6th STREET AND SPEAR AVENUE AFFORDABLE HOUSING PROJECT

INITIAL STUDY

Prepared for:

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

Chelsea Investment Corporation
6339 Paseo Del Lago
Carlsbad, CA 92011

Prepared by:

BPG
BIRDSEYE
PLANNING GROUP

May 2023

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INITIAL STUDY

1. Project title:

6th Street and Spear Avenue Apartments

2. Lead agency name and address:

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

3. Contact person and phone number:

Angel Hernandez, AICP
Community Development Director
Phone Number: 760.337.4545
Email: angel_hernandez@cityofelcentro.org

4. Project location:

The Project site (APN 053- 740-040) is located at the southeast corner of 6th Street and Spear Avenue and is comprised of approximately 12.90 acres. It is located approximately 1,000 feet south of Interstate 8 and bounded by vacant commercial land abutting South 4th Street to the east, vacant land and a hotel to the north, 6th Street to the west, Spear Avenue (if extended) to the south. Vacant land is located south of the Spear Avenue right of way. Figure 1 depicts the Project site in relation to the surrounding area. Figure 2 shows an aerial photograph of the existing developed and undeveloped conditions at and surrounding the Project site.

5. Project sponsor's name and address:

Mr. Dave Davis
Development Manager
Chelsea Investment Corporation
6339 Paseo Del Lago
Carlsbad, CA 92011

6. General Plan designation:

Tourist Commercial

7. Zoning:

CT-Tourist Commercial

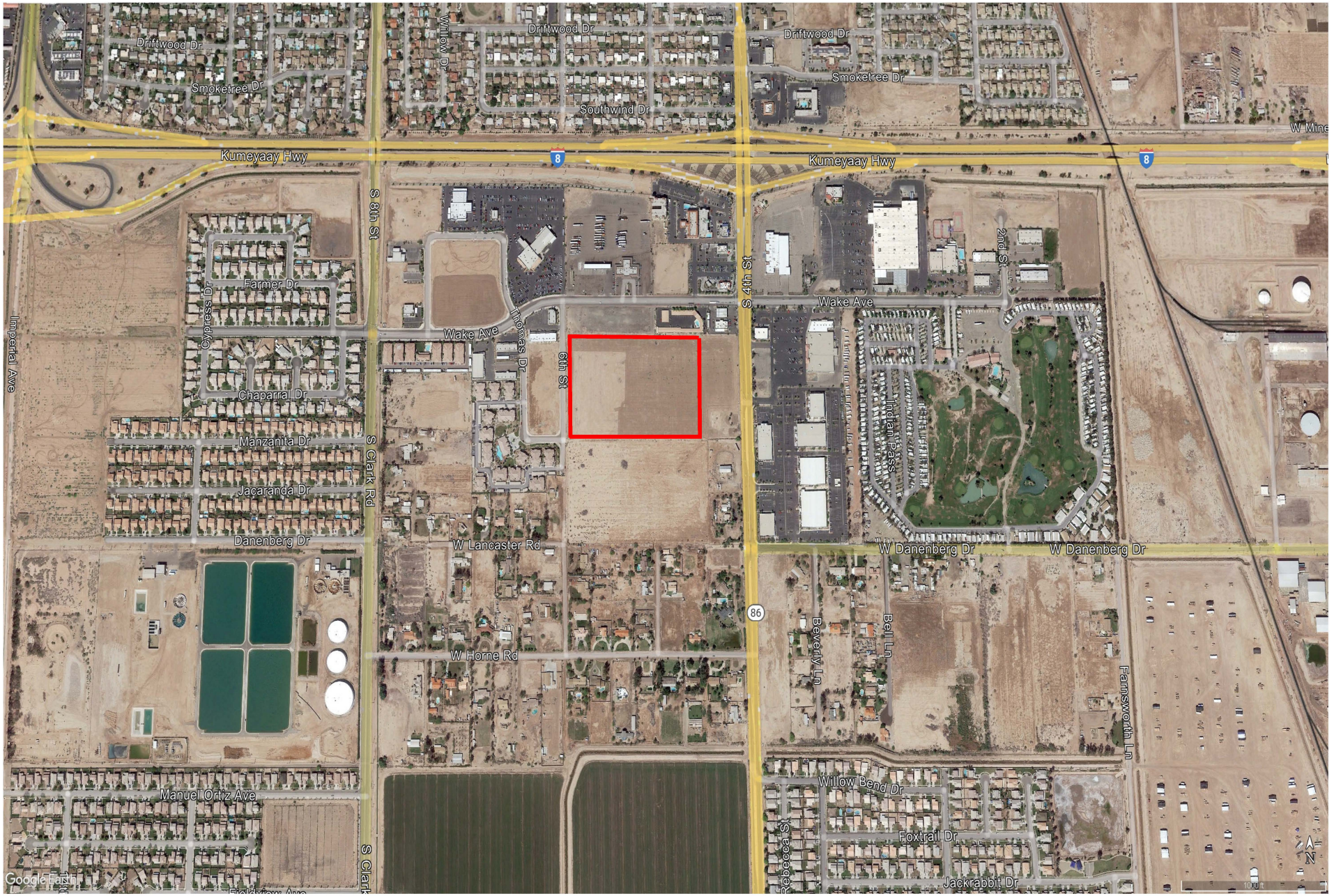

Figure 1 — Vicinity Map - **Project Site**

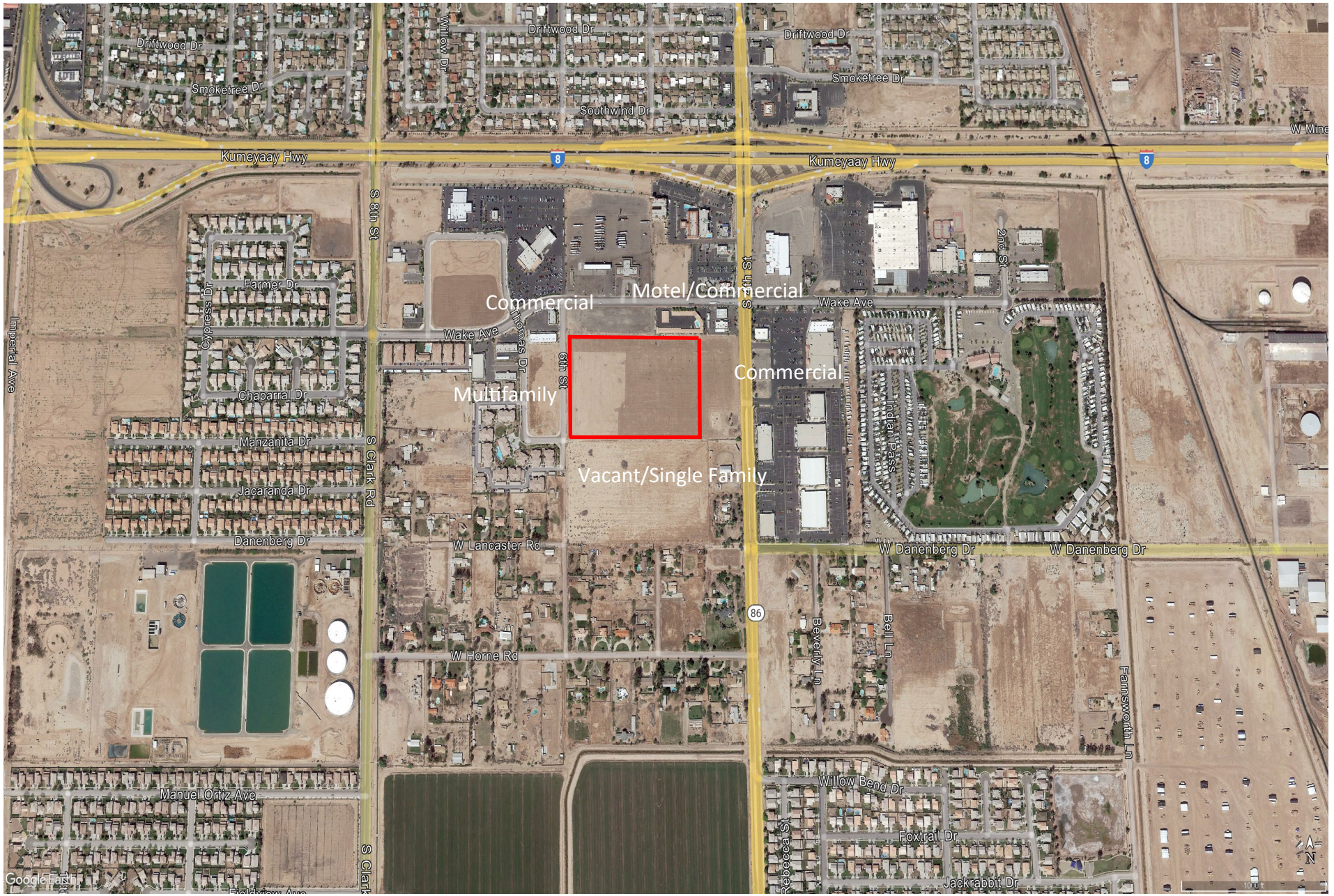

Figure 2— Surrounding Land Use - **Project Site**

8. Project Description:

The applicant, Chelsea Investment Corporation, proposes to develop a 288-unit affordable housing project on a 12.90-acre parcel (APN 053- 740-040). The parcel is zoned CT-Tourist Commercial and will require a rezone to R3 - Multiple Family Residential to accommodate the project. A General Plan Amendment from Tourist Commercial to High Density Residential is also necessary to achieve consistency with the General Plan. A tentative subdivision map is also proposed to create a total of 5 parcels. Four parcels will accommodate each project phase with one parcel dedicated for a stormwater retention basin.

The project would be constructed in four phases on Parcels 1-4. Each phase would provide 72 units in three buildings (24 units per building). Each building would provide seven one-bedroom/one bathroom, eleven two-bedroom/one bathroom and six three bedroom/two bathroom units in three stories with eight units per floor. A total of 520 parking spaces would be provided for the entire project. A 2,133 square foot community building and 193 square foot laundry facility would be constructed for each phase. A stormwater retention basin would be located within Parcel 5 along the western site boundary. The proposed site plan is shown in Figure 3.

Each phase would include development of community amenities including a sport court, barbeque area, open space/turf area and tot lot.

Site Access

The primary site access would be provided via an extension of Spears Avenue east along the project frontage from the intersection with 6th Street. The two-lane access driveway would extend north from Spears Avenue into a cul-de-sac that would provide access to each of the four parking areas. A secondary emergency vehicle access would be provided to/from 6th Street at the northwest corner of the site

Utilities and Infrastructure

Water

Water for the project would be supplied by the City's public water system. The City receives its water supply from the Imperial Irrigation District (IID). The project would likely connect to an existing water line in 6th Street. No upgrades to the existing public water infrastructure system are required or proposed to serve the project as designed.

Sewer

Wastewater treatment for the project would be provided by the City's existing sewer system. The project would likely connect to an existing 36-inch sewer line in 6th Street. All of the City's wastewater is routed to and treated at the City's Wastewater Treatment Plant located at 2255 North La Brucherie Avenue approximately 3.4 miles northwest of the site. A feasibility study is

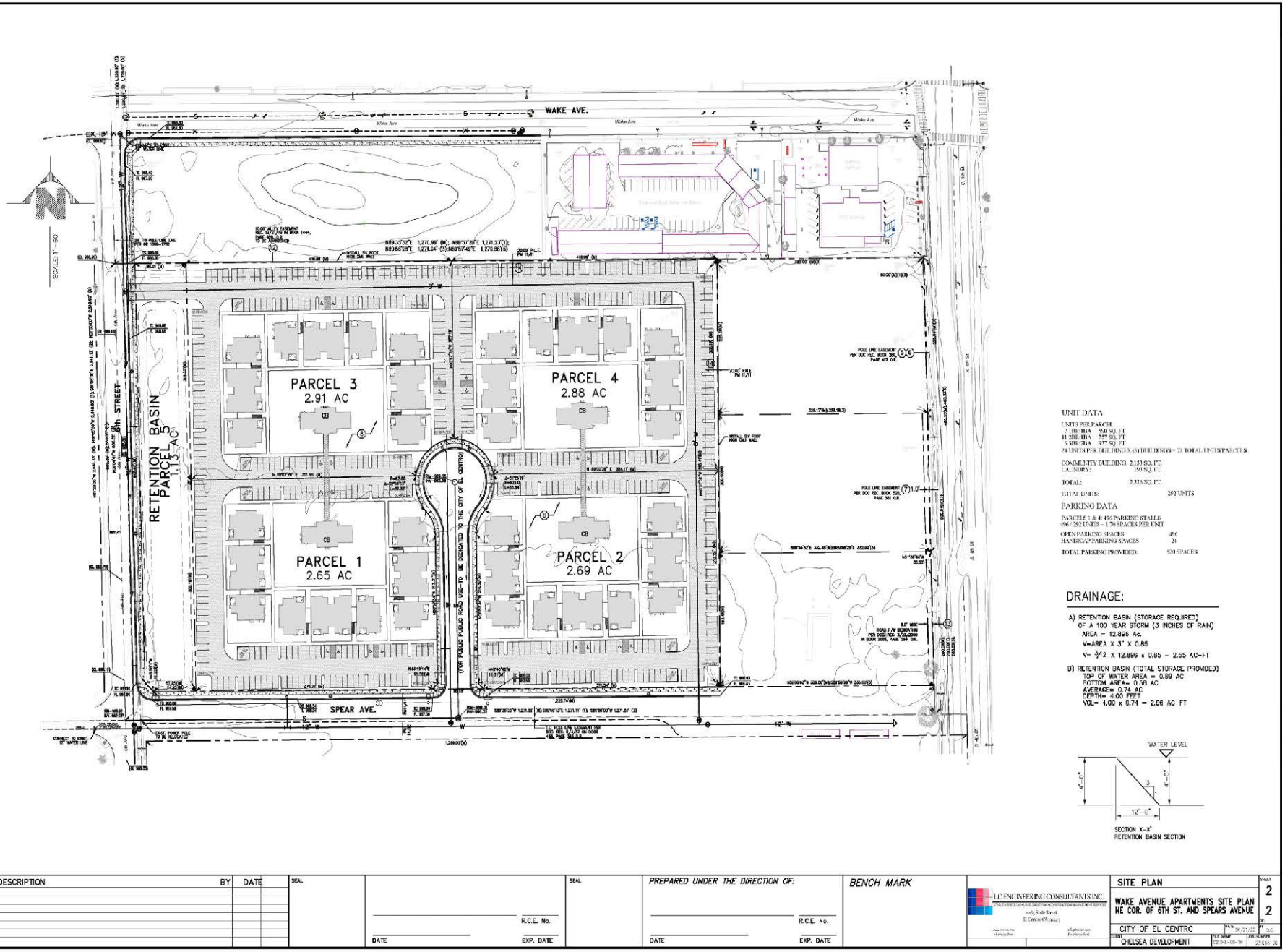

Figure 3—Site Plan

in progress to examine the capacity of an existing pump station on Wake Avenue. The feasibility study will confirm; however, it is not anticipated that any upgrades to the existing public sewer infrastructure system would be required to serve the project as designed.

Stormwater Facilities

Stormwater from the project site would be routed to a new stormwater retention basin located in Parcel 5 along the western site boundary adjacent to 6th Street. The system would be designed to retain all runoff and treat prior to release. Any off-site release would mimic existing conditions; thus, no upgrades to the City's storm drain system would be required to accommodate stormwater runoff from the subject site with project implementation. Best management practices (BMPs) would be implemented during the construction and operational phases to ensure that stormwater quality leaving the site is maintained and that no adverse effects to off-site properties or downstream waterbodies would occur.

