

DRAFT

ENVIRONMENTAL IMPACT REPORT
FOR THE CITY OF IMPERIAL
LAND USE AND CIRCULATION UPDATE

Proposed by:



City of Imperial
420 South Imperial Avenue
Imperial, CA. 92251

Certified via Resolution 17-___ on _____, 2017

Prepared by:



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I. INTRODUCTION

Public agencies are charged with the duty to avoid or minimize environmental damage where feasible. An Environmental Impact Report (EIR) is an informational document intended to inform public agencies, decision makers, and the general public of the environmental effects of a proposed project. In accordance with the California Environmental Quality Act (CEQA), this EIR is being prepared to analyze environmental impacts related to the implementation of the City of Imperial's Land Use and Circulation Element. For the purposes of this EIR, the adoption and implementation of the Land Use and Circulation Element are considered "the project." The Project constitutes a comprehensive update of the Land Use Element and respective Land Use Plan for consistency with other recently adopted General Plan Elements, inclusive of the proposed Circulation Element Update. The updates reflect changes in the City's development pattern over the years and will describe how local leadership and stakeholders would like the City to develop through 2035. The update covers the planning period of 2016 to 2035.

Evaluated under this EIR, are the potential indirect and secondary effects that may be expected from the long-term implementation of the Land Use Plan and Circulation Element future development through the implementation and/or enforcement of the adopted goals and policies. This EIR assumes full implementation of the City of Imperial's Land Use and Circulation Element. The purpose of this EIR is to identify modifications or alternatives to the project and to indicate the manner in which significant effects can be mitigated or avoided.

1.1 AUTHORITY TO PREPARE AN ENVIRONMENTAL IMPACT REPORT

Per the California Environmental Quality Act Guidelines, a "project" is defined as "the whole of an action, which has a potential for resulting in either a direct physical change to the environment, or a reasonably foreseeable indirect physical change in the environment. This includes the adoption and amendment of local General Plans or elements (Section 15378). As such, the City of Imperial's Land Use and Circulation Element Update is subject to CEQA.

The City of Imperial will act as the lead agency pursuant to Section 15051 of the State CEQA Guidelines and is responsible for the planning and implementation of the proposed project. This EIR has been prepared in conformance with the requirement of CEQA (Public Resources Code 21000 et seq.), the State CEQA Guidelines (California Code of Regulations, Section 15000 et seq.), and the rules, regulations and procedures for implementation of CEQA as adopted. Questions and comments may be directed to the City Council of the City of Imperial, 420 South Imperial Avenue, Imperial, CA 92251, (760) 355-4371.

As provided by CEQA, an Initial Environmental Study was performed by the City of Imperial Environmental Evaluation Committee (EEC). Based on the findings of the Initial Study/Environmental Checklist that was prepared for this project and approved by the EEC, the City has determined that the preparation of an Environmental Impact Report is the appropriate method by which to obtain compliance with CEQA. The Initial Study/Environmental Checklist Form for this project is included in **Appendix A** of this EIR. Based on that Initial Study/Environmental Checklist Form, agricultural and forestry resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, recreation, and utilities and service systems were anticipated to have a potentially significant impact.

1.2 OTHER AGENCIES WITH AUTHORITY OR PLANS

The Project area encompasses an area of over 7,507 acres, which constitutes the Project's Planning Area. Various local, state and federal agencies exercise control over certain aspects of the Planning Area, also known as the sphere of influence. The City of Imperial will provide environmental information to several other agencies that may be affected by the proposed project or which are likely to have an interest in the project. These agencies include, but are not limited to, the following: the California Department of Transportation (Caltrans), The Imperial Unified School District, The County of Imperial Planning & Development Services, The City of El Centro, The Imperial Irrigation District, and other similar entities. Their interest may be in result of the documented increase in demand for roadways which may impact Caltrans, an increase in households may impact the demand for energy and other utilities, a population increase may impact local School Districts, etc. Key public agencies with a particular interest in areas with jurisdiction or oversight within the project planning area are noted below.

Imperial County

The Imperial County Planning and Development Services provides long-range planning handled by the Land Use Planning Division, Code Enforcement handled by the Building Inspection Division and to be of assistance to the citizens of Imperial County in understanding and carrying out the Regulations of the County and applicable State and Federal Laws as they relate to Land Use and Development. The Imperial County Planning and Development Services division is further charged with the review and implementation of all planning documents, including the Imperial County Land Use and Circulation Elements. The Imperial County General Plan provides policies for the entire County, whereas, the Imperial County Zoning Ordinance regulates land uses. The Imperial County Land Use and Circulation Elements jurisdiction overlap with the Project's Planning Area within the Sphere of Influence and potential annexation areas. Both of these documents were closely examined under the development of the Imperial Land Use Element and Circulation Element.

The Imperial County General Plan was first adopted in 1993, but there have been various amendments to the document since then. For example, the Land Use Element was recently revised in 2008 and other Elements such as the Land Use Element, Parks and Recreation Element, Housing Element, Agricultural Element, and Conservation and Open Space Element were updated in 2008, 2008, 2014, 2015, and 2015 respectively. Imperial County's General Plan has policies that are relevant to the City of Imperial and its land use decisions and that affect land near and adjacent to Imperial. These include policies on balanced communities, small town identity, public services, employment location, park planning, regional connectivity, transportation alternatives, and agricultural preservation.

The Imperial County Zoning Ordinance was adopted by the Imperial County Board of Supervisors in November of 1998 per Ordinance #1203. The Zoning Ordinance regulates the use of land and the general design of structures, and establishes minimum regulations and standards for the development of land within Imperial County. This would include all the area within the Imperial Sphere of Influence. It is a practice however, for local jurisdictions, such as Imperial, to have an input on standards for new development within the City's Sphere of Influence.

Imperial County Local Agency Formation Commission (ICLAFCo)

The Imperial County Local Agency Formation Commission (LAFCo) establishes policies regarding the reorganization and service delivery of cities and special districts, and approves boundary changes proposed by any governmental agency. Land Use decisions affect service demand, and as such any significant changes proposed under the Imperial Land Use Element Update and Circulation Element Update will need to be consistent with the City's Service Area Plan. LAFCo is the responsible agency for reviewing and approving the Service Area Plan. The City of Imperial recently updated its Service Area Plan in 2015 which was approved by IC LAFCo in September, 2015. The update takes into account all the service demands that may result from implementation of the proposed Land Use Element and Circulation Element.

Imperial County Airport Land Use Commission (ICALUC)

The purpose of the Imperial County Airport Land Use Commission is to protect public health, safety, and welfare by ensuring that proposed development in the vicinity of airport properties are compatible with airport activities. The Commission consists of a seven (7) member board with representatives from Air Pollution Control District, Imperial Valley Resource Management Agency, City of Calexico, Imperial County Airport, City of Holtville, and County of Imperial. The Commission is charged with updating and implementing the Imperial County Airport Land Use Compatibility Plan which was last updated in 1996.

The Airport Land Use Compatibility Plan is also used to fulfill their responsibility to ensure the development of land surrounding the Imperial County Airport is compatible with the airport use. The Plan establishes Compatibility Zones for areas surrounding the Airport. Potential impacts, land use consistency, and development restrictions as specified in the Airport Land Use Compatibility Plan, were consulted during the development of the Land Use Element and Circulation Element Update.

Imperial County Air Pollution Control District (ICAPQD)

The City of Imperial is located within the Salton Sea Air Basin (SSAB) and subject to regulations from the US Environmental Protection Agency (EPA), the California Air Resources Board (CARB) and the Imperial County Air Pollution Control District (APCD). The Imperial County Air Pollution Control District serves as the regional agency dealing with air pollution in the Imperial Valley area and has the responsibility for the implementation of the California Clean Air Act. The APCD has a CEQA Air Quality Handbook, adopted in April 2012, which was also taken into consideration during the preparation of this environmental document.

Imperial Irrigation District (IID)

The Imperial Irrigation District has local surface water rights and water supply contracts serving the City of Imperial and the entire project and Planning Area. The IID provides the City of Imperial with Raw Water Supplies for the purpose of treatment and distribution to local residents and businesses. The IID bases water allotment on an approved "Equitable Distribution Plan" which allocates water to municipal users by using the base amount of 2006 usage plus current District-wide average use per capita multiplied by the increase in population since 2006.

The Imperial Irrigation District (IID) also maintains approximately 1,600 miles of irrigation drainage structures for surface water runoff and subsurface drainage from agricultural fields. The

drainage system is intended for agricultural drainage, and as such, the IID restricts the quantity and quality of runoff discharged onto its systems. All stormwater run-off within the City of Imperial's developing areas are ultimately discharged into the IID drainage system.

The Imperial Irrigation District Energy Division also supplies power services to the City of Imperial, the Planning Area and the entire Imperial Valley. The District maintains a number of substations throughout the Imperial Valley, two of which are located within the City of Imperial Planning Area.

Imperial Unified School District

The project site is located within the Imperial Unified School District. There are currently two elementary schools (Ben Hulse Elementary and T.L. Waggoner Elementary), one middle school (Frank Wright Middle School) and one high school (Imperial High School). Determination of sizing coordination and location of schools is critical during the development of the City of Imperial and for consideration under the Land Use Plan. Developable sites are able to provide service demand projections to the local School District. In turn, the School District is able to plan for growth as it is entitled to the payment or satisfaction of a fee, charge, or other required levies imposed pursuant to Government Code §65995-65998 as mitigation of impacts resulting from, but not limited to, the planning, use, or development of real property.

California Department of Transportation (Caltrans)

The California Department of Transportation is responsible for the approval of roadway improvements of state highways, including State Route 111 and 115 which currently traverse the City of Imperial. Additionally, the California Department of Transportation is charged with the review and approval of all development along state highways to ensure traffic flow and levels of service will not be adversely impacted. As new development is planned or proposed along Caltrans Right of Way, access restrictions may apply and must be adhered to, therefore, careful coordination of land use designations with the Department of Transportation during the development and adoption of the Land Use Plan and Circulation Element is important.

California Department of Conservation

The California Department of Conservation along with the California Department of Food and Agriculture (CDFA) is responsible for agricultural preservation. Responsibilities include oversight of contracts under the Williamson Act for agricultural preserves set up by the local jurisdictions. The Planning Area contains agricultural land under production and some of which is under Williamson Act contracts.

California Department of Fish and Game (DFG)

The California Department of Fish and Game is responsible for the protection, conservation, and enhancement of California's wildlife and vegetation resources. This department enforces laws and regulations protecting sensitive biological resources and habitats. The New River, Alamo River and the Salton Sea are areas of potential concern. The New River meanders west of the planning area at a distance of approximately 2 miles and is a tributary of the Salton Sea which is located north of the planning area approximately 16 miles.

Federal Emergency Management Agency (FEMA)

FEMA is an independent agency of the federal government that reports to the President. FEMA was established to reduce loss of life and property and protect our nation's critical infrastructure from all types of hazards through a comprehensive, risk-based, emergency management program of mitigation, preparedness, response and recovery from earthquakes, floods and other types of disasters such as landslides, tornadoes and tsunamis. Although the Planning area is not within a flood plain, the Planning area is subject to earthquake activity as is the entire Imperial Valley.

United States Fish and Wildlife Services (USFWS)

The US Fish and Wildlife Service agency is responsible for conserving and protecting endangered species and their habitat for the benefit of the public at large. This agency acts as the responsible agency for the Federal Endangered Species Act and Migratory Birds Act. The California Department of Fish and Wildlife is responsible for managing and protecting the state's diverse fish, wildlife, plant resources, and native habitats. The California chapter out of the Inland Deserts region is particularly interested in any potential impacts that may be caused to the Burrowing Owl, a Bird of Conservation Concern by the California Department of Fish and Wildlife and known to be present within the proposed annexation areas within the Planning Area.

1.3 PUBLIC REVIEW

The City held community outreach/workshops to guide the planning and future development of the City of Imperial and the surrounding areas. One of the workshops was held at a local farmers market on November 21, 2015. Participants were given an opportunity to prioritize land use and circulation goals and policies. Among the issues discussed at the public workshops were the public's vision of the future for the City, desired land uses in the City, attraction of visitors and businesses to the community and infrastructure needs.

The City of Imperial, in accordance with the requirements of the California Environmental Quality Act, has circulated a Notice of Preparation (NOP) to all interested parties and potential stakeholders via individual letters on **March 27, 2017**. All comments received during the 30-day NOP review period were incorporated and/or considered during the preparation of the Draft EIR. The Draft EIR was further made available for review by individuals, public, and private agencies for 45 days. Copies of the Draft Land Use Element, Circulation Element, and Environmental Impact Report were made available from the City of Imperial, City Hall located at 420 South Imperial Avenue, Imperial, CA 92251. Circulating copies are available at the City Library and City Hall during normal business hours and at The Holt Group, 1601 N. Imperial Avenue, El Centro CA 92243, (760) 337-3883 by appointment. The document is also available on the City's website www.cityofimperial.org/ Responses to comments are to be considered and included as part of the Final EIR, which City Council will review and consider prior to making a decision to approve, revise, or deny the proposed project and certification of the environmental document.

1.4 RESPONSIBLE AGENCIES ACTIONS

The following agencies will be responsible for taking certain actions regarding the adoption of the updated Land Use Element and Circulation Element Update:

- 1) **Imperial County Airport Land Use Commission:** reviews the Draft Elements and makes a determination of consistency with the 1996 adopted Imperial County Airport Land Use Compatibility Plan.

- 2) **City of Imperial Planning Commission:** after holding a public hearing the Commission recommends action to the City Council and concludes the Land Use Element and Circulation Element are consistent with one another and previously adopted Elements of the General Plan. The Commission also considers a resolution to recommend certification of the EIR for the same.
- 3) **City of Imperial City Council** (“lead agency” and “legislative body”) holds a second public hearing, considers certification of the EIR and considers a resolution approving and adopting the Land Use Element and Circulation Element Update.

1.5 ORGANIZATION

This EIR is organized into sections as mandated by CEQA. These sections describe the project and setting, provide analysis based on potential issues, and evaluates other issues including the potential for the project to contribute to cumulative impacts. The various sections are described as follows:

- **Introduction** – Includes the City’s authority as the lead agency to prepare the EIR and includes other agencies with authority and information regarding the public review process.
- **Project Description** – Includes the project location, objectives, characteristics, and required approvals to implement.
- **Environmental Impact Analysis** – Discusses the environmental setting, current conditions and potential impacts to aesthetics, agricultural and forestry resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use planning, noise, population and housing, public services, recreation, transportation and traffic and utilities and service systems.
- **Significant Environmental Effects** – Identifies impacts that are significant and non-mitigatable requiring a Statement of Overriding Considerations for proposed project approval.
- **Non-significant Environmental Effects** – Lists the impact categories found not to be significant after full analysis.
- **Mitigation Measures** – Identifies mitigation measures to reduce or avoid significant impacts where required and if feasible.
- **Project Alternatives** – Describes alternatives or modifications to the proposed project and the best environmental option.
- **Socio-Economics and Growth Inducement** – Addresses the potential for the project to spur additional growth as a result of development.
- **Cumulative Impacts** – Provides an overview including other projects that are proposed, planned, under development, or recently completed and considers the environmental impacts that may occur if this project is added to all of the projects.
- **References, Agencies, and Persons Consulted** – Contains the sources and references used in the preparation of this EI

