.

Please find the County's comments on the City's Notice of Preparation as follows:

- In the previous project, the 2005 NOP described the project as having up to "616" single family residential units, but is now "617" residential units. However, the NOP states that there is a "reduction in residential units" (page 1). Since the Draft Environmental Impact Report (DEIR) was prepared in 2007, it isn't clear as to whether all of the applicable "studies" for that document are or will be revised to reflect the change in the number of units, phasing, etc. The previous "studies" for the DEIR will need to be updated to reflect the current project, phasing, recent environmental changes and also cumulative impacts;
- The Site plan shows three phases of development and states that the "...Water loop shall be installed after construction of 300 houses (page 5)..." Why will the water infrastructure be delayed until after the construction of these 300 houses occurs? Typically, a project's infrastructure, i.e. water, wastewater treatment plant/pipelines, road improvements, and not after the development is well underway.

The following are comments on the City's CEQA Environmental Checklist:

- ✓ 1) Aesthetics: In Section C, it was determined that the project will not have any potentially significant impacts because it will be compatible with the surrounding areas. However, the development of "617 single family residential units" can be considered a visual impact to those traveling on adjacent County roads and on those on Interstate 8. The DEIR's study regarding aesthetics should be re-visited.
- ✓ 2) Agriculture and Forest Resources: No comment.
- ✓ 3) Air Quality: The existing and future "cumulative air quality impacts" should be addressed since the last air quality study was prepared in 2007. Consideration of the adjacent potential hay compress facility and air quality impacts should be addressed. What mitigation measures should be addressed in the DEIR. How will dust control emissions be addressed? How will smell and odors from adjacent cattle feedlot be mitigated?
- ✓ 4) Biological Resources: The California Department of Fish & Game is no longer Fish & Game, it is the California Department of Fish & Wildlife. In Section D, it is stated that there is no impact; however, an updated Biological Survey should be done to determine any potential significant impacts to the Burrowing Owls and/or burrows. A new study may find that there are in fact Burrowing Owls on-site.
- ✓ 5) Cultural Resources: No Comment.
- ✓ 6) Geology & Soils: The updated Phase 1 analysis may be needed for the proposed 213 acres of project areas.
- ✓ 7) Greenhouse gas Emissions: The Imperial County Air Pollution Control District should be contacted for their input and an updated study should be prepared.
- ✓ 8) Hazard and Hazardous Materials: When building the subdivision there will be a construction area and therefore there will be transportation of hazardous materials, please address how construction time frames and schedules will be managed to not impact the surrounding development.
- ✓ 9) Hydrology and Water Quality: It is recommended that you contact the County Public Works Department and the Imperial Irrigation District for drainage concerns. It is recommended that a Water Supply Assessment be prepared for the project if City water will not be utilized.

10) Land Use: Currently the proposed site is zoned A-2, General Agriculture, by the County's Zoning Map for the area.

✓ 11) Mineral Resources: No comment.

12) Noise: In the Noise criteria, sections A, C, and D are marked PSUMI; however, there are no mitigation measures identified to address the potential noise impacts, particularly during construction activities.

13) Population and Housing: The growth in population must be addressed in the DEIR and the potential impacts to impacts on the County's local road infrastructure. Any expansion of the City's water or wastewater sewer pipelines must be addressed by LAFCO and any expansion of the City's Sphere of Influence must be addressed as well.

14) Public Services: Public Services are marked PSUMI; however, no mitigation measures are identified and the DEIR must address the need for and if any expansion of services will be required for the modified project.

✓ 15) Recreation: No Comment.

✓ 16) Transportation/ Traffic: The nearest access to the interstate from the west is Forrester Road and from the east is Fourth Street. The DEIR should include an updated "Traffic Impact Study" to determine how will the traffic increase will impact the surrounding County roads and the proposed mitigation measures to be employed.

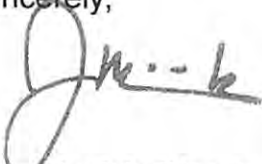
17) Utilities and Service Systems: In Section A, it lacks information on why the proposed modified project does not exceed the wastewater treatment requirements. What are the wastewater treatment requirements that are needed for this project?

✓ 18) Cumulative Impacts: The DEIR "Cumulative Impacts" section should be revised to reflect the latest information on recent developments in the City and the County environs.

Norma Villicaña
Lotus Ranch DEIR
January 21, 2015

For any questions on the above comments, feel free to contact Patricia Valenzuela, Planner IV or Jared Chavez, Planner II, at (760) 482-4236, or via e-mail at patriciavalenzuela@co.imperial.ca.us .

Sincerely,



Jim Minnick, Director
Planning & Development Services

cc: Jim Minnick Director of Planning & Development Services
Michael Abraham, AICP, Interim Asst. Director of ICP&DS
Jurg Heuberger, AICP, LAFCO Executive Director
Patricia Valenzuela, Planner IV
Jared Chavez, Planner II
File : City of El Centro Correspondence
Files: 10.101, 10.102, 10.103, 10.105

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March 4, 2015

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

SUBJECT: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for Change of Zone 05-07 and Tentative Subdivision (Lotus Ranch), El Centro

Dear Mrs. Villicaña,

The NOP to prepare an Draft EIR for the Change of Zone 05-07 and Tentative Subdivision (Lotus Ranch) in El Centro has been reviewed by the Imperial County Air Pollution Control District (Air District). As you know, the Air District's established programs to keep the air in Imperial County from declining are found within the Rules and Regulations of the Air District, the California Environmental Quality Act (CEQA), the most current CEQA Air Quality Handbook for Imperial County, the Air District State Implementation Plans (SIP's) for Ozone, PM₁₀, PM_{2.5} and the Air District non-attainment status. Currently, the "moderate" non-attainment status for ozone and PM_{2.5}, serious non-attainment status for PM₁₀, non attainment for PM_{2.5} are the driving criteria in establishing the thresholds for NOx, ROG, PM₁₀, SOx and CO. These thresholds and their significance are explained within the pages of the Imperial County CEQA Air Quality Handbook. Section 6 of the CEQA handbook describes the preparation of the Air Quality Analysis for an Environmental Impact Report (EIR).

