

Initial Study

Housing Element Update

Prepared by:

CITY OF BRAWLEY



SEPTEMBER 2021

Prepared by:

City of Brawley

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INITIAL STUDY

September 2021

A. BACKGROUND

1. Project Title: City of Brawley Housing Element Update
2. Lead Agency Name and Address: City of Brawley
Development Services Department
205 South Imperial Avenue
Brawley, CA, 92227
3. Contact Person and Phone Number/Email: Gordon Gaste
Development Services Director
(760) 344-8822
ggaste@brawley-ca.gov
4. Project Location: City of Brawley
5. Project Sponsor's Name and Address: City of Brawley
Development Services Department
205 South Imperial Avenue
Brawley, CA, 92227
6. General Plan Designation: N/A
7. Existing Zoning: N/A
8. Proposed Zoning: N/A
9. Project Description Summary:

The City of Brawley's current Housing Element was adopted in 2013. However, a new housing element is currently being prepared for the City. This Initial Study evaluates the environmental effects of the *2021-2029 Brawley Housing Element*.

The Housing Element is an integral component of the City's General Plan. The Housing Element addresses existing and future housing needs of all types for persons of all economic groups in the City. The Housing Element is a tool for use by citizens and public officials in understanding and meeting the housing needs in City of Brawley.

The Housing Element Update covers the eight-year period of October 2021 through September 2029, and provides an implementation strategy for effectively addressing the housing needs of Brawley residents during this period. Housing program strategies are presented to address the following issues:

- Availability of adequate housing supply;
- Housing cost and affordability;
- Maintenance and rehabilitation;
- Special housing needs; and
- Energy conservation.

B. SOURCES

The following documents are referenced information sources utilized by this analysis:

1. City of Brawley General Plan, September 2008.
2. California Department of Toxic Substances Control, Envirostor Database, accessed July 30, 2021.
3. City of Brawley, Housing Element 2013-2021, October 2013.
4. City of Brawley, Zoning Ordinance, September 2008.
5. California Department of Conservation, Imperial County Important Farmland 2010, Division of Land Resource Protection, 2013.
6. Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance, Imperial County, California Department of Conservation, Farmland Mapping and Monitoring Program, Updated June 2, 2010.
7. City of Brawley Service Area Plan, November 2017.
8. Imperial County General Plan, January 2008.

C. 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” or “Potentially Significant Unless Mitigation Incorporated” as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology /Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology / Water Quality |
| <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Mandatory Findings of Significance |
| <input checked="" type="checkbox"/> None | | |

D. DETERMINATION

On the basis of this initial study:

- 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 applicant. 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” 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 pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Gordon Gaste, AICP CEP

Printed Name

Date

Development Service Director

Title

E. BACKGROUND AND INTRODUCTION

The California State Legislature has identified the attainment of a decent home and suitable living environment for every Californian as the State's primary housing goal. Recognizing the important role of local planning programs in the pursuit of this goal, the Legislature has mandated that all cities and counties prepare a Housing Element as part of the comprehensive General Plan.

The Housing Element of the Brawley General Plan sets forth the City's six-year strategy to preserve and enhance the community's character, expand housing opportunities for all economic segments, and provided guidance and direction for local government decision-making in all matters related to housing.

The Housing Element covers the eight-year period of October 2021 through September 2029, and provides an implementation strategy for effectively addressing the housing needs of Brawley residents during this period. Housing program strategies address the following issues:

- Availability of adequate housing supply;
- Housing cost and affordability;
- Maintenance and rehabilitation;
- Special housing needs; and
- Energy conservation.

**Figure 1
Regional Location Map**

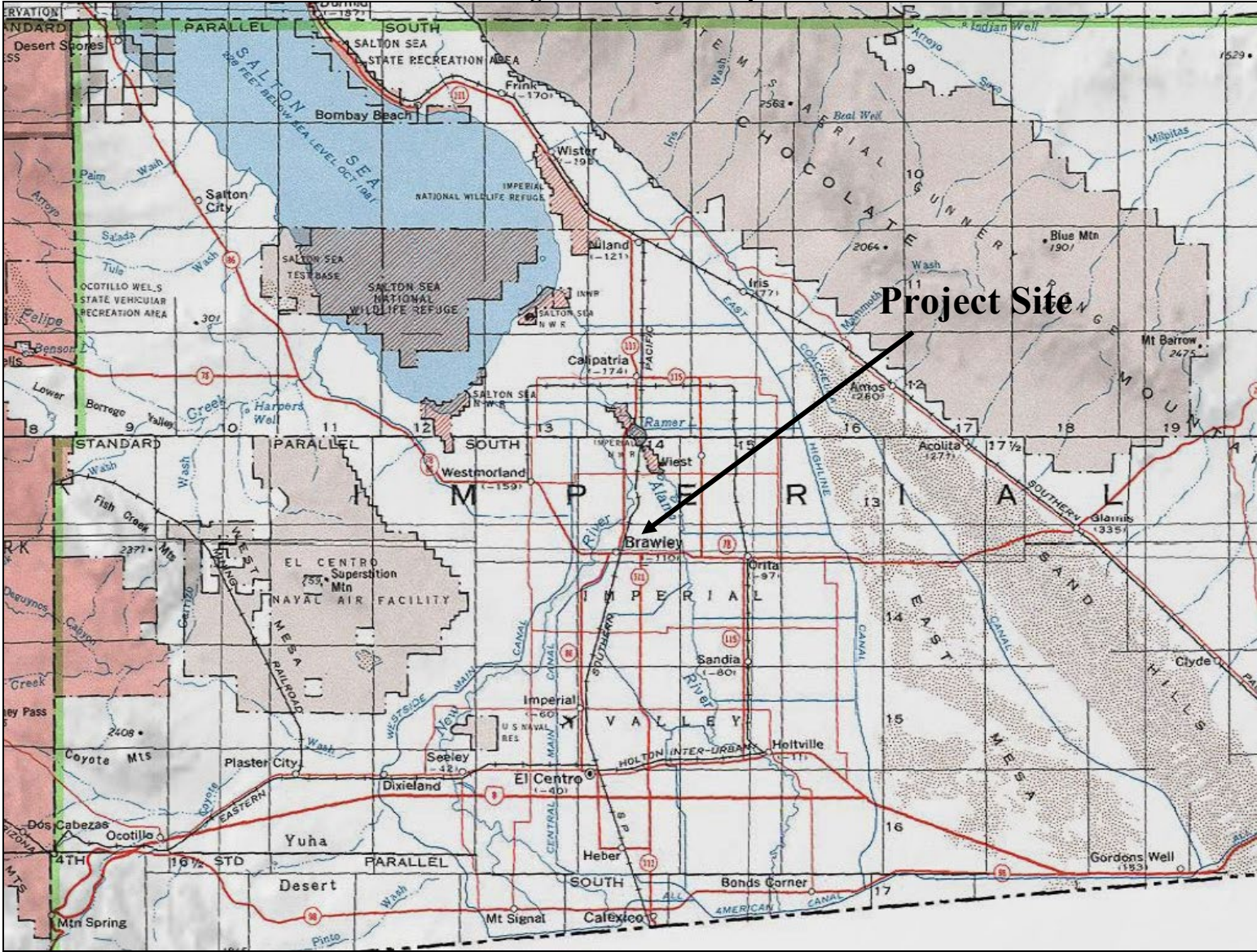
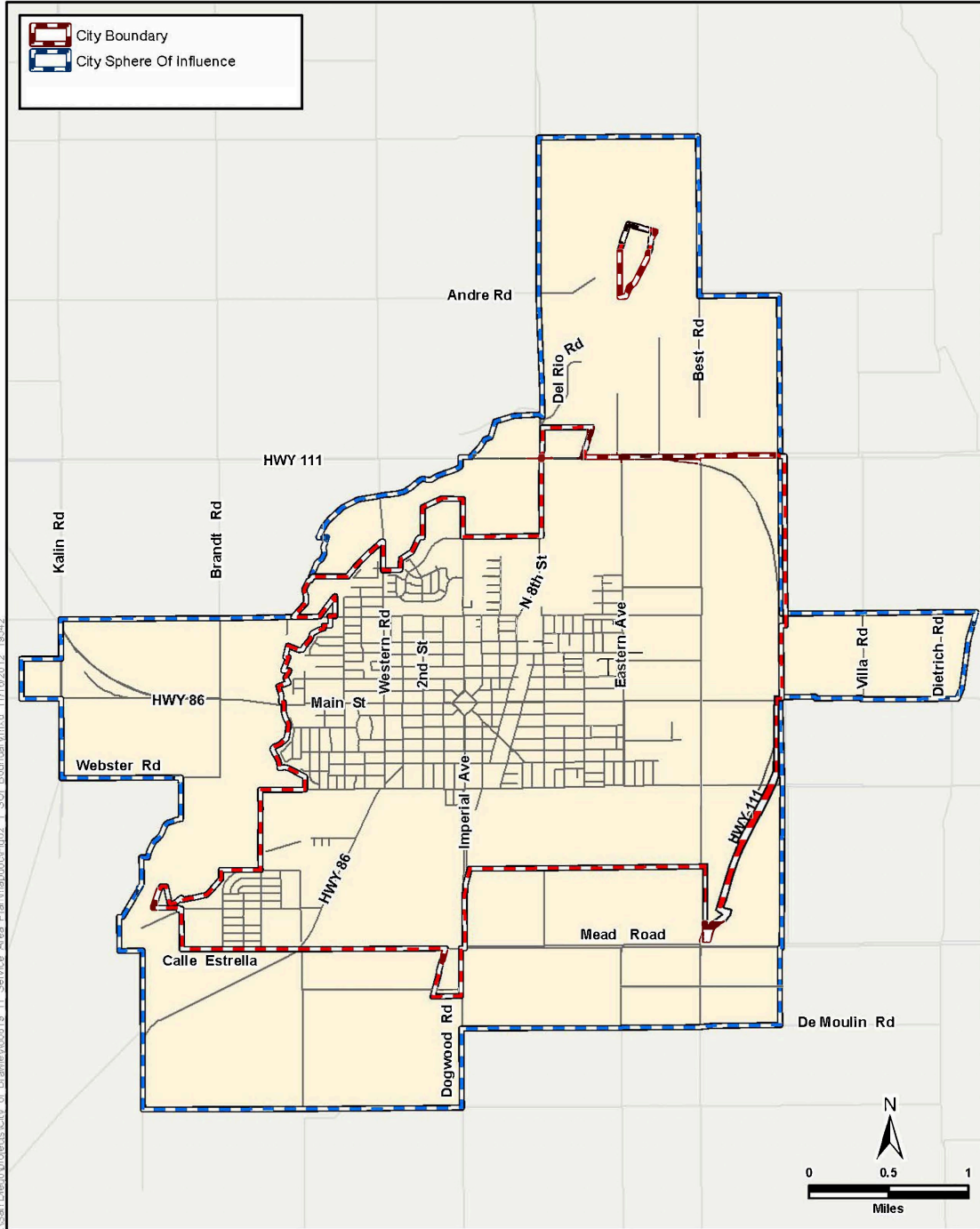