II. PROJECT DESCRIPTION

2.1 PROJECT LOCATION AND PLANNING AREA BOUNDARIES

Regional Location

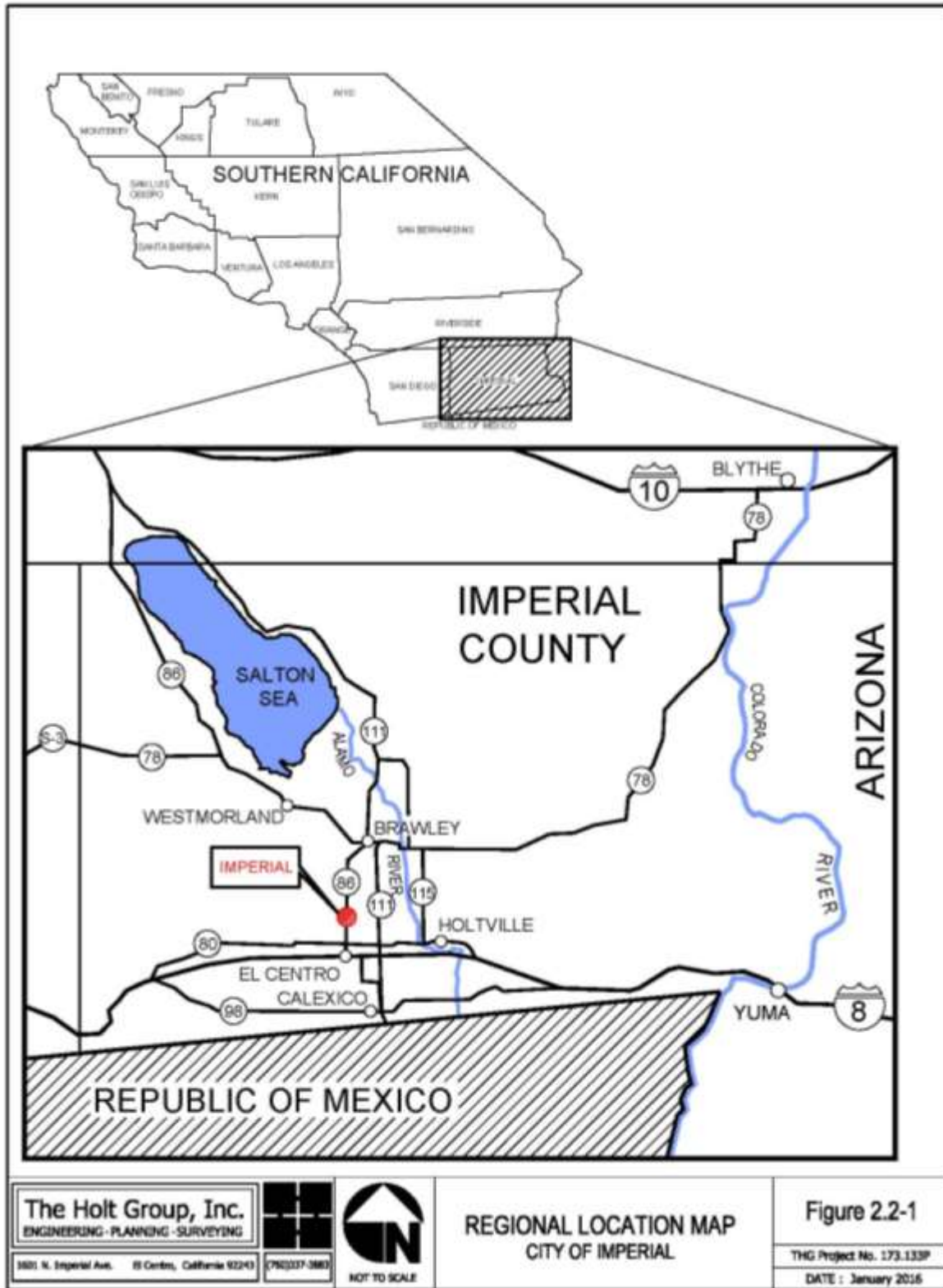
The City of Imperial is a predominantly agricultural community situated in Southern California and located in rural Imperial County. The City is centrally located in the Imperial County, approximately 150 miles east of San Diego, 220 miles south of Palm Springs and 13 miles north of the United State-Mexico border. The City's Sphere of Influence and Planning Area encompasses approximately 5.85 square miles and is adjacent to the northern boundary of the City of El Centro and its northern boundary is approximately 6 miles south of the City of Brawley. All three communities are linked by Highway 86 which spans from the US/ Mexico border south up to Interstate 10 in Indio, California to the north. State Route 86 serves the entire Imperial County, at a north/south orientation, and functions as the City of Imperial's main arterial. Please refer to **Figure 2.2-1 for Regional Location Map**.

2.2 BACKGROUND & GROWTH PROJECTIONS

The City of Imperial, incorporated in 1904, and is a multi-cultural community with a rich agricultural history and strong and diverse economy. The City's agricultural roots are largely responsible for the semi-rural character, low density development and wide-spread housing stock in the community and in its surrounding areas. Its ideal central location further attracts many important operations. The City is home to the Imperial County Airport, the Imperial Irrigation District Headquarters, and the El Centro Sector Headquarters of the U.S. Border Patrol, all of which contribute to vast employment opportunities. Imperial Valley College is also located just 1.53 miles east of the City's Sphere of Influence.

Imperial's unique situation makes the community not only ideal for investment, but for residential growth. Residents are attracted to Imperial due in part to its effective police department, low cost of living and close-knit community spirit. The City of Imperial has the highest growth rate in the County (54.3 % since 2006 per the California Department of Finance). The City of Imperial has experienced an aggressive population growth over the last couple of decades when taking into account growth trends since 1990. The City of Imperial had a population of 4,413 in 1990 and by 2010, had an estimated population of 14,758. From 1990 to 2010, the City had the highest growth in Imperial County, growing at an average annual growth rate of 12.94 percent compared to Imperial County as a whole which experienced an average growth rate of 2.99 percent for the same time period. It is projected that by 2035 the City's population will be 26,923 (Source: Imperial 2015 Service Area Plan) and up to 62,541 when considering planned annexations.

Figure 2.2-1 Regional Location Map



Planning Area Boundaries

The Planning Area for the Land Use Plan and Circulation Element consists of the incorporated City Limits, in addition to the surrounding unincorporated areas commonly referred to as the City of Imperial Sphere of Influence (SOI) or unincorporated “Urban Areas” (**Figure 2.2-2 Project Area**). General geographic boundaries of the Planning Area include Newside Canal to the north, Dogwood Road to the east, Treshill Road to the South and Austin Road to the west.

The Sphere of Influence is the probably physical boundary for growth, and service area of a local agency as determined by the Imperial County Local Agency Formation Commission (LAFCo). If the City of Imperial wishes to expand its SOI, it must submit a request to the Imperial County LAFCo. If LAFCo approves the expansion of an SOI, then the City of Imperial could seek annexation of contiguous land within the SOI, thereby expanding the City boundary. It is important to note that the Planning Area encompasses all of the land within the sphere of influence. When the Planning Area is being referred to, it is being referred to all of the land within the sphere of influence, as approved by LAFCo.

2.3 PROJECT DESCRIPTION

The proposed project consists of a comprehensive update to the City of Imperial Land Use and Circulation Element. The updated Elements anticipate the growth of the City of Imperial to the year 2035. The Elements establish goals, objectives and policies made to guide development through a minimum 20-year planning period. The Project consists of the comprehensive update of the Elements for consistency with recently adopted elements including the Housing Element Updated, the Conservation and Open Space, Safety, and Open Space Elements Updated in 2014, and the Noise Element, Airport Element and Public Facilities Element last adopted in 1992.

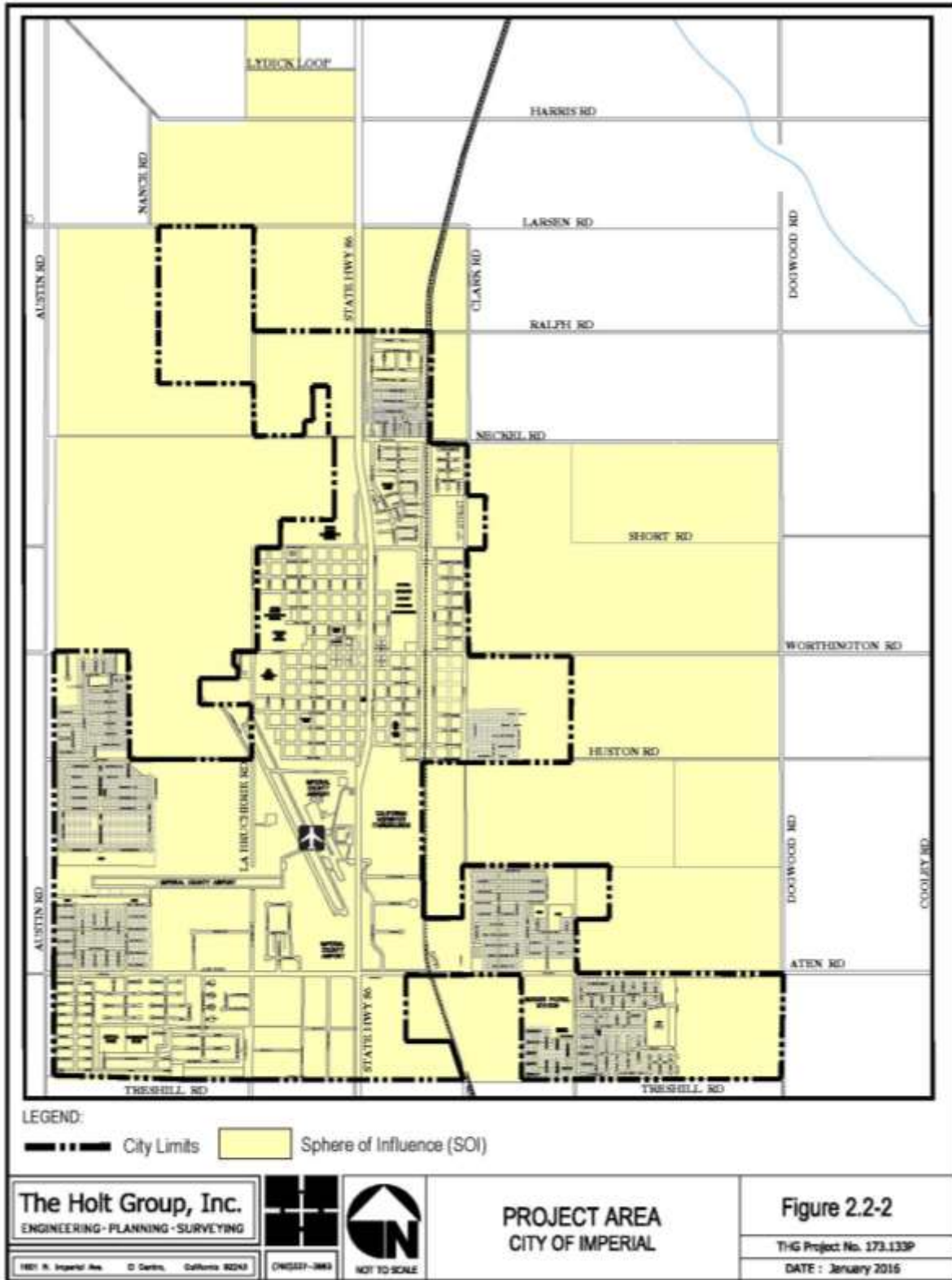
The Land Use Element, and more specifically the Land Use Plan, intends to serve as a blueprint for decisions makers to adequately plan for the anticipated growth within the Imperial Community and surrounding unincorporated area of Imperial County. The Circulation Element is equally important in establishing the base framework to accommodate these land uses. Along with the Zoning Ordinance, both of these documents have the purpose of allocating and supporting specific areas for development that will further the community’s vision and result in the largest benefit with the least impact to the environment and existing resources.

2.4 PROJECT NEED AND OBJECTIVES

The purpose of the Land Use Element and Circulation Element Update is to address regional changes, promote equity, infill development, increase economic development opportunities, and balance land uses for a more sustainable community. Moreover, with the passage of new California laws, such as AB32 and SB375 created with the intent of sequestering greenhouse gas emissions, the City has taken a proactive approach to encourage development that is more compact, urban and pedestrian-oriented and to incorporate comprehensive transportation goals and policies to further the goals of the State.

Imperial’s Land Use and Circulation Elements were last updated and adopted in 1992 and a comprehensive update has not occurred since then. Over the years some amendments have taken place, mostly for zoning consistency.

Figure 2.2-2 Project Area



The Land Use and Circulation Element Updates' objectives are to strengthen the local economy via increased development opportunities, promote public safety and environmental quality, and create a more sustainable community. The City of Imperial has sufficient land to accommodate the growth needs of the community via infill development and planned annexation areas within their Sphere of Influence. There are over 970 acres in the City Limits suitable to accommodate substantial growth.

The City of Imperial has established goals, policies, and objectives to be met through the adopted 2035 Land Use Element and Circulation Element with the intent of enhancing the quality of life for Imperial residents. These include, but are not limited to the following:

- Maintain a rural identity while accommodating growth;
- Facilitate development of vacant and under-utilized land;
- Develop a “complete streets” circulation network that is safe and efficient;
- Improve the quality of life of Imperial Residents via increased amenities and art in public places;
- Provide an adequate mix of low, medium, and high density residential land uses to house people of all socioeconomic levels;
- Establish character areas and provide adequate public services and facilities to promote their development;
- Expand commercial uses and provide for mixed use residential opportunities;
- Connect residents and neighborhoods to community facilities and employment sectors;
- Strengthen the community’s economy and provide diverse employment opportunities for City residents;
- Promote manufacturing and industrial development that takes advantage of the railroad through the City;
- Improve air and water quality and reduce energy consumption and greenhouse gas emissions; and
- Protect natural environmental resources and agricultural lands;

III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

Changes in land use are not, in and of themselves, environmental impacts. Land use changes are impacts only relative to the prior use of the site (i.e. conversion of open space, an irreplaceable resource) or the surrounding usage and character (i.e. compatibility between housing and a noise generator, or between different intensities of development). Transportation planning, including the adoption of goals and policies would also not result in any direct impact but provide a guide for all future circulation system development to be safely connected to an adequate system for efficiency.

The purpose of this section of the EIR is to determine the impacts and compatibility of the proposed project on the existing and planned land uses in the area. The information presented and examined in this section and all preceding sections has been taken from the updated Imperial Land Use Elements and other recently updated Elements. An analysis of environmental issues identified in the Initial Study as having potentially significant indirect impacts is included for each sub-section and incorporates any other relevant issues brought forward by comments received after the public Notice of Preparation of Scope of EIR.

The Environmental Evaluation Committee determined that the proposed City of Imperial Land Use Element and Circulation Element Update could have a potential impact on the following environmental factors: aesthetics, agricultural and forestry resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use, minerals, noise, population and housing, public services, recreation, transportation, and utilities and service systems. The proposed project will need to incorporate specific measures to reduce or avoid these potential impacts.

ENVIRONMENTAL SETTING

The City of Imperial is located in the County of Imperial, in the southeastern portion of the State of California. Imperial County is known for its rich agricultural production. Agriculture is the fourth largest industry in the County and accounts for 10.5 percent of all employment in Imperial County (2013 American Community Survey). Over 2 percent of the City of Imperial employment population is employed within the agricultural industry per the 2014 American Community Survey. Urban areas in the County are primarily within the Cities of Brawley, Imperial, El Centro, and Calexico forming a north/south urban corridor through the middle of Imperial County. The City of Imperial is situated in the center of this urban corridor, approximately 13 miles north of the US Mexico border.

The entire Imperial Valley floor is slightly sloped, situated on a deep alluvial fill deposited over many thousands of years referred as the Salton trough. Amongst the significant physiographic features in the vicinity are the deep narrow eroded gorges of the New River and the Alamo River. The New River is situated two miles west of Imperial's Sphere of Influence. The Salton trough, the most dominant land form within the region, comprises the northern land locked portion of the Gulf of California and includes the Coachella, Imperial, and Mexicali Valleys. The elevation of this broad alluvial plain ranges from 47 feet above sea level at the high point of the Colorado River delta in Mexico to 275 feet below sea level the Riverside County line. The City of Imperial is 60 feet below sea level at its center.

The City of Imperial is approximately 5.85 square miles (3,744 acres) in size with a household population of 17,415 based upon the 2015 data from the Department of Finance. The current City boundaries of Imperial are Larsen Road to the north, Dogwood Road to the east, Austin Road to the West and Treshill Road and the Dahlia Lateral 5 Canal to the South. The established Sphere of Influence (SOI) boundary is an additional, approximate 4,488 acres surrounding the incorporated City Boundaries.

Those areas within Imperial's incorporated boundaries are primarily developed with low to medium density single family homes and a diverse housing stock of multi-family apartments and condominiums. Also within the incorporated City Limits are commercial and industrial land uses and several government operations.

Urban uses are limited within the incorporated City limits. Commercial areas are concentrated in the downtown Imperial Avenue and Barioni Avenue and along Highway 86 which traverses the City of Imperial North to South. Commercial lot sizes are predominantly smaller lots with some vacant and/ or undeveloped sites that necessitate infill development. Industrial uses are limited to the areas along the Southern Pacific Railroad and areas within close proximity to the Imperial County Airport and the Imperial Valley Fairgrounds.

Areas outside of the City Limit boundaries, but within the Sphere of Influence, are primarily agriculture in nature with scattered home-sites. Mostly fodder crops are grown in the sphere of influence area consisting of alfalfa, bermuda grass, and sudan grass. Much of these areas are earmarked and planned for urban development.

3.1 AESTHETICS

Aesthetics and visual resources are generally defined as those features of a landscape that attract viewer interest and promote a favorable impression. However, aesthetics are mostly based on individual's perception. This EIR uses standards which are commonly accepted or considered pleasing and what could potentially be considered an adverse impact or an eyesore. This EIR also utilizes goals, objectives and policies outlined in various sections of the Land Use Element as they relate to maintaining the desired rural character and a certain level of aesthetically pleasing development.

This section examines the Element's potential impacts to aesthetics within the project area and the surrounding planning area (sphere of influence). This discussion provides an overview of the physical conditions that may be affected or that currently affect the Planning Area. The analysis of the project's effect on the site's aesthetic qualities is based on current conditions and factors consequential to proposed changes to circulation routes, land uses and potential future development that may result from the implementation of the proposed Land Use and Circulation Element.

3.1.1 EXISTING CONDITIONS

Background

Aesthetics relates to visual resources, scenic vistas, visual character, and limited intrusion of light and glare or other obstructions for the enjoyment of these views. Aesthetic resources in the Imperial Valley are limited to desert landscapes and some mountain views. The Superstition and Laguna mountains to the west of Imperial are visible from many areas in the Imperial Community and considered an aesthetic resource.