The following is a synopsis of the information pertinent to the development of an Air Quality analysis. A **comprehensive Air Quality Analysis** of the construction and operational impacts of the project is required. A thorough analysis should include a description, impacts and health consequences of all air quality and associated emissions. The analysis should be conducted using the Air Districts approved modeling factors.¹ The analysis should include short and long term emissions as well as daily and yearly emission calculations. Project alternatives should be included along with a

¹The most current modeling tool recently adopted is CalEEMod.

thorough emissions analysis per alternative. A description of the Air District attainment status, State and Federal, is required as is describing any regulatory restrictions to the project. All temporary construction and grading impacts should quantify fugitive dust and combustion emissions and propose mitigation measures.

A health risk assessment such as a diesel exhaust screening level should be included for projects anticipating the use of heavy-duty diesel equipment.² A health risk assessment should also be conducted for projects locating near already existing facilities with a potential to emit toxics. Typically, these health risk assessments are of a quantitative nature but can be a mixed qualitative and quantitative analysis. In any case, the relative human exposure, location of the project, distance to sensitive receptors all should be considered when developing the risk assessment.

Projects anticipating heavy volumes of traffic should conduct hot spot modeling.³ Hot spot modeling will help determine compliance with the state CO standard at intersections and roadway links as determined by traffic impact analysis. In addition, existing and proposed projects must have a cumulative impact analysis. For each sub analysis and risk assessment mitigation measures should be identified, quantified for effectiveness and incorporated into the environmental document (i.e. Environmental Impact Report EIR or Environmental Impact Statement EIS). All mitigation measures must follow District Rules and Regulations including the most current CEQA Air Quality Handbook including but not limited to section 4.1 Special Conditions. In this case a good example is the close proximity of Lotus Ranch to the Development site. Section 4.1 of the CEQA Air Quality Handbook indicates:

4.1 Special Conditions

Project impacts may also be considered significant if one or more of the following special conditions apply:

- a. *Development projects which locate in close proximity to already existing industrial type operations which have the potential to emit toxic or hazardous air pollutants, even at a very low level of emissions, may be considered significant because of the increased cancer risk to the incoming population. This is also true of development projects which have the potential to emit toxic or hazardous air pollutants and are located in close proximity to sensitive receptors. Such projects may be required to prepare a health risk assessment to determine the potential level of risk associated with the operation. The ICAPCD should be consulted on any project with the potential to emit toxic or hazardous air pollutants. In addition, pursuant to the requirements of California Health and Safety Code 42301.6 (AB 3205) and Public Resources Code Section 21151.8, subdivision (a)(2), any proposed industrial or commercial project site located within 1000 feet of a school must be referred to the ICAPCD for review.*

² Guidelines and procedures as approved by the California Air Resources Board and the Office of Environmental Health Hazard Assessment (OEHHA)

³ Using APCD approved hot spot modeling such as CALINE4, developed by and available through the California Department of Transportation.

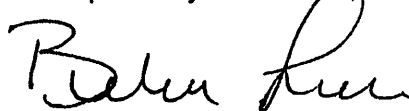
- b. *If a determination is made that a development project has the potential to cause a nuisance problem which impacts a considerable number of people, the project may be considered as having a significant effect. There are projects that may emit pollutants in concentrations that would not otherwise be significant except as a nuisance, as an example projects which emit hydrogen sulfide.*

If a project is proposed within the screening level distance in Table 3, the ICAPCD should be contacted for information regarding potential odor problems. For projects that involve new receptors located near an existing odor source(s), a public information reviewing request should be submitted to the ICAPCD for a review of any existing odor complaints and for the nearest odor emitting facility(ies).

Finally, consultation with the most recent Clean Air Plans (SIP's), District Rules and Regulations and other Air District approved programs is recommended for effective applicability of standards. When it becomes apparent that on-site mitigation is insufficient to reduce the impacts to insignificance then off-site mitigation should be discussed and appropriately applied. Finally, in accordance with Assembly Bill 32 known as the Global Warming Solutions Act of 2006 and the most recent amendments to the 2014 CEQA Guidelines, a discussion of the impacts from Green House Gas emissions and its relation to Climate Change is required.

Please note that all construction sites regardless of size must adhere to the requirements of Regulation VIII, Fugitive Dust Control. This regulation is comprised of six individual rules which combined apply Best Available Control Measures to any size construction or earthmoving activity. Aside from the standard of measurement, is the requirement of a dust control plan and notification 10 days prior to the commencement of construction to the Air District is important. The Imperial County Rule book can be found at <http://www.co.imperial.ca.us> under "Air Pollution Control." We encourage all developers, construction companies, cities and interested parties to obtain a copy of the Regulation VIII, Fugitive Dust Control. Should you have any questions please do not hesitate to call the office at 442-265-1800.