Electricity and Natural Gas

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

Sustainability/Energy Saving Measures

The project would be designed to meet the requirements of the 2022, or applicable code at time of building permit submittal, California Green Building Code. Energy-saving measures incorporated into the project design are anticipated to include such features as low-flow fixtures (i.e., faucets, showers, and toilets) in individual units and the community buildings. Additionally, multiple charging stations for electric vehicles (EV) would be provided on-site for use by residents, staff and guests.

Lighting

All outdoor street lighting and on-site security lighting and landscape lighting would be designed to City of El Centro standards in the City's Lighting Regulations which are contained in Section 29-149 of the Municipal Code. These regulations require light fixtures to be shielded from above and designed and adjusted to reflect light away from streets and residences.

General Plan Land Use and Zoning

The project as proposed would require a General Plan Amendment to change the existing General Plan land use designation from Tourist Commercial on a portion of the site from General Commercial to High-Medium Density Residential. The zoning designation would be changed from Tourist Commercial to Multiple Family Residential (R-3). The General Plan Amendment and rezone would allow the proposed uses outright.

Subdivision Map

As part of the mapping actions associated with the project, the applicant proposes to subdivide the property into five parcels. Parcel 1 would be 2.65 acres; Parcel 2 would 2.69 acres, Parcel 3 would be 2.91 acres and Parcel 4 would be 2.88 acres. These parcels would accommodate the

four proposed project phases. Parcel 5 would be 1.13 acres and accommodate the stormwater detention basin.

Construction Characteristics

Construction of Phases I is expected to begin in early 2024 and be completed by late 2025 (approximately 18 months). Phase II would be constructed based on market demand; however, for the purpose of this evaluation, construction of the entire project is expected to occur at the same time. The City of El Centro has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise-sensitive land uses. Section 17.1-8, Construction Equipment, of the City of El Centro Municipal Code indicates that no construction or repair work is to be performed on Sundays and holidays. Mondays through Saturdays, construction can only occur between the hours of 6:00 a.m. and 7:00 p.m. Additionally, no such equipment, or combination of equipment regardless of age or date of acquisition, shall be operated so as to cause noise at a level in excess of 75 decibels for more than eight hours during any 24 hour period when measured at or within the property lines of any property which is developed and used either in part or in whole for residential purposes.

Lights may be used within the construction areas, notably the construction staging areas, to provide security for construction equipment and construction materials. Further, in the event that construction related activities occur during nighttime hours on the Project site, temporary, overhead artificial lighting would be provided to illuminate the work area.

Construction workers would travel to the Project site by passenger vehicle and materials deliveries would occur by medium- and heavy-duty trucks. Construction of the Project would require common construction equipment.

9. Surrounding Land Uses and Setting

The Project site is comprised of disturbed vacant land. The Project site is generally flat with an elevation of approximately 37 feet below mean sea level (amsl). The project site is in an area characterized by a mix of commercial and residential uses. A hotel and convenience store is located to the north and then Wake Avenue. Vacant commercial land then South 4th Street is located to the east and then commercial uses. The Spear Avenue right of way abuts the site to the south followed by vacant land. South 6th Street is located to the west followed by a mixture of commercial and residential uses (Figure 3). The existing General Plan land use designation and zoning is Tourist Commercial. As shown on Figure 3, land to the north is designated Tourist Commercial. Land to the east and west is designated General Commercial. Land to the south is designated Low Density Residential.

The Project site is located approximately 6.0 miles southeast of the El Centro Naval Air Station and 3.2 miles south of Imperial County Airport. The project site is not located within the Airport Influence Area for either airport as depicted in Figures 3E and 3G of the Imperial County Airport Land Use Compatibility Plan (September 2004).

10. Other public agencies whose approval is required:

General Plan Amendment - An amendment to the General Plan Land Use Element would be required to change the land use designation on the southern portion of the site from Tourist Commercial to High-Medium Density Residential.

Zone Change Approval – The project site will need to be rezoned from Tourist Commercial to Multifamily Residential (R-3).

Tentative Subdivision Map Approval – The project will require approval of a Tentative Subdivision Map subdividing the parcel into five parcels to accommodate each project phase and the stormwater detention basin.

Regional Water Quality Control Board (RWQCB) – Issuance of a Construction Activity General Construction Permit and Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit

Imperial Irrigation District – Approval from the Imperial Irrigation District will be required for the electrical connections.

City of El Centro – Approval from the City of El Centro will be required for water and sewer connections as well as the extension of Spears Avenue from 6th Street along the southern property boundary.

El Centro Elementary School District – receipt for payment of impact fees

Central Union High School District – receipt for payment of impact fees

Imperial County Air Pollution Control District – receipt for payment of Rule 310 fees.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun is there a plan for consultation?

A Phase I Cultural Resources Report was prepared for the proposed project and is included as Appendix C. The findings were negative for cultural resources. As part of the process, a Sacred Lands File (SLF) search was conducted by the Native American Heritage Commission. Tribal representatives identified as part of the SLF search were noticed during preparation of the Phase I Cultural Resources Report. Responses are provided as part of the Phase I Cultural Resources Report (Appendix G). On October 12, 2022, City Staff prepared tribal consultations as required per Assembly Bill (AB) 52. There were 15 tribes contacted, to date there have been two responses received. The Fort Yuma Quechan Tribe did not wish to comment on the project further. The City of El Centro will continue ongoing formal government-to-government process throughout the life of the project.

ENVIRONMENTAL FACTORS AFFECTED

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

☐ Aesthetics	☐ Agriculture and Forest Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION:

On the basis of this initial evaluation:

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

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

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

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

_____ _____

Signature Date

_____

Printed Name

ENVIRONMENTAL CHECKLIST

The lead agency has defined the column headings in the environmental checklist as follows:

A. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

B. "Less Than Significant with Mitigation Incorporated" applies where the inclusion of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." All mitigation measures are described, including a brief explanation of how the measures reduce the effect to a less than significant level. Mitigation measures from earlier analyses may be cross-referenced.

C. "Less Than Significant Impact" applies where the project does not create an impact that exceeds a stated significance threshold.

D. "No Impact" applies where a project does not create an impact in that category. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project specific screening analysis).

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

a) Scenic vistas are generally defined as public viewpoints that provide expansive or notable views of a highly valued landscape and are typically identified in planning documents, such as a general plan, but can also include locally known areas or locations where high-quality public views exist. The City's General Plan does not identify or otherwise designate scenic vistas or protected viewsheds; however, natural landforms are visible throughout the City of El Centro.

The site is located in a developed area of the City of El Centro, with a large commercial lots to the west and north, multifamily residences to the west and vacant land to the south. The site is generally flat and does not support any scenic resources or features, including waterways, rock outcroppings, or other natural features, nor does it have any scenic views to off-site points of visual interest. While the project would change views into the site, the change would not be substantial. **No impact** would occur under this threshold.

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

c) The site is not located within an urbanized area as defined by Section 15387 of the CEQA Guidelines and depicted in the US Department of Census 2010. There are no Urbanized Area Reference Map (US Department of Census, 2010) for Imperial County. Furthermore, the project site is not located in one of the City's designated Visual Enhancement Areas, as identified in the City General Plan Land Use Element (City of El Centro 2004). The project site is currently undeveloped, previously graded land in proximity to other existing multi- and single-family residential uses and area commercial uses, as well as some undeveloped lands. As discussed under Response 1(b) above, development of the proposed residential uses would not substantially damage any resources having scenic quality, as the site does not support any such features.

Views from the site are of vacant land, commercial uses and multifamily residences. The project would be designed in accordance with the El Centro Municipal Code to ensure that development reflects required design requirements such as for building size and height, setbacks, provision of landscaping, and common open space, among other such design features. Development occurring with the project would also be required to be consistent with the City's adopted Design Standards. The proposed buildings would be similar in design to the existing apartment complex located adjacent to the southwest of the site; and thus, would not substantially change the existing character of the area. With approval of the rezone and General Plan Amendment, the project would be consistent with the planned site uses and would not conflict with applicable zoning or other regulations governing scenic quality. Impacts associated with the visual character and quality and applicable regulations governing scenic quality would be **less than significant** and no mitigation would be required.

d) There are two primary artificial sources of light that generally affect an urban environment: light emanating from building interiors that passes through windows to the outside, and light from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting) that affect the natural ambient light level. The introduction of light can affect adjacent areas and diminish night sky views depending on the location of the light sources and proximity to nearby light-sensitive areas.

Glare can be caused by unshielded or misdirected lighting sources. Reflective surfaces such as chrome or polished metal can also be a source of glare. Glare results from development and associated parking areas that contain reflective materials such as hi-efficiency window glass, highly polished surfaces and expanses of pavement. The existing lighting in the project area includes streetlights and vehicle lights within the adjacent roadway corridors and interior and exterior building lighting from developed parcels proximal to the site.

Development of the proposed residential uses on the currently undeveloped site would result in the introduction of new nighttime lighting sources and/or potential sources of glare in the area. As the subject property is undeveloped in the current state, nighttime lighting levels on the project site would increase over current levels with the proposed development and could result in adverse effects to adjacent land uses. However, exterior lighting would be installed on the individual buildings for identification purposes (i.e., addresses or building numbers) and access. Lighting would also be installed at the access drives and in the surface parking areas to ensure safe circulation, as well as at the community buildings and open space areas.

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

Additionally, the project as designed does not include the incorporation of large expanses of glass or other reflective materials such as high gloss paints, metallic surfaces, or other such features. It is not anticipated that project elements would result in potential adverse glare effects on surrounding properties (or on operations associated with the Imperial County Airport located approximately 3.4 miles northwest of the project site). Therefore, the project would not create a new source of substantial light or glare that could potentially adversely affect day or nighttime views in the area. Project impacts associated with light and glare would be less than significant.

During construction, lights may be used within the construction areas, notably the construction staging areas, to provide security for construction equipment and construction materials. Further, in the event that construction-related activities occur during nighttime hours, temporary, overhead artificial lighting would be provided to illuminate the work area. Lighting would be visible off-site which may create a potentially significant temporary light and/or glare impact. Potential impacts would be **less than significant.**

	Potentially Significant Impact	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
II. <u>AGRICULTURE AND FOREST RESOURCES</u> -- Would the project:				
a) Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
II. AGRICULTURE AND FOREST RESOURCES -- Would the project:				
the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

a) The Farmland Mapping and Monitoring Program (FMMP) is a statewide program that designates farmland among several categories, including Prime Farmland, Unique Farmland, and Farmland of Statewide Importance. The FMMP is maintained by the California Department of Conservation (CDC) and is the agency responsible for overseeing farmland classification throughout the state. Agricultural land is rated according to soil quality and irrigation status. The land use highest potential agricultural value is Prime Farmland. Unique farmland is land, other than Prime Farmland, that has combined conditions to produce sustained high quality and high yields of specialty crops. Farmland of Statewide Importance may include tracts of land that have been designated for agriculture by State law. In some areas that are not identified as having national or statewide importance, land is Farmland of Local Importance.

While the undeveloped project site would be converted from vacant to residential, the conversion would not include the loss of active farmland. According to the FMMP online mapping database (CDC 2016), the Project site is classified as Farmland of Local Importance and does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Furthermore, the Project site is not used for agricultural production. Additionally, the Conservation Element of the City General Plan does not identify the Project site as containing Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Grazing Land. Therefore, **no impact** would occur in relation to this issue.

b) The Williamson Act, also referred to as the California Land Conservation Act of 1965, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments which are much lower than typical because they are based upon farming and open space rather than full market value. The Williamson Act is only applicable to parcels within an established agricultural preserve consisting of at least 20 acres of Prime Farmland, or at least 40 acres of land not designated as Prime Farmland. The project site does not meet these criteria; and thus, does not qualify for preservation under a Williamson Act contract nor is the land under a Williamson Act contract. Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. **No impact** would occur under this threshold.

c) Public Resources Code Section 12220(g) defines "forest land" as land that can support 10 percent native cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Based on this definition, no forest land occurs within or adjacent to the project site. Further, there is no land zoned as forest land or timberland proximal to the site. **No impact** would occur under this threshold.

d) The site is vacant and primarily void of vegetation. What vegetation that does exist is limited to ruderal weedy species. There is no concentration of trees on the site that would constitute a forest. The site has not been historically, and is not currently, used or planned to be used for forest land. As such, implementation of the proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, **no impact** would occur under this threshold

e) The project site is designated Farmland of Local Importance; however, no agricultural resources are present on or proximal to the project site. The majority of the surrounding area is classified as urban and built-up land. Additionally, there is no concentration of trees on or proximal to the site that could be defined as a forest. Therefore, implementation of the project would not result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. **No impact** would occur in relation to this issue.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
III. AIR QUALITY -- Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) 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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The material presented herein is based on the *Air Quality and Greenhouse Gas Study for the 6th Street and Spear Avenue Apartments,* prepared by Birdseye Planning Group, November 2022 (Appendix A).

Ambient Air Quality

The USEPA and CARB designate air basins or portions of air basins and counties as being in "attainment" or "nonattainment" for each of the criteria pollutants. Areas that do not meet the standards are classified as nonattainment areas. The National Ambient Air Quality Standards (NAAQS) (other than for ozone [O3], particulate matter [PM10 and PM2.5], and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. The NAAQS for O3, PM10, and PM2.5 are based on statistical calculations over one- to three-year periods, depending on the pollutant. The California Ambient Air Quality Standards (CAAQS) are not to be exceeded during a three-year period. The attainment status for the Salton Sea Air Basin, which encompasses the project site, is included in Table 1.

Table 1
Imperial County Air Quality Standard Attainment Status

Pollutant	CAAQS	NAAQS

Ozone (O_3)	Nonattainment	Nonattainment - Moderate
Carbon Monoxide (CO)	Attainment	Unclassified/Attainment
Respirable Particulate Matter (PM_{10})	Nonattainment	Nonattainment - Serious
Fine Particulate Matter ($PM_{2.5}$)[(1)]	Unclassified[(2)]	Unclassified/Attainment
Nitrogen Dioxide (NO_2)	Attainment	Unclassified/Attainment
Lead (Pb)	Attainment	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment
Sulfates	Attainment	No Federal Standards
Vinyl Chloride	Unclassified	
Hydrogen Sulfide (H_2S)	Attainment	
Visibility Reducing Particles	Unclassified	

Source: County of Imperial, September 2013
[1] Part of Imperial County is designated nonattainment for the NAAQS; however, the nonattainment area does not include the project location
[2] Insufficient data to designate area or designations have yet to be made

The determination of whether an area meets the state and federal standards is based on air quality monitoring data. Some areas are unclassified, which means there is insufficient monitoring data for determining attainment or nonattainment. Unclassified areas are typically treated as being in attainment. Because the attainment/nonattainment designation is pollutant-specific, an area may be classified as nonattainment for one pollutant and attainment for another. Similarly, because the state and federal standards differ, an area could be classified as attainment for the federal standards of a pollutant and as nonattainment for the state standards of the same pollutant. The region is designated as a nonattainment area for the federal O3, PM10, and PM2.5 standards and is also a nonattainment area for the state standards for O3 and PM10.