Open areas and agricultural lands, and rural residential land uses are also perceived as pleasing sceneries. As a rural residential community, much of the existing suburban land uses are particularly sensitive to scenic obstructions or excessive lighting sources. Higher densities, commercial, and industrial development are typically concentrated in key areas of the community such as Barioni and Imperial Avenue and along Highway 86. An active industrial rail line the "Niland to Calexico Railroad" also runs in a north/south orientation and further divides the community. These major transportation corridors bisect the City into major areas thus somewhat restricting neighborhood continuity. These areas are largely perceived as having their own character.

Scenic Resources

Open Space – The Planning Areas major open space is the agricultural land use outside of the City Limits. Within the incorporated areas, the City's major open space areas include fourteen (14) City parks: C.A. Irving Sports Complex, Aviation Park, Imperial Dog Park, Eager Park, Evans Park, Freddie White Park, Joshua Tree Park, Paseo Del Sol Park, Savanna Ranch Green Belt, Savanna Ranch Park, Sky Ranch Green Belt, Sky Ranch Park, Sunsent Park, Springfield Picnic Areas, Victoria Basin/Park, and Victoria Park which total 62.87 acres and are considered scenic resources for the community. The city has a demand for 51.94 acres of parkland, based on an estimated household population of 17,313 and based on the City's performance standard ratio of 3 acres of

parkland per 1,000 in population and was at a surplus of 10.93 acres at the time of the preparation of this EIR.

Scenic Corridors- A highway can be designated as scenic depending on how much of the natural landscape can be seen by travelers. Streets and highways can provide scenery in one of two ways. To illustrate, a street can be tree-lined or pass through scenic terrain or open space or make scenic vistas available to motorists. According to the California Scenic Highway Mapping System of the California Department of Transportation, there are no state scenic highways in the City of Imperial. The City of Imperial furthermore does not have any non-designated highways or corridors within the City Limits or within the Planning Area that would be considered scenic.

Landmarks- A landmark can be any prominent feature within the City including unique geographic features, buildings or statues. Landmarks are important as they provide cities with unique visual character and can attract visitors. The Niland to Calexico Railroad that runs through the City was originally built between 1902 and 1904, which was important for the early development of the region.

Scenic Vistas- The City of Imperial has limited views of the Superstition and Laguna Mountains to the west. Other scenic resources in Imperial include natural views of landscape features such as agricultural lands under production that surround the City.

Regulatory Setting

The proposed Imperial Land Use Element Update and the previously adopted Recreation, Open Space and Conservation Elements are used by the City to regulate, preserve and enhance aesthetics resources in the community. The City's existing Recreation, Conservation and Open Space Elements guide the comprehensive and long range preservation and conservation of open space and natural resources. The proposed Land Use Element Update is consistent with the Conservation Element. It furthers the conservation goals. "Conservation" is defined as the careful preservation, protection, or planned management of a natural resource to prevent its exploitation, destruction or neglect. In this vein, much of what contains aesthetic value relates to nature and is thus regulated by the Conservation and Open Space Element and supported by the proposed Land Use Element Update.

Consequently, the City's Zoning Code is responsible for guiding development while protecting aesthetic resources by designating certain land uses in each of the respective zones and by regulating building height and setbacks for development and incorporating the requirement of aesthetic features. The development process required by the Zoning Code allows for consideration of visual quality and site design thereby enhancing the aesthetics of the community. Consistency between the adopted Zoning Code and the proposed Land Use Element will be further assessed under the Land Use and Planning Section of this EIR.

3.1.2 THRESHOLDS OF SIGNIFICANCE

CEQA Guidelines suggest that a proposed project would result in significant aesthetic and visual impacts if the proposed project would:

- Have a substantially adverse affect on a scenic vista or scenic highway;
- Substantially damage scenic resources along a state scenic highway;
- Substantially degrade the visual character or quality of the site or its surroundings;
- Create a new source of substantial glare, which would adversely affect day or nighttime views in the area.

3.1.3 IMPACT ANALYSIS

Aesthetically Pleasing Rural Character

Increased residential density proposed to be allowed through the Land Use Element Update may alter visual qualities in the area and potentially have impact on a scenic vista. The proposed Land Use Element and Circulation Element may alter and potentially impact the existing visual character or quality and design of the Planning Area's rural character and overall aesthetics. However, several goals and policies have been incorporated in the Land Use Element and Circulation to ensure a less than significant impact to the visual character and quality of the Planning Area as noted below.

Land Use Element Goal #1 Growth & Development: To implement the successful transformation of the City from a small town into a medium, full service City while maintaining its rural character via planned and orderly development.

- **Land Use Element Policy 1.2:** Expansion of the Sphere of Influence boundaries shall take into consideration and preserve and enhance the rural character of Imperial through the encouragement of land uses and development that is consistent with a rural lifestyle and image.

Land Use Element Goal #3 Quality of Life: Availability of adequate public serves and facilities for all existing and proposed development and create an aesthetically pleasing, full service community with an excellent quality of life.

- **Land Use Element Policy 3.2:** Encourage the provision of a high-level of community amenities and design features as a way of balancing increased density for a very high quality, amenity rich livable community.
- **Land Use Element Policy 3.3:** Achieve and maintain a high standard of appearance of land and buildings consistent with the community character.

Circulation Goal #6 Beautification & Identify: sustain a vision along City roadways and corridors that is identifiable to the City of Imperial.

- **Land Use Element Policy 6.1:** The City shall coordinate with other jurisdictions to maintain seamless landscape and streetscape elements along major roadways connecting to the City.

- **Land Use Element Policy 6.2:** The City shall require new development within the City to maintain consistency among landscape and streetscape elements for projects along major roadways to create a more uniform approach to these elements.

Open Space

The proposed land plan, at build-out, will likely encourage the change from undeveloped or underdeveloped land to future residential, commercial, and industrial development thus potentially impacting the existing visual character of the Planning Area. There is a strong desire from the community to maintain and preserve the rural atmosphere and character of Imperial by protecting open space land uses as much as possible beyond those areas identified along the major transportation corridors. These objectives are supported under the existing Conservation and Open Space Element and are also demonstrated through the following Goals and Policies presented in the Land Use Element and Circulation Element update:

Land Use Element Goal #1 Growth & Development: To implement the successful transformation of the City from a small town into a medium, full service City while maintaining its rural character via planned and orderly development.

- **Land Use Element Policy 5.3:** Residential Neighborhoods should protect and promote the existing rural lifestyle and character of the City of Imperial including low noise levels, limited motorized traffic, and natural open spaces.

Lighting and Night-time Views

Another factor that may impact the existing day or nighttime views in the area is new light sources associated with any future development such as streetlights, parking lights and lighted commercial and industrial signs. A substantial increase in light or glare may likely result in adverse impacts to nighttime views at existing or planned residences in an area currently with little glare existing or no unnatural lighting sources.

Lighting plans are required to be submitted for review and approval to the City of Imperial, prior to obtaining any building permits and therefore any impacts to nighttime views would be less than significant. In addition to development standards, all development project are required by the City of Imperial to have a sensible lighting plan, which includes narrow lighting angles and shielded street lights to minimize significant off-site glare or adverse light intrusion into neighboring properties. The Imperial Zoning Code already regulates lighting throughout for various land uses.

3.1.4 SIGNIFICANT IMPACTS

The proposed Imperial Land Use and Circulation Elements incorporate policies and development standards to regulate the aesthetics of the City and ensure the preservation of scenic vistas in the City via the regulation of new development. The existing Zoning Ordinance is further consistent and supports these objectives. The implementation of the proposed Land Use and Circulation Elements will not adversely affect the visual character of the community because proper mitigation measures are in place and therefore, this project will have a less than significant impact to aesthetics and the visual character of the Imperial community.

3.1.5 MITIGATION MEASURES

No further mitigation is required.



3.2 AGRICULTURAL & FOREST RESOURCES

This section examines the potential impacts of the proposed project to agricultural resources. This section discusses an analysis of the project's effect on the site's agricultural potential based on information from the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS), the California State Department of Conservation Farmland Mapping and Monitoring Program (FMMP) and applicable regulations concerning agriculture and farming.

3.2.1 EXISTING CONDITIONS & REGULATORY SETTING

Background

A critical factor in determining whether a particular property is suitable for agriculture is its soil composition. The soils found within the Planning Area and through much of the Imperial Valley were created as a result of historic flooding of the Colorado River and contain deep, rich silts, deposited over thousands of years. These soils provide a basis for the agricultural operations located throughout the area. Highly productive soils, climate and complex network of irrigation canals have created an important farming economy in the Imperial County. The City of Imperial supports agricultural industries and the City recognizes the benefits of maintaining and preserving agricultural land uses.

United States Department of Agriculture

One of the most important factors in determining whether an area is suitable for agriculture is its soil composition. The United States Department of Agriculture (USDA) National Resources Conservation Service (NRCS) compiled a map of surface soil conditions to provide a rating system showing the relative degree of suitability for agricultural activities based solely on soil characteristics. As shown on the NRCS Soils Map, the project site is composed of the following soil types:

**Table 3.2-1
Soil Conditions within Planning Area**

Map Unit	Map Unit Name	Acres
106	Glenbar clay loam, wet	12.4
110	Holtville Silty Clay, wet	1,234.6
114	Imperial Silty Clay, wet	2, 444.8
115	Imperial-Glenbar Silty Clay Loams, Wet 0-2% Slopes	4,443.9
116	Imperial-Glenbar silty clay loams, 2-5% slopes	9.5
118	Indio loam, wet	66
122	Meloland Very Fine Sandy Loam, Wet	121.7
123	Meloland and Holtville loams, wet	10.6
142	Vint loamy very fine sand, wet	38.8
144	Vint and Indio very fine sandy loams, wet	36.1
145	Water	2.1
146	Miscellaneous Water	8.4

Source: Natural Resources Conservation Service- Web Soil Survey, 2016

California State Department of Conservation

The outer portions of the Planning Area contain agricultural land some of which is under production. Agricultural land surrounding the City, and within the Planning Area, is considered as valuable land for farming purposes and may be subject to development pressures and conflicts in land uses. Much of the farmland within the Planning Area has been classified as either Farmland of Statewide Importance, Prime Farmland, Farmland of Local Importance and regarded as “Important Farmland” by the California State Department of Conservation’s Farmland Mapping and Monitoring Program (See **Figure 3.2-1**). “Prime Farmland” is farmland which contains soils with the best combination of physical and chemical characteristics of all types. “Farmland of Statewide Importance” is farmland with a good combination of physical and chemical characteristics for the production of crops. Within the planning area there are approximately 2,894 acres of Farmland of Statewide importance and approximately 692 acres of Prime Farmland as referenced in **Table 3.2-2**.

**Table 3.2-2
Farmland Classification within Planning Area**

Type of Farmland	Acres	Percent
Farmland of Statewide Importance	2,894	69%
Prime Farmland	692	16%
Farmland of Local Importance	647	15%
Total	4,233 Acres	100%

Source: Department of Conservation 2014 Imperial County Map

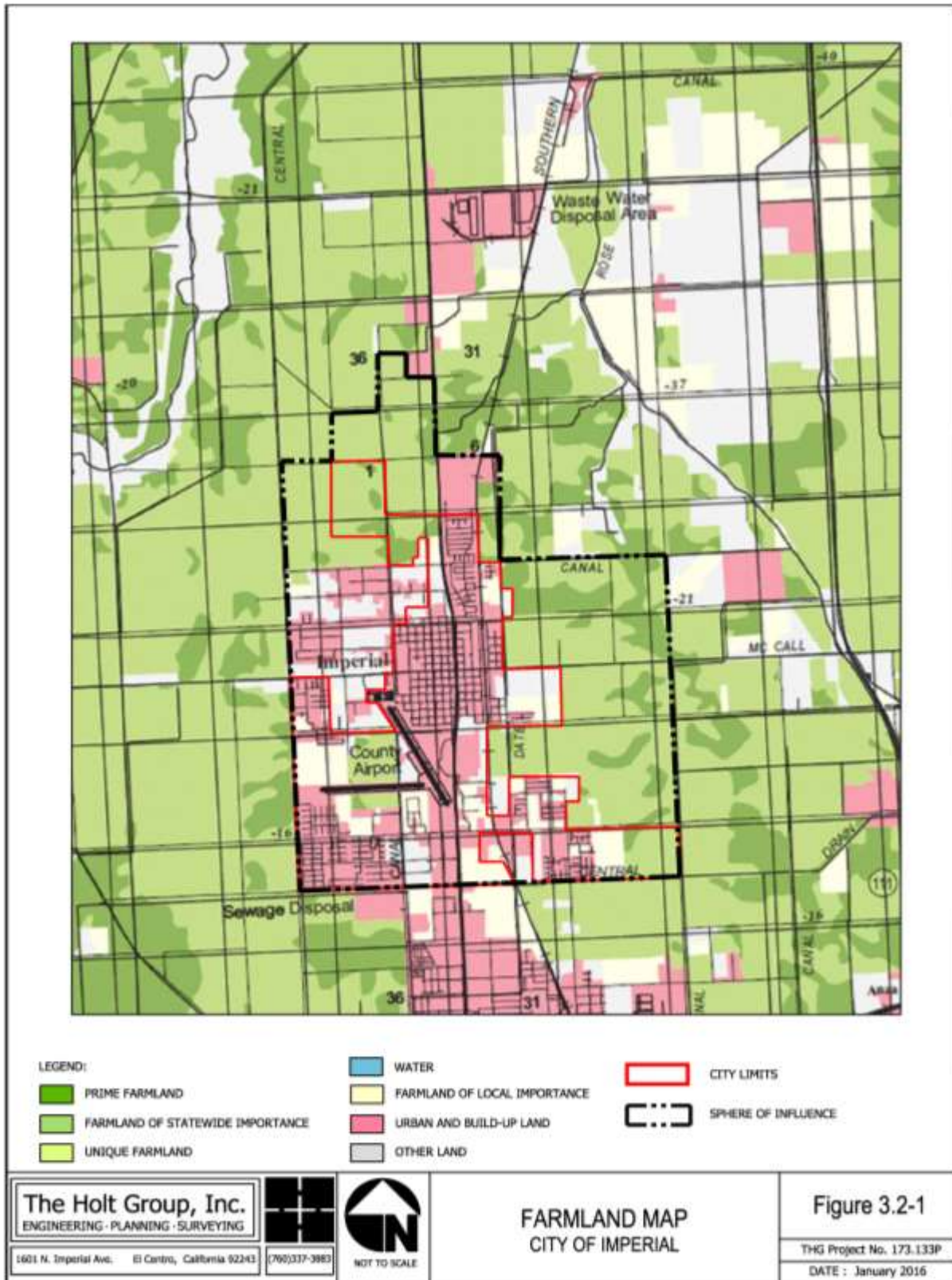
Williamson Act

The California Land Conservation Act of 1965, better known as the Williamson Act, created a program for counties to protect viable agricultural land by offering a tax incentive to property owners for keeping their land in agricultural production. The Act provides an arrangement where private landowners voluntarily restrict their land to agricultural and compatible open space uses under a contract with the County of Imperial, known as a Land Conservation Contract. In 2010, the Imperial County Board of Supervisors voted to not renew the contracts from the Williamson Act in the Imperial County. However, the tax breaks for each contract do not go away under the Act until the end of each of the respective contract. There are farm lands within the Planning Area that hold preservation contracts under the Williamson Act. A review of land identified under the Williamson Act identified 3,830 acres within the planning area as being under a Williamson Act contract at the time of preparation of this EIR.

Forest Resources

In accordance with the definition provided in California Public Resources Code Section 12220(g), “forest land” is land that can support, under natural conditions, 10 percent native tree cover of any species, including hardwoods, and that allows for the preservation or management of forest-related resources such as timber, aesthetic value, fish and wildlife, biodiversity, water quality, recreational facilities, and other public benefits. None of the lands within the County at large are used for timber harvesting. The Planning area is primarily urban land or undeveloped, agricultural lands actively cultivated with crops.

Figure 3.2-1 Farmland Map



3.2.2 THRESHOLDS OF SIGNIFICANCE

Per CEQA Guidelines the proposed project would result in a significant impact to agricultural resources if it will:

- Convert Prime Farmland, Unique Farmland, or Farmland of State-wide Importance, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
- Conflict with existing zoning for agricultural use, or a Williamson Act contract;
- 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 511040(g));
- Result in the loss of forest land or conversion of forest land to non-forest use;
- Involve other changes in the existing environment, which due to their location or nature, could result in conversion of farmland to non-agricultural uses or conversion of forest land to non-forest use.

3.2.3 IMPACT ANALYSIS

Important Farmland

Most of the land surrounding the Imperial community is farmed land, most of which is under production within the Planning Area. The farmland within the Planning Area has been classified as Farmland of Statewide Importance, Farmland of Local Importance, or Prime Farmland and regarded as “Important Farmland” by the California State Department of Conservation. Therefore, full development of the proposed project area may not only take important farmland out of production, but may further have the effect of encouraging the conversion of the adjacent farmlands to non-agricultural uses unless proper mitigation measures are incorporated. The potential conversion of these lands may evolve over the full implementation of the Land Use Plan although build-out of these areas is not projected to occur within a twenty (20) year time frame, based on the estimated population growth for the area through 2035.