Respectfully Submitted,



Belen Leon
APC Administrative Analyst II

Hay Compress
1469 La Brucherie Road
El Centro, California 92243
Phone (760) 352-4157
Fax (760) 352-5754



Seed Division Office
4746 Highway 111
Brawley, California 92227
Phone (760) 344-0166
Fax (760) 344-1643

P.O. Box 1109 • El Centro, California, 92244-1109 • Phone (760) 352-4157 • Fax (760) 352-5754
eltoro@eltoroexport.com

March 5, 2015

Norma Villicana, Community Development Director
City of El Centro
1275 West Main Street
El Centro Ca, 92243

Subject: Lotus Ranch Housing Development

Ms. Villicana,

El Toro Export is an existing Ag business operating at 1469 S. LaBrucherie Road, located directly south of the proposed Lotus Ranch housing development site. This letter is being submitted to the City of El Centro to highlight concerns we have as an Agricultural business operating in the County of Imperial.

The El Toro Export facility houses three operations: a Compress Operation, Truck Operation, and Feedlot; and neighbors a farming operation (LaBrucherie Produce, LLC). All of these operations by their very nature, may not create the ideal environment for neighboring future residential housing, and a potential school site. A list of environmental factors produced and take place at this facility are:

- Noise – from heavy machinery and equipment, trucks, tractors,
- Oder – from feedlot/cattle
- Dust – facility is largely unpaved, and movement of machinery directly on dirt creates dust
- Light – from security lights and lighting necessary for nighttime operations
- Traffic – several tractors, semi-trucks, feed trucks frequently enter and exit the facility daily
- 24 hour operation – night time operation is necessary for the businesses
- Fire risk – Hay is flammable and hay storage is located directly south of the Lotus Ranch site.

The Developer needs to design the development to minimize the above inconveniences for future homeowners. Measures to be taken could include building a significant (large) barrier fence along the south border, relocation of the water retention basins to the south border, requirement for dual pane (low noise) windows in all houses and other structures. In addition we would suggest the City place a permanent ordinance prohibiting the use of fireworks in this development.

At the Public Scoping Meeting on January 21, 2015, McCabe's Superintendent made the public aware that the school will now be requesting a school site within Lotus Ranch, when initially McCabe did not

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MAR 05 2015

Community Development
Department

request ground for a school. We are concerned that studies done before this announcement will not be accurate, and will need to be re-done.

Another area of concern are any studies that were done prior to 2014. It is our understanding that most studies being used are from the previous EIR process from 2007-2008. Clearly these would seem outdated. Any studies that were conducted prior to 2014 should be re-done to better accommodate any changes that could have taken place since studies were initially conducted. Also, any studies that did not take into consideration a school site within the housing development, should be re-done to reflect the impacts of a new school.

The final concern is the initial notices given to any potential homebuyers. We feel that homebuyers should be made aware of who their neighbor to the south of the new community is well before purchasing a new home. In the beginning stages of purchasing the home, we'd like the Builder, to give any potential homebuyers a disclosure notice, stating that El Toro Export's facility is located directly to the south and list any inconveniences or nuances the facility might cause. We would suggest that Builder also require this notice be signed by any potential homebuyer when signing a sales contract. This disclosure notice will help to educate the homebuyer upfront, leaving nothing undisclosed from the beginning stages to potentially purchasing a home in this community.

If you have any questions concerning this letter, please contact me at 760-352-4157.

Sincerely,

EL TORO EXPORT, LLC



William R. Plourd
President/C.E.O.



CITY OF EL CENTRO
Parks & RECREATION

May 15, 2015

Gary McPhetridge
G-Mac Development Co.
P.O. Box 3305
El Centro, CA 92244

RE: Lotus Ranch Subdivision – Proposed Park

Dear Mr. McPhetridge:

The City of El Centro Parks & Recreation Division has reviewed the Lotus Ranch Subdivision Map for consistency with the City's adopted Parks and Recreation Facilities Master Plan. The proposed housing development, as proposed would consist of 617 new single-family dwelling units and two parks, encompassing 5.3 acres and 5.9 acres, for a total of 11.2 acres.

After our review, it is anticipated that Lotus Ranch will generate approximately **1,993 new residents**. Using the adopted park ratio of 5 acres/1,000 residents, a total of **9.965 acres** are required. Based upon the recommendations adopted in the aforementioned master plan, City staff is respectfully requesting that proposed park facilities be consolidated to one (1) park facility for not only recreational purposes but to maximize resources in in terms of maintenance. A conceptual park rendering illustrating the proposed amenities is attached for your consideration.

It is my understanding that you also requested if the park could be used for stormwater overflow. Please be advised that using the park for overflow would be acceptable provided that the green space was no deeper than 1-foot. This alternative would be acceptable upon submission of supporting documentation identifying that turf would be able to thrive.

Should you wish to discuss this matter with me, please do not hesitate to contact me at (760) 337-4555. Thank you for providing us with the opportunity to comment on your proposed subdivision.