Figure 2
Project Location Map



K:\San_Diego\projects\City of Brawley\00818_11_Service Area Plan\mapdocs\Fig2_1_SCI_Boundary.mxd 11/16/2012 10:54:2



F. PROJECT DESCRIPTION

REGIONAL SETTING

Imperial County is located in a broad desert that has been transformed to productive agricultural lands by the importation of irrigation water. The City of Brawley is located in central Imperial County, which is in the southeastern corner of California near the Mexican border. Brawley is located approximately –

- 6 miles southeast of the City of Westmorland
- 9 miles to the south of the City of Calipatria
- 9 and 12 miles north of the Cities of Imperial and El Centro
- 21 miles north of Calexico situated along the Mexican border

Within the context of the County, Brawley is located at the intersection of State Route 78 with State Route 86 and State Route 111. The New River flows from the southwest to the northern portion of the Brawley Planning Area and the Union Pacific Railroad generally extends north-to-south and bisects central Brawley.

Brawley has historically played a significant role in the agricultural economy that characterizes Imperial County. The landscape around the urbanized areas is dominated by agricultural fields, scattered farmhouses, and related agricultural structures. Scenic views are enjoyed throughout Brawley including panoramic views of the stark topography of the Chocolate Mountains in the east and the foothills of the Peninsular Range in the west, the New River riparian corridor, and agricultural open space.

Brawley's strategic crossroads location at several major highways and the railroad facilitates easy access for residents and visitors, and regional shipping services. The City continues to provide a unique urban setting for residential, commercial, agribusiness, and industrial uses. The City is distinguished by a historic downtown commercial and civic center surrounded by a variety of distinct residential neighborhoods, parks, some industrial development, agriculture, and a municipal airport.

HISTORICAL CONTEXT

In 1902, J.H. Braly, a Los Angeles investor, was assigned 4,000 acres of land in the center of the area representing the present-day City of Brawley. U.S. Government Circular No. 9 was shortly released after Braly took control of the land and it claimed that nothing would grow in the desert area of Imperial Valley, even with plentiful water. In response to this news, Braly sold the land to G.A. Carter who shortly sold the land to the Imperial Land Company. In defiance of the government circular, the Imperial Land Company ordered the new town plotted and began promoting the agricultural potential of the area. Colorado River water was initially diverted to Imperial Valley in 1901 and irrigated agriculture in the Valley was showing promise.

People had already begun to call the new townsite "Braly." However, Mr. Braly prohibited the use of his name for the town because he was convinced the town would fail miserably. A.H. Heber, one of the principals of the Imperial Land Company, suggested that the town be named

Brawley: "I have a friend in Chicago named Brawley - we'll name the town after him," said Mr. Heber. The town developed that year with approximately a dozen tent houses and the railroad reached Brawley in September 1903. Due to the town's location at the end of the rail, new immigrants hopped off the train and often remained in Brawley for a while. By Christmas of 1903, the town's success was certain.

Brawley incorporated as a City in 1908. The City initially served as a bedroom community for farmers and cattlemen working in the central part of Imperial Valley. Due to the historic location of Brawley along the railroad, the City also served as an important trading and shipping center. For many years, Brawley contained the largest concentration of people in Imperial Valley.

During World War II, the City of El Centro exceeded Brawley's population due to the large military installations located near El Centro and Brawley consequently had become the second largest city in the Valley. Today, the cities of El Centro and Calexico each surpass the population of Brawley as a result in part to their advantageous position near Interstate 8 and the international border.

Chart 1-1 shows Brawley's population growth over the past 41 years. During this period the City grew by almost 12,400 persons or by 82%. Brawley, as noted in the preceding paragraph, is the third most populous city in Imperial County after El Centro and Calexico.