Outside of the incorporated City limits, but within the planning area, approximately 811 acres have been designated Residential Low Density and 2,050 have been designated Residential Single Family. Additionally, 140 acres have been designated Commercial Neighborhood and 355 acres Rail Served Industrial. Approximately 1,130 acres has been designated for agriculture.

It is important to note that much of the land designated to be converted consists of soils in fair condition, according to the Storie Index, an index prepared by the United States Department of Agriculture Natural Resources Conservation Service. The Storie Index Rating System ranks soils characteristics according to their suitability potential for cultivated agriculture in California. The Index assesses the productivity of a soil from the following characteristics: Factor A, degree of soil profile development, factor B, text of the surface layer, factor C, slope, and factor X, manageable features, including drainage, fertility, erosion and salt content. A score ranging from 0-100 percent is determined for each factor, and the scores are

then multiplied together to derive an index rating. Storie Index ratings are combined into six grade classes as follows: Grade 1 (excellent), 100 to 80, grade 2 (good), 79-60, grade 3 (fair) 59-40, grade 4 (poor) 39-20, grade five (very poor), 19-20, and grade 6 (non-agricultural) less than 10. Within the sphere of influence, and planning area, consisting of approximately 8,400 acres, the breakdown is as depicted in **Table 3.2-3- Storie Index Ratings within Sphere of Influence:**

**Table 3.2-3
Storie Index Ratings within Sphere of Influence**

Map Unit Name	Grade Rating	Acres in SOI	Percent of SOI
Glenbar Clay Loam, Wet	2(Good)	12.4	.1%
Holtville Silty Clay, Wet	3 (Fair)	1,234.6	14.6%
Imperial Silty Clay, Wet	4(Poor)	2, 444.8	28.9%
Imperial-Glenbar, Silty Clay Loams, Wet, 0-2% Slope	2 (Good)	4,443.9	52.6%
Imperial-Glenbar, Silty Clay Loams, Wet, 2-5% Slope	1(Excellent)	9.5	.1%
Indio loam, wet	1(Excellent)	66	.8%
Meloland Very Fine Sandy Loam, Wet	2(Good)	121.7	1.4%
Meloland and Holtville Loams, Wet	2(Good)	10.6	.1%
Vint loamy very fine sand, wet	2(Good)	38.8	.5%
Vint and Indio, Very Fine Sandy Loams, Wet	2(Good)	36.1	.4%
Water	Not Rated	2.1	.3%
Miscellaneous Water	Not Rated	8.4	.1%
Total		8,453.1	100%

Approximately 15 percent of the land within the sphere of influence consists of fair land and 55 percent of land consists of land in good condition for agricultural production. According to the soils USDA Soils Map, much of the land within the sphere of influence that is rated as good continues to be designated for agricultural purposes (1,130 acres).

The City of Imperial 2014 Conservation Element protects agricultural resources for their numerous benefits to the community and region. This protection is demonstrated in the numerous actions in support of the Goal and Policy adopted as presented below:

Conservation Element Goal #1. Preserve and Protect: Agricultural Prime Farmland and Farmland of Statewide Importance for their numerous benefits to the region.

- **Conservation Element Policy 1.1** Avoid annexation and conversion of farmland to non-agricultural uses, except as necessary to meet the City’s housing and economic development goals.

Additionally, the proposed Land Use Element Update incorporates the following Goal, Policy and action in support of farmland and agricultural operations:

Land Use Element Goal #2 Land Use Compatibility: To achieve land use compatibility throughout the City and promote character areas, where appropriate.

- **Land Use Element Policy 2.3** New Development (urban or rural) shall prioritize compatibility with surrounding land uses, when developing adjacent to existing uses and where land use conflicts exist, they shall be addressed through the use of adequate buffering, setbacks, or construction measures.

Williamson Act Agricultural Properties

During the environmental review process it was determined that there are sixty-one (61) agricultural properties within the planning area under a Williamson Act contract. The properties are comprised of approximately 3830 acres as noted in Table 3.2-4.

**Table 3.2-4
Williamson Act Agricultural Properties**

Type of Farmland	Acres	Percent
Farmland of Local Importance	62.68	2%
Farmland of Statewide Importance	862.77	23%
Prime Farm Land	152.44	4%
Mixed: Farmland of Statewide Importance and Prime Farmland	2751.78	72%
Total	3829.67	100%

Source: Imperial County Williamson Act Map, 2012

All Williamson Act properties are located approximately 1.25 miles north, .5 miles east, and .95 miles west of the City Limits. On February 2010, the Board of Supervisors voted for the non-renewal of existing Williamson Act Contracts, approved to deny new contracts, and directed staff to send out non-renewal notices. Given the non-renewal of contracts the program is to end within a decade. As such, it is estimated the program will fully end in 2020 within the proposed planning period.

Forest Properties

As previously noted, the Planning area is primarily urban land or undeveloped, agricultural lands actively cultivated with crops. Crops common to the area consist of alfalfa, lettuce, and Bermuda grass and do not contain any forest resources, thus no impacts are anticipated to forest resources.

3.2.4 SIGNIFICANT IMPACTS

The City of Imperial's adopted General Plan and proposed Land Use Element updated goals and policies are proposed to be actively implemented and demonstrate a strong effort on the part of the City of Imperial to implement all feasible measures to mitigate the conversion of farmland to non-agricultural use and to encourage the conservation of farmland. The CEQA review process for all non-infill development projects also allows the Division of Land Resource Protection with the State Department of Agriculture to review projects and recommend incorporation of proper mitigation measures including but not limited to conservation easements. Therefore, the effects of any potential impacts are reduced to the level of less than significant and need no further mitigation measures.

3.2.5 MITIGATION MEASURES

There are no additional mitigation measures required.

3.3 AIR QUALITY & GREENHOUSE GAS EMISSIONS

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

Senate Bill 97 amended the California Environmental Quality Act Guidelines to address the analysis and mitigation of greenhouse gas emissions that may result from the project. This section provides background information on global climate change in addition to evaluating the City of Imperial greenhouse gas (GHG) contributions and an evaluation of the General Plan Land Use Element and Circulation Element Update's consistency with the goals and strategies of AB 32.

This section examines the climatic influences that affect the air quality of the Imperial Planning Area and describes the available data on measured contaminant levels near the study area. Where appropriate, mitigation measures are suggested that would minimize or eliminate potentially significant air quality impact.

3.3.1 EXISTING CONDITIONS

Background

The project site is located in Imperial County within the Salton Sea Air Basin. Imperial County's climate is characterized by hot, dry summers and mild, wet winters. The County is dominated by high-pressure cell that drives onshore circulation from the Pacific Ocean that helps create two types of temperature inversions, subsidence and radiation which contribute to poor local air quality.

Currently, the planning area is designated as a non-attainment area for the federal and state standards for ozone, particulate matter less than 2.5 microns (PM-2.5), and particulate matter less than 10 micron (PM-10). The planning area and Imperial County are designated as attainment or unclassified for the state and federal carbon monoxide (CO), nitrogen oxides (NOx), and sulfur oxides (Sox) standards.

Ozone is primarily generated by automobile traffic, trains, and aircraft all of which are present in the City of Imperial. Ozone (O₃) is a colorless toxic gas which is the chief component of urban smog. Ozone can enter the blood stream and interfere with the transfer of oxygen through the body and potentially deprive sensitive tissues in the heart and brain of oxygen. It is a highly reactive gas that damages lung tissue, reduces lung function, and sensitizes the lung to other irritants.

As typical in rural communities, residents depend the automobile to travel to larger employment centers or specialized services. Although the City of Imperial houses several large employment generators such as the Imperial Irrigation District and the United States Border Patrol, an estimated 7,100 residents are employed by the State Prisons in Seeley and Imperial located over 13 and 24 miles away, respectively, from the city center. Vehicle trips

are seen as a major contributor of greenhouse gases (GHG), and thus the proposed Land Use and Circulation Elements are designed to continue to encourage a job/housing balance.

Regulatory Framework

The 1970 Clean Air Act (CAA) gave the Environmental Protection Agency (EPA) the authority to set Federal ambient air quality standards. The State of California has its own air quality standards and air pollution planning programs. While both processes attempted to avoid health-related effects, the Federal and State ambient standards were developed independently with different purposes and methods. As a result, the Federal and State standards differ in some cases. In general, the California State standards are more stringent. This is particularly true for ozone and PM10.

The California Air Resources Board (CARB) regulates local air quality indirectly by establishing vehicle emission standards, by conducting research activities, and through its planning and coordinating activities. CARB also oversees the activities of County Air Pollution Control Districts and regional Air Quality Management Districts (AQMDs).

The Imperial County Air Pollution Control District (ICAPCD) is the agency responsible for protecting the public health and welfare through the administration of Federal and State air quality laws and policies throughout the County of Imperial and the City of Imperial. The ICAPCD is primarily responsible for inspecting and controlling emissions from stationary sources such as industrial operations. The ICAPCD is also responsible for monitoring air quality in the region, preparing the County's portion of the State Implementation Plan (SIP), and to carry out Rules and Regulations into effect. In 2010, the ICAPCD prepared an Air Quality Management Plan, which details goals, policies and programs for improving air quality and establishing thresholds for daily operation emissions.

Assembly Bill (AB) 32, the Global Warming Solutions Act, signed into law in 2006, establishes a comprehensive program to reduce greenhouse gas emissions throughout the state in order to slow climate change. AB 32 requires that the State's global warming emissions be reduced to 1990 levels by the year 2020 and directs the California Air Resources Board to develop regulations and establish a reporting and monitoring system to track global warming emissions levels.

Senate Bill 375 was enacted to link greenhouse gas emissions generated by automobiles and light trucks through integrated transportation, land use, housing and environmental planning. It required that ARB to develop regional greenhouse gas emission reduction targets for passenger vehicles. In turn the State's Metropolitan Planning Organization MPOs to prepare a Sustainable Community Strategy. The City of Imperial, being a member of the Southern California Association of Governments, participated in the development of the SCS which was adopted in April 2012 and incorporates many of its goals and objectives into the proposed Land Use and Circulation Element.

Criteria Air Pollutants

Air pollution forms either directly or indirectly from pollutants emitted from a variety of sources. These sources can be natural, such as oil and tar seeps, or windblown dust or salt spray. Emissions may also result from combustion, as in automobile engines; from evaporation of organic liquids, such as those used in coating or cleaning processes; or through abrasion, such as tires on roadways. Air quality studies generally focus on five pollutants that are most commonly measured and regulated: Carbon Monoxide (CO), Ozone (O3), Nitrogen

Dioxide (NO₂), Sulfur Dioxide (SO₂) and Suspended Particulate Matter (PM₁₀) which are further discussed in the Impact Analysis section of this EIR.

- **Ozone-** Ozone (O₃) is a colorless toxic gas which is the chief component of urban smog. Ozone can enter the blood stream and interfere with the transfer of oxygen through the body and potentially deprive sensitive tissues in the heart and brain of oxygen. The primary source of smog-producing gases in Imperial County are automobiles and motorized vehicles.
- **Carbon Monoxide-** Carbon monoxide (CO) is a colorless, odorless, poisonous gas produced by incomplete burning of carbon-based fuels such as gasoline, oil, and wood. Upon entering the body, CO combines with chemicals in the body and prevents blood from carrying oxygen to cells, tissues, and organs. It can cause dizziness and fatigue, and can impair central nervous system functions. Other symptoms of exposure to CO can include problems with vision, reduced alertness, and general reduction in mental and physical functions. Carbon monoxide from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions (highest during the winter time in Imperial County).
- **Suspended Particulate Matter-** Suspended Particulate Matter pollution consists of very small liquid and solid particles floating in the air. These particles include smoke, soot, dust, salts, acids, and metals. PM₁₀ refers to particulate matter refers to particles less than 10 microns in diameter (about 1/7 the thickness of human hair). When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM₁₀ contributes to the severity and number of asthma attacks, bronchitis, and other lung diseases. The primary source particulate matter include motor vehicles, wood burning stoves and fireplaces, dust from construction or landfills, atmospheric chemical, etc. Farm related field burning is a contributing factor to PM₁₀ in Imperial County.
- **Nitrogen Oxide-**Nitrogen oxides (NO_x) are produced from burning fuels, including gasoline and coal. Nitrogen oxides react with volatile organic compounds (found in paints and solvents) to form smog, which can harm health, damage the environment, and cause poor visibility. Additionally, NO_x constitutes a major component of acid rain. Health effects related to nitrogen oxide include lung irritation and lung damage.
- **Sulfur Dioxide-**Sulfur Dioxide (SO₂) is a product of high-sulfur combustion from coal and oil used in power stations, in industries and for domestic heating. SO₂ is an irritant gas that can cause respiratory symptoms and diminished ventricular functions. In recent years, So₂ concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions and limits on the sulfur content of fuels. Concentrations of SO₂ have been reduced to levels well below the State and Federal standards, but further reductions are needed to attain compliance with standards for sulfates and PM₁₀, for which SO₂ is a contributor.
- **Greenhouse Gasses (GHGs)-** Many chemical compounds found in the Earth's atmosphere act as GHGs, including, water vapor, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), chloroflourocarbons (CFCs), hydroflourocarbons (HFCs), perflourocarbons (PFCs) and sulfur hexafluoride (SF₆). When sunlight strikes the Earth's surface, some of it is reflected back towards space as infrared radiation (heat). GHGs absorb this infrared radiation which results in more heat

trapped in the Earth's atmosphere. Over time, the amount of energy sent from the sun to the Earth's surface should be approximately equal to the amount of energy radiated from Earth back into space, leaving the Earth's surface temperature roughly constant. The accumulation of GHGs is causing global climate change, as these gases are trapping additional heat within the Earth's atmosphere. The Earth's average surface temperature has risen by 0.3 to 0.6 degrees Celsius over the past century affecting agriculture, water supply, pests and diseases, sea-level, polar ice caps/glaciers, and biology/ecosystems.

Most of the effort to improve air quality in the United States is directed toward the control of the five listed criteria pollutants: photochemical oxidants (ozone), carbon monoxide (CO), particulate matter less than ten microns (PM₁₀), oxides of nitrogen (NO_x), and sulfur oxide (SO₂). Twenty years ago, suspended particulate lead would have been included in this list, but today the widespread availability and use of unleaded gasoline has effectively eliminated lead as an air quality concern. In Imperial County Particulate Matter (PM₁₀) and Ozone (O₃) are of primary concern.

Attainment

The State of California has had its own ambient air quality standards for many years, and these ambient standards are, in general, more stringent than the existing Federal standards for the criteria air pollutants. The California Clean Air Act (CCAA) requires the California Air Resource Board to designate areas within California as either attainment or non-attainment for each criteria pollutant. Under the CCAA, Imperial County is classified as a non-attainment area for both particulate matter (PM₁₀) and Ozone.

The Imperial County Air Pollution Control District's (ICAPCD) Air Quality Management Plan, prepared in 2010, details goals, policies and programs for improving air quality and establishing thresholds for daily operation emissions. The Air Quality Management Plan was developed to comply with National Ambient Air Quality Standards (NAAQS), which protect public health, vegetation, materials, and improve visibility. Developing, implementing, and adopting an Air Quality Management Plan allows for continued compliance of NAAQS.

The Imperial County Air Pollution Control District monitors air quality conditions at several locations throughout Imperial County and these are compared to both State and Federal Standards. Both State and Federal standards are summarized in **Table 3.3-1**. The "primary" standards have been established to protect public health. The "secondary" standards are intended to protect the nation's welfare and account for air pollutant effects on soil, water, visibility, materials, vegetation and other aspects of the general welfare.

The El Centro Monitoring Station is the closest monitoring station to the proposed Planning Area located at 150 South 9th Street El Centro. This monitoring station is approximately five miles south of the Planning Area. Historical data from the Station was used to evaluate existing conditions and to establish a baseline for estimating future conditions with and without the proposed project. Criteria pollutants monitored at the Station include O₃, CO, NO₂, and PM₁₀.