Construction and operational emissions associated with implementing the proposed project were calculated using the California Emission Estimator Model (CalEEMod) version 2020.4.0 (2021) software. Construction emissions modeling for site preparation, grading, building construction, paving, and architectural coating application is based on the overall scope of the proposed development and construction phasing. Project construction is scheduled to begin in early 2024 and be complete by mid-2026. In addition to ICAPCD Rule 800, 801 and 804 requirements for fugitive dust control associated with grading and earthmoving activities.

a) Imperial County Air Pollution Control District (ICAPCD) is the local air pollution control agency for Imperial County and the southern portion of the Salton Sea Air Basin located in Riverside County. The ICAPCD has primary responsibility for ensuring that state and federal air quality standards are attained and maintained within the ICAPCD's jurisdiction. Thus, the ICAPCD is responsible for preparing clean air plans, issuing construction and operation permits, monitoring ambient air quality, as well as developing and implementing rules and regulations that govern air quality within Imperial County. The ICAPCD meets its regulatory responsibilities through the State of California State Implementation Plan (SIP). The ICAPCD adopted its first SIP in 1971 and has prepared periodic updates to the SIP. SIPs for controlling PM_{10}, ozone, and a reasonably available control technology SIP are in place for Imperial County and constitute the Air Quality Attainment Plan (AQAP) for Imperial County.

A SIP revision for revised rules under ICAPCD Regulation VIII for fugitive dust PM_{10} was reviewed by EPA and the final rule was signed on March 27, 2013, and published in the Federal Register (Federal Register 2013). The ICAPCD adopted the rules on October 16, 2012, to regulate PM_{10} emissions from sources of fugitive dust (e.g., unpaved roads and disturbed soils in open and agricultural areas). CARB submitted these rules to EPA for approval on November 7, 2012; EPA proposed approval of these revisions to the ICAPCD portion of the California SIP on January 7, 2013. Rules and regulations promulgated by the ICAPCD and in the SIP revision applicable to the proposed project include the following:

- ICAPCD Rule 400, Nuisances, forbids the emission of air contaminants or other materials that would cause a nuisance to the public, including non-agricultural related odors.

- ICAPCD Rule 800 General Requirements for Control of Fine Particulate Matter (PM-10), requires actions to prevent, reduce, or mitigate PM-10 emissions from anthropogenic (man-made) Fugitive Dust (PM-10) sources generated within Imperial County.

- ICAPCD Regulation VIII, Rule 801 (Construction and Earthmoving Activities) establishes a 20 percent opacity limit, requires the implementation of a dust management control plan for all nonresidential projects of 5 acres or more, and requires compliance with other portions of Regulation VIII regarding bulk materials (Rule 802), carry-out and track-out (Rule 803), and paved and unpaved roads (Rule 805). The rule exempts single-family homes and waives the 20 percent opacity limit in winds over 25 miles per hour (mph) under certain conditions. To comply with this reguation, the applicant would implement Mitigation Measure AQ-1 which requires preparation of a Fugitive Dust Suppression Plan to minimize dust generated during construction and ground disturbing activities.

- ICAPCD Rule 804 Open Areas, requires actions to prevent, reduce or mitigate the amount of fine Particulate Matter (PM-10) emissions generated from Open Areas. Open areas are defined as any open area having 0.5 acres or more within urban areas, or 3.0 acres or more within rural areas; and contains at least 1,000 square feet of disturbed surface area.

On October 23, 2018 the Imperial County Air Pollution Control District Board of Directors approved the Imperial County 2018 Redesignation Request and Maintenance Plan for PM_{10}. The California Air Resources Board during a December 13, 2018 Public Hearing approved the Imperial County 2018 Redesignation Request and Maintenance Plan for PM_{10}.

ICAPCD adopted the 2013 $PM_{2.5}$ plan on December 2, 2014. The plan was transmitted to CARB on December 9, 2014. CARB reviewed and approved the plan on December 18, 2014, as a

revision to the California State Implementation Plan for Imperial County. The plan was submitted to the U.S. EPA on January 9, 2015, and is pending approval.

A project may be inconsistent with the SIP or related AQAP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQAP. As referenced, the ICAPCD meets its regulatory responsibilities through the State of California SIP. The ICAPCD adopted its first SIP in 1971 and has prepared updates to the SIP over the years. SIPs for controlling PM_{10}, ozone, and a reasonably available control technology SIP are in place for Imperial County and constitute the AQAP for Imperial County.

The ICAPCD air quality plans aim to reduce emissions of criteria pollutants for which the region is in nonattainment by establishing a program of rules and regulations directed at reducing air pollutant emissions and achieving state and national air quality standards. The project proposal to amend the General Plan land use designation from Tourist Commercial to High-Medium Density Residential is consistent with this strategy.

The project is considered infill development, as it proposes to develop a residential property in a rapidly urbanizing area with proximal residential uses and commercial businesses and services along Wake Avenue and South 4th Street. Thus, the project would be consistent with the definition of locational efficiency. Location efficiency describes the location of the project relative to the type of urban landscape within which it is developed. Compared to the statewide average, the VMT for a project with location efficiency can be between 10 and 65 percent less than those which are not. This in turn results in reduced air pollutant emissions.

Therefore, the proposal to amend the project site General Plan land use designation from Tourist Commercial to High-Medium Density Residential would be consistent with ICAPCD strategies for integrating land use and transportation in a manner that reduces regional air emissions. Because the proposed project is required to comply with applicable ICAPCD rules, regulations, and requirements for controlling emissions and because maximum daily pollutant emissions projected to result from the project would be below ICAPCD significance thresholds, the project would not conflict with or obstruct implementation of any air quality plans. Impacts would be less than significant.

b) Any development with a potential to emit criteria pollutants below significance levels defined by the Imperial County APCD is referred to as a "Tier I project," and is considered by the ICAPCD to have less than significant potential adverse impacts on local air quality. For Tier I projects, the project proponent should implement a set of feasible "standard" mitigation measures (determined by the ICAPCD) to reduce the air quality impacts to less than significant. A "Tier II project" would exceed any of the emission thresholds. The impact would be considered significant and the project proponent would be required to implement all feasible "discretionary" mitigation measures (as determined by the ICAPCD) in addition to the standard measures. Tier I and Tier II thresholds are shown in Table 2.

Table 2
ICAPCD Tier I and Tier II Daily Operational Thresholds

Pollutant	Tier I	Tier II
NOx and ROG	Less than 137 lbs/day	Greater than 137 lbs/day
PM_{10} and SOx	Less than 150 lbs/day	Greater than 150 lbs/day
CO and $PM_{2.5}$	Less than 550 lbs/day	Greater than 550 lbs/day
ROG = reactive organic gas; NOX = oxides of nitrogen; CO = carbon monoxide; PM10 = particulate matter with an aerodynamic diameter 10 microns or less; lbs/day = pounds per day SOURCE: Imperial County APCD 2017		

The ICAPCD has developed specific quantitative thresholds that apply to short-term construction activities and project operation. The thresholds are shown in Table 3.

Table 3
ICAPCD Daily Emission Thresholds

Pollutant	Construction (pounds/day)	Operation (pounds/day)
Reactive Organic Gases	75	55
Nitrogen Oxide	100	55
Carbon Monoxide	550	550
Particulate Matter 10	150	150
Particulate Matter 2.5	N/A	55*
Sulfur Oxides	N/A	150

Source: ICAPCD CEQA Handbook, 2007
Note: The ICAPCD has not adopted a significance threshold for operational or construction related emission of PM2.5 or construction related emissions of SOx. Recent projects in the ICAPCD have used a PM2.5 threshold for operation emissions of 55 pounds per day based on the SCAQMD's Final Methodology to Calculate PM2.5 and PM2.5 Significance Thresholds (SCAQMD 2006).
NA = Construction thresholds for PM2.5 and SOx are not applicable.

Project construction would generate temporary air pollutant emissions. Both construction emissions and vehicle emissions associated with operation of the facility are quantified herein. The CalEEMod output file for summer emissions is provided as Appendix A.

Construction Emissions

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction vehicles. Construction would generally consist of site preparation, grading, construction of the building pads and internal parking areas. Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions (CO and NOx) from heavy construction vehicles and trucks. As described, the applicant is intending to construct Phase I first with future phases developed based on market demand. To conservatively estimate grading emissions and for fugitive dust control purposes, it was assumed that the entire site is graded and that all 288 units are constructed in one phase. Modeling projected the construction duration would be approximately 18 months extending from January 2024 through July 2025. For modeling purposes, it was assumed that all spoils would be stored on-site and used for cover material; thus, no off-site haul trips would occur. Construction emission estimates are shown in Table 4.

Table 4
Estimated Maximum Daily Construction Emissions

Construction Phase	Maximum Emissions (lbs/day)					
	ROG	NO_x	CO	SOx	PM_{10}	$PM_{2.5}$
Construction – *2024*	3.2	32.4	16.2	0.06	20.9	11.2
Construction - 20*25*	68.9	16.5	28.5	0.06	3.1	1.2
ICAPCD Regional Thresholds	*75*	*100*	*No Standard*	*550*	*150*	*No Standard*
Threshold Exceeded	**No**	**No**	**No**	**No**	**No**	**No**

The emissions shown in Table 4 reflect implementation of the regulatory measures to control fugitive dust (PM_{10}) emissions during construction and assume exposed soil areas would be watered twice daily. To minimize fugitive dust and general construction emissions, the applicant would be required to implement fugitive dust control measures per ICAPCD Rules 801 and 804 as referenced herein. The fugitive dust control plan and related requirements to control fugitive dust emissions during construction are addressed as follows and assumed to be conditions of approval for the project:

> **AQ-1a:** Prior to commencing construction, the project applicant will be required to submit a Dust Control Plan to the ICAPCD for approval. The Dust Control Plan will identify all sources of PM_{10} emissions and associated mitigation measures during the construction and operational phases (see Rule 801 F.2). The applicant shall submit a "Construction Notification Form" to the ICAPCD 10 days prior to the commencement of any earthmoving activity. The Dust Control Plan submitted to the ICAPCD shall meet all applicable requirements for control of fugitive dust emissions, including the following measures designed to achieve the no greater than 20-percent opacity performance standard for dust control and address the following parameters:
>
> - All disturbed areas, including bulk material storage that is not being actively used, shall be effectively stabilized; and visible emissions shall be limited to no greater than 20-percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps or other suitable material, such as vegetative groundcover. Bulk material is defined as earth, rock, silt, sediment, and other organic and/or inorganic material consisting of or containing particulate matter with 5 percent or greater silt content. For modeling purposes, it was assumed that watering would occur twice daily.
> - All on-site unpaved roads segments or areas used for hauling materials shall be effectively stabilized. Visible emissions shall be limited to no greater than

20 percent opacity for dust emissions by restricting vehicle access, paving, application of chemical stabilizers, dust suppressants and/or watering.

- The transport of bulk materials on public roads shall be completely covered, unless 6 inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks shall be cleaned and/or washed at the delivery site after removal of bulk material, prior to using the trucks to haul material on public roadways.

- All track-out or carry-out on paved public roads, which includes bulk materials that adhere to the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto the pavement, shall be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.

- Movement of bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line except where such material or activity is exempted from stabilization by the rules of ICAPCD.

AQ-1b: Each project proponent shall implement all applicable standard measures for construction combustion equipment for the reduction of excess NO_x emissions as contained in the Imperial County CEQA Air Quality Handbook and associated regulations. These measures include:

- Use alternative-fueled or catalyst-equipped diesel construction equipment, including all off-road and portable diesel-powered equipment.

- Minimize idling time, either by shutting equipment off when not in use or reducing the time of idling to five minutes at a maximum.

- Limit the hours of operation of heavy-duty equipment and/or the amount of equipment in use. Replace fossil-fueled equipment with electrically driven equivalents (assuming powered by a portable generator set and are available, cost effective, and capable of performing the task in an effective, timely manner).

- Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing construction activity during the peak hour of vehicular traffic on adjacent roadways.

- Implement activity management (e.g., rescheduling activities to avoid overlap of construction phases, which would reduce short-term impacts).

With implementation of conditions AQ1a and AQ1b required to meet ICAPCD regulatory requirements, construction related impacts would be **less than significant**. No mitigation would be required.

Operational Impacts

Table 5 summarizes emissions associated with operation of the 288-unit affordable housing project. The ICAPCD thresholds for ROG, NO_X, CO, SO_X, PM_{10} or $PM_{2.5}$ would not be exceeded. Therefore, the project's regional air quality impacts (including impacts related to criteria pollutants, sensitive receptors and violations of air quality standards) would be **less than significant**.

Table 5
Estimated Operational Emissions

*Full Build out (**288** units)*	**Estimated Emissions (lbs/day)**					
	ROG	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area	7.9	0.3	23.7	0.01	0.13	0.13
Energy	0.12	1.1	0.4	0.01	0.08	0.08
Mobile	4.5	3.1	26.0	0.4	5.0	1.3
Total Daily Emissions	12.6	4.3	50.2	0.05	5.2	1.5
ICAPCD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Summer emissions shown.

c) The nearest sensitive receptor to the project site are residences located adjacent to and southwest of the site. As shown in Tables 5 and 6, project construction and operation would not exceed ICAPCD pollutant thresholds. Pollutants generated during operation would be negligible. Therefore, impacts would be **less than significant.**

A CO hotspot analysis is performed if an intersection meets one of the following criteria: 1) the intersection is at Level of Service (LOS) D or worse and where the project increases the volume to capacity ratio by 2 percent, or 2) the project decreases LOS at an intersection to D or worse. A CO hotspot is a localized concentration of CO that is above the state or national 1-hour or 8-hour CO ambient air standards. Localized CO "hotspots" can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal AAQS of 35.0 parts per million (ppm) or the state AAQS of 20.0 ppm.

As discussed in the Traffic Impact Analysis (Linscott, Law and Greenspan Engineers, Inc., February 2022), the project would add an additional 1,224 daily trips to cumulative conditions. The traffic analysis shows that with operation of the project in the cumulative condition, none of the intersections studied would be adversely affected. No adverse impact associated with CO hotspots would occur. A **less than significant** impact would occur under this threshold.

Construction-Related Toxic Air Contaminant Impacts. The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk". The California Office of Environmental Health Hazard Assessment (OEHHA) health risk guidance states that a residential receptor should be evaluated based on a 30-year exposure period. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the short-term construction schedule, the proposed project would not result in a long-term (i.e., 30 or 70 year) exposure to a substantial source of toxic air contaminant emissions; and thus, would not be exposed to the related individual cancer risk. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the proposed project.

d) Potential sources of odor during construction activities include equipment exhaust and activities such as paving. The objectionable odors that may be produced during the construction process would occur periodically and end when construction is completed. The project would provide 288 new multifamily residences. The project would not develop new uses such as agricultural processing or manufacturing, that have the potential to generated odor. Operational emissions may be associated with periodic use of landscape equipment; however, these emissions would be short-term and not confined to one specific location. Odors would be **less than significant** per threshold (d).

	Potentially Significant Impact	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
IV. BIOLOGICAL RESOURCES -- Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or	☐	☒	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IV. <u>BIOLOGICAL RESOURCES</u> -- Would the project:				
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?				
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local,	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact

IV. BIOLOGICAL RESOURCES --
Would the project:

regional, or state habitat conservation plan?

The material presented herein is based in part on the Biological Report for the *6th Street and Spear Avenue Apartments,* prepared by Barrett Biological Surveys, Inc., December 2022 (Appendix B).

a) No sensitive plant species with the potential to occur within the project area were identified. One special-status wildlife species, burrowing owl, a federal Bird of Conservation Concern and a California Species of Special Concern, was not observed; however, BUOW could potentially utilize burrows in nearby canal or drain ditch banks adjacent to the project site. Thus, BUOW has a potential to occur within the survey area.

Site Survey Results
A site survey conducted on November 15, 2022, confirmed that the site is disturbed and characterized by ruderal, non-native vegetation that typically has limited ecological value. The entirety of the project site is considered disturbed habitat. Dominant plant species observed include five-hook bassia, goosefoot, quailbush; four wing salt bush and salt cedar. These plant species were located sparsely throughout the site.