Brawley's strategic crossroads location with several major highways and the railroad as well as the City's proximity to Mexico continues to provide convenient access and opportunities for residents, visitors and businesses. The City's employment base, low cost of living, historic character, and recreational opportunities have made Brawley an attractive place to live.

STATE REQUIREMENTS AND LEGISLATIVE CHANGES

The Housing Element is one of the seven mandatory elements of the General Plan, and it specifies ways in which the housing needs of existing and future residents can be met. The element became a mandated element of a general plan in 1969, or 44 years ago. The law acknowledges that, in order for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems which provide opportunities for, and do not unduly constrain, housing development.

Government Code Section 65583 states:

The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobile homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.

In enacting the housing element requirement in 1969, the State legislature found and declared that -

The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farm workers, is a priority of the highest order.

And that –

The provision of housing affordable to low- and moderate-income households requires the cooperation of all levels of government.

Also –

Local and state governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for housing needs of all economic segments of the community.

The Housing Element must include six major components:

- An assessment of the City's housing *needs*.
- An inventory of *sites* that can accommodate the need for new housing.
- An analysis of housing market and governmental *constraints* that impede public and private sector efforts to meet the needs.
- A *progress report* describing actions taken to implement the *2013-2021 Housing Element*.
- A statement of *goals*, quantified *objectives* and *policies* relative to the construction, rehabilitation, conservation and preservation of housing.

- An *implementation program* which sets forth a schedule of actions which the City is undertaking or intends to undertake to implement the policies and achieve the stated goals and objectives.

The City's prior Housing Element was adopted on December 3, 2013.

According to Government Code Section 65588(f)(2):

“Projection Period” shall be the time period for which the regional housing need is calculated.

The SCAG Regional Housing Needs Assessment (RHNA) covers the period from October 2021 to October 2029.

ROLE AND ORGANIZATION OF THE HOUSING ELEMENT

As previously noted, the Housing Element is one of seven mandatory elements of a General Plan. Its focus is on assessing the community's housing needs and describing programs to address those needs. The element must describe actions to –

- Identify adequate sites to accommodate a variety of housing needs
- Assist in the development of affordable housing
- Remove governmental constraints to housing improvement and construction
- Improve the condition of housing
- Preserve the affordable housing supply
- Promote fair housing
- Promote energy conservation

In addition to this Introduction, two additional sections and two appendices comprise the Housing Element as well as the related zoning ordinance updates:

Section 2 - Housing Program: This section provides a summary of the housing needs and describes the goals, policies and objectives of the Housing Element. Section 3 also describes the individual programs that the City will implement during the eight-year planning period in order to address the community's housing needs.

Appendices: The Appendices contains detailed information on the following:

- Appendix A: Assessment of Housing Needs
- Appendix B: Assessment of Fair Housing
- Appendix C: Sites Inventory and Analysis
- Appendix D: Governmental Constraints Analysis
- Appendix E: Analysis of Non-Governmental Constraints
- Appendix F: Housing Resources
- Appendix G: Progress Report

RELATIONSHIP TO OTHER GENERAL PLAN ELEMENTS

Seven elements comprise the Brawley General Plan:

- Land Use Element
- Infrastructure Element
- Resource Management Element
- Open Space/Recreation Element
- Public Safety/Noise Element
- Economic Development Element
- Housing Element
- Environmental Justice Element (To be adopted October/November 2021)

The Housing Element complements other General Plan elements and is consistent with the policies and proposals set forth by the General Plan. For example, the housing sites identified in the Housing Element are consistent with those designated as residential or mixed use in the Land Use Element. Also, residential densities established by the Land Use Element are incorporated within the Housing Element and form the basis for calculating the residential capacity within the City.

The California Government Code requires internal consistency among the various elements of a General Plan. Section 65300.5 of the Government Code states that the General Plan's various Elements shall provide an integrated and internally consistent and compatible statement of policy. The City has reviewed the other elements of the General Plan and has determined that this Housing Element provides consistency with the other Elements of the General Plan. The City will maintain this consistency as future General Plan amendments are processed by evaluating proposed amendments for consistency with *all* elements of the General Plan.

OTHER STATUTORY REQUIREMENTS

Water and Sewer Priority

Chapter 727 amended Government Code Section 65589.7(a) as follows:

The housing element adopted by the legislative body and any amendments made to that element shall be immediately delivered to all public agencies or private entities that provide water or sewer services for municipal and industrial uses, including residential, within the territory of the legislative body. Each public agency or private entity providing water or sewer services shall grant *a priority for the provision of these services to proposed developments that include housing units affordable to lower income households.* [Emphasis added]

The General Plan Infrastructure Component contains the following goals and objectives:

- Goal 7: Adequate water service and infrastructure.
- Objective 7.1: Provide adequate water service and infrastructure for existing development while planning and implementing improvements to accommodate planned growth in Brawley
- Goal 8: Provide adequate sewer collection infrastructure and treatment facilities.
- Objective 8.1: Provide adequate sewer collection infrastructure and treatment facilities for existing development while planning and implementing improvements to accommodate planned growth in Brawley.

The Public Works Department plans, constructs, and maintains the water system. The City purchases raw imported Colorado River water from the Imperial Irrigation District (IID), which then delivers treated water to the City.

The City provides wastewater collection, treatment and disposal services from residential, commercial, and industrial uses, and the Public Works Department plans, constructs, and maintains the sewage system, which includes a collection network of pipes and a wastewater treatment plant (WWTP).

The Planning Department will transmit a copy of the adopted Housing Element to the Public Works Department.

Required Approvals

Implementation of the proposed project would require the following discretionary actions by the City of Brawley City Council:

- Approval of a Negative Declaration; and
- Adoption of the Housing Element for the City of Brawley.

7. ENVIRONMENTAL CHECKLIST

The following Checklist contains the environmental checklist form presented in Appendix G of the CEQA Guidelines. The checklist form is used to describe the impacts of the proposed project. A discussion follows each environmental issue identified in the checklist. Included in each discussion are project-specific mitigation measures recommended as appropriate as part of the proposed project.

For this checklist, the following designations are used:

Potentially Significant Impact: An impact that could be significant, and for which no mitigation has been identified. If any potentially significant impacts are identified, an EIR must be prepared.

Potentially Significant Unless Mitigation Incorporated: An impact that requires mitigation to reduce the impact to a less-than-significant level.

Less-Than-Significant Impact: Any impact that would not be considered significant under CEQA relative to existing standards.

No Impact: The project would not have any impact.

I. AESTHETICS. <i>Would the project:</i>	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>

Discussion

a-d. The City of Brawley is located in the central portion of Imperial County, southeast of the Salton Sea, North of the City of El Centro, in the Imperial Valley area. The core of the Brawley consists of residential, commercial, industrial, park/open space, and public facilities uses. The surrounding areas consist primarily of agricultural land. The New River runs along the western edge of Brawley. The General Plan EIR states that specific scenic resources or unique features do not exist within or adjacent to the City limits. State Routes 98 and 111 run through the City, but they have not been identified as State scenic highways.

The City of Brawley’s Housing Element is a policy-level document and would not cause direct development or redevelopment of specific projects within the City. Future development within the City will be required to comply with the City’s development standards. Without identifying the location of development within the area, the potential impact of development on a scenic vista, scenic resources, historic buildings, or the visual character of the City is impossible to determine. Furthermore, because the Housing Element is a policy-level document, site-specific designs or proposals are not included; therefore, that an assessment of potential site-specific visual impacts resulting from future development proposals is not possible.