**Table 3.3-1
Ambient Air Quality Standards**

Pollutant	Averaging Time	California Ambient Air Quality Standards	National Ambient Air Quality Standards	
		Concentration	Primary	Secondary
Ozone (O ₃)	1 hour	0.09 ppm	-	Same as primary
	8 hours	0.070 ppm	0.070 ppm	Same as primary
Respirable Particulate Matter (PM ₁₀)	24 hours	50 µg/m ³	150 µg/m ³	Same as primary
	Annual Arithmetic Mean	20 µg/m ³	-	Same as primary
Fine Particulate Matter (PM _{2.5})	24 hours	-	35 µg/m ³	Same as primary
	Annual Arithmetic Mean	12 µg/m ³	12 µg/m ³	15 µg/m ³
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	-
	8 hours	9.0 ppm	9 ppm	-
	8 hours (Lake Tahoe)	6 ppm	-	-
Nitrogen Dioxide (NO ₂)	1 hour	0.18 ppm	100 ppb	-
	Annual Arithmetic Mean	0.30 ppm	0.53 ppm	Same as primary
Sulfur Dioxide (SO ₂)	1 hour	0.25 ppm	75 ppb	-
	3 hours	-	-	0.5 ppm
	24 hours	0.04 ppm	0.14 ppm	-
	Annual Arithmetic Mean	-	0.030 ppm	-
Lead (Pb)	30 day average	1.5 µg/m ³	-	-
	Calendar Quarter	-	1.5 µg/m ³	Same as primary
	Rolling 3-Month average	-	0.15 µg/m ³	Same as primary
Visibility Reducing Particles	8 hours	See footnote 1	No National Standards	
Sulfates (SO ₄)	24 hours	25 µg/m ³		
Hydrogen Sulfide (HS)	1 hour	0.03 ppm		
Vinyl Chloride	24 hours	0.01 ppm		

ppm = parts per million

ppb = parts per billion

µg/m³ = micrograms per cubic millimeter

¹In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are “extinction of 0.23 per kilometer” and “extinction of 0.07 per kilometer” for the statewide and Lake Tahoe Air Basin standards, respectively.

Source: California Air Resources Board, *Ambient Air Quality Standards*, October 1, 2015

Sensitive Receptors

Air quality standards exist to protect the public, especially those who are most sensitive to the adverse effects of air pollution. These “sensitive receptors” include children, the elderly, and the acutely and chronically ill. Some land uses are considered more sensitive to changes in air quality than others, depending on the types of population groups and the activities involved. Some land uses are also considered to be more sensitive to air pollution because of larger concentrations of sensitive receptors or the activities involved. Sensitive land uses include schools, playgrounds, childcare centers, hospitals, and clinics. Residential areas are also considered to be sensitive land uses because residents include children and the elderly, and because residents are exposed to air pollutants for extended periods.

There are a number of sensitive receptors identified within the project area including schools, child day care centers, single-family residences, multi-family residences, and play grounds. These receptors are both existing and allowed at the proposed land use classifications. These sensitive receptors do not constitute a comprehensive list of all sensitive uses within the vicinity; rather, they are intended to represent a sampling.

3.3.2 THRESHOLDS OF SIGNIFICANCE

Per State CEQA Guidelines, the implementation of the proposed Land Use Plan would have an effect on the environment, if any of the following occur:

- Conflict or obstruct the implementation of the applicable Air Quality Management Plan (AQMP) or applicable portions of the State Implementation Plan (SIP);
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of PM10 or exceed quantitative thresholds for Ozone (O3) precursors, oxides of nitrogen (NOx) and reactive organic compounds (ROCs);
- Expose sensitive receptors (including, but not limited to, schools, hospitals, resident care facilities, or day-care centers) to substantially pollutant concentrations; or
- Create objectionable odors affecting a substantial number of people.
- Generate greenhouse gas emissions, either directly or indirectly, that may have significant impact on the environment?
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

3.3.3 IMPACT ANALYSIS

Construction Phase Impacts

The proposed project is the adoption of a plan and regulating policies and will not result in any direct construction activities. Construction activities associated with the implementation of the proposed Land Use and Circulation Elements as development occurs may cause emission of dust or contaminants from construction equipment exhaust that may substantially contribute to existing air quality violations or expose sensitive receptors to substantial

pollutant concentrations. Construction activities often produce high levels of fugitive dust, including PM10 particulate matter. Construction related fugitive dust is generated primarily by grading activities and heavy equipment travel over temporary roads on-site. Any development and subsequent construction within the project area would be subject to the requirements of the Imperial County's Air Pollution Control District Regulation VIII, Fugitive Dust Requirements for control of fine particulate matter (PM10). Regulation VIII requires the implementation of all reasonably available control measures to control fugitive dust identified, but not limited to the following:

- ***Inactive Construction Areas***- Apply non-toxic soil stabilizers to all inactive construction areas.
- ***Active Site Areas***- Water active site areas twice daily.
- ***Storage Piles***- Control dust for material storage piles by either enclosing, covering and watering twice daily. Outdoor storage of fine particulate material is prohibited.
- ***Hauling***- All trucks hauling dirt, sand, soil, or other loose materials shall be covered.
- ***Adjacent Roadways***- Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the project site. Sweep streets at the end of the day.
- ***Unpaved Roads and Parking/Staging Areas***- Apply water three times daily or chemically stabilize with non-toxic soils all unpaved roads and parking.
- ***Speed Limit***- Traffic speeds on unpaved roads shall be limited to 5 miles per hour.
- ***Construction Roadways***- Pave construction roads that have a traffic volume of more than 50 daily trips. Access roads leading into the construction site shall be paved at least 25 feet from main road.
- ***Disturbed Areas***- When active construction ceases on the site, replace grounds cover as quickly as possible.

Vehicular Trip Emission Impacts Resulting from Plan Implementation

The City of Imperial, being a member of the Southern California Association of Governments, participated in the development of the SCS which was adopted in April 2012 and incorporates nine goals and six policies into the proposed Land Use and Circulation Elements inclusive of eight applicable action items.

Implementation of the proposed General Plan Elements per the adopted policies and regulating zoning densities would cause an increase in future population. The proposed Land Use Element Update and Circulation Element Update, however, proposes strategic measures to reduce vehicle trips and encourage alternative transportation. Consequently, when comparing the results of not implementing the proposed project, attainment of the State-level ambient air quality standards could be delayed.

Motor vehicles are the predominant source of long-term project emissions. Workers, residents, occupants and visitors driving to new land uses in the Planning Area would cause a significant increase in average daily trips by the time of build-out (2035), however, under current conditions, residents have to make longer trips for employment outside the area, and workers have to make longer trips for housing outside the area.

The principal sources of Ozone (O₃) in the region are trains and heavy diesel trucks and automobiles. The principle source of Ozone in the planning Area is the Imperial County Airport and motor vehicles associated with Highway 86. A total of around 14,615 flights are recorded annually. According to the International Civil Aviation Organization (ICAO) emissions calculator, which calculate CO₂ emissions levels per flight, it can be estimated that 6,095 metric tons of CO₂ are generated every year. Since the largest single source of air pollutants in the County is from motor vehicle trips, the Air Quality Management Plan contains transportation control measures and planning strategies to reduce the number and length of vehicle trips that have further been incorporated into the proposed Land Use Element.

- **Planning Compact Communities-** This strategy calls upon Cities and the County to develop at densities that reduce trips and travel distances, to encourage the use of alternative forms of transportation, to focus growth within urban areas, and to maintain rural areas as open space and agricultural lands.
- **Mixed Land Use-** Locating residential, commercial and retail uses close to each other encourages alternative modes of transportation such as walking and bicycling. Mixed land use developments also reduce the length of vehicle trips by providing support services near residential uses.
- **Jobs/Housing Balance-** New developments are encouraged to provide both housing and employment opportunities in order to reduce home-to-work travel distances.
- **Residential Developments-** Linking cul-de-sacs and dead-end streets encourages bicycle and pedestrian travel. It is also recommended to allocate easements or land dedications for bikeways and pedestrians walkways.
- **Industrial Developments-** Implement carpool/vanpool programs and incentives, for example: carpool ride matching for employees, assistance with vanpool formation, provision of vanpool vehicles, etc. Design and locate buildings to facilitate transit access by locating building entrances near transit stops and/or eliminating building setbacks.

The process of Land Use Planning provides a multitude of opportunities to incorporate policies that will affect the individual automobile usage, which is the primary source of air pollution problems in Imperial County. To comply with the Air Quality Management Plan, the Land Use Element and Circulation Element of the General Plan organizes land uses in relation to each other, promotes commercial and industrial land uses with convenient access to transportation, encouraging alternative transportation where feasible, and provides a balanced Land Use Plan that promotes a favorable relationship between job and housing. Mixed Land Use is designated in the City's Downtown District to allow for job opportunities in the first floor, but allow for housing opportunities in the higher floors. The jobs-housing balance is further encouraged by planning for and strategically situating commercial activity centers amidst higher density residential land uses planned for future growth.

The proposed Elements support and implement standards that attempt to reduce pollution sources that result from isolated populations. This is achieved by the policies in the Land Use Element, Circulation Element and previously adopted Conservation and Open Space Elements. The Zoning Ordinance achieves this as well via development standards. In order to keep low levels of air pollutants generated from vehicles in the future, the City of Imperial integrates air quality planning with land use and transportation planning as noted in the goals, actions, and policies listed herein. Land use decisions were based on the desire for a balance

of land uses that create a community where people can live, shop, work, and recreate. The following are some examples of the numerous goals, actions, and policies presented in the Land Use Element and Circulation Element that guide the initiative to reduce vehicle trip emissions:

Land Use Element Goal #4 Economic Prosperity: Achieve a balanced and varied economic base which provides a broad range of goods, services, and employment to the City's residents and the region in a manner that is aesthetically pleasing and consistent with the character areas.

- **Land Use Element Policy 4.1:** Commercial land use designations shall allow a full range of retail, office, service and institutional business within close proximity to and for the convenience of residents.
- **Land Use Element Policy 4.5:** New development adjacent to the Imperial County Airport shall be compatible with the facility, and provide additional opportunities for economic investment and expansion of jobs within the region.

Land Use Element Goal #8 Bicycle Trail Network: Create and build upon a pedestrian, bicycle and multi-use trail network that facilitates commuting, traveling to work, or school and recreation.

- **Land Use Element Policy 8.2:** Provide pedestrian connections and amenities so that all existing and new residential streets have a sidewalk or path on at least one side of the street and promote their use.

Circulation Element Goal #2 Safe & Complete Streets: To develop a multi-modal network and balanced transportation system that safely accommodates all modes of travel.

- **Circulation Element Policy 2.1:** Develop effective Transportation Demand management to manage the amount of vehicles generated by a land use by promoting alternative modes of transportation and continuing to utilize technology and intelligent transportation systems to stabilize street system flow and safety.

Circulation Element Goal #7 GHG Reduction: Reduce the amount of Green House Gases emitted by vehicular use in the City of Imperial.

- **Circulation Element Policy 7.1:** Develop a localized anti-idling ordinance to limit truck idling.
- **Circulation Element Policy 7.2:** The City shall encourage ridesharing in both the public and private sectors as a means of reducing overall traffic generation.

Conservation Element Goal #8: Improve air quality to help meet or exceed state and federal standards and minimize greenhouse gas emissions in support of AB 23 and SB 375.

- **Conservation Element Policy 8.2:** Coordinate with other regional agencies, such as the County of Imperial, for the purpose of developing greenhouse gas reduction strategies and reduce community-wide emissions of greenhouse gases by at least 15% from 2005 levels as stipulated in AB 32.
- **Conservation Element Policy 8.3:** Minimize the impact of future development in the City on global climate change by promoting walking, biking, and use of public transit to reduce dependency on public transportation.

Other Implementation Phase Impacts

New residential, commercial, and industrial land uses associated with the proposed implementation of the Land Use Element would also result in new emissions from the use of electricity and natural gas for site heating, cooling, ventilation, and lighting in addition to mobile emissions. These are stationary, and area source emissions that would be produced either directly in the Planning Area or indirectly through increased use of utilities located elsewhere. Energy use and other stationary sources would cause emissions of NO_x and PM₁₀ that would contribute to existing violations of either the State or Federal ambient air quality standards. The Imperial County adopted 1991 Air Quality Attainment Plan (AQAP) contains 19 stationary source control measures, including reducing the reactive organic compound (ROC) of paints. The General Plan incorporates a number of goals and policies to mitigate potential impacts of future implementation. The following is a goal and policy presented in the General Plan that guides the initiative to improve and/or reduce the impacts to the ambient air quality from stationary sources.

Conservation Element Goal #8: Improve air quality to help meet or exceed state and federal standards and minimize greenhouse gas emissions in support of AB 23 and SB 374.

- **Conservation Element Policy 8.1:** Facilitate compliance of regional air quality regulations by local employers and businesses through education, outreach, and involvement and by supporting a positive business climate and leading by example.

Implementation of the proposed Land Use Element and Circulation Element Update could result in placement of sensitive land uses near potential sources of objectionable odors, dust, or toxic air contaminants. Because of the rural character and the community's desire to preserve agricultural land uses, odors, dust, smoke, and chemicals associated with agricultural operations are likely to impact sensitive receptors within and in the surrounding vicinity of the project area. The principle sources of PM₁₀ and PM_{2.5} are fugitive wind blown dust, dust from unpaved roadways and farming operations. Certain Industrial uses may further handle or store material such as fertilizers or sack of sand which are active in the area and disperse throughout the area when wind is blowing. The City of Imperial has adopted and incorporated the following goal and policy into the Land Use Element:

Conservation Element Goal #7: Encourage soil conservation and management practices that maintain soil suitability within and surrounding the City.

- **Conservation Element Policy 7.1:** Establish measures to prevent blowing of topsoil during high winds and encourage the use of rock mulch or other ground cover to help control erosion.

It shall further be noted that in recognition of the vital role of agriculture in the County and in the City of Imperial, the Board of Supervisors adopted Ordinance #1031 to require a disclosure to owners and purchasers of properties near agricultural lands or operations. The disclosure required by the Right to Farm Ordinance advises people of the discomfort and inconvenience from odors, fumes, dust, smoke and chemicals resulting from agricultural operations. These operations are a normal and necessary aspect of living in Imperial County.

Consistency with Air Quality Plans

The City is committed to cooperate with the Imperial County Air Pollution Control District (APCD), the Southern California Association of Governments (SCAG), and Imperial County

to implement the regional Air Quality Management Plan. In addition, to reduce dust and particulate matter levels, the Plan encourages fugitive dust control measures such as the following:

- Restrict outdoor storage of fine particulate matter;
- Require departments to submit dust control plans to mitigate fugitive dust from areas and/or activities under their control;
- Limit and control requirements for construction and earthmoving activities;
- Establish requirements to prevent and clean-up mud and dirt transported onto paved roads from unpaved roads and areas;
- Provide tree buffers between residential and agricultural uses;
- Monitor construction and agricultural uses, activities and emissions; and
- Pave alleys and other areas frequently used by vehicles and limit and control requirement for unpaved haul and access roads, canal roads and traffic areas that meet certain size or traffic threshold.

3.3.4 SIGNIFICANT IMPACTS

Regional Air Quality Plans supported by the City of Imperial along with the Imperial General Plan goals and policies and Zoning Ordinance presented here and proposed to be actively implemented demonstrate a strong effort on the part of the City of Imperial to implement all feasible measures to mitigate potential impacts to air quality. Therefore, the effects of this impact are reduced to the level of less than significant and need no further mitigation measures.

3.3.5 MITIGATION MEASURES

No additional mitigation measures are required.

3.4 BIOLOGICAL RESOURCES

This section of the EIR examines the potential availability of sensitive biological resources within and in the vicinity of the Planning Area. The study focuses on protected plants, animals, and/or habitats that have been designated as rare, threatened, or endangered by the California Department of Fish and Game or the US Fish and Wildlife Service, and are protected under the California or Federal Endangered Species Act. It further discusses candidate species being considered or proposed for listing under these same acts. Any other species that would be considered as a species of expressed concern to resource and regulatory agencies, including local jurisdictions, would also be identified under this section.

3.4.1 EXISTING CONDITIONS

Background

The Planning Area is located just southeast of the Salton Sea. Prior to the 1900's the Planning Area consisted of Sonoran desert scrub biome. After the 1900's the majority of the area was converted to agriculture. The entire Planning Area consists of approximately 4,805 acres of land of which less than 24% has been developed. Much of this undeveloped land is agricultural land that has been actively farmed and under production. The Project Area is relatively flat with minimal changes in elevation. Temperatures range from 54° during the winter up to 119° in the summer. The temperature combinations set unique weather conditions for the area and its benefits to biological resources.

Much of the undeveloped, outer sections of the Planning Area to the west, north and east support several agricultural and fallow fields. The majority of the agricultural fields appear to be routinely plowed or disked, supporting cultivated crops. Weedy invasive vegetation typically associated with fallow fields is also found in this habitat. The existing conditions of the agricultural and fallow land may provide foraging habitat and shelter opportunities for a wide variety of common wildlife species.

Regulatory Framework

The United States Congress passed the Federal Endangered Species Act (FESA) in 1973 to protect those species that are endangered or threatened with extinction. The State of California enacted a similar law, the California Endangered Species Act (CESA) in 1984. Raptors, migratory birds, and other avian species are protected by a number of State and Federal laws-the Federal Migratory Bird Treaty Act prohibits the killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of Interior.

The State and Federal Endangered Species Acts are intended to operate in conjunction with CEQA and the National Environmental Policy Act (NEPA) to help the natural habitats in which endangered and threatened species depend. The United States Fish and Wildlife Service (USFWS) is responsible for implementation of the FESA, while the California Department of Fish and Game implements the CESA. In addition to formal listing under the FESA and the CESA, species receive additional consideration during the CEQA process. Species that may be considered for review are included on a list of Species of Special Concern developed by the California Department of Fish and Game. It tracks species in California whose numbers, reproductive success, or habitat may be threatened. During

project reviews, each agency is given the opportunity to comment on the potential of the project to affect listed plants and animals.