Sincerely,

Marcela Piedra
Community Services Director

CC: Norma Villicaña, Community Development Director
Abraham Campos, Associate Engineer
Chris Legakes, Parks Supervisor

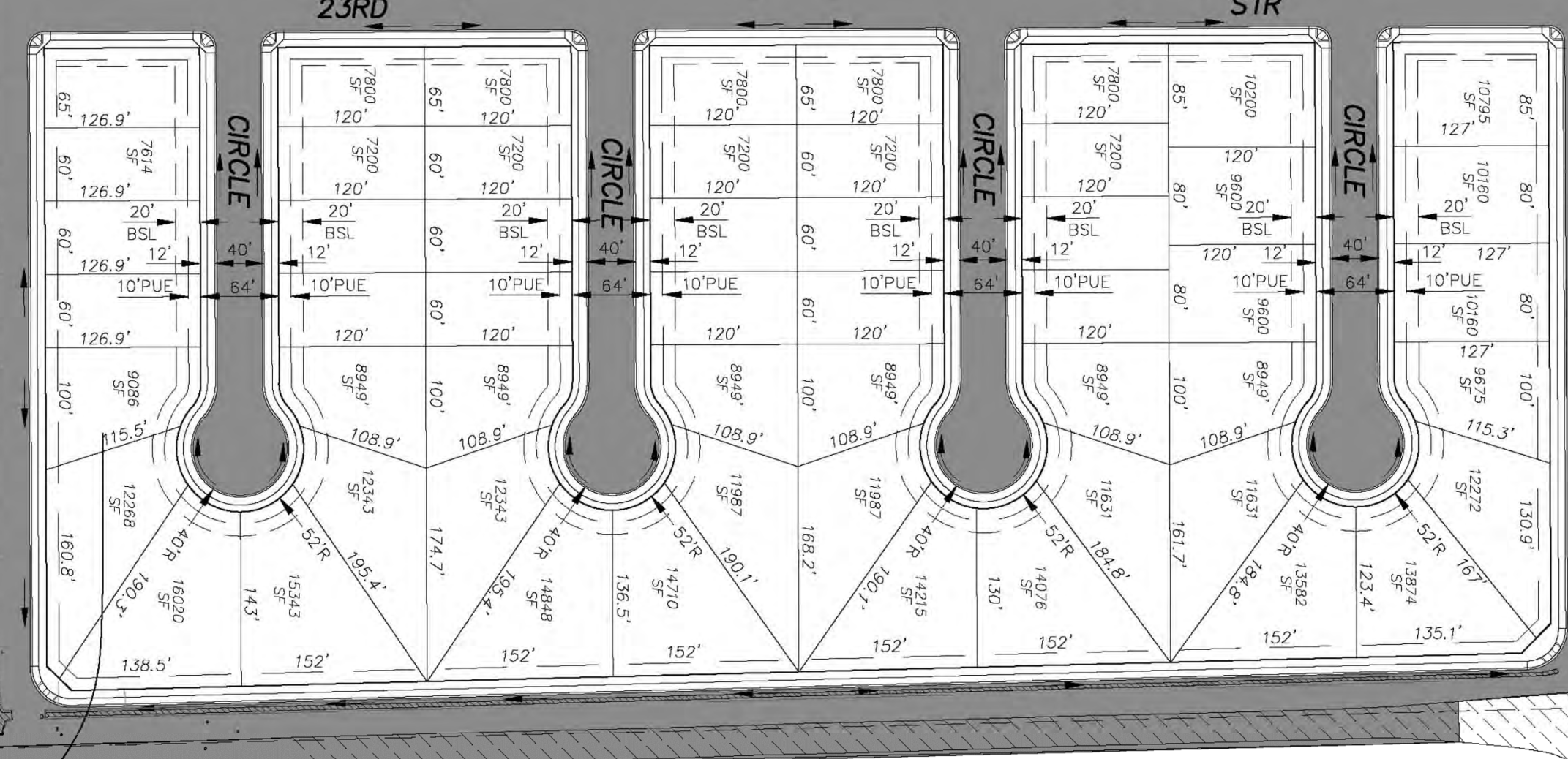
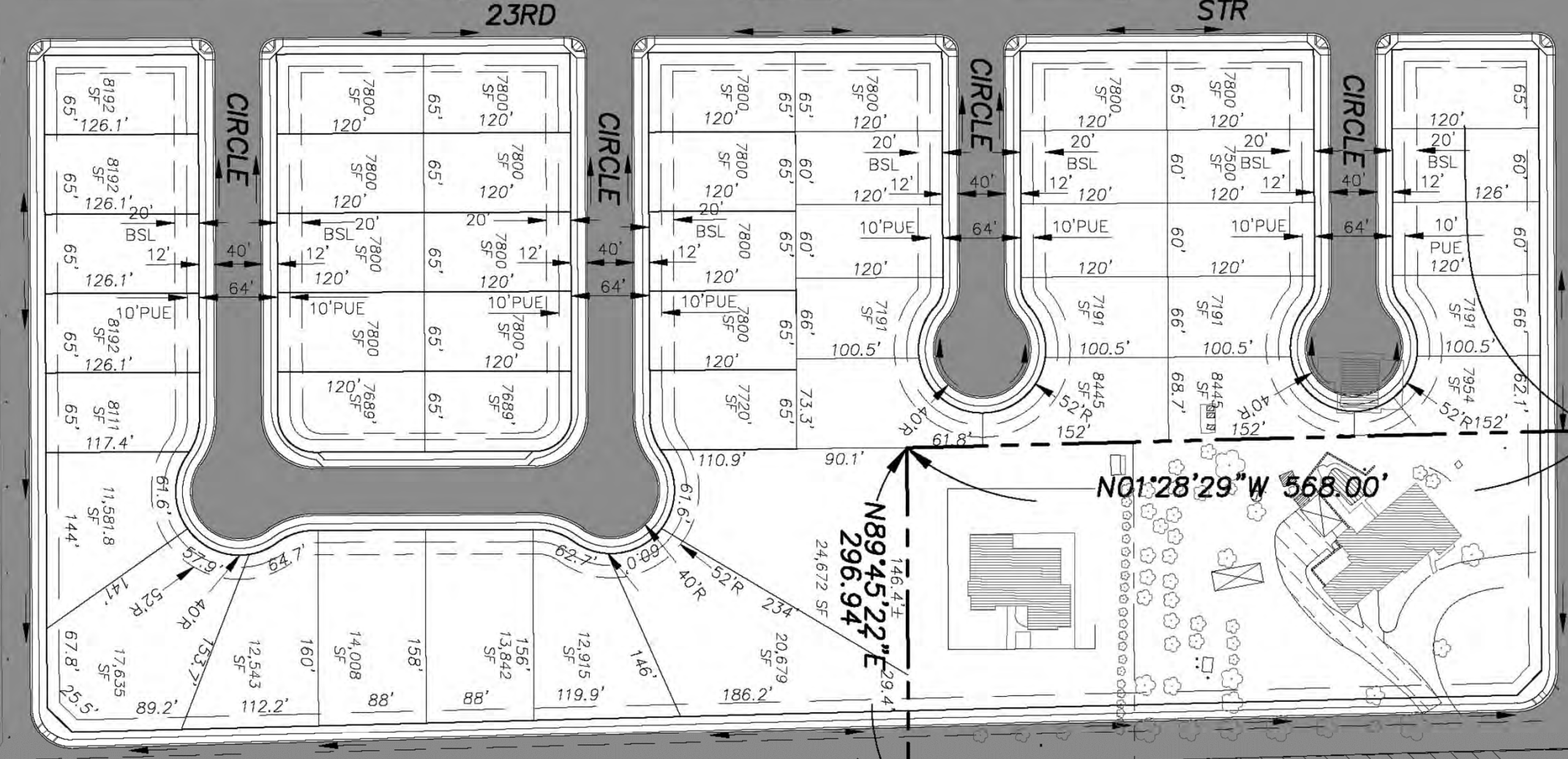