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

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

1. Listed, proposed, or candidates for listing under the federal Endangered Species Act (50 Code of Federal Regulations [CFR] 17.11;

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

3. Designated as Species of Special Concern by the CDFW;

4. Designated as Fully Protected by the CDFW (FGC Sections 3511, 4700, 5050, 5515); and,

5. Species that meet the definition of rare or endangered under CEQA (14 CCR Section 15380), including CNPS List Rank 1b and 2.

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

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

Special-Status Wildlife Species
Special-status wildlife species with occurrence records were assessed for the potential to occur within the survey area. One special-status wildlife species, burrowing owl, a federal Bird of Conservation Concern and a California Species of Special Concern, was determined to have a potential to occur within the survey area. Burrowing owl is a small owl typically found in dry open areas with few trees and short grasses such as prairie, pastures, and desert scrublands. This species is also found near human habitation in agricultural areas, vacant lots, and airports and uses uninhabited mammal burrows for roosts and nests. The species could utilize burrows within existing ditches located proximal to the site. Further, bird nesting could occur within vacant lots adjacent to the site. Ground nesting species, such as lesser nighthawk, and killdeer could use the area.

Although no burrowing owl or potential burrows were identified during the field survey, conditions could change by the time project construction activities begin. Additional vegetation could grow onsite if not maintained and provide suitable nesting habitat for ground dwelling/sparse shrub nesting birds. Additionally, soils within the project area could become compacted enough to become suitable for California ground squirrel and other burrowing mammals. Because the species could occur on or proximal to the site, a preconstruction survey is recommended. Mitigation measure **BIO-1 and BIO-2** would reduce potential impacts to special-status wildlife species and/or nesting birds to less than significant.

Mitigation Measure BIO-1: To avoid direct or indirect impacts to BUOW, surveys for this species should be conducted to determine if this species is present within the survey area. If BUOW is present, mitigation will be required. Minimization measures could include preconstruction surveys within 14 days and 24 hours of start of ground breaking activities and worker training.

1. If occupied burrows are found on site, the burrows shall be passively relocated by a qualified biologist outside of nesting season and an appropriate number of artificial burrows shall be installed. If possible, these burrows shall be installed as close as possible to the passively relocated burrows

2. If not in the active construction areas, the occupied burrows can be sheltered in place with appropriate materials

3. If occupied burrows are sheltered, a biological monitor shall monitor areas of active construction This biologist will ensure that the project complies with these mitigation measures and will have the authority to halt activities if they are not in compliance. The biologist will inspect the construction areas periodically for the presence of BUOWs.

4. If work is stopped for longer than 14 days, area will be resurveyed prior to restart of construction.

Mitigation Measure BIO-2: If construction is scheduled to begin during nesting season (February-August), a survey for nesting birds should be performed within 3-5 days of groundbreaking activities. Depending on the species found, appropriate buffer zones will be established by a qualified biologist. Buffer zones will be established for active nests and these nests will be monitored by qualified biologist until young have fledged. If work is stopped for longer than 7 days during nesting bird season, area will be resurveyed prior to restart of construction. It is recommended that construction foremen and workers and onsite employees be given worker training by a qualified biologist regarding nesting birds that would include
the following:

- Description of birds covered under MBTA and likely to be found on project site;
- Biology;
- Regulations (CDFW/USFWS); and
- Notification procedures if bird (dead, alive, injured) is found on or near site.

A sign in should be obtained and the training materials and sign in sheet should be submitted to appropriate agency. A biologist should be consulted immediately if a dead or injured bird is found on site.

The project would have the potential to have a substantial adverse effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. With implementation of mitigation measure **BIO-1 and BIO-2**, impacts would be reduced to less than significant.

b and c) No wetlands, non-wetland jurisdictional waters or riparian corridors occur on-site. Thus, project implementation would not result in the loss of jurisdictional waters of the state and waters of the United States. No impact to federally protected wetlands would occur.

d) Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. It is possible for a habitat corridor to be adequate for one species yet still inadequate for others. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space can provide a buffer against both human disturbance and natural fluctuations in resources.

The project site has not been identified as occurring in a wildlife corridor or linkage. The proposed project will be confined to existing areas that have been heavily disturbed and are isolated from regional wildlife corridors and linkages. In addition, there are no useful patches of steppingstone habitat (natural areas) within or connecting the site to a recognized wildlife corridor or linkage. As such, implementation of the proposed project is not expected to impact wildlife movement opportunities.

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

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

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
V. CULTURAL RESOURCES -- would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

The material presented herein is based on the Phase I Cultural Resources Report, prepared for the 6th Street and Spear Avenue Apartments, PaleoWest, November 2022. The report is provided as Appendix C.

a) The site is vacant and has historically been used for agricultural purposes. No historic resources occur on-site; thus, **no impact** would occur under this threshold.

b) On September 26, 2022, PaleoWest staff conducted a cultural resource records search of the California Historical Resources Information System (CHRIS) at the South Coastal Information Center (SCIC), San Diego State University. The purpose of the records search was to identify all previous cultural resource work and previously recorded cultural resources within a 0.5-mi radius of the APE (APE). The CHRIS search included a review of the NRHP, CRHR, the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. The records search also included a review of available historical USGS topographic maps and General Land Office (GLO) plat maps. The SCIC records search identified 13 cultural resources studies that were conducted within a 0.5-mi radius of the APE. No resources have been documented within or adjacent to the APE.

PaleoWest requested a review of the Native American Heritage Commission's (NAHC) Sacred Lands File (SLF) on November 3, 2022. In anticipation of the results from the SLF, PaleoWest sent letters to a list of contacts, based on prior projects in the immediate area, on November 3, 2022. As of November 16, 2022, nine responses had been received from contacts. A summary of the Native American outreach is provided in Appendix B of Appendix C.

The Quechan Historic Preservation Office responded by email on November 3, 2022. The email stated that the tribe did not wish to provide PaleoWest with comments on this Project.

Ray Teran of the Viejas Band of Kumeyaay Indians responded via email on November 3, 2022. Mr. Teran stated that he has reviewed the proposed Project and determined that the Project site has cultural significance or ties to Viejas. He noted that cultural resources have been located within or adjacent to the APE. Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities and requested that the tribe be informed of any inadvertent discovery of cultural artifacts, cremation sites, or human remains.

Justin Brundin, Cultural Resources Manager of Cocopah Indian Reservation, responded via phone on November 16, 2022. He stated that the tribe does not have any comments about this Project as it is located in a farm field.

A receptionist in the tribal office of the Iipay Nation of Santa Ysabel replied via phone on November 16, 2022. She stated that Chairperson Paipa usually returns any comment she has on a Project in an email. She advised that if PaleoWest did not receive a response then the tribe probably does not have any comments.

Lisa Contreras, Vice Chairperson of the Inaja-Cosmit Tribal Band, replied via phone on November 16, 2022. She stated that the tribe had no questions, comments, or concerns due to the Project's geographical location in relation to tribal lands.

Lisa Cumper, Tribal Historic Preservation Officer of the Jamul Indian Village, responded via email on November 16, 2022. She noted that a review of the tribe's records indicates that had no information to provide.

Carmen Lucas of the Kwaaymii Laguna Band of Mission Indians replied via phone on November 16, 2022. She stated a well-qualified tribal monitor should be present during construction.

A receptionist in the tribal office of Chairperson Parada of the La Posta Band of Diegueno Mission Indians responded via phone on November 16, 2022. He stated he would send Chairperson Parada a message about the email we sent. If PaleoWest did not receive a reply from Chairperson Parada, then we may conclude that the tribe has no comments about this Project.

On November 16, 2022, a receptionist in the tribal office of Chairperson Theresa Hernandez of the Mesa Grande Band of Diegueno Mission Indians noted that Chairperson Hernandez had been informed about PaleoWest's outreach efforts. The receptionist noted that the Chairperson would respond with any questions or comments directly. PaleoWest has received no comments from Chairperson Hernandez.

As of November 16, 2022, PaleoWest had not received any additional responses to the Native American scoping letters or email.

PaleoWest conducted a pedestrian survey of the APE on November 8, 2022. The site was surveyed using transects spaced 5–10 m apart and generally oriented in a north-south direction. The entire 12-acre area of the APE was surveyed. All exposed ground surface was examined for artifacts (e.g., flaked stone tools and tool-manufacture debris, ground stone tools, ceramic sherds, fire-altered rock), ecofacts (marine shell, bone), soil discoloration that could indicate the presence of a cultural midden, soil depressions, and features indicative of the former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations) or historic period debris (e.g., metal, glass, ceramic sherds, cut bone). Ground disturbances, such as burrows, were visually inspected. Results of the survey indicate that the APE consists of fallowed agricultural fields with no noted development. Visibility was generally excellent (80-90%), though small portions of the ground surface were obscured by shrubs and modern refuse. In addition to evidence of discing and plowing from past agricultural use, other noted disturbances include concentrations of modern trash, construction debris, and a homeless encampment. No prehistoric or historic cultural resources were identified in the APE.

Because there is a lack of available freshwater sources in the vicinity and there are no known prehistoric archaeological sites in the immediate area, the sensitivity of the APE for containing intact buried prehistoric archaeological resources is considered low. Furthermore, an examination of historic topographic maps and aerial images indicates that the APE has largely been used for agricultural purposes. Based on the lack of intensive development of the APE during the historic period, the potential to encounter buried historic period archaeological resources during Project construction is relatively low. However, because it is unknown whether previously undiscovered cultural resources occur below the ground surface, potential impacts associated with the unanticipated discovery of archaeological resources would be **less than significant** with implementation of Mitigation Measure CUL-1.

> **CUL-1:** If cultural resources are encountered during Project related activities, work in the immediate area must halt and the Project Archaeologist should be contacted immediately to evaluate the find. If the discovery proves to be significant for listing on the California Register of Historical Resources and/or the National Register of Historic Places, additional work such as data recovery excavations may be warranted to mitigate any impacts.

c) There is always the possibility that ground-disturbing activities during construction may uncover previously unknown buried human remains. If human remains are discovered during any phase of construction, including disarticulated or cremated remains, all ground-disturbing activities must cease within 100 feet of the remains and the County Coroner and the Lead Agency (City of El Centro) must be immediately notified.

California State Health and Safety Code §7050.5 dictates that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant

to CEQA regulations and Public Resources Code (PRC) §5097.98. If the County Coroner determines that the remains are Native American, the NAHC shall be notified within 24 hours and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project contractor shall implement approved mitigation measure(s), to be verified by the Lead Agency, prior to resuming ground-disturbing activities within 100 feet of where the remains were discovered. The proposed project grading impact to unanticipated discovery of human remains would be **less than significant** with implementation of Mitigation Measure CUL-2**.**

> **CUL-2:** If human remains are found during ground disturbing activities, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the county coroner must be notified immediately. If the human remains are determined to be prehistoric, the coroner will notify the Native American Heritage Commission, which will determine and notify a Most Likely Descendant. The Most Likely Descendant shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VI. ENERGY – would the project:				
a) Result in potentially significant adverse impact due to wasteful, inefficient, consumption of energy resources during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

a) During construction, the project would temporarily consume energy for the operation of construction equipment and vehicles. Standard methods of earth moving, excavations, building construction, and paving are planned. Construction activities do not include methods of construction which would result in inefficient or unnecessary use of energy resources. For operational energy use, the project would be required to meet CCR Title 24 building energy and

CALGreen green standards. Energy-efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for space or water heating) results in greenhouse gases (GHG) emissions. The Title 24 standards are updated approximately every three years to allow consideration and possible incorporation of new energy efficiency technologies and methods.

The 2019 Title 24 standards went into effect on January 1, 2020. The standards are divided into three basic sets. First, there is a basic set of mandatory requirements that apply to all buildings. Second, there is a set of performance standards—the energy budgets—that vary by climate zone (of which there are 16 in California) and building type; thus, the standards are tailored to local conditions. Finally, the third set constitutes an alternative to the performance standards, which is a set of prescriptive packages that are basically a recipe or a checklist compliance approach.

CALGreen (CCR Title 24, Part 11) is a code with mandatory requirements for all nonresidential buildings (including industrial and commercial buildings) for which no other state agency has authority to adopt green building standards. The current 2019 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings went into effect on January 1, 2020. The 2022 Update was approved in September 2022 and became effective January 1, 2023. CALGreen is intended to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction. CALGreen contains requirements for storm water control during construction; construction waste reduction; indoor water use reduction; material selection; natural resource conservation; site irrigation conservation; and more.

Compliance with state Title 24 and CALGreen standards would ensure the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. No further Project-specific mitigation measures would be required. Implementation of the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resource that may have a significant impact on the environment. Impacts would be **less than significant** and no mitigation would be required.

b) Several levels of government have implemented regulatory programs in response to reducing GHG emissions, which consequently serve to increase energy efficiency statewide. Multiple state agencies, including CARB, California Energy Commission, California Public Utilities Commission, CalRecycle, California Department of Transportation (Caltrans), and the Department of Water Resources have developed regulatory and incentive programs that promote energy efficiency. Many of the measures are generally beyond the ability of any future development to implement and are implemented by utility providers or manufacturers.

The project does not conflict with any state or local plans for renewable energy efficiency. The project would employ standard methods of construction and does not propose to create a

project condition post-construction whereby a greater energy, relative to projects of a similar scope would occur. The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **No impact** would result from the project under this threshold.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial	☐	☐	☒	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – would the project:				
direct or indirect risks to life or property?				
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Information provided in this section was obtained in part from the Preliminary Geotechnical Investigation, prepared by Landmark Consultants, February 2022) and provided herein as Appendix D.

a (i) There are no known faults traversing the project site or in the vicinity of the project site or in the City of El Centro (City of El Centro 2004). The project site is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault (Landmark, 2022). The nearest zoned fault is the Superstition Hills fault located approximately 4.6 miles northwest of the project site and the Imperial fault located approximately 5.4 miles northeast of the project site.

However, like much of Southern California, the project site is located in a seismically active area. The City of El Centro requires proper development engineering and building construction of proposed development and enforces these requirements through the development and environmental review process. Adherence to the California Building Code (CBC), as adopted in the City of El Centro Municipal Code, with regard to construction of the project development would ensure that impacts relative to rupture of a known earthquake fault remain **less than significant.**

a (ii) The Imperial Valley, which includes the project site, is susceptible to seismic ground shaking. The valley is considered likely to be subjected to moderate to strong ground motion

from earthquake events in the larger region (Landmark Consultants, 2022). The Imperial Fault is located approximately 5 miles to the east of the City of El Centro (City of El Centro 2004), while the Imperial, Brawley, and Superstition Hills Faults are also subject to the potential for strong seismic ground shaking in the project vicinity. There is no Alquist-Priolo Earthquake Fault Zone on the site; thus, the likelihood of a ground rupture is remote (Landmark Consultants 2022).

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

a (iii) Liquefaction typically occurs within the upper 30 feet of the surface, when saturated, loose, fine- to medium-grained soils (sand and silt) are present. Earthquake shaking suddenly increases pressure in the water that fills the pores between soil grains, causing the soil to lose strength and behave as a liquid. When liquefaction occurs, the strength of the soil decreases, reducing the ability of the underlying soil to support foundations for buildings and other structures.