Existing Conditions

Based on a review of existing information (including a records search of the California Natural Diversity Database (CNDDDB), the following species have been identified within the Imperial planning area:

**Table 3.4-1
Listed Species from California Native Plant Society Database***

Listed Species <i>Accessed November 10, 2016</i>			
Scientific Name	Common Name	Rare Plant Rank	State Rank
Abronia villosa var. aurita	chaparral sand-verbena	1B.1	S2
Amaranthus watsonii	Watson's amaranth	4.3	S3
Astragalus sabulorum	gravel milk-vetch	2B.2	S2
Cryptantha costata	ribbed cryptantha	4.3	S4
Cryptantha holoptera	winged cryptantha	4.3	S4
Cylindropuntia wolfii	Wolf's cholla	4.3	S3
Eucnide rupestris	annual rock-nettle	2B.2	S1
Euphorbia abramsiana	Abrams' spurge	2B.2	S2
Imperata brevifolia	California satintail	2B.1	S3
Lycium parishii	Parish's desert-thorn	2B.3	S1
Malperia tenuis	brown turbans	2B.3	S2
Mentzelia hirsutissima	hairy stickleaf	2B.3	S3
Nama stenocarpa	mud nama	2B.2	S1S2
Pholisma sonora	sand food	1B.2	S2
Pilostyles thurberi	Thurber's pilostyles	4.3	S4

CNPS Status

- 1A: Plants Presumed Extirpated in California and Either Rare or Extinct Elsewhere
- 1B: Plants Rare, Threatened, or Endangered in California and Elsewhere, Endangered
- 2A: Plants Presumed Extirpated in California, But Common Elsewhere
- 2B: Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere
- 3: Plants About Which More Information is Needed
- 4: Plants of Limited Distribution

Threat Rank:

- 0.1-Seriously threatened in California
- 0.2-Moderately threatened in California
- 0.3-Not very threatened in California

Source: CNPS, Rare Plant Program. 2016. Inventory of Rare and Endangered Plants (online edition, v8-02)

*Not all CNPS Rank 3 and 4 may be available in database list

State Status

- S1 = Critically Imperiled
- S2 = Imperiled
- S3 = Vulnerable
- S4 = Apparently Secure
- S5 = Secure

The City of Imperial is predominantly urban built area, as a result much of the land with native habitat has been altered and the predominant plants in the areas are non-native species and herbs. Species common in the area to the area include mesquite, desert lilies, sunflowers, arrow weed, desert mistletoe, and willows.

**Table 3.4-2
Listed Species from California Natural Diversity Database**

Listed Species <i>Accessed November 9, 2016</i>			
Scientific Name	Common Name	State Status	CDFW Status
Lithobates pipiens	northern leopard frog	None	SSC
Charadrius montanus	mountain plover	None	SSC
Athene cunicularia	burrowing owl	None	SSC
Pyrocephalus rubinus	vermillion flycatcher	None	SSC
Nyctinomops macrotis	big free-tailed bat	None	SSC
Neotoma albigula venusta	Colorado Valley woodrat	None	-
Sigmodon hispidus eremicus	Yuma hispid cotton rat	None	SSC
Taxidea taxus	American badger	None	SSC
Lasiurus xanthinus	western yellow bat	None	SSC
Anodonta californiensis	California floater	None	-

DFG Status

SSC= Species of Special Concern

Wildlife usage of the project area is low, since the majority of the site has been subject to urban development, however, according to the California Natural Diversity identifies eight (8) Species of Special Concern (as identified in Table 3.4-1 Listed Species from California Natural Diversity Database). These species were identified in the El Centro Quadrangle.

3.4.2 THRESHOLD OF SIGNIFICANCE

Per CEQA Guidelines, impacts to biological resources would normally be considered significant if the project would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or by US Fish and Wildlife Service;
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service;
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- 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;

- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance;
- Conflict with the provision of an adopted Habitat Conservation Plan, Natural Community Conservation plan, or other approval local, regional, or state habitat conservation plan.

3.4.3 IMPACT ANALYSIS

An evaluation of whether or not an impact on biological resources would be substantial must consider both the resource itself and how that resource fits into a local or regional context. Approval and development of projects under the proposed Land Use Element and Circulation Element Update may reduce or destroy the habitat of species identified as sensitive, including species identified as special status by the California Department of Fish and Game and US Fish and Wildlife Services. Approval of development projects may also result in loss of planned and wildlife habitat within the Planning Area or adversely affect the movement and dispersal of wildlife and wildlife migration corridors.

The potential for a particular habitat to support special-status species depends on numerous factors including microhabitat, the level of human disturbance, and site conditions during proposed development. Since several special status species are potential for the project area, the habitats supporting conditions suitable for these species should be considered sensitive and as such should be surveyed before project development occurs in these areas. If one of these species is found within the survey area, the appropriate resource agency should be contacted and species-specific management strategies should be developed to ensure the protection of the species and their associated habitat. The City of Imperial has incorporated the following goals and policies into the Conservation Element to protect biological resources:

Conservation Element Goal #2. Preserve and protect biological resources.

- **Conservation Element Policy 2.1:** Support State and federal laws and policies to preserve populations of rare, threatened, and endangered species and sensitive habitats by ensuring development does not adversely affect such species or habitats or by mitigating adverse effects.
- **Conservation Element Policy 2.2:** Promote measures to reduce urban and agricultural pollution in runoff from impacting sensitive habitats.

Additionally, the draft Land Use Element incorporates the following Goal and Policy to help mitigate biological resources.

Land Use Element Goal #2 Land Use Compatibility To achieve land use compatibility throughout the City and promote character areas, where appropriate.

- **Land Use Element Policy 2.3:** New Development (urban or rural) shall prioritize compatibility with surrounding land uses, when developing adjacent to existing uses and where land use conflicts exist, they shall be addressed through the use of adequate buffering setbacks, or construction measures.

3.4.4 SIGNIFICANT IMPACTS

The City of Imperial's goals and policies presented here and proposed to be actively implemented demonstrate a strong effort on the part of the City of Imperial to implement all feasible measures to mitigate any potential impacts to biological resources. Therefore, the effects of potential impacts from implementation of the Land Use Element and Circulation Element are reduced to the level of less than significant and need no further mitigation measures.

3.4.5 MITIGATION MEASURES

No additional mitigation measures are required.

3.5 CULTURAL RESOURCES

This section of the EIR presents the environmental setting and impact assessment for historical and cultural resources in the Imperial Planning Area. Generally, a cultural resource or a historical resource can be a prehistoric, historic or archaeological site. It can also be an object, building, structure, place, record or manuscript that the lead agency (City of Imperial) determines is a cultural resource based on the idea that have made a significant contribution to the broad patterns of California's history and cultural heritage, is associated with persons in our past, embodies distinctive characteristic of a type, period, region, and that has yielded or may be likely to yield information important to prehistory or history.

The National Historic Preservation Act (NHPA) establishes laws for historic resources to preserve important historic, cultural, and natural aspects of our national heritage, and to maintain, wherever possible, an environment that supports diversity and a variety of individual choice. The National Register of Historic Places is the nation's master inventory of known historic resources. Structures, sites, buildings, districts, and objects over 50 years of age can be listed on the National Register as significant historic resources, however properties under 50 years of age that are of exceptional importance or are contributors to the area can also be included on the National Register.

3.5.1 EXISTING CONDITIONS

Background

The planning area is within the Salton Trough and located within the boundaries of the prehistoric Lake Cahuilla. Throughout historic and prehistoric times the Colorado River would flood and flow into this basin, creating Lake Cahuilla. The location of Lake Cahuilla is identified in **Figure 3.5-1**. During different periods, the size of the Lake varied. It is believed that at one point the Lake was about 5,500 square kilometers. When the Colorado River would return to draining into the Gulf of California, the Lake would recede through evaporation. Radiocarbon dating indicates that a minimum of three fillings and recessions occurred between about AD 1200 and 1700 (Laylander, 2011). The most significant occurrence occurred in 1905 when heavy rainfall and snowmelt caused the Colorado River to swell and create what is known today as the Salton Sea.

Figure 3.5-1- Location of Ancient Lake Cahuilla

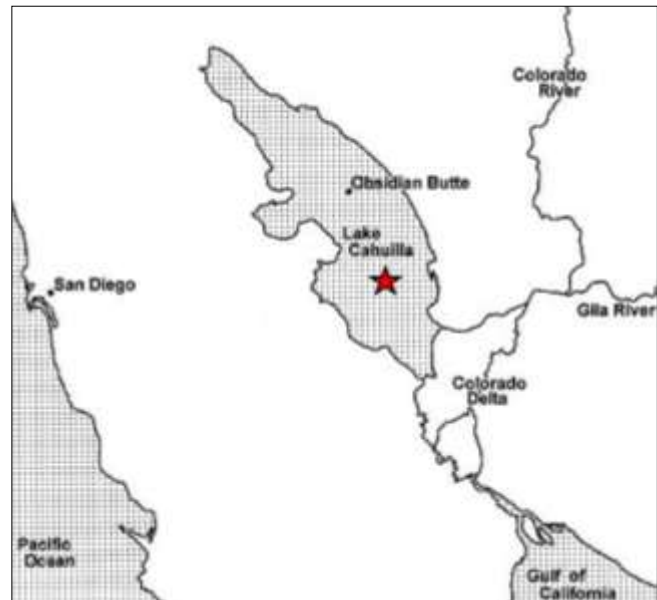


Figure 3.5-2- Lake Cahuilla Ethnolinguistic Groups



The Lake Cahuilla basin and Colorado River delta were split among at least three major ethnolinguistic groups: the Cahuilla in the northern portion of the basin, the Kumeyaay in the southern basin, and the Cocopa in the delta (Laylander, 2011). **Figure 3.5-2** identifies the division of the various groups.

These groups survived on the consumption of fish, shellfish, waterfowl and marsh plants at lakeshore sites (e.g., Laylander 1997a:86-90; Sutton and

Wilke 1988; Wilke 1978). The presence of the lake was also a critical resource for these groups as it provided them with potable water, which was essential in the hot and arid Colorado Desert. However, from a historical standpoint, the intensive use of Imperial Valley for irrigation agriculture since the beginning of this century has impacted any resources that may have existed on land that is now farmland or under the Salton Sea. Additionally, an environmental feature that discourages the likelihood of finding any prehistoric cultural resources are the Algodones Sand Dunes (Imperial County General Plan). In the map on Figure 3.5-1, Imperial would be located near the southern portion of the ancient Lake Cahuilla.

Imperial History

American settlement of the Imperial Valley began in the late 1800’s and early 1900’s by Oliver M. Wozencraft and Charles Robinson Rockwood. With the construction of the Imperial Canal in 1901, water from the Valley could be delivered to the Valley, facilitating agricultural development, however, additional infrastructure was needed to establish a strong agricultural economy. The Union Pacific Railroad also constructed a branch from 1902-1904 from Calexico to Niland, traversing the City of Imperial, also facilitating growth in the Valley (Tout, 1931). In 1911, the Imperial Irrigation District was formed with the purpose of delivering water in the pursuit of capitalizing on agriculture. It wasn’t until the completion of construction of the Hoover Dam (1935) and the All American Canal (1942) that water was successfully delivered from the Colorado River to the Imperial Valley. The availability of water and the nature of the soils in the Valley led to the growth of a successful agricultural economy.

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George Chaffey and L.M. Holt began the Imperial Land Company in the late 1800's with the prospect of the Colorado River reaching the Southern California Desert. They began plotting and staking out the town of Imperial, and began offering lots in early 1901, and population grew once water was supplies, by 1904 Imperial reached a population of 700. The town of Imperial was the first to vote to be incorporated, and officially became a City on July 12, 1904.

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Historic Monuments

There are many structures throughout the City of Imperial that the City desires to preserve and enhance as a reminder of the City's rich history. Being the first town in the County to incorporate, Imperial consequently became to hub of many first in the Valley, such as the first church, school, drugstore, grocery store, chamber of commerce, brick yard, and the first brick building. The City was devastated by earthquakes in 1916, 1940, and in 1979 which destroyed many of the old buildings in the downtown area. The biggest earthquake to devastate the City was the earthquake on 1940 which cause a lot of damage to the irrigation system and rail lines, additionally the old brick buildings in the City collapsed due a lack of reinforcements, and deteriorated limed mortar. Consequently no buildings of historical value remain in the City of Imperial.

Regulatory Framework

A variety of local, State, and Federal laws regulate and protect cultural and historic resources. The National Register, CEQA, the California Register and Sections 5024 and 5025 of the Public Resources Code establish some policy for cultural and historic resource preservation. The various laws establish a process for compliance, identify responsible agencies, and identify the relationship among other involved agencies.

Agency Contacts

The California Historical Resources Information System (CHRIS) includes the statewide Historical Resources Inventory Database maintained by the Office of Historic Preservation and the records maintained and managed, under contract, by twelve independent regional Information Centers. The Information Center that corresponds to Imperial County and the Planning Area is the Southeast Information Center at San Diego State University in San Diego.

Senate Bill 18, signed into law in 2004, requires a city, prior to adoption or amendment to a general plan, to conduct consultation with California Native American tribes for the purpose of preserving places, features, and objects protected by specific provisions of the public Resources Code that are within its jurisdiction. The following tribes were contacted during the preparation of this EIR: Cocopah Indian Reservation, Ewiiapaayp Tribal Office, Iipay Nation of Santa Ysabel, Barona Group of the Capitan Grande, Inaja Band of Mission

Indians, Jamul Indian Village of California, Kwaaymii Laguna Band of Mission Indians, La Posta Band of Diegueño Mission Indians, Manzanita Band of Kumeyaay Nation, Mesa Grande Band of Mission Indians, San Pasqual Band of Mission Indians, Sycuan Band of the Kumeyaay Nation, Viejas Band of Kumeyaay Indians, and Campo Band of Diegueño Mission Indians.

3.5.2 THRESHOLD OF SIGNIFICANCE

Cultural resources are considered an environmental impact under CEQA. A significant impact would occur with full implementation of the Land Use Plan if it would:

- Cause a substantial adverse change in the significance of an historical resource;
- Cause a substantial adverse change in the significance of an archaeological resource;
- Disrupt or adversely affect any site of historic or cultural significance to a community or ethnic or social group;
- Directly or indirectly destroy a unique paleontological resource, site, or geological feature; or
- Disturb any human remains.

3.5.3 IMPACT ANALYSIS

A record search through the South Coastal Information Center (SCIC) located at San Diego State University did not identify any known historical resources eligible for the California or National Register at or near the proposed planning area. Literature searches of information archived with the California Historical Research Information System identified three recorded cultural resources one of which was demolished in the early 21st century (Imperial Water Tower). The two remaining cultural resources include the Dahlia Drain No. 8 located on the west side of Highway 86 starting on Neckel Road, and the Niland-Calexico Railroad that traverses the City of Imperial, and is located on Aten Road between Clark Road and Imperial Avenue

In accordance with Senate Bill 18, the City of Imperial has contacted the California Native American Heritage Commission and will be forwarding a copy of the draft EIR for their review and comment. Any recommendations for the preservation of places, features, and objects within the Planning Area that are protected by specific provisions of the public Resources Code will be reviewed.

In the unlikely event that subsurface cultural materials are identified during project construction or maintenance, the City strictly enforces CEQA Guidelines in that all ground-disturbing activities should halt in the immediate area until the significance of the find can be determined in accordance with the provisions of CEQA Section 15064.5. This determination shall be made by a qualified archaeologist (defined as an archaeologist meeting the Secretary of Interior's Standards for archaeology), in consultation with County staff and Native American representative(s), if the resources are prehistoric or Native American in nature.

These procedures for reviewing potential impacts that may result from the implementation of the Land Use and Circulation Elements along with the City's General Plan goals, policies, and action programs mitigate any potential impacts on the visual character and cultural and

historic quality inherent to City of Imperial and the planning area. These are further identified below as follows:

Conservation Element Goal #3: Identify and promote the preservation of cultural, archaeological, and historic resources that define the historical significance of the City of Imperial.

- **Conservation Element Policy 3.1** Inventory and prevent the loss or compromise of significant historical and cultural resources and landmarks located within the City.

3.5.4 SIGNIFICANT IMPACTS

The land use designation of areas where historical resources are located will not cause them to be destroyed. The Imperial General Plan Conservation goals and policies demonstrate a strong effort on the part of the City of Imperial to implement all feasible measures to mitigate any potential impacts to cultural resources. Therefore, the effects of the future implementation of the Land Use and Circulation Element are reduced to the level of less than significant and need no further mitigation measures.

3.5.5 MITIGATION MEASURES

No additional mitigation measures are required.

3.6 GEOLOGY AND SOILS

This section describes the geologic and soils conditions within the Planning Area. Geologic and seismic hazards are also addressed. It is important to understand the geology and soils of the area in order to make informed policy decisions regarding future development in the City of Imperial. This section was based on review of documents and other data that are germane and provides a comprehensive report on the latest research and data on the geology and soils of the entire Planning Area for the City of Imperial.