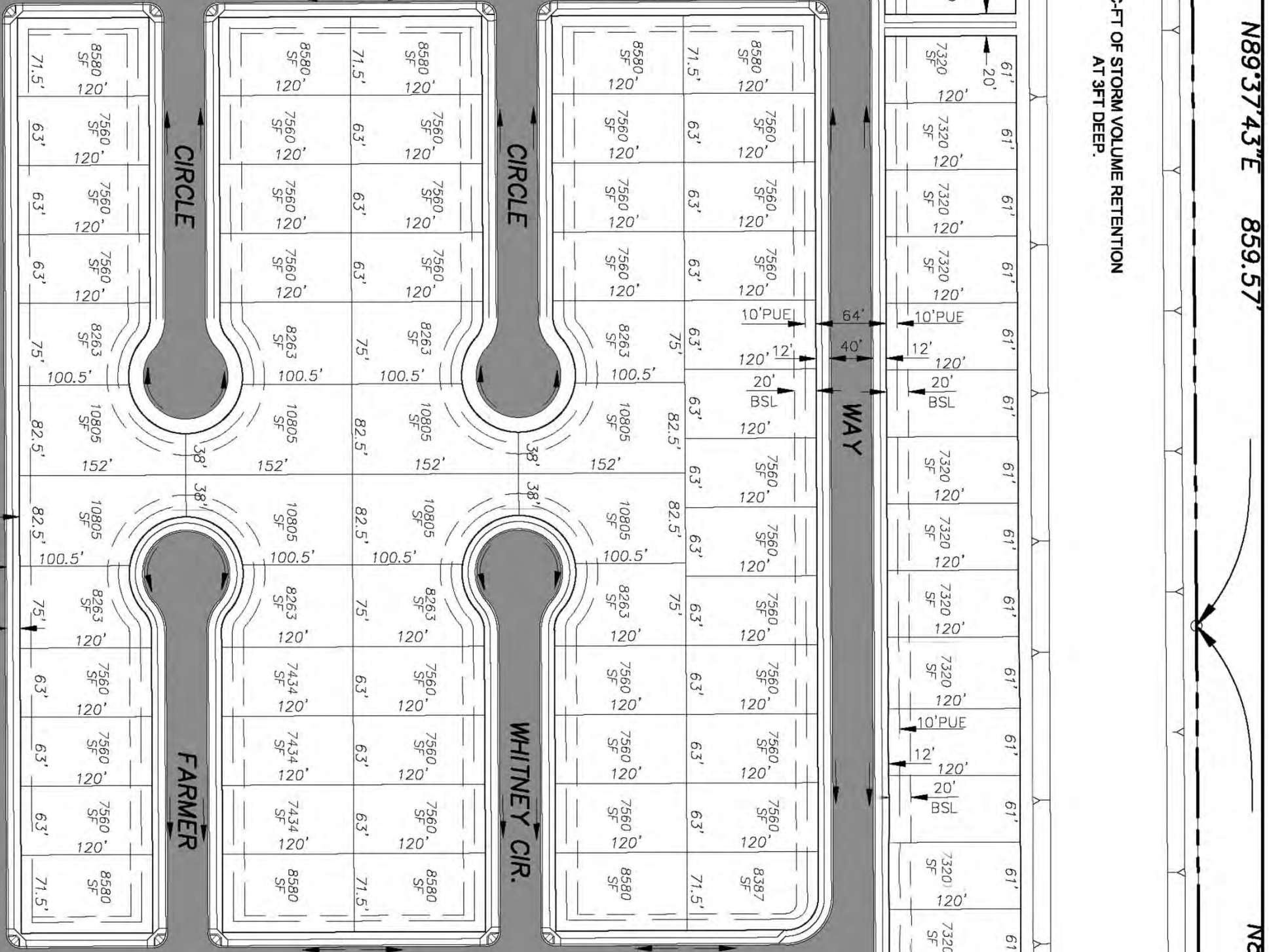
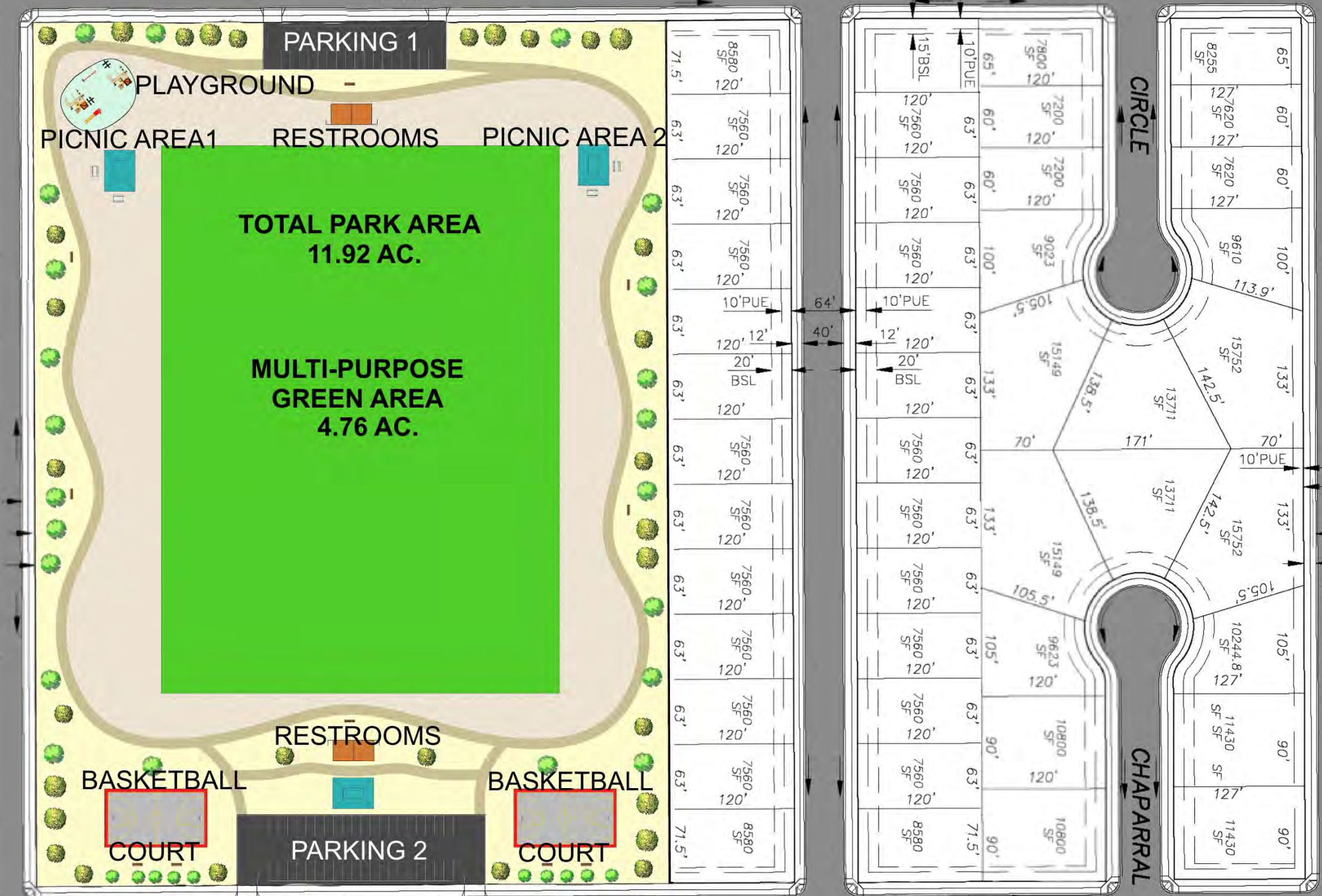
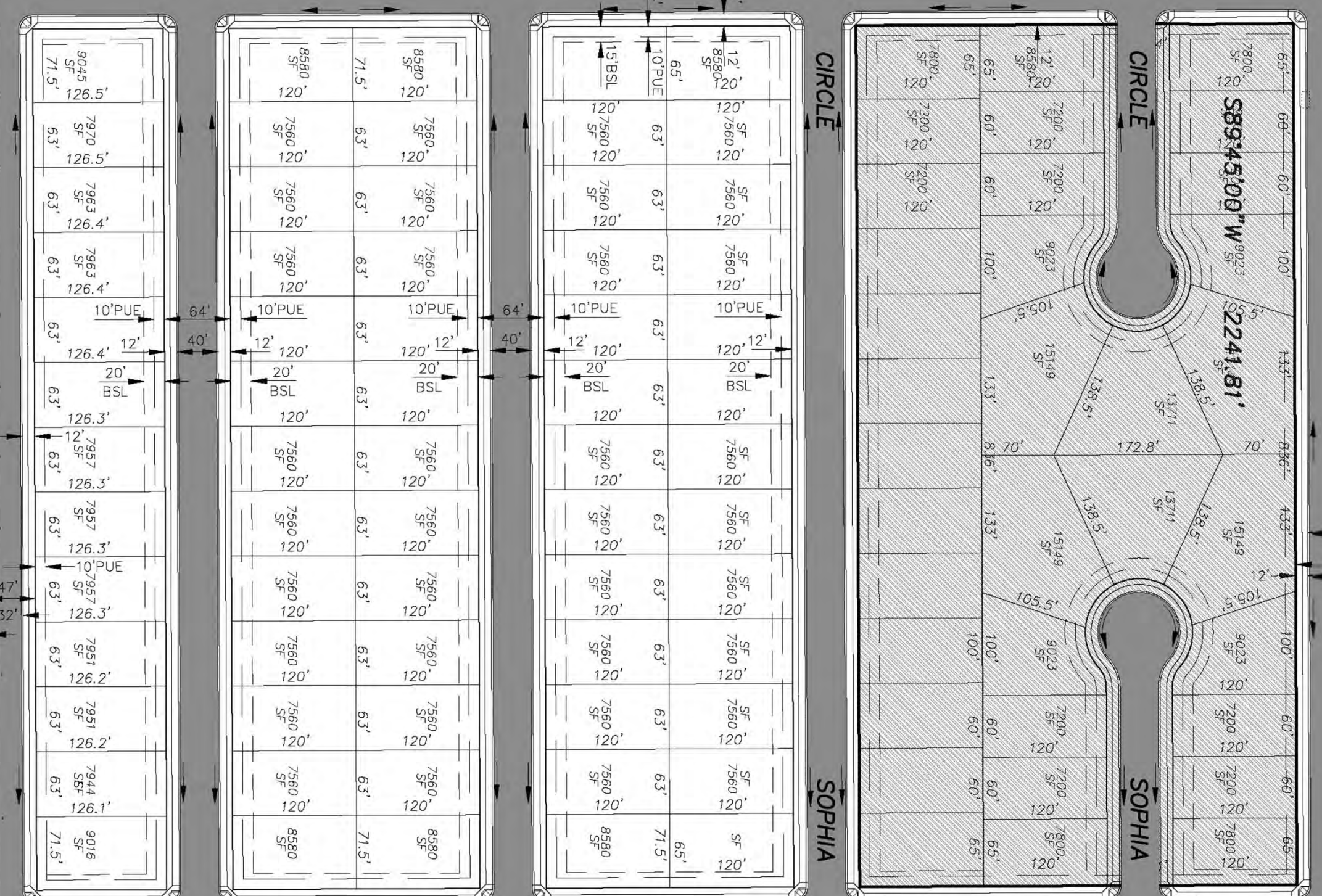