Groundwater in the site vicinity has been historically encountered at approximately 8 to 10 feet below ground surface (bgs) (Landmark Consultants 2022). However, groundwater levels may fluctuate with precipitation, irrigation of adjacent lands, drainage, and site grading. Because of the depth of the liquefiable layer, the 13-foot thick, non-liquefiable clay layer will likely act as a bridge over the liquefiable layer resulting in a fairly uniform ground surface settlement. Therefore, wide area subsidence of the soil overburden would be the expected effect of liquefaction rather than bearing capacity failure of the proposed structures. Impacts related to liquefaction would be **less than significant.**

a (iv) The topography of the City of El Centro is generally flat. Therefore, landslides are not considered to represent a major safety hazard (City of El Centro 2004). The topography of the project site and surrounding vicinity is relatively flat. Landslide hazards are unlikely due to the regional planar topography. No ancient landslides are shown on geologic maps, aerial photographs and topographic maps of the region and no indications of landslides were observed during the geotechnical site investigation. Impacts related to landslides would be **less than significant.**

b) Soil erosion is most prevalent in unconsolidated alluvium and surficial soils and in areas that have slopes. Erosive soils are generally found in areas of steep slope where runoff velocity is greater and vegetative cover is low. According to the US Department of Agriculture's Natural Resources Conservation Service Web Soil Survey website, surficial deposits at the project site consist predominantly of silty clay loams overlying fine sands of the Imperial soil group. These

loams are formed in sediment and alluvium of mixed origin including the Colorado River overflows and fresh-water lake-bed sediments). Grading and trenching during project construction would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. In addition, the project would increase impervious surface areas on-site, which would potentially contribute to increased stormwater runoff.

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

c) Land subsidence is defined as the sinking or settling of land to a lower level. Causes can include: (1) earth movements; (2) lowering of ground water level; (3) removal of underlying supporting materials by mining or solution of solids, either artificially or from natural causes; (4) compaction caused by wetting (hydro-compaction); (5) oxidation of organic matter in soils; or (6) added load on the land surface. Lateral spreading is a phenomenon in which large blocks of intact, non-liquefied soil move down slope on a liquefied soil layer. Lateral spreading is often a regional event. For lateral spreading to occur, the liquefiable soil zone must be unconstrained laterally and free to move along sloping ground.

The project site is generally flat and does not have slopes that may be subject to the potential for lateral spread. Further, the project would comply with the most recent CBC, Uniform Mechanical Code, Uniform Fire Code, and National Electric Code, as adopted by the City of El Centro, which contain structural requirements for existing and new buildings designed to ensure structural integrity during seismic events and to prevent injury, loss of life, and substantial property damage due to liquefaction. Conformance with applicable regulations and remediation recommendations would ensure that project impacts relative to land subsidence are **less than significant.**

d) Expansive soils are those that undergo volume changes as moisture content fluctuates, swelling substantially when wet or shrinking when dry. Soil expansion can damage structures by cracking foundations, causing settlement, and distorting structural elements. In general, much of the near surface soils in the Imperial Valley consist of silty clays and clays which are moderate to highly expansive (Landmark Consultants 2022).

The subsurface soils consist of stiff silty clays to a depth of 18 to 20 feet below ground surface. Medium dense to dense silty sands with minor interbeds of silt and clay extend from 20 feet to

50 feet, the maximum depth of exploration. The native surface clays likely exhibit moderate to high swell potential. The clay is expansive when wetted and can shrink with moisture loss (drying). Further, the Geotechnical Report provides measures that can be implemented to minimize potential impacts associated with expansive soils. These consist of moisture conditioning subgrade soils to a minimum of 5% above optimum moisture (ASTM D1557) within the drying zone of surface soils and the design of foundations that are resistant to shrink/swell forces of silt/clay soil (Landmark, 2022). Conformance with applicable regulations and remediation recommendations would ensure that project impacts relative to expansive soils are **less than significant.**

e) The proposed project would connect to the existing sewer line located along 6th Street. No septic systems would be installed. **No impact** would occur under this threshold.

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

Though the Lake Cahuilla bed deposits, on which the project rests, are known to contain fossils, finds typically occur at depths greater than several meters. Project excavation would not extend more than 10 feet below ground surface; thus, fossils are unlikely to be encountered during project construction. In addition, the site has been previously disturbed and the on-site soil types (clays) are considered to have a low potential to yield significant paleontological resources. For these reasons, the project is not anticipated to adversely affect any unknown unique paleontological resource or geologic feature. Impacts would be **less than significant.**

	Potentially Significant Impact	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
VIII. <u>GREENHOUSE GAS EMISSIONS-</u> Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The material presented herein is based on the *Air Quality and Greenhouse Gas Study for the 6th Street and Spear Avenue Apartments,* prepared by Birdseye Planning Group, November 2022. The report is provided as Appendix A.

a) The determination of impact significance is governed by State CEQA Guidelines Section 15064.4, entitled "Determining the Significance of Impacts from Greenhouse Gas Emissions." State CEQA Guidelines Section 15064.4(a) states, "[t]he determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to … [use a quantitative model or qualitative model]". In turn, State CEQA Guidelines Section 15064.4(b) clarifies that a lead agency should consider "Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project." Therefore, consistent with State CEQA Guidelines Section 15064.4, the GHG analysis for the proposed Project relies upon a threshold based on the exercise of careful judgement and believed to be appropriate in the context of this particular project.

To date, neither the ICAPCD nor the City of El Centro have adopted GHG significance thresholds applicable to potential development projects. As stated in Section 15064.7(c) of the CEQA Guidelines, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the lead agency's decision is supported by substantial evidence. Thus, in the absence of any GHG emissions significance thresholds, the projected emissions are compared to the South Coast Air Quality Management (SCAQMD) numeric threshold of 3,000 metric tons of CO2e (carbon dioxide equivalent) annually. This threshold is also appropriate as the SCAQMD GHG thresholds were formulated based on similar geography and climate patterns as found in Imperial County and are used for determining the significance of GHG emissions in the Riverside County portion of the Salton Sea Air Basin, the air basin where the project is located.

Therefore, the 3,000 metric ton of CO2e threshold is appropriate for analysis of the proposed project. The project was also evaluated for consistency with regulations or requirements adopted by the 2017 CARB Climate Change Scoping Plan. GHG emission were modeled using CalEEMod 2020.4.0, the statewide land use emissions computer model designed to estimate air and GHG emissions associated with both construction and operations from land development projects. Refer to Appendix A for details regarding the methodology used to estimate GHG emissions generated by the project.

Construction activities would generate greenhouse gas (GHG) emissions associated with equipment operation. The project-related construction emissions would be generated over a two-year construction phase extending from early 2024 through mid-2025. Site preparation and grading typically generate the greatest emission quantities because the use of heavy equipment is greatest during this phase of construction. Emissions associated with the construction period

were estimated based on the projected maximum amount of equipment that would be used onsite at one time. Air districts such as the SCAQMD have recommended amortizing construction-related emissions over a 30-year period to calculate annual emissions. Construction of the project would generate approximately 925 metric tons of GHG emissions during construction. Amortized over 30 years, the project would generate 31 metric tons as shown in Table 6 below.

Table 6
Combined Annual Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Construction	31 metric tons
Operational	
Energy	328 metric tons
Solid Waste	67 metric tons
Water	58 metric tons
Mobile	672 metric tons
Total	**1,156 metric tons**

See Appendix A for CalEEMod software program output

The combined annual emissions would total approximately 1,156 metric tons per year. As discussed, individual projects that would generate less than the 3,000 annual MT screening threshold would have a less than significant environmental impact under CEQA. The project would not exceed the 3,000 MT annual standard; thus, GHG emissions would be **less than significant**.

b) There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is AB 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. SB 32 would require further reductions of 40 percent below 1990 levels by 2030. Because the Project's operational year is post-2020, the Project is being designed to reach the quantitative goals set by SB 32. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the Low Carbon Fuel Standard, and regulations requiring an increasing fraction of electricity to be generated from renewable sources, are being implemented at the statewide level; as such, compliance at the Project level is not addressed. The proposed project would not conflict with statewide plans and regulations. The following summarizes project consistency with Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy and the 2017 CARB scoping plan.

Connect SoCal 2020-2045 RTP/SCS Consistency. On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy), and the addendum to the Connect

SoCal Program Environmental Impact Report. Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern California residents within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura.

Further, *Connect SoCal* is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG emission reduction goals and federal CAA requirements. The project would utilize the existing street network and extend a segment of Spears Avenue to provide primary access to the project site. The project would not conflict with plans to integrate the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The project does not involve any improvements to the regional transportation system. The project would be consistent with or would not conflict with any of the goals identified in Connect SoCal.

SB 32/2017 Scoping Plan Consistency. The 2017 Scoping Plan Update reflects the statewide 2030 target of a 40% reduction in GHG emissions below 1990 levels, set by EP B-30-15 and codified by SB 32. Table 7 summarizes the Project's consistency with applicable action elements of the 2017 Scoping Plan.

Table 7
2017 Scoping Plan Consistency Summary

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	California Public Utility Commission (CPUC), California Energy Commission (CEC) and California Air Resources Board (CARB)	**No Conflict**. The Project would use energy from the Imperial Irrigation District (IID). IID has met or exceed the renewable portfolio standard of 33% by 2020. The Project would not interfere with or obstruct IID's energy source diversification efforts.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		**No Conflict.** The Project would be constructed in compliance with current CBC requirements including the 2019 Building and Energy Efficiency Standards and the 2022 California Green Building Standard requirements.

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plugin hybrid light-duty EVs by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, Office of Planning and Research (OPR), Local Agencies	**No Conflict.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2025 targets. As this is a CARB enforced standard, vehicles that access the Project must comply with the standards as applicable; and thus, would comply with the strategy.
At least 4.2 million zero emission and plugin hybrid light-duty EVs by 2030.		**No Conflict.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2030 targets.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, Office of Planning and Research (OPR), Local Agencies	**No Conflict.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.
Medium- and Heavy-Duty GHG Phase 2.		**No Conflict.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
		implement Medium- and Heavy-Duty GHG Phase 2.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NOX standard.		**Not Applicable.** This measure is not related to the project scope.
Last Mile Delivery: New regulation that would result in the use of low NOX or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		**No Conflict.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve last mile delivery emissions.
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		**No Conflict.** As stated in Section XVII of this Initial Study, the project would be 100% affordable; and thus, VMT would be less than significant.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	**No Conflict.** The project would exceed SCAQMD GHG emission standards for residential sources; however, it would implement all applicable CAP goals and action

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
		items to reduce GHG emissions. The project would not conflict with GHG reduction efforts.
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GOBiz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	**No Conflict.** The project would not conflict with use of adjacent streets by pedestrians or bicycles. Further, transit service provided by Imperial Valley Transit.
By 2019, develop pricing policies to support low-GHG transportation (e.g., low emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, California Transportation Commission (CTC), OPR, SGC, CARB	**Not Applicable.** This measure is not related to the project scope.
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, California Natural Resource Agency (CNRA), CARB, Caltrans, CEC, GO-Biz	**No Conflict.** This measure would apply to all trucks accessing the project site. It is presumed that these vehicles would be comprised of delivery vans operated as part of the statewide goods movement sector.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near zero emission freight vehicles and equipment powered by renewable energy by 2030.		**Not applicable.** This measure is unrelated to the project scope.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	**No Conflict.** When adopted, this measure would apply to all fuel purchased for use in vehicles accessing the project site. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, California Department of Food and Agriculture (CDFA), California State Water Resource Control Board (SWRCB), Local Air Districts	**No Conflict.** The Project would be required to comply with this measure and reduce any Project-source SLPS emissions accordingly. The Project would not obstruct or interfere with agency efforts to reduce SLPS emissions.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	**No Conflict.** The Project would be required to comply with applicable Cap-and-Trade Program provisions. The Project would not obstruct or interfere agency efforts to implement the post-2020 Cap-and-Trade Program.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink:		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	**Not applicable**. The Project site is not an identified property that needs to be conserved.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.		**Not applicable**. The entire site is planned for development.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.		**No Conflict.** To the extent appropriate for the proposed commercial buildings, wood products would be used in construction, including roof structure. Additionally, the Project includes landscaping using native species.
Establish scenario projections to serve as the foundation for the Implementation Plan.		**Not applicable.** This measure is unrelated to the project scope.
Implement Forest Carbon Plan.	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	**Not applicable.** This measure is unrelated to the project scope.

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	**Not applicable.** This measure is unrelated to the project scope.

As discussed, the project would not exceed 3,000 MT of annual CO2e emissions and it would be consistent with Connect SoCal RTP/SCS and the 2017 CARB scoping plan goals intended to reduce overall regional GHG emissions. The project will not impede or delay local or statewide initiatives to reduce GHG emissions. Impacts would be **less than significant**.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS - Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous material 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?	☐	☐	☐	☒
e) For a project located within an airport	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS - Would the project:				
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?				
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

Material in this section is based in part on the *Phase I Environmental Site Assessment* prepared by Weis Environmental, Inc., (November 2021) and provided herein for reference as Appendix E.

a) The proposed project would be comprised of a new 288-unit affordable housing apartment complex with related improvements. Construction would involve the transport of fuels, lubricants, and various other liquids needed for operation of construction equipment at the site via service trucks. Materials hazardous to humans, wildlife, and sensitive environments would be present during construction of the proposed project. These materials include fuels, equipment fluids, cleaning solutions and solvents, and lubricants.

The routine transport, use, and disposal of hazardous materials can result in potential hazards to the public through accidental release. Such hazards are typically associated with certain types of land uses, such as chemical manufacturing facilities, industrial processes, waste disposal, and storage and distribution facilities. None of these uses are proposed by the project; rather, the project would provide 288 multi-family residential units and associated amenities. Thus, the project would not create a hazard to the public or to the environment through the routine transport of hazardous materials. Impacts would be **less than significant.**

b) Project construction activities would result in the transport, use, and disposal of hazardous materials such as gasoline fuels, asphalt, lubricants, paint, and solvents. Project construction

activities would occur in accordance with all applicable local standards adopted by the City of El Centro, as well as state and federal health and safety requirements intended to minimize hazardous materials risk to the public, such as Cal/OSHA requirements, the Hazardous Waste Control Act, the California Accidental Release Protection Program, and the California Health and Safety Code. The contractor would be required to implement such regulations relative to the transport, handling, and disposal of any hazardous materials, including the use of standard construction controls and safety procedures that would avoid or minimize the potential for accidental release of such substances into the environment.

The project proposes multi-family residential uses, passive and active recreational uses, sewer/water connections, and access/circulation improvements typical of residential development. Once the project is operational, hazardous material use associated with the residences, recreational uses, landscaping, and maintenance would be limited to private use of commercially available cleaning products, landscaping pesticides and fertilizers, and use of various other commercially available substances. Thus, the project is not anticipated to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be **less than significant.**

c) No schools are located within one-quarter mile of the project site. The closest school is Desert Garden Elementary School located approximately ½ mile north of the site. **No impact** would occur under this threshold.

d) There is no visible evidence that uses or activities that could have caused or contributed to a release of hazardous chemicals or materials on the property occur or have occurred on the site. The site is not on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. This is confirmed in the Phase I Environmental Site Assessment (Weis Environmental, Inc., November 2021). **No impact** would occur under this threshold.

e) The Project site is located approximately 6.0 miles southeast of the El Centro Naval Air Station and 3.2 miles south of Imperial County Airport. The project site is not located within the Airport Influence Area for either airport as depicted in Figures 3E and 3G of the Imperial County Airport Land Use Compatibility Plan (September 2004). **No impact** would occur under this threshold.

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

threats addressed by the plan include major earthquakes, hazardous materials incidents, flooding, transportation, civil unrest, and threats to national security.