Future development applications submitted for parcels within the City of Brawley will be subject to additional environmental review, which would ensure that impacts to aesthetics are minimized. Project-specific environmental review of future development applications and adherence to the above-mentioned City requirements would ensure that impacts related to aesthetics are *less-than-significant*.

II. AGRICULTURE RESOURCES.

Would the project:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Involve other changes in the existing environment which, due to their location or nature, could individually or cumulatively result in loss of Farmland to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a, c. The Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance in Imperial County (2010) in conjunction with the Soil Survey of Imperial County, California (1981), lists soils in the City that are considered Prime Farmland or Farmland of Statewide Importance. The following Prime Farmland soils are found within the City: Holtville silty clay, Holtville silty clay (wet), Indio loam, Indio loam (wet), Indio-Vint complex, Meloland very fine sand loam (wet), Meloland and Holtville loams (wet), Vint loamy very fine sand (wet), and Vint and Indio fine sandy loams (wet). In addition, the following soils of Statewide Importance are found within the City: Imperial silty clay (saline), Imperial silty clay (wet), and Imperial-Glenbar silt clay loams (wet), 0 to 2 percent slopes. However, much of Brawley has already been developed, resulting in a loss of Prime Farmland and Farmland of Statewide Importance. Furthermore, future development projects within the City would be required to undergo individual environmental review to determine potential impacts to existing agricultural uses, and to implement General Plan goals and policies related to conservation of agricultural resources including, but not limited to, Goal 8 found in the General Plan Resource Management Element, Goal 2 found in Open Space/Recreation Element, Goal 7 found in the Land Use Element and Goal 7 in the Public Safety/Noise Element. Therefore, impacts related to the conversion of agricultural lands to other uses would be ***less-than-significant***.
- b. Williamson Act contract lands do not exist within the Brawley City Limits. In addition, the Housing Element is a policy-level document and does not include any site-specific designs or proposals that would enable an assessment of potential site-specific impacts to lands that are zoned for agricultural use. Future development applications submitted for parcels within the City of Brawley will be subject to additional environmental review, which would ensure that impacts to agricultural uses are minimized. Therefore, impacts related to Williamson Act lands or lands zoned for agricultural use would be ***less-than-significant***.

III. AIR QUALITY.

Would the project:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a-d. Brawley is located within the Salton Sea Air Basin (SSAB), which is under the jurisdiction of the Imperial County Air Pollution Control District (ICAPCD). The SSAB consists of all of Imperial County and the southeast portion of Riverside County.

Regional air quality within the SSAB is affected by topography and atmospheric inversions. The area is generally very flat and is bordered to the east by the Chocolate, Orocopia, and Cargo Muchacho mountains and to the west by the Peninsular Mountain Range. The prevailing winds tend to come from the west-northwest through the southwest. The mountains located to the east act as physical barriers to the dispersion of airborne contaminants. The SSAB also experiences surface inversions almost every day of the year. The surface inversions often last for long periods of time, allowing for air stagnation and the buildup of pollutants. During the winter, the area experiences radiation inversions in which the air near the ground surface cools by radiation, whereas the air higher in the atmosphere remains warmer. A shallow inversion layer is created between the two layers and precludes the vertical dispersion of air, causing pollutants to be trapped.

The State of California and the federal government have established air quality standards and emergency episode criteria for various pollutants. These standards are used to determine attainment of State and federal air quality goals and plans. Generally, State regulations are stricter standards than federal regulations. Air quality standards are set at concentrations that provide a sufficient margin of safety to protect public health and welfare. Episode criteria define air pollution concentrations at the level where short-term exposures may begin to affect the health of a portion of the population particularly susceptible to air pollutants. The health effects are progressively more severe and widespread as pollutant concentrations increase.

The Housing Element is a policy-level document that does not include site-specific development plans. Although implementation of a successful Housing Element can be expected to induce long-term physical growth in the City, the lack of site-specific development applications, including the design and location of specific projects, makes evaluation of the project's air quality impacts nearly impossible. In addition, future development within the City will be required to undergo project-specific review and approval and to adhere to General Plan goals and policies related to air quality, as well as federal, State, and regional air quality plans. Because the proposed project is a policy-level document that does not include direct development and because future development would be required to adhere to federal, State, and local policies and regulations, a *less-than-significant* impact would result.

- e. The proposed project would not include industrial or intensive agricultural uses; thus, the project would not be expected to create odors. Therefore, the proposed project would have *no impact* related to production of odors.

IV. BIOLOGICAL RESOURCES.

Would the project:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
d. Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a-d. The Imperial Valley provides a mix of arid desert and wetland habitat areas that can support a broad range of wildlife species. These species include both native and introduced species, as well as year-round and migrant species. Large, actively cultivated areas provide foraging habitat for numerous birds and small mammals.

It should be noted that, to a large extent, the City of Brawley has been disturbed by human activity and does not provide suitable habitat for special-status plant and wildlife species. Lands surrounding the developed areas of Brawley are primarily used for agricultural purposes. However, within the developed areas of Brawley, the New River and land adjacent to the river, as well as irrigation ditches and canals, potentially provide habitat for sensitive species. In addition, lands used for agriculture provide habitat for the burrowing owl, as well as foraging and roosting habitat for migratory birds that winter in the area.

Successful implementation of the Housing Element within Brawley would be expected to contribute to long-term physical growth in the area, which could adversely impact known and unknown biological resources in the area. Impacts could include the potential displacement or elimination of assorted biological resources in the area. However, the Housing Element is a policy-level document and would not cause direct development or redevelopment of specific projects within the City. Future development within the City will be required to comply with the City's development standards. Without identifying the location of development within the area, the potential impact of development on biological resources within the City is impossible to determine. Furthermore, because the Housing Element is a policy-level document, site-specific proposals that would enable an assessment of potential site-specific biological impacts that could result are not included. Future development applications submitted for parcels within the City of Brawley will be subject to additional environmental review, which would ensure that impacts to biological resources are minimized. In addition, future projects would be subject to federal, State, and local regulations, such as the Federal Endangered Species Act, the California Endangered Species Act, and Policy 1.1 found in the Open Space/Recreation Element of the General Plan. Therefore, impacts associated with the proposed project would be considered *less-than-significant*.

- e-f. The City of Brawley's Housing Element is a policy-level document and would not directly result in the development of specific projects within the City. Without identifying the location of specific development within the area, the potential impact of development on biological resources is impossible to determine. Because the Housing Element is a policy-level document, site-specific proposals that would enable an assessment of potential site-specific biological impacts are not included. Future development applications within the City will be required to comply with the City's development standards and will be subject to additional environmental review, which would ensure that impacts to biological resources are minimized. In addition, future projects would be subject to federal, State, and local regulations, such as the Federal Endangered Species Act, the California Endangered Species Act, and General Plan Open Space Policy 1.1. At this time, a habitat conservation plan has not been adopted within, or adjacent to, the planning area. Therefore, the proposed project would not conflict with any policies or ordinances protecting biological resources, or a habitat conservation plan, resulting in *no impact*.