The California Environmental Quality Act requires an assessment of potential impacts to individuals and or property that may result from ruptures of known earthquake faults, seismic shaking, liquefaction and other geologic hazards including the risk of loss, injury, or death to people and or structures. Geotechnical studies are necessary to evaluate and investigate subsurface soils and their physical and engineering properties. Geotechnical issues include subsurface soils conditions, groundwater conditions, regional faulting and seismicity, liquefaction, and soil expansion properties.

Geotechnical reports, in general, provide design and construction recommendations for the safe and sound development of buildings and structures. The following conditions are addressed through geological reports: Site grading and earthwork, building pad and foundation subgrade preparation, allowable soil bearing pressures and expected settlements, concrete slabs-on-grade, excavation conditions and buried utility installations, seismic design parameters, and pavement structural sections.

3.6.1 EXISTING CONDITIONS

Background

The Planning Area lies within the Imperial Valley at elevations varying from approximately 60 feet below mean sea level. The site is further located in the Imperial Valley portion of the Salton Trough physiographic province. The Salton Trough is a topographic and geologic structural depression resulting from large scale regional faulting. The complex geomorphic structure of the Salton trough has been evolving for millions of years and the entire northern portion of the Imperial Valley is a continuation of the structural depression of the Gulf of California. The trough is bounded on the northeast by the San Andreas Fault and Chocolate Mountains and the southwest by the Peninsular Range and faults of the San Jacinto Fault Zone. This trough represents the northward extension of the Gulf of California, containing both marine and non-marine sediments. According to recent reports and studies by geotechnical engineers, the tectonic activity that formed the trough continues at a high rate and is evidenced by deformed young sedimentary deposits and high levels of seismicity. Imperial Valley is a seismically active region and is considered likely to be subjected to moderate to strong ground shaking from earthquakes in the region.

The mountains outlining the Salton trough are primarily extrusions of volcanic, granitic, igneous and metamorphic rock complexes. Much of the irrigated portion of the Imperial Valley coincides with the shoreline of the ancient Lake Cahuilla and the sea level contour, which are still visible in many of the rock formations.

Soil Types

The Imperial Valley is directly underlain by interbedded lenticular and tabular silt, sand, and clay. The periodic folding of the Colorado River which intermittently formed a fresh water

lake (Lake Cahuilla, have caused lake deposits that are probably less than 100 feet thick. In general much of the near surface soils in the Imperial Valley consist of silty clays and clays which are moderate to highly expansive which can pose a potential hazard. Clay is expansive when water is added and can shrink with moisture loss. Some causes of soil saturation include landscape irrigation, broken utility lines, or capillary rise in moisture upon sealing the ground surface to evaporation. Moisture losses can occur with lack of landscape watering, close proximity of structures to downslopes and root system moisture extraction from deep rooted shrubs and trees placed near foundations. Development of building foundations, concrete flatwork, and asphaltic concrete pavements should include provision for mitigating potential swelling forces and reduction in soil strength.

Seismic Hazards

The City of Imperial, as well as the entire Imperial Valley, is considered to be a seismically active area. The Planning Area is susceptible to potentially strong seismic ground shaking because of the nearby Superstition Hills, Imperial, and Brawley Faults. The primary seismic hazard within the Planning Area is for strong seismic ground-shaking resulting from earthquakes along these faults of which Superstition Hills is the closest at 2.5 miles away as noted in **Table 3.6-1** and subsequent **Figure 3.6-1**.

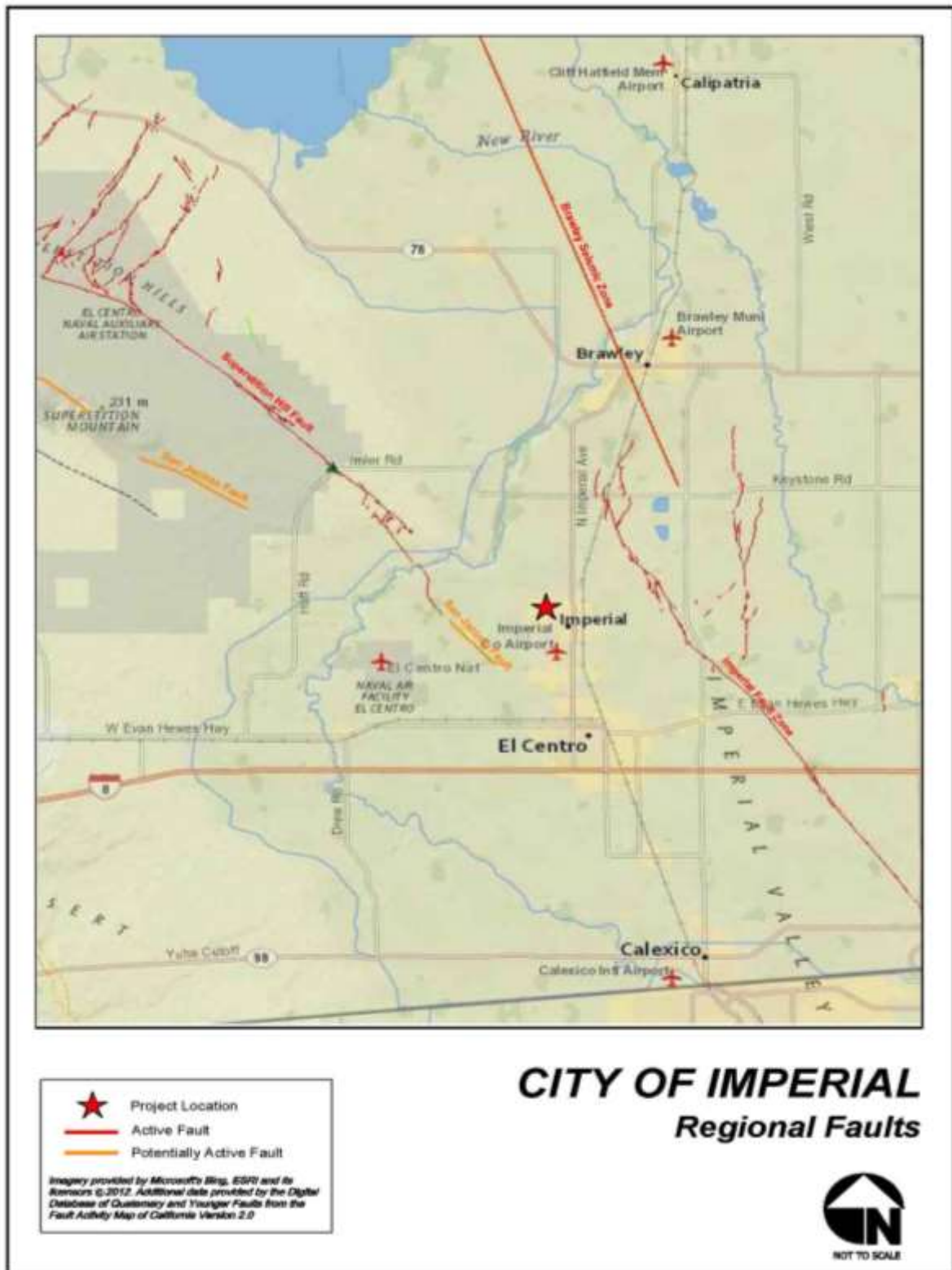
Table 3.6-1 – Faults and Earthquake Magnitudes Near Planning Area

Fault Name or Seismic Zone	Distance (mi) & Direction From Site	Fault Type		Fault Length (km)	Maximum Magnitude Mmax (Mw)	Avg Slip Rate (mm/yr)	Avg Return Period (Yrs)	Date of Last Rupture	Largest Historic Event > 5.5M (years)	Est. Site PGA
		2	3							
Reference Notes: (1)										
Imperial Fault Zone										
-Imperial	.64 E	A	B	62	7.0	20	79	1979	7.0 1940	0.51
-Brawley	2.6 E	B	B	14	7.0	20	-	1979	5.8 1970	0.42
-Brawley Seismic Zone	4.3 NE	B	B	42	6.4	25	24		5.9 1981	0.19
East Highline Canal	18 NE	C	C	22	6.3	1	774			0.10
Cerro Prieto	24.5 SE	A	B	116	7.2	34	50	1980	7.1 1934	0.15
San Jacinto Fault System										
-Superstition Hills	2.5 W	B	A	22	6.6	4	250	1987	6.5 1987	0.34
-Superstition Mtn.	6.5 NW	B	A	23	6.6	5	500	1440+/-		0.20
-Elmore Ranch	19.9 NW	B	A	29	6.6	1	225	1987	5.9 1987	0.11
-Borrego Mtn.	24.6 NW	B	A	29	6.6	4	175		6.5 1942	0.09
-Anza Segment	18.7 NW	A	A	90	7.2	12	250	1918	6.8 1918	0.09
-Coyote Creek	24.6 NW	B	A	40	6.8	4	175	1968	6.5 1968	0.07
Elsinore Fault System										
-Laguna Salada	20.3 SW	B	B	67	7.0	3.5	336			0.14
-Coyote Segment	26.0 NW	B	A	38	6.8	4	625		7.0 1891	0.10
-Earthquake Valley	54 NW	B	A	20	6.5	2	351			0.05
San Andreas Fault System										
-Coachella Valley	36 E	A	A	95	7.4	25	220-	1690+/-		0.11
-Algodones	38 N	A	A	458	7.9	-	-	1857	6.5 1948	0.14

Note:

- Jennings (1994) and CDMG (1996)
- CDMG (1996), where type A faults- slip rate >5 mm/yr end well constrained paleoseismic data; Type B faults- all others faults.
- WGCEP (1995)
- CDMG (1996) based on Wells & Coppersmith (1994)
- Elsworth Catalog in USGS PP 1515 (1990) and USBR (1976), Mw= moment magnitude.
- The determination estimates of the Site PGA are based on Attenuation relationship of: Boore, Joyner, Fumal (1997)

Figure 3.6-1. Regional Faults and Seismicity Map



The project area does not lie within a State of California, Alquist-Priolo Earthquake Fault Zone according to the California Department of Conservation Official Maps of Seismic Hazard Zones records. Surface fault rupture is considered to be low within the Planning Area, however, as noted by **Figure 3.6-1** numerous faults and a seismic zone are located in the vicinity of Imperial and residents may be affected by ground shaking from these faults. Nearby faults include the Elmore Ranch Fault, located northwest of the planning area.

Active Faults and Zones

- **Imperial Fault Zone:** The Imperial fault is probably the main element of the San Andreas fault system in the southern Salton trough, accommodating slip from both the San Andreas and San Jacinto fault zones.
- **Brawley Fault Zone:** The Brawley Fault Zone is a linear zone of seismicity (up to 10 km wide) associated with the right-step between the Imperial and San Andreas faults. Faulting reaches the surface within the Brawley fault zone, a zone of left-stepping, en echelon, principally normal, faults at the southern end of the Seismic Zone.
- **San Jacinto Fault Zone, Superstition Hill Section:** This is the most seismically active fault in southern California, with significant earthquakes. The San Jacinto fault zone is a major element of the San Andreas Fault system in southern California, with historic earthquakes (if not ground rupture) associated with most of its sections. This dextral fault zone branches off from the San Andreas near Cajon Pass and extends southeastward through the Peninsular Ranges for 240 km into southwestern Imperial Valley.

Potentially Active Faults:

- **San Jacinto Fault Zone, Superstition Mountain Section:** Like the Superstition Hill Section, it is also an area of the San Jacinto Fault Zone. There has been no documented surface rupture of the Superstition Mountain Section within the past 200 years.

Liquefaction

Liquefaction is the loss of strength in the granular, saturated, and unconsolidated sediments. Areas with deep sediments and shallow water tables are particularly susceptible to liquefaction. Damage from liquefaction may be caused as the ground liquefies and flows or lurches, or the ground may respond as quicksand causing buildings to tilt or sink. For liquefaction to occur, three factors must be present: 1) Soils must be loose, unconsolidated, evenly graded fine sands or silts; 2) The water table must be shallow; and 3) Intense, long duration ground shaking (greater than .13 g with a duration of greater than 45 seconds) must occur. Due to the shallow groundwater depth and alluvial nature of the soils present in the Imperial Valley (silts, sands and sandy silts), the risk from liquefaction as a result of a major earthquake is considered moderate. In addition, silty clays and clays found in the much of the near surface soils in the Imperial Valley are moderate to highly expansive and measures should be taken during construction to mitigate these potential swelling forces.

Subsidence

Subsidence is the downward setting of soil materials with little horizontal motion. There are four primary causes of subsidence: 1) Ground water withdrawal; 2) Oil or gas withdrawal; 3) Hydrocompaction (usually caused by first-time wetting of open textured soils which compact

under their own weight) and 4) Peat Oxidation (results from shrinkage of buried organic debris).

Structural Hazards

Structural hazards cause the vast majority of deaths and injuries in an earthquake resulting from partial or total collapse of man-made structures. Through enforcement of building codes and ordinances, the City can reduce the seismic hazard risk to all future structures and facilities. The California Building Code (CBC), which is the regulatory environment for design and construction of building codes and standards covering local, state, federal, land use and environmental regulations, is developed specifically for the purpose of regulating the life-safety, health and welfare of the public. For all buildings, construction techniques will be regulated according to the latest edition of the California Building Code (CBC) & recommendations in site specific geotechnical studies.

The City requires building design to be commensurate with the expected level of ground shaking in a major earthquake, based on site-specific soils and geologic conditions, as well as on the level of risk associated with potential damage to the building. Thus, high occupancy buildings and buildings that serve disaster recovery functions need to be designed to withstand a greater degree of ground shaking than low occupancy, low risk buildings. For all buildings, once environmental protection policies are met, construction techniques will be regulated according to the latest edition of the California Building Code (CBC). The City was required by state law to identify unreinforced masonry status. No buildings in the City of Imperial were identified in the 2006 Unreinforced Masonry Building Law Status Report to the State Legislature.

Secondary Hazards

Landsliding, volcanic hazards, tsunamis, seiches, and flooding are secondary hazards. The hazard of landsliding is unlikely due to the regional planar topography and no ancient landslides are shown on geologic maps. The Planning Area is not located in proximity to any known volcanic area, or any large bodies of water, so the threat of volcanic hazards and tsunami, seiches, or other seismically-induced flooding is unlikely.

3.6.2 THRESHOLDS OF SIGNIFICANCE

Per State CEQA Guidelines, the proposed project would have an effect on the environment, if any of the following occur:

- Expose people or structure to potentially substantial adverse effects, including risk of loss or death resulting from seismic activity, ground failure, or landslides;
- Result in substantial soil erosion or the loss of topsoil or be located in expansive soils thus creating a risk to life or property;
- 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 landslides, lateral spreading, subsidence, liquefaction, or collapse;
- Have soils incapable of adequately supporting the use of septic tanks or alternative waste disposal systems, where sewers are not available.

3.6.3 IMPACT ANALYSIS

Development associated with the proposed Land Use Element and Circulation Element Update may place the future development of buildings on expansive soils, thus, potentially causing structural damage or exposing people or structures to potential seismic events and related ground shaking due to its location within a seismically active region. The State of California provides minimum standards for seismic structural design and site development through the California Building Standards Code (California Code of Regulations Title 24). The California Building Code is based on the Uniform Building Code used widely throughout the United States and has been modified for California conditions with numerous more detailed and/or more stringent regulations.

The state earthquake protection law (California Health and Safety Code 19100 et seq.) requires that structures be designed to resist stresses produced by lateral forces caused by wind and earthquakes. Damage from earthquake is usually the result of liquefaction. The City continues to enact programs to reduce geologic, seismic, and structural hazards in order to protect public safety. To minimize hazards from earthquakes and other geologic hazards, the City implements the most recent geologic, seismic, and structural guidelines including the most recent Uniform Building code and other codes and regulations that ensure the public safety.

The City of Imperial understands the importance of geological concerns in the Planning Area. The City requires geologic reports in consideration of development proposals involving grading, unstable soils, and hazardous conditions, surveys of soils and more detailed geologic conditions by a State licensed engineering geologist. In order to protect the people, property, and infrastructure in the Planning Area, the General Plan also includes policies throughout that emphasize prudent construction and hazard awareness. These are identified below:

Safety Element Goal #1. Minimize the potential for loss of life, physical injury, property damage, and social disruption resulting from seismic ground shaking and other geologic events.

- **Safety Element Policy 1.1** Ensure that new building construction conforms to the latest Uniform Building Code standards for seismic design and that existing hazardous structures are identified and abated for public safety.
- **Safety Element Policy 1.2** Ensure the community is informed of earthquake preparedness and that there are adequate provisions for the community to respond to and recover from an earthquake as quickly and effectively as possible.

3.6.4 SIGNIFICANT IMPACTS

Development of sites within the Planning Area may subject populations to possible unstable soil conditions due to the site's proximity to various seismic zones. The above mentioned policies are designed to mitigate these impacts to a level less than significant. The City of Imperial General Plan adopted policies are actively implemented and demonstrate a strong commitment on the part of the City of Imperial to apply all feasible measures to mitigate this potential impact. Therefore, the effects of this impact are reduced to the level of less than significant and need no further mitigation measures.