The extension of Spears Avenue required to provide adequate access to the site would be subject to City of El Centro review for the potential to interfere with emergency evacuation routes to ensure that access and circulation are maintained during the construction and operational phases. Additionally, the project would be subject to site plan review by City of El Centro emergency services personnel to ensure that it would not result in components that potentially interfere with an emergency response plan or an emergency evacuation plan. As a result, the project's impacts would be **less than significant** under this threshold.

g) The project site is located in a developed urbanized area generally supporting residential and commercial development. According to CalFire's Hazard Severity Zone Map, the project site is not located in a zone designated as Very High Fire Hazard Severity (VHFHSZ) (CalFire 2022). Similarly, adjacent lands are not identified as being in a VHFHSZ. Therefore, the project area is not considered to be at high risk for wildfire events or the damage and public safety risks associated with such occurrences.

Similar to existing conditions, the project would be served by the City of El Centro Fire Department. The nearest fire station is located at 900 South Dogwood Avenue, approximately 1.5 miles northeast of the site. Existing fire protection services are adequate to serve the project as proposed with applicant payment of the required development impact fees; no new facilities or personnel would be required as the direct result of project implementation. Therefore, it is not anticipated that the project would expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires. Impacts would be **less than significant**.

	Potentially Significant Impact	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
IX. <u>HYDROLOGY AND WATER QUALITY</u> – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that project may impede sustainable groundwater management of the	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY – Would the project:				
basin?				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surveys, in a manner which would:				
(i) result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
(ii) substantially increase the rate or amount of surface water runoff which would result in flooding on- or off-site?	☐	☐	☐	☒
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
(iv) Otherwise impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami or seiche risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

a) The majority of stormwater discharges are considered nonpoint sources and are regulated by an NPDES Municipal General Permit or Construction General Permit. The Colorado River RWQCB administers the NPDES stormwater permitting program for construction activities for the project area. Construction activities disturbing one acre or more of land are subject to the

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

The Construction General Permit requires the preparation and implementation of a water quality management plan (WQMP) and a stormwater pollution prevention plan (SWPPP), both of which must be prepared before construction can begin. The water quality management plan outlines the project site design, source control, and treatment control of BMPs utilized throughout the life of the project. The SWPPP outlines all activities to prevent stormwater contamination, control sedimentation and erosion, and comply with Clean Water Act requirements during construction.

Implementation of the SWPPP starts with the construction phase and continues through to project completion. The SWPPP would identify site-specific construction BMPs to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater runoff from the project area. Compliance with the SWPPP and state and local regulations, the ensure the project does not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Development of the proposed Project would add impervious surfaces to the site through rooftops, parking, loading areas, and drive aisles. By increasing the impervious surfaces on the site, less water would percolate into the ground and more surface runoff would be generated. Paved areas and streets would collect dust, soil and other impurities that would then assimilate into surface runoff during rainfall events. As stated, the proposed Project incorporates site design, source controls and treatment control BMPs to address storm water runoff that would be stipulated in the WQMP. Thus, through the BMPs combined with compliance with existing regulations such as the implementation of the WQMP, the proposed Project would not violate water quality standards or waste discharge requirements. Therefore, impacts would be **less than significant** under this threshold.

b) The City of El Centro does not use groundwater for potable water as it is too brackish for human consumption and agricultural uses. Water service for the project would be supplied from the City's public water supply system rather than from groundwater, which would not result in a net deficit of water in the aquifer. Therefore, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that

the project may impede sustainable groundwater management of the basin. **No impact** would occur under this threshold.

c-(i) The project would not alter the course of a stream or river because such features are not present on or proximal to the site. The project would increase runoff; however, flows would be conveyed to the on-site basin proposed for construction on the west side of the property. The detention basin has been designed to adequately accommodate stormwater runoff resulting from build out of the project site. **No impact** would occur under this threshold.

c-(ii) As stated, all runoff would be directed to the on-site stormwater basin; thus, no runoff would leave the site. The FEMA Flood Map Service Center designates the site as Zone X which indicates it is not in a flood plain or special flood hazard area (Map 06025C1725C, September 26, 2008). Thus, **no impacts** related to flooding are anticipated.

c-iii) As stated, the project would construct a stormwater detention basin designed to accommodate on-site flows at buildout. No off-site release is anticipated; thus, the project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. **No impact** would occur under this threshold.

c-iv) As stated, the project site is not located within a special flood hazard area or proximal to a river or stream. The project would not impede or otherwise redirect flood flows. **No impact** would occur under this threshold.

d) As stated, the project site is located in Zone X as illustrated on FEMA map panel 06025C1725C; and thus, is outside the FEMA-mapped 100-year floodplain. Tsunamis are a type of earthquake-induced flooding that is produced by large-scale sudden disturbances of the sea floor. Tsunamis interact with the shallow sea floor topography upon approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The site is located approximately 93 miles east of the Pacific Ocean. Therefore, the site is not located in a tsunami inundation area and inundation due to tsunami would not occur.

A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. Based on the distance between the site and large, open bodies of water, including the Pacific Ocean, inundation of the site due to a seiche or tsunami event is not anticipated. **No impact** would occur this threshold.

e) This section summarizes project consistency with the *Water Quality Control Plan for the Colorado River Basin – Region 7* (Updated October 8, 2008). There is no management plan for the Imperial Valley Groundwater Basin. The majority of all potable water in the Imperial Valley is obtained from the Colorado River.

The *Water Quality Control Plan for the Colorado River Basin – Region 7* (Plan) is intended to provide definitive guidelines and give direction to the full scope of Regional Board activities that optimize the beneficial uses of the state waters within the Colorado River Basin Region of California by preserving and protecting the quality of these waters. The Plan lists and defines the various beneficial water uses, describes the water quality which must be maintained to support such uses and describes the programs, projects and other actions which are necessary to achieve the standards established in the Plan. Further, the Plan summarizes the various plans and policies which protect water quality and describes water quality issues which require special attention. Finally, the Plan describes activities within the Colorado River Basin Region which are related to surveillance, monitoring, assessment, lab support, quality assurance and quality control.

As discussed herein, the project would not cause or contribute to the release of polluted stormwater runoff or generate other discharges that could adversely impact water quality within the Colorado River Basin. All runoff would be retained on-site and treated prior to percolation into the soil. The project would not conflict with water quality goals provided in the Water Quality Control Plan for the Colorado River Basin. **No impact** would occur under this threshold.

	Potentially Significant Impact	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
XI. <u>LAND USE AND PLANNING</u> -- Would the proposal:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

a) The project site is zoned Tourist Commercial. With approval of the proposed zone change, the project site would be zoned High-Medium Density Residential (R-3). The project improvements would occur on an infill site with adjacent commercial uses to the north and east, vacant land to the south and commercial/multifamily residential to the west. The extension of Spears Avenue along the southern site boundary would result in a new roadway; however, the extension would occur within a planning right of way. The project would not include improvements that would divide an established community. **No impact** would occur under this threshold.

b) The project as proposed would require a General Plan Amendment to change the existing General Plan land use designation from Tourist Commercial to High Density Residential. The project would also rezone the property from Tourist Commercial to R-3 Multiple Family Residential. Although City approvals would be required to allow for the project as proposed, with such approvals, the project would not conflict with a land use plan, policy, or regulation applicable to the project site relative to land use and zoning.

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

The project site is not located within the boundaries of an Airport Land Use Compatibility Plan; thus, no consistency evaluation is provided herein.

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

Based on the above conditions, the project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **No impact** would occur under this threshold.

	Potentially Significant Impact	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
XII. <u>MINERAL RESOURCES</u> -- Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a, b) The California Department of Conservation (CDC) classifies the availability of mineral resources in a region into four mineral resource zone (MRZ) categories: MRZ 1 for no mineral resources, MRZ 2 for significant resources areas with the quality and quantity known, MRZ 3 for significant resource areas with the quality and quantity unknown, and MRZ 4 for areas with no information. The City of El Centro is generally built out with urban uses that are typically incompatible with surface mining and mineral extraction activities. Further, the General Plan does not provide for mining activity to occur (City of El Centro 2004). No mineral resources that would be of value to the region or to residents of the state have been identified on the project site (DOC 2018b).

Further, the project site is not delineated as a locally important mineral resource recovery site. Therefore, the project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. **No impacts** to mineral resources would occur under these thresholds.

	Potentially Significant Impact	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
XIII. <u>NOISE</u> – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or 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?	☐	☐	☐	☒

Material provided in this section was obtained in part from the 6th Street and Spear Avenue Apartments *Noise Impact Study,* prepared by Veneklasen and Associates, Inc., January 2023 (Appendix F).

Noise levels (or volume) are generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Sound pressure level is measured on a logarithmic scale with the 0 dB level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dB, and a sound that is 10 dB less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dB greater than the reference sound to be judged as twice as loud. In general, a 3 dB change in community noise levels is noticeable, while 1-2 dB changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while those along arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

In addition to the instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (L_{eq}). The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, L_{eq} is summed over a one-hour period.

The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the daytime. Two commonly used noise metrics – the Day-Night average level (L_{dn}) and the Community Noise Equivalent Level (CNEL) recognize this fact by weighting hourly L_{eq} over a 24-hour period. The L_{dn} is a 24-hour average noise level that adds 10 dB to actual nighttime (10:00 PM to 7:00 AM) noise levels to account for the greater sensitivity to noise during that time period. The CNEL is identical to the L_{dn}, except it also adds a 5-dB penalty for noise occurring during the evening (7:00 PM to 10:00 PM).

Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called ground borne noise. Ground borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors. Ground-borne vibration related to human annoyance is generally related to velocity levels expressed in vibration decibels (VdB). However, construction-related groundborne vibration in relation to its potential for building damage can also be measured in inches per second (in/sec) peak particle

velocity (PPV) (Federal Transit Administration, April 2018). Based on the FTA's *Transit Noise and Vibration Impact Assessment* and the California Department of Transportation's *Transportation-Related Earthborne Vibration, Technical Advisory* (September 2013) vibration levels decrease by 6 VdB with every doubling of distance.

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Residences, hospitals, schools, guest lodging, libraries, and parks are most sensitive to noise intrusion; and therefore, have more stringent noise exposure standards than commercial or industrial uses that are not subject to impacts such as sleep disturbance. Sensitive land uses generally should not be subjected to noise levels that would be considered intrusive in character. Therefore, the location, hours of operation, type of use, and extent of development warrant close analysis to ensure that noise sensitive receptors are not substantially affected by noise.

City of El Centro Noise Standards

Construction Noise. According to City of El Centro Municipal Code Section 17.1-8 Construction Equipment, except for emergency work, it shall be unlawful for any person to operate construction equipment at any construction site, except as outlined in subsections (a) and (b) below:

(a) It shall be unlawful for any person to operate construction equipment at any construction site on Sundays, and days appointed by the president, governor, or the city council for a public holiday. Notwithstanding the above, a person may operate construction equipment on the above specified days between the hours of 10 a.m. and 5 p.m. in compliance with the requirements of subsection (b) of this section at his residence or for the purpose of constructing a residence for himself, provided such operation of construction equipment is not carried on for profit or livelihood. In addition, it shall be unlawful for any person to operate construction equipment at any construction site on Mondays through Saturdays except between the hours of 6 a.m. and 7 p.m.

(b) No such equipment, or combination of equipment regardless of age or date of acquisition, shall be operated so as to cause noise at a level in excess of seventy-five (75) decibels for more than eight (8) hours during any twenty-four (24) hour period when measured at or within the property lines of any property which is developed and used either in part or in whole for residential purposes.

In the event that lower noise limit standards are established for construction equipment pursuant to state or federal law, said lower limits shall be used as a basis for revising and amending the noise level limits specified in subsection (b) above.

Operation Noise. The City of El Centro General Plan Noise Element establishes noise/land use compatibility criteria. The city uses land use compatibility standards when planning and marking development decisions to ensure that noise producers do not adversely affect sensitive

receptors. Residential uses are identified as "normally acceptable" between 50 dBA and 60 dBA CNEL, "conditionally acceptable" between 60 to 70 dBA CNEL and "normally unacceptable" between 70 to 75 dBA CNEL unless noise reduction and installation are incorporated into project design.

City of El Centro Municipal Code Section 17.1-4 establishes noise standards for various types of land use. The standards are shown in Table 8 and represent the maximum acceptable noise levels and are used to determine potential noise impact.

Vibration. The City of El Centro does not establish criteria for maximum vibration thresholds. The Federal Transit Administration (FTA) has published guidelines for assessing the impacts of groundborne vibration associated with construction activities. The FTA measure of the threshold of architectural damage for non-engineered timber and mason buildings (e.g., residential units) is 0.2 in/sec peak particle velocity (PPV). The threshold of perception of vibration is 0.01 in/sec PPV (Federal Transit Administration, Noise and Vibration Manual, September 2018).

Table 8
City of El Centro Noise Standards

Zone	Time of Day	One Hour Average
Single-family Residential	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	50 dBA 45 dBA
Multifamily Residential	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	55 dBA 50 dBA
Commercial Civic and Limited Use	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	60 dBA 55 dBA
Manufacturing	7:00 a.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	75 dBA 70 dBA

Note 1: Zones which exists on the abutting or nearby property at whose boundary the measurement is taken

The PPV thresholds are converted to decibels of vibration (VdB) for the purpose quantifying potential environmental impact. The FTA uses a threshold of 72 VdB for residences and buildings where people normally sleep (i.e., hotels and rest homes). A threshold of 75 VdB is used for institutional land uses where activities occur primarily during the daytime (i.e., churches and schools). The threshold used for the proposed project is 72 VdB (Federal Transit Administration, Noise and Vibration Manual, September 2018).

There are no state standards for traffic-related vibrations. California Department of Transportation's (Caltrans) position is that highway traffic and construction vibrations generally pose no threat to buildings or structures. For continuous (or steady-state) vibrations, however, Caltrans considers the architectural damage risk level to be between 0.2 and 2.0 inches/second PPV (California Department of Transportation, *Transportation and Construction Vibration Guidance Manual, September 2013).*

a) **Construction Noise**. Temporary, construction-related noise would occur during construction

of the proposed project. The noise levels associated with the operation of common construction equipment are shown in Table 9. The noise levels are provided for reference purposes; not all equipment shown would be used for the proposed project. Noise levels are expected to occur within the ranges shown.

Table 9
Typical Maximum Construction Equipment Noise Levels

Equipment Onsite	Typical Maximum Level (dBA) 25 Feet from the Source	Typical Maximum Level (dBA) 50 Feet from the Source	Typical Maximum Level (dBA) 100 Feet from the Source
Air Compressor	84	79	73
Backhoe	84	79	73
Bobcat Tractor	84	79	73
Concrete Mixer	85	78	72
Bulldozer	88	82	76
Jack Hammer	95	89	83
Pavement Roller	86	80	74
Street Sweeper	88	82	76
Man Lift	81	75	69
Dump Truck	82	76	70

Source: Noise levels based on FHWA Roadway Construction Noise Model (2006) Users Guide Table 1.
Noise levels based on actual maximum measured noise levels at 50 feet (Lmax).
Noise levels assume a noise attenuation rate of 6 dBA per doubling of distance.