OPTION 2

15.3 AC-FT OF STORM VOLUME RETENTION AT 4FT DEEP.

8.91 AC-FT OF STORM VOLUME RETENTION AT 3FT DEEP.

25.68 AC-FT OF STORM VOLUME RETENTION AT 3FT DEEP.



N89°44'19"E 2565.94'

N89°45'27"E 296.94'

N01°28'29"W 568.00'

N00°50'05"E 754.20'

N89°38'04"E 734.31'

N89°37'43"E 859.57'

N89°37'33"E 787.00'

25.68 AC-FT OF STORM VOLUME RETENTION AT 3FT DEEP.

McCABE UNION ELEMENTARY SCHOOL DISTRICT

701 WEST MCCABE ROAD - EL CENTRO, CALIFORNIA 92243
MCCABE SITE: PHONE: (760) 352-5443 - CORFMAN SITE: PHONE (760) 335-5200

LAURA DUBBE
Superintendent
ARLYN ATADERO
Asst. Superintendent
ARMANDO LOPEZ
Principal

BOARD OF TRUSTEES

Mike McFadden, President
Chris Legakes, Clerk
Chip Corfman, Member
Mark Larson, Member
Judy Tagg, Member

July 2, 2015

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

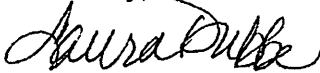
Re: Lotus Ranch Subdivision

The McCabe Union Elementary School District has requested for the inclusion of a school option in the proposed Lotus Ranch Subdivision Project. In response to the requirement of the State Department of the Architect's visit to the proposed school's location to ensure its adequacy please find enclosed the Initial School Site Evaluation form and findings recently received by the district. On April 1, 2015 Mr. Rob Corley, Field Representative for the School Facilities & Transportation Services Division of CDE visited the proposed school location in the Lotus Ranch Subdivision Project. The evaluation concludes the proposed Lotus Ranch site is suitable for further analysis.

In addition, clarification was requested on the type of school and acreage required for the proposed school. As the enclosed report demonstrates, the McCabe district is proposing a K-6 school that would be situated on 12 acres. The developers for the Lotus Ranch subdivision have presented a conceptual map that meets this criteria. It is the expectation of the district that in providing this information, the City will be able to move forward with the school alternative.

If you have any further questions or concerns regarding this matter, please contact me at your convenience.

Sincerely,



Laura Dubbe
Superintendent



**CALIFORNIA DEPARTMENT OF EDUCATION
SCHOOL FACILITIES PLANNING DIVISION**

SFPD 4.0 (Rev. 07/09)

INITIAL SCHOOL SITE EVALUATION

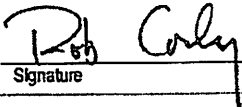
- A scaled drawing with north indicated is attached to this review.
- A local educational agency boundaries map showing existing school sites, attendance areas, and the proposed new school site is attached to this review.