V. CULTURAL RESOURCES.

Would the project:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource on site or unique geologic features?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a. The City of Brawley was incorporated in 1908. The City initially served as a bedroom community for farmers and cattlemen working in the central part of Imperial Valley. For many years, Brawley contained the largest population concentration in Imperial Valley and a number of residential, commercial, civic, and agricultural structures were constructed. Although many of the historic structures have been removed, subsurface features such as house foundations, privies, and trash deposits may exist. Typically, the buildings and waterworks features associated with the irrigation systems of the early 20th Century are considered historic resources.

Because the Housing Element is a policy-level document, site-specific development is not associated with the proposed project, and future development projects will be required to undergo project-specific review and approval, including analysis for impacts to cultural and historic resources. In addition, future development projects would need to be consistent with the General Plan goals and policies related to cultural and historic resources, which include, but are not limited to, goals and policies found in the Land Use and Resource Management Elements. Furthermore, the future development projects would be required to adhere to federal, State, and local polices regarding preservation of historic resources. Therefore, the proposed project would result in a ***less-than-significant*** impact to cultural and historical resources.

b-d. According to the County of Imperial General Plan, approximately 7,000 prehistoric archaeological sites have been recorded in Imperial County as a whole. The Sensitivity Map of Cultural Resources prepared for the County of Imperial General Plan Final EIR indicates that the New River is the nearest known cultural resource to the City of Brawley and the entire length of the New River is considered very sensitive for cultural resources due to the propensity of earlier peoples to settle in river areas.

The Brawley Housing Element is a policy-level document and would not cause direct development of specific projects within the City. Because the Housing Element is a policy document, site-specific proposals that would enable an assessment of potential site-specific impacts to cultural resources are not included. Future development projects

would be required to undergo project-specific environmental review. In addition, future projects would be required to adhere to federal and state regulations associated with protection of cultural resources, and to implement General Plan goals and policies associated with cultural resources. Therefore, impacts related to destruction or disturbance of cultural resources as a result of the proposed project would be *less-than-significant*.

VI. GEOLOGY AND SOILS.

Would the project:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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 based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

ai-iii. According to the Brawley General Plan EIR, the City of Brawley lies within a seismically active region. The County of Imperial General Plan estimates that minor earthquakes will affect certain portions of Imperial County every few months. The Alquist-Priolo Special Studies Zone for the Imperial Fault extends approximately 500 feet into the southern portion of the Brawley Sphere of Influence.

Liquefaction, settlement, ground lurching, and ground displacement along the fault line, are often the secondary effects of earthquakes. The soils in the New River Corridor, which includes portions of the City of Brawley, have properties, such as a combination unconsolidated soils, high groundwater, and saturated soils, that could facilitate these effects. Although the City of Brawley is within a seismically-active region, new developments would be required to adherence to the Uniform Building Code (UBC). Adherence with the UBD would reduce impacts from known geologic hazards.

The Housing Element is a policy-level document that does not include site-specific development proposals. Future development related to the Housing Element will have to undergo project-specific design review and approval, and will have to comply with the

goals and policies set forth in the General Plan relating to seismic hazards as well as other federal and State policies and Uniform Building Codes. Adherence to such regulations would reduce the potential impacts relating to groundshaking to a *less-than-significant* level.

- aiv. The proposed project area is not susceptible to landslides because the area is essentially flat. In addition, the Housing Element is a policy-level document and does not include site-specific development proposals that could result in the exposure of people or structures to landslides. Therefore, *no impact* would occur.

- b. Successful implementation of the Housing Element can be expected to contribute to development of residential uses within the City of Brawley. The development would range from renovation of existing structures to development of new structures on land that is currently vacant. The conversion of mostly vacant land to single-family or multi-family residential development, and the associated infrastructure improvements, would involve the disturbance and relocation of topsoil, rendering earth surfaces susceptible to erosion from wind and water. Soil erosion, or the loss of topsoil, resulting from the grading and excavation of a project site could be considered a significant impact.

However, the Housing Element is a policy-level document that does not include site-specific development proposals. Future development projects will be required to undergo project-specific environmental and design review, as well as comply with all UBC regulations. Therefore, impacts related to soil erosion would be *less-than-significant*.

- c,d. According to the City of Brawley General Plan EIR, the possibility exists in the City for geologic hazards such as liquefaction and subsidence, as well as mudslides near the rivers and canals. However the General Plan EIR states that through the implementation of mitigation measures and General Plan policies, the impacts would be reduced to a less-than-significant level. In addition, the Housing Element is a policy-level document that does not include site-specific development proposals. Future development projects would be required to undergo project-specific environmental and design review, and would be required to comply with the General Plan goals and policies related to geologic hazards, as well as the regulations found in the UBC. Therefore, impacts related to liquefaction, expansive soils, subsidence, and mudslides would be *less-than-significant*.

- e. Successful implementation of the Housing Element within the City of Brawley is expected to contribute to long-term growth in the area. However, the type of residential buildout related to the Housing Element would not include the use of septic tanks or alternative wastewater disposal systems, as all units would be required to connect to the City sewer system. Therefore, *no impact* would result.

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?

✘

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

✘

a, b. The Housing Element Update would not in itself, produce impacts related to GHG emissions. The Housing Element identifies adequate sites under current zoning regulations that can accommodate the City's RHNA allocation through 2021. The potential impacts related to GHG emissions and global warming for any specific future residential projects will be assessed at the time the projects are actually proposed. Mitigation measures would then be adopted as necessary, in conformance with CEQA. Based on the above, the Housing Element Update would result in *less-than-significant* impacts from greenhouse gas emissions.

VIII. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Expose people or structures to the risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a-c. Accidents can occur in the production, use, transport, and disposal of hazardous materials. Hazardous materials are used in Brawley for a variety of purposes including manufacturing, service industries, small businesses, agriculture, medical clinics, schools and households. In addition, several highways and railroads traverse the City of Brawley. The transportation routes include Highways State Routes 78, 86 and 111, and the Southern Pacific Railroad.

The City of Brawley does not have direct authority to regulate the transportation of hazardous materials on State highways and rail lines, but the U.S. Department of Transportation (DOT) regulations establish criteria for safe handling procedures. Federal

safety standards are also included in the California Administrative Code. In addition, the California Health Services Department regulates the haulers of hazardous waste, but does not regulate all hazardous materials.

Successful implementation of the Housing Element would be expected to contribute to long-term growth in the City. However, the type of residential development associated with the Housing Element would not include the routine use, transport, disposal, or release of hazardous waste. In addition, the Housing Element is a policy-level document and specific development projects are not proposed in conjunction with the Housing Element. Future development projects would be required to undergo project-specific environmental review; therefore, the project's impacts associated with hazardous materials would be *less-than-significant*.

- d. One site near the City of Brawley, Holtville Rocket Target Range No. 2., has been identified on list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The hazardous materials site is 13 miles northeast of Brawley. As the City is located over 10 miles from the hazardous site, adverse impacts are not anticipated.

The Housing Element is a policy-level document and does not include site-specific development proposals. Future development projects would be required to undergo project-specific environmental review, and would be required to implement General Plan policies related to hazardous materials, including Goal 3 found in the General Plan Safety Element. Therefore, impacts related to hazardous materials sites would be *less-than-significant*.

- e-f. The Brawley Municipal Airport is located within the Brawley City Limits. The Brawley Municipal Airport is located in the northeastern portion of the City, west of North Best Avenue and north of River Drive.