As stated, per the City of El Centro Municipal Code Section 17.1-8 Construction Equipment, except for emergency work, no construction equipment, or combination of equipment regardless of age or date of acquisition, shall be operated so as to cause noise at a level in excess of seventy-five (75) decibels for more than eight (8) hours during any twenty-four (24) hour period when measured at or within the property lines of any property which is developed and used either in part or in whole for residential purposes. Table 10 shows the predicted noise levels at all receivers. Receiving properties are defined as follows:

R1 – Multifamily Residence – 2602 Thomas Drive
R2 – Mira Flores Luxury Apartments – Spears Avenue
R3 – Single-family residence – 621 Virginia Lane
R4 – Single-family residences – 2802 South 4th Street
R5 – Imperial County Child Support Services Building – 2695 South 4th Street
R6 – America's Best Value Inn – 455 Wake Avenue

Table 10
Projected Construction Noise Levels at Nearest Receivers

Construction Phase	Existing Measured Noise Levels at Project Site	Construction Noise Levels at Receiving Property Boundaries					
		R1	R2	R3	R4	R5	R6
Demolition	53-59 dBA	56	57	54	56	57	63
Site Preparation		64	66	63	65	67	71
Grading		64	65	63	65	66	71
Building Construction		61	62	59	61	63	68
Architectural Coating		--	--	--	--	--	--
Paving		71	73	70	72	73	78

Source: Veneklasen Associates, January 2023

Receiver 6 as referenced in Table 10, is a motel located adjacent to and north of the site. While the Leq at the location is projected to exceed 75 dBA, noise levels will vary throughout the day and noise will not exceed 75 dBA continuously over an 8-hour period. As shown in Table 10, construction noise levels at the adjacent residential receivers, Receivers 1-4, would not exceed the 75 dBA threshold. Thus, construction noise would be **less than significant.**

Operational Noise

Exterior. Traffic is the primary noise source that would be generated by the proposed project. Existing measured noise levels are with the compatible or conditionally compatible range referenced above. Noise levels in this area are dominated by traffic on Wake Avenue and 4th Street. Measured noise levels on-site range between 53 dBA and 59 dBA. The adjacent roadway network (Wake Avenue and 4th Street) was modeled to estimate project related traffic noise impacts. The model calculates traffic noise at receiver locations based on traffic volumes, travel speed, mix of vehicle types operating on the roadways (i.e., cars/trucks, medium trucks and heavy trucks) and related factors. The 15-minute counts were multiplied by four to obtain hourly traffic counts. Modeled noise levels along Wake Avenue and 4th Street segments are 58 dBA CNEL and 62 dBA CNEL, respectively under existing conditions. Thus, whether a traffic-related noise impact would occur is based on whether project traffic, when added to the existing traffic, would cause the Leq to noticeably increase (+3 dBA) from baseline conditions. Traffic volumes used for the impact analysis were obtained from the Traffic Impact Analysis (Linscott, Law and Greenspan, Transportation Engineers, Inc., February 2022).

The project is estimated to generate approximately 1,214 daily trips and 110 p.m. peak hour trips. The peak hour trips were distributed within the modeled road network as were cumulative trips on Wake Avenue and 4th Street. With the addition of project trips, the CNEL would increase by 0.1 dBA. This would be an imperceptible increase; thus, exterior traffic noise impacts would be **less than significant.**

Heating, Ventilation and Air Conditioning. The project will include outdoor mechanical equipment, such as split-system outdoor condensing units. Based on published sound power data for units consistent with those to be installed on-site, the noise level will be less than 50

dBA at a distance of 30 feet from the equipment screened behind parapets. The residences surrounding the property are one and two-story single or multi-family homes. The nearest residence is approximately 500 feet away. The predicted mechanical equipment noise level at the nearest residential receiver, would be approximately 41 dBA. This is below the measured on-site noise level of 58 dBA. Noise from the HVAC system would not be audible above ambient conditions.

Interior Traffic Noise. California Energy Code Title 24 standards specify construction methods and materials that result in energy efficient structures and up to a 30 dBA reduction in exterior noise levels (assuming windows are closed). This includes operation of mechanical ventilation (e.g. heating and air conditioning), in combination with standard building construction that includes dual-glazed windows with a minimum Sound Transmission Class (STC) rating of 26 or higher. When windows are open, the insertion loss drops to about 10 dBA.

As stated above, City of El Centro Municipal Code Section 17.1-4 limits noise levels at single-family properties to 45-dBA 10:00 p.m. to 7:00 a.m. It is assumed that this is an interior standard. It is unknown whether the existing residences were constructed consistent with current Title 24 standards and the interior decibel reduction may be less than the 30-dBA referenced above. However, noise levels with operation of the project would not exceed the compatibility criteria as stated. Regardless of the insertion loss associated with the building structures, interior noise levels at neighboring residences would not be adversely affected by project related traffic. Further, assuming an exterior noise level of 62 dBA CNEL for units facing Wake Avenue, the interior noise levels, assuming a 25 dBA insertion loss would be 37 dBA and less than the 45 dBA standard.

b) Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas noise is simply carried through the air. Thus, vibration is generally felt rather than heard. Some vibration effects can be caused by noise; e.g., the rattling of windows from truck pass-bys. This phenomenon is caused by the coupling of the acoustic energy at frequencies that are close to the resonant frequency of the material being vibrated. Typically, groundborne vibration generated by manmade activities attenuates rapidly as vibration rapidly diminishes in amplitude with distance from the source. In the U.S., the ground motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB).

The vibration velocity level threshold of perception for humans is approximately 65 VdB (i.e., vibration velocity of 0.01 inches per second). A vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. If a roadway is smooth, the groundborne vibration from traffic is barely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings. There were no activities observed in the area that generate perceptible groundborne vibration.

Construction activity on the project site would be temporary and any vibration would not persist for long periods. Assuming vibration levels would be simlar to those associated with a large bulldozer, typical groundborne vibration levels could range from 87 VdB at 25 feet, 81 VdB at 50 feet, and 75 VdB at 100 feet, based on the Federal Transit Administration's (FTA's) *Transit Noise and Vibration Impact Assessment* (September 2018) as shown in Table 11.

Construction activities that typically generate substantial groundborne vibration include deep excavation and pile driving. Based on the proposed scope of improvements, this type of construction activity would not occur on the project site. General construction associated with the project would be confined to the project site and surrounding road corridors and consist of grading, excavations for building footings and installation of subsurface infrastructure. It would be temporary in duration. The closest residences are within 500 feet of the site. Based on reference data provided Table 11, and assuming a 6 dBA attenuation for each doubling distance between the source and receiver, vibration would attenuate to approximately 73 VdB at 200 feet assuming a large bulldozer is the heaviest piece of equipment used during grading or site clearing. This would be less than the 75 VdB criteria referenced above.

As discussed, 100 VdB is the threshold where minor damage can occur in fragile buildings. There are no fragile buildings located in proximity to the construction site. Further, vibration levels would be under the threshold associated with structural damage. Thus, structural damage is not expected to occur as a result of construction activities associated with the proposed project. Impacts would be **less than significant**.

Table 11
Vibration Source Levels for Construction Equipment

Equipment	Approximate VdB				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	91	85	83	82	79
Loaded Trucks	90	84	82	81	78
Jackhammer	94	88	86	85	82
Loader	86	80	78	77	74

Source: FTA, 2018

c) The Project site is located approximately 6.0 miles southeast of the El Centro Naval Air Station and 3.2 miles south of Imperial County Airport. The project site is not located within two miles of an airport or within the Airport Influence Area for either airport as depicted in Figures 3E and 3G of the Imperial County Airport Land Use Compatibility Plan (September 2004). While noise from overflights or distant aircraft operation may be audible at the project site, airport operations would not cause an adverse noise impact. **No impact** would occur under this threshold.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIV. <u>POPULATION AND HOUSING</u> — Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) The project as proposed would require a General Plan Amendment to change the existing General Plan land use designation from Tourist Commercial to High-Medium Residential and the zoning from Tourist-Commercial to on a portion of the site from Commercial-Tourist to High Density Residential. The project would also rezone a portion of the property from Tourist Commercial to R3-Multiple Family Residential. The project as proposed would develop multi-family (apartment) uses similar to that which have been constructed adjacent to and southwest of the site along the west side of South 6th Street. With implementation, the project would provide new housing within an area of the City of El Centro where planned development is ongoing.

The project would develop 288 multi-family residential units, ranging from one to three bedrooms. The Southern California Association of Governments population projections for the City of El Centro show that in 2016 the population was 45,500 residents. The population projections for 2045 show the population will increase to 55,800. The U.S. Census population projections for El Centro were 44,158 people in 2021. The proposed project would house approximately 930 residents (Birdseye Planning Group, 2022 – Appendix A). Assuming these are new residents to the City of El Centro, project residents would be within SCAGs 2045 projections. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf

The project proposes the extension of Spears Avenue to provide primary access to the site. This is a planned improvement and would occur within City of El Centro right of way. Additionally, all infrastructure (water, sewer, stormwater, electricity) is already present in the project vicinity

and serves adjacent properties under existing conditions. The project would not require new infrastructure to areas where such facilities are not available. Thus, the project would not induce substantial unplanned population growth in the area, either directly or indirectly. Impacts would be **less than significant**.

b) The project site is vacant. Project implementation would not result in the removal of any housing. No residents would be displaced nor would removal of housing require the construction of replacement housing elsewhere. **No impact** would occur under this threshold.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐

i) The project would be served by the El Centro Fire Department (ECFD). The ECFD provides emergency and disaster response to mitigate fire, emergency medical, hazardous materials, and other incidents within its boundaries as well as to other jurisdictions via a mutual aid agreement. Fire Station No. 1 is nearest to the project site, located approximately 1.5 miles to the northeast at 900 Dogwood Road. The EFCD maintains a staffing standard providing that 10 sworn and uniformed personnel are available to respond to calls at any given time throughout the day or night (City of El Centro 2016). There is currently no standard that dictates the total number of personnel on staff relative to City population. The ECFD has adopted standards for

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

Although the project would not substantially alter the ECFD's ability to provide fire protection services to the project site, constructing new residences would increase the demand on ECFD services, personnel, and equipment, adding new demand for emergency and nonemergency service responses. The applicant would be required to pay development impact fees in proportion to the development proposed to help fund fire protection services in the City. Additionally, the ECFD operates and shall continue to operate under mutual aid agreements with other agencies as-needed for assistance and backup (City of El Centro 2016). With the payment of development impact fees, the project would not result in a substantial adverse physical impact associated with the provision fire protection service ratios, response times, or other performance objectives. Impacts would be **less than significant**.

ii) Police protection services for the project site would be provided by the El Centro Police Department (ECPD). The ECPD is headquartered at 150 N. 11th Street, approximately two miles north of the project site. The project as proposed would present an increase in demand on ECPD personnel and resources due to the increased intensity of use on the site with development of 180 new multi-family units. A greater number of homes and residents in the project area would be a potential source of additional calls for police protection services. The City's General Plan Public Facilities Element identifies the goal of maintaining a staffing goal of 1.75 sworn officers per 1,000 City residents (City of El Centro 2004). In addition, the ECPD staffing goal is to have a minimum of five police personnel on duty, including four responding officers and one supervising sergeant or officer-in-charge at any given period throughout the day and night (City of El Centro 2016).

The ECPD does not maintain response time goals. However, the department tracks and reviews response times annually to determine the adequacy of its service and any possible improvements to methods that would reduce response time (City of El Centro 2016). To compensate for an increase in law enforcement costs resulting from increased service demand generated by the project, the developer would be required to pay development impact fees. With the payment of development impact fees, the project would not result in a substantial adverse physical impact associated with providing law enforcement service ratios, response times, or other performance objectives. Impacts would be **less than significant**.

iii) The El Centro Elementary School District, the McCabe Union School District, and the Central Union High School District provide public school services within the City of El Centro. Two charter schools are also located in the City of El Centro and are operated by the El Centro Elementary School District (City of El Centro 2016). School-age students residing in the proposed multifamily units would enroll in El Centro Elementary School District for grades kindergarten through 8th grade and Central Union High School District for grades 9 to 12.

Schools in the City are generally constructed for a school year enrollment of 600 students. The three school districts have their own student yield rates (average number of students per dwelling unit) that range from 0.21 to 0.66 students per dwelling unit (City of El Centro 2016). According to the Office of Public School Construction, the state yield is 0.69 students per dwelling unit. To standardize the student yield rate, the City's Service Area Plan utilizes the state rate of 0.69 students per dwelling unit. For planning purposes, projects that proposed 870 or more new units would be required to incorporate a school on-site or to identify a potential school site within the City limits. The 288 multi-family units proposed with the project would yield an estimated 199 students (at 0.69 students/dwelling unit) and would not trigger the need for a new school facility.

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

iv) The project would construct 288 multi-family units (estimated 930 residents) that would place additional demand on existing park facilities. The City General Plan Public Facilities Element identifies the goal of providing 3 acres of public parkland per 1,000 residents (City of El Centro 2004). Therefore, the project would result in demand for an additional 3 acres of parkland (City of El Centro 2016). According to the General Plan, the City operates at a deficit of parkland within its jurisdiction. In addition to parkland required to meet current demands, future growth of the City of El Centro would continue to require acquisition of additional parkland to meet its performance standard at anticipated buildout of the General Plan.

The project would provide recreational amenities on-site; however, the City of El Centro would require the project applicant to pay a fair-share park impact fee in lieu of the dedication of parkland in conformance with Section 24, Article V of the City of El Centro Code of Ordinances. With the payment of development impact fees, the proposed project would not result in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities to maintain acceptable park service ratios or other performance objectives. Impacts would be **less than significant.**

v) The nearest City library to the subject site is the City of El Centro Public Library, approximately three miles north of the site at 1140 N. Imperial Avenue. The Imperial County Local Agency Formation Commission requires that the library facilities section of the City's Service Area Plan maintain a performance standard measured in demand for square feet. The performance standard for the City is a range of 300 to 600 square feet of library facility space per 1,000 residents (0.30 to 0.50 square feet of library facility space per capita) (City of El Centro 2016).

Project residents may increase demand for library facilities. As the project is expected to generate 970 new residents, the project would create demand for an additional 291 to 582 square feet of library space. The City would require the project applicant pay development impact fees to ensure that library service remain adequate to serve the City's population over the long term. With the payment of development impact fees, the project would not result in a substantial adverse physical impact to maintain acceptable performance objectives. Impacts would be **less than significant.**

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

a) As stated, the project is anticipated to generate 970 residents. It is anticipated that a portion of project occupants currently reside in the City of El Centro and common open space provided on-site would meet the City's requirement of 150 square feet of common space per residential unit for the proposed R3-Multiple Family Residential zone. Each phase would have a community building, sport court, barbeque/picnic area, turf area and tot lot. The project is not expected to substantially increase demands on existing area neighborhood or regional parks or other recreational facilities or contribute to a substantial deterioration of such facilities as a result. Impacts would be **less than significant**.

b) As stated, the project proposes a variety of active and passive recreational amenities on-site that would be available for use by residents of the development and meet City requirements for common space. The potential physical effects that could result from construction of these facilities are discussed herein as part of the overall project development. It is not anticipated that the project would directly require the construction or expansion of off-site recreational facilities that may have an adverse physical effect on the environment. Therefore, impacts would be **less than significant.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVII. <u>TRANSPORTATION</u> -- Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

The information provided in this section is summarized from the Traffic Impact Assessment prepared for the 6th Street and Spear Avenue Apartments by Linscott, Law and Greenspan, Inc., November 2022; (Appendix G).

a) The follow addresses pedestrian, bicycle and transit conditions in the study area:

Sidewalks. Continuous sidewalks are provided in the Project vicinity as follows:

- Along both sides of 4th Street (SR-86), north of Wake Avenue, and on the east side of 4th Street (SR-86), south of Wake Avenue.
- Along both curbs of Wake Avenue between 8th Street (Clark Avenue) and 6th Street; east of 4th Street (SR 86); and on the north side of Wake Avenue, between 6th Street and 4th Street (SR- 86).
- Along the west curb of 8th Street.
- Along both curbs of Thomas Drive.
- Along the west curb of 6th Street.
- Along both curbs of 4th Street (SR 86) north of Wake Avenue and along the east curb of 4th Street (SR 86) south of Wake Avenue.