Date of Field Review 01 April 2015		County Imperial		
Local Educational Agency (LEA) McCabe Union Elementary School District			School Site Lotus Ranch	
Site Location (nearest cross streets, compass direction, and city) South of Nuffer Road, West of S. La Brucherie Road, El Centro, California				
Master Plan Capacity 720	Grade Levels If stand alone special education See Additional Requirements K-6	Number of Multitrack Year-Round Education Tracks na	Class Size Reduction Grades K-3	Estimated Land Value/Acre \$20,000
Project Type			Funding	
<input checked="" type="checkbox"/> New School <input type="checkbox"/> Land Addition to Existing Site <input type="checkbox"/> Other:		<input type="checkbox"/> Charter School <input type="checkbox"/> Joint-Use Facilities:	<input checked="" type="checkbox"/> Developer <input checked="" type="checkbox"/> Local <input checked="" type="checkbox"/> State <input checked="" type="checkbox"/> Financial Hardship	
Proposed Facilities for County-Educated Special Education Students at the School to be determined				
Proposed School Athletic Program District standard program				
Site Acreage				
Gross Acres 15	Net Usable Acres 12	California Department of Education (CDE) Recommended Acres	Percent of State Standard (Net Usable/CDE Recommended)	
Site Characteristics				
Topography flat				
Historical Use alfalfa				
Current Use alfalfa				
Existing Structures to Be Removed or Demolished none, minor irrigation improvements				
Easements and Rights of Way none				
Current Land Use or Zoning Adjacent to Site				
North currently agriculture, future specific plan residential				
East existing farm dwelling and office				
South currently agriculture, future specific plan residential				
West currently agriculture, future specific plan residential				
Potential Land Use Incompatibilities none				

Potential Issues

Yes (Y), No (N), ?	Indicate "Yes" if the following is a known or a potential concern.
N	*Traffic:
N	*Railroad Tracks (<1,500 ft.):
N	*Airport Runway (<2 nautical miles):
N	*Power Lines Above or Below Ground (>50kV):
?	*Pipelines (<1,500 ft., >80 psi):
N	*Excessive Ambient Noise:
N	*Active Fault Zones:
?	*Likelihood of Landslides or Liquefaction: will do soil study
N	*Flood or Dam Inundation:
?	*Inadequate Soil Stability, Bearing Capacity: will do soil study
N	*Topographic Problems (ex., excessive slope):
N	*Water or Fuel Storage Tanks:
?	*Toxics (natural or man-made): will test for residual agricultural chemicals
N	*Odors, Dust, Smoke, Pesticide Drift:
N	*Hazardous Air Emissions or Hazardous Material <¼ mile:
N	*Within 500 feet of a Major Traffic Corridor or Freeway for Air Quality:
N	*Wildland Fire Interface:
N	*Social Hazards:
?	*Unsafe Walking Routes: possible during development until sidewalks connect
N	*Difficult or Unsafe Accessibility:
N	Not Centrally Located in Attendance Area:
?	Distant From Other Community Facilities: see Specific Plan
N	Poor Orientation For Wind or Light:
N	Poor Drainage:
N	Shape (length to width ratio >2:1):
N	Distant or Unavailable Utilities:
N	Excessive Grading or On-Site Development Costs:
N	Excessive Off-Site Development Costs:
N	Likely <i>Eminent Domain</i> or Relocation:
N	Wildlife, Protected Habitat, Wetland:
N	Historic, Archeological, Scenic Resource:
N	Farm Land or Agricultural Preserve (Williamson Act):
N	Other (specify):

*Major safety issues to be avoided.

Ranking (1=high and 5=low)			
Ranking of This Site	Number of Sites Evaluated	Relative Ranking of This Site	
1	2	1	
If fewer than three sites evaluated, explain why. Specific Plan area, this is better choice			
Recommendation			
<input checked="" type="checkbox"/> The California Department of Education's initial evaluation of this site indicates that the local educational agency may proceed with further evaluation of the site including the items detailed in the SFPD 4.01, School Site Approval Procedures. Specific concerns identified in this evaluation must be addressed in the site approval application. <i>THIS EVALUATION DOES NOT CONSTITUTE AN APPROVAL.</i> <input type="checkbox"/> The California Department of Education recommends that the school district no longer pursue acquiring this site.			
Comments District will continue to work with developer and city on this site. Appears to be good choice. Details to be clarified as project moves forward.			
Additional Requirements			
<input type="checkbox"/> Electromagnetic Field Mitigation Plan <input type="checkbox"/> Pipeline/Tank Risk Assessment <input type="checkbox"/> Special Education Program Review <input type="checkbox"/> Noise Study <input type="checkbox"/> Traffic Safety Study <input type="checkbox"/> Other: <input type="checkbox"/> Railroad Safety Study <input type="checkbox"/> Caltrans Airport Assessment			
Field Review Participants			
Name	Address	Telephone Number	E-mail
Jimmy Sanders	1102 Industry Way, Suite A, El Centro, CA 92243	(760) 353-5440	Jimmy@sanders-inc.com
Rob Corley	1430 N Street, Suite 1201, Sacramento, CA 95814	(805) 835-3089	rcorley@cde.ca.gov
Name	Address	Telephone Number	E-mail
Name	Address	Telephone Number	E-mail
CDE Field Representative Signature			
Rob Corley			
Print Name		Signature	
		April 1, 2015	
		Date	