The General Plan environmental document indicates that General Plan policies found in the Land Use Element, as well as changes that were previously made to some existing land use designations near the airport, adequately address airport safety with respect to planned and existing land uses; therefore adverse impacts that could be significant are considered less-than-significant when policies are implemented. In addition, the Housing Element is a policy-level document that does not include site-specific development proposals, and an assessment of potential impacts related to the proximity of the project site to an airport is not possible. Future projects would be required to undergo project-specific environmental review and adhere to federal and State regulations, as well as General Plan goals and policies, related to airport land use plans. Therefore, implementation of the proposed project would result in a *less-than-significant* impact related to conflict with any airport land use plans.

- g, h. The Housing Element is a policy-level document that does not include site-specific development proposals, and any future development projects would be required to adhere to City regulations regarding emergency access, thus the project would not have an effect on any emergency plans. In addition, the proposed project area is not located within an area designated as "wildlands," where wildland fires pose a risk to structures. Therefore,

the proposed project would have *no impact* on emergency plans and would not be impacted by wildfires.

IX. HYDROLOGY AND WATER QUALITY.

Would the project:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 (i.e., 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year floodplain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year floodplain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a, f. Imperial Valley sediments contain as much as three billion acre-feet of groundwater, according to the Imperial County General Plan EIR. The application of imported water combined with the presence of fine-textured soils that do not drain well has caused the groundwater level to rise in many areas. Tile drain systems have been installed below ground in order to dewater soils to a depth below the crop root zone. Groundwater in Imperial Valley is not generally used for domestic purposes.

Water quality for all surface water and groundwater for the entire Imperial Valley is regulated under the jurisdiction of the Colorado River Basin Regional Water Quality Control Board (CRBRWQCB), Region 7. The jurisdictional area of the CRBRWQCB is separated into six different planning area.

Future development projects related to the Housing Element would be required to comply with all applicable federal, State, and local water quality regulations. Currently, the City of Brawley does not have specific standards for water quality, so the City follows State standards for water quality. During construction, future development projects would be required to obtain coverage under the State's General Permit for Construction Activities, which is administered by the CRBRWQCB. As stated in the Permit, during and after construction, Best Management Practices (BMPs) would be required to be implemented in order to reduce or eliminate adverse water quality impacts resulting from development. In addition, pursuant to the City's Municipal Separate Storm System (MS4) permit, the City is required to ensure that development does not cause adverse water quality impacts. Furthermore, stormwater management measures that will effectively control erosion and sedimentation and other construction-related pollutants during construction would be identified and implemented as required by City Ordinance. Other management measures, such as construction of detention basins, would also be required to be identified and implemented on a project-specific basis to effectively treat pollutants that would be expected for post-construction land uses. Because the Housing Element is a policy-level document and because future development projects will be subject to regulatory requirements, impacts to water quality standards or waste discharge requirements would be considered *less than significant*.

- b. According to the Brawley Service Area Plan 2017, groundwater is not used as a source of drinking water in the City of Brawley. The City purchases raw imported Colorado River water from the Imperial Irrigation District (IID). The groundwater is highly saline and detrimental to plant growth; therefore, the entire valley contains extensive underground tile drain systems to drain water from within the crop root zone. Conversion to urban land uses may result in a local lowering of the groundwater table, but this would not be substantial or detrimental because groundwater recharge in the region is estimated to be approximately 400,000 acre-feet per year. At the City of Brawley General Plan buildout, agriculture would continue to be the dominant land use in the region and because groundwater is not a source of potable water, impacts to ground water supplies and recharge would not be significant.

Because the proposed project does not include site-specific development and because buildout of the General Plan was determined not to have an adverse impact on groundwater levels, a *less-than-significant* impact would result.

- c-e. Drainage patterns in the City of Brawley are defined by the New River and the intricate network of drainage and irrigation canals that were constructed to serve the agricultural community. All of the manmade drainages ultimately discharge to the New River and then to the Salton Sea. Buildout of future development projects within the Brawley SOI would introduce roadway systems with curbs and gutters, stormwater conveyance systems, and/or stormwater detention basins that would alter existing drainage patterns. Changes to existing drainage patterns could result in a substantial increase in erosion and sediment transport to the New River unless appropriate mitigation were incorporated.

Because the Housing Element is a policy-level document, site-specific proposals that would enable an assessment of potential site-specific drainage impacts are not included. In addition, future development projects would be required to implement General Plan goals and policies related to hydrology, water quality, and drainage, as well as the mitigation measures related to drainage found in the General Plan environmental document, which would ensure that impacts of future development projects upon the City's drainage systems would be *less-than-significant*.

- g-i. The potential flood hazards in the City of Brawley are located near the New River along the western border of the City. The City has discouraged development in the New River flood channel by designating land as Open Space, where residential units are not permitted.

Because the Housing Element is a policy-level document, site-specific proposals that would enable an assessment of potential site-specific flooding impacts are not included. In addition, future development projects would not be constructed within the 100-year floodplain, resulting in *no impact*.

- j. A tsunami is a sea wave caused by submarine earth movement. A seiche is an oscillation of the surface of a lake or landlocked sea. The City of Brawley is not in close proximity to the ocean, a landlocked sea, or a lake; therefore the City is not at risk of inundation from these phenomena. In addition, the City's land is relatively flat and has a low risk of being impacted by mudslides. Therefore, the potential impact is *less-than-significant*.

X. LAND USE AND PLANNING. <i>Would the project:</i>	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
b. Conflict with any applicable land use plans, policies, or regulations 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 on environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘
c. Conflict with any applicable habitat conservation plan or natural communities conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✘

Discussion

- a. The proposed project is a policy-level document that does not include site-specific development plans. Although implementation of a successful Housing Element would be expected to induce long-term growth in the City of Brawley, the lack of site-specific development applications, including the locations and design of projects, makes evaluating the impacts of the proposed project on the community impossible. Future development projects would be required to undergo project-specific review and approval and would be required to adhere to the General Plan goals and policies related to land use. Because the proposed project is a policy-level document that does not include direct development and because future development would be required to adhere to local policies and regulations, a ***less-than-significant*** impact would result.
- b. The intent of the Housing Element is to assess the housing needs of the City and to set future goals to fulfill those housing needs. Adoption of the Housing Element would not alter existing General Plan land use designations or zoning, nor would new land use designations or zones be created. Goal 2 of the General Plan Land Use Element sets policies to ensure that land uses will be compatible with each other and prevents the planning of incompatible land uses adjacent to one another. In addition, the Housing Element itself is an element included in the General Plan and, in accordance with State planning law, the Housing Element must be consistent with the other elements in the General Plan. Because the Housing Element must be consistent with the goals, policies, and regulations set forth in the General Plan regarding land use, ***no impact*** would result.
- c. The City of Brawley does not currently participate in a habitat conservation plan or natural community conservation plan. Therefore, ***no impact*** would result from conflict with such a plan.

XI. MINERAL RESOURCES.	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
<i>Would the project:</i>				
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"/>
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"/>

Discussion

a,b. According to the County of Imperial General Plan, geothermal plants or mineral recovery plants do not exist within the City of Brawley. Geothermal resources are present in the area underlying the City’s proposed Sphere of Influence; however, the resource area is far greater than the area subject to future urbanization. Consequently, impacts to mineral and geothermal resources and resource recovery from implementation of the City’s proposed General Plan were not determined to be significant. The proposed project is a policy-level document that does not include project-specific development, impacts to mineral resources would be *less-than-significant*.