It is recommended that the Project provide the following missing sidewalks in the Project vicinity:

1. Construct Spears Avenue along the Project frontage east of 6th Street and provide curb, gutter and sidewalks

2. Construct curb, gutter and sidewalk, along the east curb of 6th Street between Spears Avenue and Wake Avenue, along the Project frontage.

To provide potential connectivity between the project site and 4th Street, it would be beneficial to provide sidewalk along the missing section of Wake Avenue between 6th Street and 4th Street.

Bicycle. There are no other bicycle facilities provided along the remaining street segments within the study area, nor are any proposed.

Transit. Imperial Valley Transit (IVT) operates within the study area. A description of the transit services within the Project vicinity are as follows:

Blue Line – El Centro
The Imperial Valley Transit (IVT) Blue line begins at State Street / 7th Street and ends at State Street / 7th Street. There are 17 stops along this route. It operates on the weekdays from approximately 6 AM to 6:30 PM. Services are at 140-minute frequency.

Stops at the above route are located along 4th Street (SR-86), Wake Avenue, and Danenberg Drive. The nearest bus stop at the project site is on Wake Avenue, east of 4th Street (SR-86).

Route 1S
The IVT Route 1S begins at State Street / 7th Street, El Centro and ends at Hacienda Drive / Ollie Avenue, Calexico. There are 13 stops along this route. It operates on the weekdays from approximately 6 AM to 11 PM. Saturday service operates from approximately 7 AM to 7 PM. Sunday service operates from approximately 8:30 AM to 5 PM. Services are at 30 to 60-minute frequency.

Stops at the above route are located along 4th Street (SR-86). The nearest bus stop at the project site is on 4th Street (SR-86), north of Wake Avenue.

Route 1N
The IVT Route 1S begins at Hacienda Drive / Ollie Avenue, Calexico and ends at State Street / 7th Street, El Centro. There are 25 stops along this route. It operates on the weekdays from approximately 6 AM to 11:30 PM. Saturday service operates from approximately 7 AM to 8:30 PM. Sunday service operates from approximately 7 AM to 5 PM. Services are at 30 to 60-minute

frequency. Stops at the above route are located along 4th Street (SR-86). The nearest bus stop at the project site is on 4th Street (SR-86), south of Wake Avenue.
The project would improve pedestrian sidewalk connectivity in the area. It would no effect on bicycle lanes or transit services. Therefore, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. **No impact** would occur under this threshold.

b) Senate Bill 743 (SB 743) was approved in 2013 and revised the method for assessing transportation impacts under CEQA. The Office of Planning and Research (OPR) has recommended the use of vehicle miles travelled (VMT) as the required metric to replace the automobile delay-based Level of Service (LOS). The VMT assessment is required to satisfy CEQA guidelines that utilize VMT as the required metric to determine transportation impacts.

As a service to professional planners, land use officials, and CEQA practitioners, OPR published a Technical Advisory as part of a series of advisories in December 2018. In the section on "Screening Thresholds for Land Use Projects", some projects are screened out from requiring a VMT analysis based on several criteria. The following Screening Criterion applies to the subject project.

- The Presumption of Less Than Significant Impact for Affordable Residential Development

Adding affordable housing to infill locations generally improves jobs-housing match, in turn shortening commutes and reducing VMT. Further, "… low-wage workers in particular would be more likely to choose a residential location close to their workplace, if one is available." In areas where existing jobs-housing match is closer to optimal, low-income housing nevertheless generates less VMT than market-rate housing. Therefore, a project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less-than-significant impact on VMT. Evidence supports a presumption of less than significant impact for a 100 percent affordable residential development (or the residential component of a mixed-use development) in infill locations. Lead agencies may develop their own presumption of less than significant impact for residential projects (or residential portions of mixed-use projects) containing a particular amount of affordable housing, based on local circumstances and evidence. Furthermore, a project which includes any affordable residential units may factor the effect of the affordability on VMT into the assessment of VMT generated by those units. Because the project is 100 percent affordable, it would have a **less than significant** impact on transportation.

c) The project design does not propose any features that would construct or modify local roads that would potentially increase hazards. The project would require the extension of Spears Avenue east from the intersection with 6th Street along the site frontage. Primary site access would be provided from an extension of Spears Avenue. A secondary EVA would be constructed at the northeast corner of the site. No new roadway design or features (i.e., sharp curves, dangerous intersections, or other hazardous features) would be required that could

result in transportation-related hazards or safety concerns. Additionally, on-site structures would be set back from adjacent roadways as required by the City's Zoning Code to ensure that views at the driveways are uninhibited.

No uses that would involve the use of farm equipment or heavy machinery post-construction are proposed. Therefore, the project would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts related to the project's design features would be **less than significant**.

d) A significant impact would occur if the design of the proposed Project would not satisfy emergency access requirements of the ECFD or in any other way threaten the ability of emergency vehicles to access and serve the Project site or adjacent uses. The proposed Project would not result in inadequate emergency access. As discussed above, access to the site will be provided an EVA from 6th Street at the northwest corner. Spears Avenue would be primary site access roadway. The driveways would be of standard size to accommodate passenger cars and delivery trucks. All access features are subject to the City of El Centro design requirements, including the Fire Department's requirement of a minimum 20-foot width for driveways. Because of this, emergency vehicles would be able to access the Project site. Impacts associated with this issue would be **less than significant**.

	Potentially Significant Impact	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
XVIII. TRIBAL CULTURAL RESOURCES -- Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in the Public Resource Code section 21074 as either a site, feature, place cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historic Places, or in a local register of historical resources as defined in Public Resource	☐	☒	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES -- Would the project:				
Code section 5020.1(k), or				
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

a-b) California State AB 52 (Chapter 532, Statutes of 2014) establishes a formal consultation process for California Native American tribes as part of CEQA and equates significant impacts on tribal cultural resources with significant environmental impacts (California Public Resources Code Section 21084.2). The project site is currently undeveloped. As discussed in Section 5, Cultural Resources, the site does not support any listed or eligible historical or cultural resources, as defined by Public Resources Code Section 5020.1(k). A cultural resources inventory was conducted for the project by PaleWest, LLC (November 2022). PaleoWest requested a records search for the property at the South Coastal Information Center of the California Historical Resources Information System at San Diego State University. No previously recorded resources were identified within the project area. In addition, PaleoWest contacted the California Native American Heritage Commission (NAHC) to request a search of the Sacred Lands File for the area of potential effect (APE). The search was negative and no Native American cultural resources were identified within the project area. Additionally, the entire project area was field surveyed on November 8, 2022. No cultural or tribal cultural resources were identified as a result of the field survey.

Pursuant to AB 52, the City initiated consultation with culturally affiliated tribes by sending initial notification letters on (October 12, 2022). While no specific tribal cultural resources that could be impacted by the project have been identified, mitigation measure **CUL-1** would be implemented to reduce potential impacts to Tribal Cultural Resources including human

remains, to less than significant. Pending the outcome of consultation, these mitigation measures may be revised or additional mitigation may be included.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS -- Would the project:				
a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) 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?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

a) According to the City's Service Area Plan (2016), the City purchases its untreated water from the Imperial Irrigation District (IID), which is conveyed to City facilities from the Colorado River via the IID's canal system. City facilities are developed and maintained by the Department of Public Works. The average daily demand on the City's water system is approximately 8.6 million gallons (mgd) and the maximum daily demand is approximately 13.8 mgd. The existing storage and conveyance capacity of 21 mgd is sufficient for existing daily water demand and peak flow requirements through the planning horizon year 2025 and can be expanded in 21 mgd increments to provide the maximum daily demand of 42 mgd and ultimately 63 mgd (City of El Centro 2016).

The system also has adequate capacity to accommodate anticipated near-term development. The City of El Centro continues to make periodic improvements to modernize the facilities and materials over time. Any expansions would be considered when the maximum daily demand approaches 21 mgd (City of El Centro 2016).

The project would connect to the existing water supply system. The existing water line would be adequate to serve the project site and no upgrades to or expansion of existing facilities would be required to serve the project as proposed. Additionally, according to the City's Service Area Plan (2016), capacity of the City's wastewater treatment plant (WWTP) is 8.0 mgd. Current generation from City wastewater customers averages approximately 3.4 mgd, and existing peak flow is approximately 6 mgd. The WWTP consistently meets Secondary Treatment Standards and has adequate capacity to handle existing flows. The facility operates at approximately 50 percent capacity (City of El Centro 2016). It is anticipated that the WWTP and delivery system would meet demand of growth through 2026, as well as that future expansion would be required when the monthly flow reaches 6.4 mgd, or 80 percent of the plant's capacity of the 8.0 mgd. Planned improvements to expand the WWTP and delivery system were considered during the 2016 update of the City's Sewer Master Plan. It is anticipated that provision of wastewater collection to the ultimate service area will require additional treatment capacity and extension of the wastewater collection and transmission system. The proposed project would connect to an existing sewer line located in Wake Avenue or other location proximal to the site. No expansion of or upgrades to existing facilities would be required to adequately serve the proposed residential uses.

In general, the City of El Centro drains in a northeasterly direction and is tributary to the Salton Sea. The City reviews specific drainage needs on a project-by-project basis. Stormwater from the project site would be routed to a new detention basin constructed on the project site. Any overflow would discharge into the City's storm drain; however, no upgrades to the City's storm drain system would be required to accommodate stormwater runoff from the subject site with project implementation.

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

or upgrades to these utility systems are required to serve the project site. Therefore, the project would not require or result in the relocation or reconstruction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be **less than significant**.

b) The project site is currently undeveloped; and therefore, project-related development would increase demand for City water services. The City of El Centro would provide water services to the project site through connections to an existing line in Wake Avenue or proximal to the site. As stated above, the existing storage and conveyance capacity of the City's water storage system of 21 mgd is sufficient for the daily water demand and peak flow requirements through the planning horizon year 2025 and can be expanded as needed to serve future development (City of El Centro 2016).

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

The project consists of 288 residential units, which are estimated to house a population of approximately 930 residents (3.22 persons per household (CalEEMod version 2020.4.0). Daily per capita water demand for the City of El Centro is estimated at 194 gallons per day (IID 2021). Therefore, the project would generate additional demand for an estimated 180,420 gpd over existing conditions. Based on the service capacity of the City's existing and planned water systems, it is anticipated that existing and future water supplies would be adequate to serve the proposed development. Water demand anticipated with the proposed project. Impacts would be **less than significant.**

c) Refer to Response 19(a), above. The project would result in construction of 288 multi-family units. It is anticipated that the City's water treatment plant is adequate to accommodate future planned growth through the year 2026. Additional improvements are anticipated by the City to expand the WWTP as needed to ensure that adequate capacity is maintained. Therefore, the project would not result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Impacts would be **less than significant**.

d) Construction waste is commonly comprised of concrete, metals, wood, landscape and typical domestic material. The California Integrated Waste Management Act (CIWMA) of 1989 mandates that all cities and counties in California reduce solid waste disposed at landfills generated within their jurisdictions by 50% and has a long-term compliance goal of 75% by 2020 per AB 341.

Construction Demolition Waste (CDW) associated with the proposed project will be recycled to the extent practicable with the remainder sent to a landfill.

Solid waste services including collection, transportation, recycling and disposal of solid waste, recyclable and compostable materials, is provided by CR&R Incorporated. CR&R disposes of collected solid waste at the Imperial Allied Waste Landfill, a privately-owned landfill, located at 104 East Robinson Road, within an unincorporated area, east of the City of Imperial. The landfill has a disposal acreage of 162 acres with an annual demand of 2,788 tons annually. The landfill has an expected closure date of December 31, 2040. Assuming a 75% diversion rate as required per AB 341, the project would generate 33.1 tons of solid waste annually or 0.11 percent of the annual demand. Solid waste could be accommodated within the existing CR&R landfill capacity. Impacts would be **less than significant** under this threshold.

e) The applicant and project contractor will comply with all local, state, and federal requirements for integrated waste management (e.g., recycling, green waste) and solid waste disposal as required by the CIWMA of 1989 and AB 341. The City of El Centro will condition the project to provide recycling as required to facilitate recycling of residential waste and related materials (i.e., paper, carboard, cans, bottles). **No impact** would occur under this threshold.

	Potentially Significant Impact	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
XX. WILDFIRE – If located in or near a state responsibility areas or lands classified as very high hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts	☐	☐	☐	☒

to the environment?				
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a) The project would provide a primary access road from the extension of Spears Avenue and an EVA at the northwest corner of site via South 6th Street. These improvements would facilitate emergency access or evacuation out of the project if needed. The site and much of central Imperial County is not located within a Fire Hazard Safety Zone as defined by the California Department of Forestry https://egis.fire.ca.gov/FHSZ/. The site is located within a Local Responsibility Area; thus, fire and emergency services would be provided by the City of El Centro Fire Department. **No impact** would occur under this threshold.

b) The project site is flat and surrounded by residential and commercial uses, public facilities and undeveloped land. With the exception of landscaped areas, the site would be paved and/or covered with impervious surfaces. While unlikely based on topography and surrounding land use, like all of southern California, it is possible that wildfires occurring in the general area could expose residents to pollutant concentrations based on proximity and wind direction.

The site is not located in a Fire Hazard Severity Zone and is with a Local Responsibility Area as stated. Materials used in the construction of the buildings would be consistent with the Uniform Fire Code and are intended to minimize or avoid fire-related impacts. The project would minimize the exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be **less than significant.**

c) The project would require the installation of paved surface and above ground improvements. The site is surrounded by developed and vacant land. No infrastructure would be needed for wildfire control. **No impact** would occur under this threshold.

d) As referenced, the project site is flat. No steep slopes occur nor would they be created as a result of the project. In the unlikely event that a wildfire were to occur, the topography would not result in downstream flooding or landslides resulting from runoff, post-fire slope instability or drainage changes. **No impact** would occur under this threshold.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE —				
a) Does the project have the potential to substantially degrade the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, eliminate a plant or animal community, substantially 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?	☐	☒	☐	☐
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)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) The project would be constructed on a largely undeveloped site. Removal of ruderal vegetation species would be required in some areas prior to construction particularly along the site perimeter. There are no threatened, endangered or sensitive plant or animal species occurring on the site. Implementation of Mitigation Measure BIO-1 would avoid potential impacts to burrowing owls and nesting bird species; Mitigation Measure BIO-2 would avoid significant impacts to nesting birds.

The project site has a low sensitivity to cultural or paleontological resources. Implementation of Mitigation Measure CUL-1 and CUL-2 and TCR mitigation would avoid or minimize potentially significant impacts to previously undiscovered cultural resources. Impacts to biological, cultural resources and paleontological resources would be **less than significant with mitigation incorporated**.

b) As presented in the discussion of environmental checklist Sections I through XX, the project would have no impact, a less than significant impact, or a potentially significant impact unless mitigation is incorporated with respect to all environmental issues. With mitigation measures, potentially significant biological resource, cultural resource and tribal cultural resource impacts would be **less than significant**. Based on the limited scope of direct physical impacts to the environment associated with the proposed project, the impacts are project-specific in nature. Consequently, the project along with other cumulative projects would result in a **less than significant** cumulative impact with respect to all environmental issues with mitigation incorporated.

c) In general, impacts to human beings are associated with air quality, hazards and hazardous materials and noise. As presented in the environmental checklist discussions, temporary and permanent impacts to these topical issues would be less than significant. No significant or adverse impacts related to hazards or hazardous materials were identified. Therefore, the project would have a **less than significant** impact on human beings.

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