XII. NOISE. <i>Would the project result in:</i>	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less- Than- Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a, b. Development of a project requires the use of construction equipment, which would generate an increase in noise levels, as well as potential groundborne vibration. Short-term construction-related noise levels would be higher than current ambient noise levels in a development area, but would be temporary in nature. Activities associated with construction would typically generate maximum noise levels ranging from 85 to 90 dB at a distance of 50 feet. However, because construction activities would be temporary and would occur during normal daytime working hours, significant adverse public reaction to construction noise would not be anticipated.

Although construction activities could result in periods of elevated noise levels, specific development projects are not proposed in connection with the Housing Element, and future construction activities would be required to comply with the Brawley Zoning Code. Therefore, impacts related to construction noise and groundborne vibration would be *less-than-significant*.

c, d. Successful implementation of the Housing Element would induce growth within the City of Brawley; specifically, residential growth. Residential growth would introduce additional traffic to the local roadway network, which, in turn, would result in a permanent increase in ambient noise levels. Whether or not the increase is considered

significant is a function of the amount of traffic noise generated by each project, relative to existing traffic noise levels prior to development of the project.

The City of Brawley includes a centralized urban area surrounded by agricultural lands. The type of housing that may result from the proposed project would be developed as infill or would involve the expansions of the urbanized limits of the City. The amount of housing would be considered small in regards to the amount of housing and population that already exists within the City and would be spread throughout the City; which would also spread the traffic related noise impacts throughout the City.

Because the proposed project does not include site-specific development, site-specific evaluation of noise-related impacts is not possible. Future development projects would be required to undergo project-specific environmental review. In addition, future projects would be required to adhere to General Plan goals and policies related to noise. Therefore, a *less-than-significant* impact to ambient noise levels would result.

- e.f. According to the Brawley General Plan, the northern portions of the City are located within the Brawley Municipal Airport Plan. The Land Use Element of the General Plan designates the areas west and north of the airport and under the flight pattern for Industrial uses. The objective of employing the Industrial designation around the airport and below the flight pattern is to minimize the risk of aircraft overflight incidents and human endangerment.

The Housing Element does not include site-specific designs or development proposals that would enable an assessment of potential site-specific impacts that could result from future development proposals. Furthermore, all future development would be reviewed to ensure consistency with all regional and local transportation plans and policies, including the Brawley Municipal Airport Plan. In addition, potential future development related to the Housing Element would generally not be expected to occur in the vicinity of the airport. Adherence to applicable plans, policies, and regulations would reduce the potential impacts related to air traffic noise levels to a *less-than-significant* level.

XIII. POPULATION AND HOUSING.

Would the project:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>

Discussion

a-c. Housing development that is anticipated by the Brawley Housing Element would be located on land already served by the necessary infrastructure for residential development, or on land that would allow for the reasonable extension of existing infrastructure systems. Therefore, adoption and implementation of the Housing Element would not be expected to induce substantial growth that would require significant new infrastructure. In addition, future development associated with the Housing Element would not require the displacement of existing housing or people, or necessitate the construction of replacement housing. Therefore, approval and implementation of the Housing Element would have *less-than-significant* impacts related to population and housing.

XIV. PUBLIC SERVICES.

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:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a,b. Fire Protection

The Brawley Fire Department (BFD) provides fire protection to the City of Brawley. The BFD currently has two fire stations located at 815 Main Street and 1505 Jones Street. The BFD is a member of the Imperial Valley Firefighters Strike Force, which is responsible for responding to fire emergencies throughout California. The BFD is also a member of the Imperial Valley Hazardous Materials Response Team and is available to respond to hazardous materials emergencies throughout Imperial County.

Police Protection

The Brawley Police Department (BPD) provides police protection for the City of Brawley. The BPD station is located at 351 Main Street. As Brawley develops outward, the necessity may arise in the future to construct new facilities in order to maintain acceptable response times.

Conclusion

The proposed project is a policy-level document that does not include site-specific development plans. Although implementation of a successful Housing Element would be expected to induce long-term growth in the Brawley, the lack of site-specific development applications, including the location and design of projects makes evaluating the impacts of projects on the City's Police and Fire Departments difficult. However, future development would be required to undergo project-specific review and pay appropriate Impact Fees related to public services, as well as adhere to General Plan goals and policies related to land use. Because the proposed project is a policy-level document that does not include direct development and because future development would be required to pay associated Impact Fees, a ***less-than-significant*** impact would result.

- c. The Brawley Elementary School District (BESD) provides educational services for K-8 the City of Brawley. BESD has students in four elementary schools and one junior high school. The Brawley Union High School (BUHS) District includes two high schools and one community day school.

The proposed project is a policy-level document that does not include site-specific development plans. Although implementation of a successful Housing Element would be expected to induce long-term growth in Brawley, the lack of site-specific development applications makes evaluating the impacts of projects on school facilities difficult. Because future development projects would be required to undergo project-specific review, comply with General Plan goals and policies related to school facilities, and pay Chapter 407, Statutes of 1998 (SB 50) school facility development fees, a ***less-than-significant*** impact would result.

- d,e. According to the Brawley Service Area Plan, as of 2017, the City of Brawley had 20 park and recreation facilities totaling more than 125 acres. All of the City's parks are classified as Mini, Neighborhood, or Community Parks

The proposed project is a policy-level document that does not include site-specific development plans. Although implementation of a successful Housing Element would be expected to increase long-term growth in the City, the lack of site-specific development applications makes evaluating impacts to park and recreational facilities difficult. However, future development projects would be required to comply with the GP Goal 4, Policy 6.2.6 that includes the payment of in-lieu fees and Quimby fees. Because the proposed project is a policy-level document that does not include direct development and because future development would be required to comply with the Quimby Act and pay appropriate fees, a ***less-than-significant*** impact would result.

XV. RECREATION.

Would the project:

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

Discussion

- a,b. According to the City of Brawley Service Area Plan (2017), the City of Brawley had 20 parks and recreational facilities totaling more than 125 acres. In addition, 101.9 acres are planned for addition or expansion of parks. All of the City’s parks are classified as mini-park, Neighborhood Park, or Community Park. Parks that are less than two acres and serve a one-quarter-mile radius are considered Mini Parks, Neighborhood Parks are three to ten acres, and Community Parks are within a one to two-mile radius and are larger than ten acres.

The proposed project is a policy-level document that does not include site-specific development plans. Although implementation of a successful Housing Element would be expected to long-term growth in the City, the lack of site-specific development applications makes evaluating impacts to park and recreational facilities difficult. Because the proposed project is a policy-level document that does not include direct development and because future development would be required to comply with the Quimby Act and pay appropriate fees, a *less-than-significant* impact would result.

XVI. TRANSPORTATION/CIRCULATION.

Would the project:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially increase hazards due to a design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Conflicts with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a,b. Cities in the more urbanized areas of southern California use Level of Service (LOS) D or E for determining the performance of roadways. The City of Brawley maintains a LOS C performance criteria. The City of Brawley regulates the impacts of new development on the transportation system by requiring payment of Traffic Impact Fees as part of the Development Impact Fees required to be paid by developers as part of specific development projects.

However, the Housing Element is a policy-level document and does not include site-specific development proposals that would enable an assessment of potential site-specific impacts to traffic and circulation. In addition, future development projects within the City would be required to follow the City’s regulations and development standards, and contribute the appropriate Traffic Impact Fees, as assessed on a project-by-project basis. Therefore, because the proposed project does not include site-specific development and future development would be required to adhere to City regulations and standards, a *less-than-significant* impact would result.

c. The City of Brawley is located within the Brawley Municipal Airport Plan. The Housing Element does not include site-specific development proposals that would enable an assessment of potential site-specific impacts related to an increase in traffic levels near the airport; however, all future development projects would be required to undergo

review to ensure consistency with all regional and local transportation plans and policies, including the Brawley Municipal Airport Plan and Brawley General Plan. In addition, it should be noted that potential future development related to the Housing Element would not generally be located in the vicinity of the airport. Therefore, impacts related to interference with existing air traffic patterns would be *less-than-significant*.

- d,e. The proposed project does not include site-specific development proposals that would enable an assessment of the adequacy of road design and emergency access with any precision. Future development projects would be evaluated on a project-by-project basis for potential safety impacts and to determine adequacy of emergency access prior to approval. Therefore, the proposed project would have a *less-than-significant* impact to hazards resulting from roadway design features.
- f. The City of Brawley regulates the design of development to ensure proper emergency access and parking facilities. The City also regulates off-street truck parking to reduce the impact of truck traffic in residential areas. Because the proposed project does not include site-specific development, and future development would be required to adhere to City regulations related to parking, a *less-than-significant* impact would result.
- g. According to the Brawley General Plan, the City of Brawley works with many organizations to implement plans and programs for alternative modes of transportation as well as for direct improvements to existing highways. In addition, General Plan policies address and encourage cooperation with transit providers, development of appropriate transit facilities (such as bus stops and shelters), and demand for service systems such as dial-a-ride. The General Plan infrastructure Element includes a transit, bicycle, pedestrian, and equestrian section, which identifies locations and standards for trails, routes, lanes, and related bicycle facilities. Because the Brawley General Plan recognizes and incorporates plans and programs that support alternative modes of transportation, and because site-specific development proposals are not included as part of the proposed project, the impact would be *less-than-significant*.

XVII. UTILITIES AND SERVICE SYSTEMS. <i>Would the project:</i>	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a,e. According to the Brawley General Plan and Service Area Plan (2017), the City of Brawley operates the wastewater collection and treatment system. The City's wastewater treatment plant has a capacity of approximately 5.9 million gallons per day (MGD) and currently processes 5.83 MGD.

The Housing Element is a policy-level document and does not include site-specific development proposals. Future development projects within the City would be required to follow the City's regulations and development standards related to wastewater facilities. Therefore, because the proposed project does not include site-specific development and future development would be required to adhere to City regulations and standards, a *less-than-significant* impact would result.

b,d. The City of Brawley provides water treatment and distribution services within the City limits and to some unincorporated areas of Imperial County. The City owns and operates a water treatment plant that provides clarification, filtration, and disinfection of water from the Colorado River. Untreated water is delivered to the plant via the Imperial

Irrigation District (IID) canals. Treated water is then pumped from storage tanks to users via a grid of distribution pipelines and water mains. The City plans for existing water and future development through a Water Master Plan.

According to the Brawley Service Area (2017), the IID canals provide up to 16 MGD. The water treatment plant is capable of processing 15 MGD.

The Housing Element is a policy-level document and does not include site-specific development proposals that would enable an assessment of potential site-specific impacts to water supply. Future development projects would be subject to project-specific environmental review and would be required to comply with General Plan goals and policies related to water facilities. In addition, future projects would be required to comply with Chapter 643, Statutes of 2001 (SB 610) and Chapter 642, Statutes of 2001 (SB 221), which require large developments to prove their ability to obtain adequate water supply for their projects. Therefore, a *less-than-significant* impact would result.

- c. The Brawley General Plan states that development of planned land uses will affect the drainage system in the planning area. New development will result in greater areas of impervious surfaces such as streets, roofs, sidewalks, and parking lots. Future development within the City would increase impervious surfaces and runoff. In order to accommodate for the increased run off, future development would either have to discharge stormwater to existing retention facilities or construct new facilities. Retention needs would depend on the particular constraints of each project and would be determined on an individual basis, as development applications are submitted and reviewed by regulatory agencies.

Because the Housing Element is a policy-level document, the Housing Element does not include any site-specific proposals that would enable an assessment of potential site-specific drainage impacts that could result with future development projects. Future projects would be required to undergo project-specific environmental review, and would be required to comply with the City of Brawley's design criteria. Therefore, because the proposed project would not include direct development, and because future development would be required to comply with City regulations, a *less-than-significant* impact would occur.

- f,g. Solid waste collection and disposal services are provided to the City of Brawley by Allied Waste. The County of Imperial and other local agencies continue to actively seek a new landfill site and expect to open a new site in the near future.

Because the Housing Element is a policy-level document and does not include site-specific development proposals, and because future development projects would be required to comply with City regulations and development standards related to solid waste, impacts associated with solid waste would be *less-than-significant*.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	✘	<input type="checkbox"/>

Discussion

- a. As mentioned previously, to a large extent the City of Brawley has been disturbed by human activity and does not provide suitable habitat for special-status plant and wildlife species. However, within the developed areas of Brawley, the New River and land adjacent to the river, as well as irrigation ditches and canals, potentially provide habitat for sensitive species. In addition, lands used for agriculture provide habitat for the burrowing owl, as well as foraging and roosting habitat for migratory birds that winter in the area. However, the proposed project is a policy-level document and does not include site-specific development proposals. All future development projects would be required to undergo site-specific environmental review, at which time the impacts to biological resources would be determined and mitigation would be required to reduce the project's impacts to a less-than-significant level. Therefore, the proposed project would have a *less-than-significant* impact to special-status species and sensitive natural communities.
- b. Development that converts rural areas to urban/suburban uses may be regarded as achieving short-term goals to the disadvantage of long-term environmental goals. However, long-range planning to establish policies, programs, and measures for the efficient and economical use of resources mitigates the inevitable impacts resulting from population and economic growth. Long-term environmental goals, both broad and specific, have been addressed previously in several environmental documents, the most comprehensive being the Brawley General Plan. The proposed project is a policy-level document and does not include site-specific development proposals. Future development projects would be required to undergo site-specific environmental review for both short-term and cumulative impacts, and implement any mitigation measures required to reduce

those impacts to less-than-significant levels. Therefore, the impact related to the proposed project would be *less-than-significant*.

- c. The loss of prime agricultural land is considered both a “cumulatively considerable impact” and a “substantial adverse impact,” both direct and indirect. As mentioned previously, portions of the General Plan buildout area are designated as Prime Farmland or Farmland of Statewide Importance.

However, the impact related to the proposed project, which is a policy-level document and does not include site-specific development proposals, is not considered significant. Other cumulative impacts could be identified in the categories of population growth, use of resources, demand for services, and physical changes to the natural environment. These impacts could be considered *potentially significant*; however, the impacts would be related to future site-specific projects, and would be mitigated to a less-than-significant level through mitigation measures required for those projects, as well as through cumulatively applied measures as development occurs. Therefore, the proposed project would result in a *less-than-significant* impact.

XIX. DETERMINATION AND PREPARERES

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE FEE DETERMINATION (Fish and Wildlife Code Section 711.4, Statutes of 2006 - SB 1535)

[X] It is hereby found that this project involves no potential for any adverse effect, either individual or cumulatively, on wildlife resources and that a "Certificate of Fee Exemption" shall be prepared for this project.

[] It is hereby found that this project could potentially impact wildlife, individually or cumulatively, and therefore, fees in accordance with Section 711.4(d) of the Fish and Wildlife Code shall be paid to the County Clerk.

Report Preparers

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