3.6.5 MITIGATION MEASURES

No additional mitigation measures are required.

3.7 HAZARDS AND HAZARDOUS MATERIALS

The California Environmental Quality Act requires an assessment of potential impacts from hazards and hazardous material to the public or the environment that may result from the project. Impacts from hazardous materials are determined in terms of the potential to release existing hazardous materials that may exist on, or in the vicinity of the Planning Area and the potential for their release as a result of their use in development resulting from the proposed Land Use Element and Circulation Element. This chapter provides information on safety hazards within the City of Imperial Planning Area, including environmental hazards associated with flood, fire, emergency preparedness, and hazardous waste disposal.

3.7.1 EXISTING CONDITIONS

Background

A framework of Federal, State and local environmental laws, ordinances, regulations and standards, exists to reduce risks of accidents and reduce routine hazards, ranging from the federal Superfund and Clean Air Acts to State requirements for Risk Management Plans submitted by stationary handlers, to the local Uniform Fire and Building codes. Background information on safety hazards for the Planning Area provides a basis for proficient land use planning that would reduce unreasonable risks and protect public health and welfare. A listing of Federal and State databases was reviewed including Envirostor and Geotracker. There were no listings of facilities or unauthorized releases identified within the Planning Area.

There are a number of establishments within the Planning Area that use, store, handle or dispose of hazardous materials used in agricultural operations. Additionally, the railroad provides services for the transfer of industrial use and agricultural fertilizer product. There is also the risk of exposure of hazardous material which is common near roadways that are frequently used to transport such materials in addition to other natural hazards discussed in the preceding sections at a regional and state-wide level.

Fire Hazards

Fire hazards may threaten lives, property, and natural resources throughout the Planning Area. While fires are not entirely preventable, it is possible to create conditions that reduce the chances of fire and that facilitate efficient response in case of fire emergencies. When a fire does occur, quick response from firefighters and an adequate supply of water are essential in minimizing damage. Fire is a unique hazard in that it can result both from natural processes and from the intentional or accidental actions of people. There are three main types of fire hazards: 1) Wildfires, which affect open space and development on the urban fringe; 2) Structural fires, which occur in buildings; and 3) Commercial/industrial fires, which generally result from the ignition of flammable materials.

General factors that affect an area's risk from fire hazards include its location, land uses, distance from fire stations or water sources, ease of accessibility by fire-fighting equipment, and adequacy of water supply. More specifically, the extent and severity of damage by fires are determined by several key factors affecting vulnerability. The California Department of Forestry and Fire Protection designate portions of Imperial as moderate fire hazard zones, according to the Local Responsibility Area map.

The City of Imperial contracts with the County of Imperial for Fire Protection services and thus the Imperial County Fire Department informally monitors the demand of fire protection services for the City. The Fire Chief is also responsible for the identification and correction of fire hazards throughout the City. The County of Imperial Fire Department provides fire suppression services to the City, as well as to the unincorporated areas of Imperial County. The City renews its contract with the County of Imperial periodically with the most current Agreement dated July 8, 2014. The City is served by one fire station located at 2514 La Brucherie Road.

When new development projects are proposed, the water systems are reviewed by the City Engineer and Fire Chief to ensure there is adequate capacity and fire flows. Fire hydrants are required in all new development projects and water main systems are required to be looped to provide a steady pressure. Generally, 8-inch water mains are required in all new developments. The City has established minimum performance standards for adequate fire flow and supply as per the adopted 2008 Service Area Plan in order to maintain minimum safety thresholds.

Flood Hazards

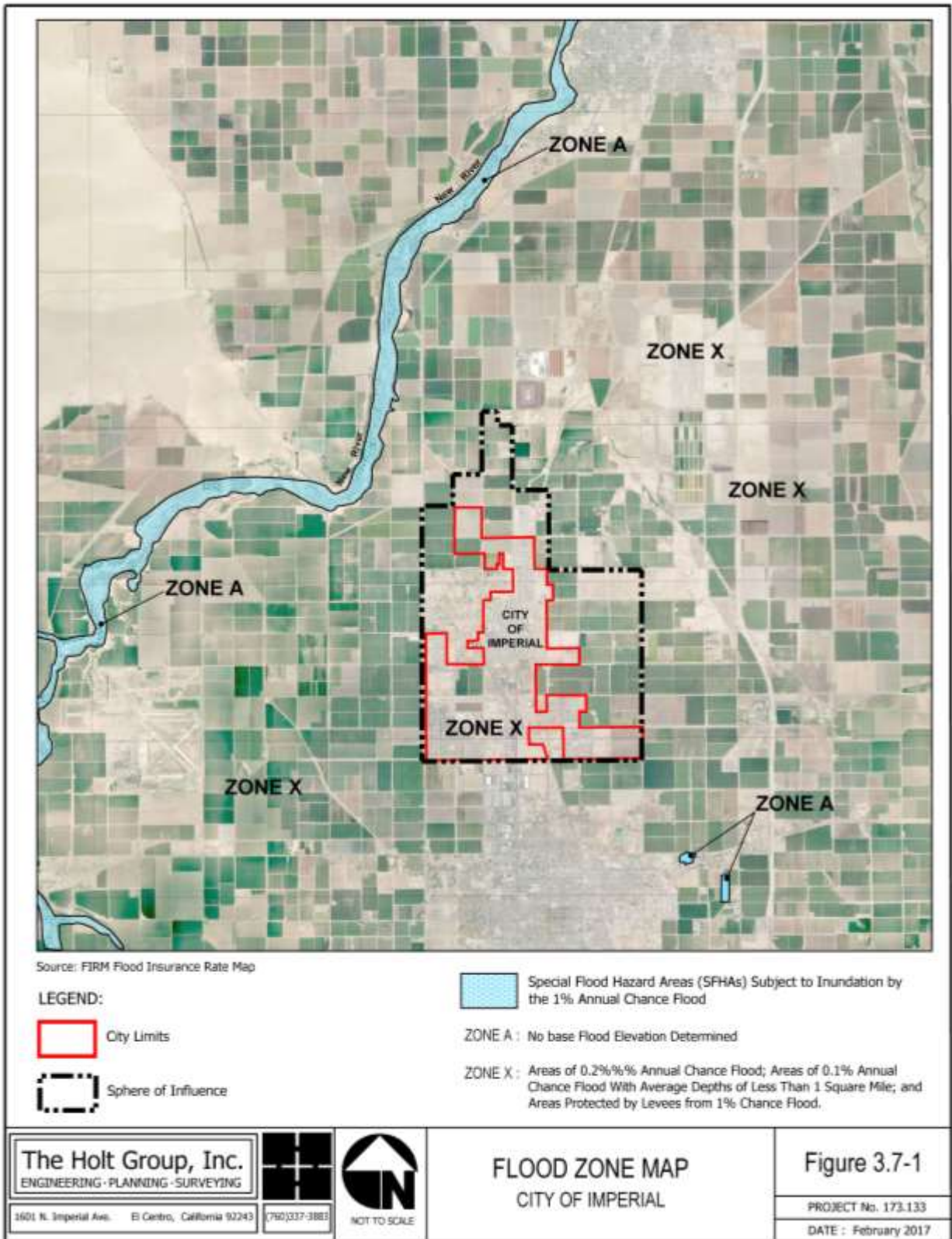
Floodplain management generally refers to the 100-year floodplain, and is concerned with both potential structural damages within the floodplain as well as changes to the configuration of the floodplain brought about by flood protection measures or construction activities. The 100-year floodplain delineates the inundation area from a flood having a one percent chance of occurring in any given year. There is a 100-year flood hazard area along the New River Corridor, however the nearest point to the City of Imperial is at a distance of 1.5 miles as noted in **Figure 3.7-1- Flood Zone Map**. However, it is important to note that due to deficient and/or absent stormwater collection systems flooding conditions are known to occur within certain areas of the community.

Storm and other flood waters are generally contained within the City streets and typically do not affect structures such as residential units or commercial buildings. The City adopts performance standards for all drainage facilities to conform with local design guidelines, NPDES requirements, and any Emergency Management Agency requirements. The City has very proactive design guidelines for example, the City of Imperial requires building pads for new structures to be at least 12 inches above the top of the adjacent curb and finish floor at 18". This requirement is intended to ensure that if floodwaters breach existing curbs, they will not impact the interior of residential units. All new projects within the City are also required to have grading and drainage plans approved by the City Engineer prior to the issuance of permits in order to ensure adequate control of floodwaters.

Hazardous Material & Waste

Solid, liquid, and hazardous materials and waste from area residents and businesses contribute to environmental and human health hazards that have become an increasing public concern. Toxicity and contamination of soils, water, air, and organisms present hazards of varying severity that can be controlled and minimized by proper waste management and disposal.

Figure 3.7-1 Flood Zone Map



Although a hazardous material incident can occur almost anywhere, certain areas are at higher risk. Jurisdictions with agriculture that use, store, handle or dispose of hazardous materials or those near roadways that are frequently used to transport such materials have an increased potential for major accident. Some possible sources of contamination might be the older underground storage tanks used to store hazardous materials including petroleum products. State laws relating to underground storage tanks include permitting, monitoring, closure, and cleanup requirements.

Asbestos- Asbestos are another common environmental hazard in the area. Asbestos, a naturally-occurring fibrous material, was used as a fireproofing and insulating agent in building construction before such uses were banned by the Environmental Protection Agency (EPA) in the 1970's. Asbestos can cause lung diseases in persons exposed to its airborne fibers. Because it was widely used prior to the discovery of its health effects, asbestos may be found in a variety of building materials and components including walls, ceilings, floors (tile), fireproofing, and pipe insulation in a number of existing buildings and structures in the Imperial Valley and within the Planning Area. All new development requires Phase I Environmental Assessments to determine the presence of asbestos materials on site.

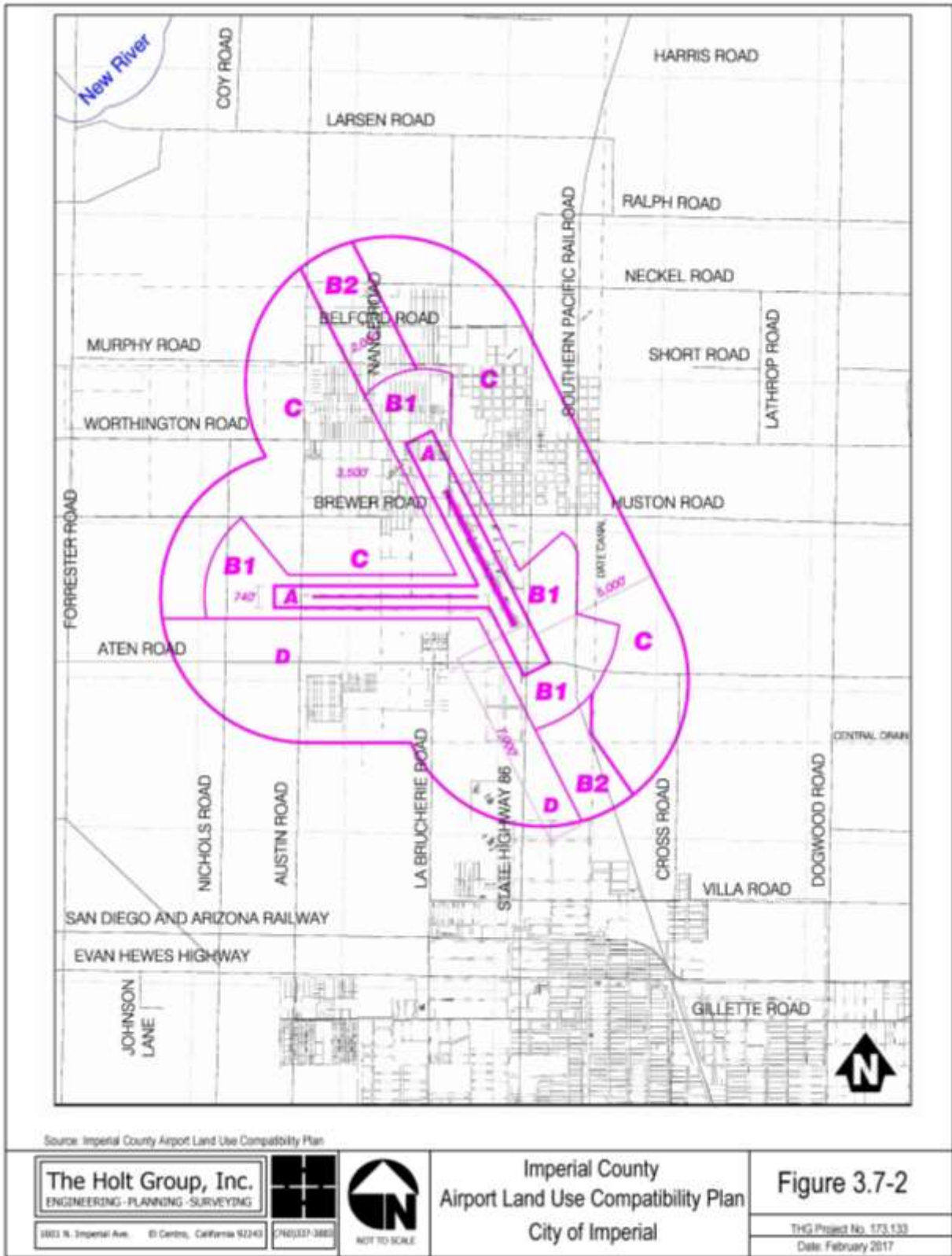
Pesticides- The majority of the Planning Area is currently, and historically has been used for agricultural purposes. Agricultural activities have traditionally used pesticides that contain hazardous chemical toxins. Pesticides contain chemicals formulated specifically to be toxic to certain living things. Due to the Planning Area's current and historical operation for agricultural production, low concentrations of pesticide residue typical to agricultural crop applications are commonly present in surface soils. These toxins can remain in the soil and can be released during grading activities. These pesticides and their use are regulated by federal and state legislation.

Asbestos- Asbestos are another common environmental hazard in the area. Asbestos, a naturally-occurring fibrous material, was used as a fireproofing and insulating agent in building construction before such uses were banned by the Environmental Protection Agency (EPA) in the 1970's. Asbestos can cause lung diseases in persons exposed to its airborne fibers. Because it was widely used prior to the discovery of its health effects, asbestos may be found in a variety of building materials and components including walls, ceilings, floors (tile), fireproofing, and pipe insulation in a number of existing buildings and structures in the Imperial Valley and within the Planning Area. All new development requires Phase I Environmental Assessments to determine the presence of asbestos materials on site.

Airport Hazard

The Imperial County Airport is centrally located within the City of Imperial and Planning Area. The airport's central location presents problems in terms of land use compatibility. The urban growth in the surrounding areas is enveloping the airport. A portion of the community lies within the Airport Land Use Compatibility Plans Zoning Districts which may include common traffic patterns for aircraft, and some areas having higher risk than others. The ICALU compatibility plan designates maximum densities as can be noted in **Figure 3.7-2 ALUC Plan Overlays**.

Figure 3.7-2 ALUC Plan Overlays



There are five restriction zones within the Imperial County Airport Overlay. The City of Imperial contains all five airport overlay zone types: A, B1, B2, C, and D as follows:

Zone A- The A zone contains the runway and has high impact risk, and high noise levels. All land is required to be open, and there is a maximum density of 10 people per acre, and no residential dwelling units allowed. All structures are prohibited in this zones except those necessitated by aeronautical functions, additionally the Development conditions of requires a dedication of aviation easement. Examples of acceptable uses include aircraft tie downs, pastures, and parking. The Land Use Map designated this area as open space, and the only development included are the air strip and administration building. Existing land uses in this Zone other than the runways and airport administrative offices include commercial offices, a gas station, ten single family dwelling units, and the waste water treatment plant.

Zone B1-The B1 Zone has substantive risk, and substantial noise levels. There is only .1 dwelling units allowed per acre, and 100 people per acre for other uses. The city Land Use Plan designates in these areas are as Residential Low Medium Density (2-5 dwelling units per acre), Light Industrial, Public Use, and Commercial Regional. Current land uses include multiple commercial buildings, multiple industrial buildings a restaurant and a hotel, both located at the Airport, a portion of the California Midwinter Fairgrounds, six duplex units, multiple single family residential subdivisions, a portion of Ben Hulse Elementary School, and thirty-five vacant lots. There are numerous uses that are not compatible with the Airport Land Use Compatibility Plan.

Zone B2- The B2 zone has significant risk, and significant noise levels. There is 1 residential dwelling unit per acre allowed, and up to 100 people per acre for other uses. The city Land Use Plan Designates these areas as Residential Low Density (5 dwelling units per acre), and Residential Low Medium Density (20 dwelling units per acre), Commercial Neighborhood and Rail Served Industrial. Existing land uses include several single family dwelling units which are spread out and two vacant lots. There are numerous uses that are not compatible with the Airport Land Use Compatibility Plan.

Zone C-The C Zone is the common traffic pattern, and has limited risk, and frequent noise intrusion. It has a residential maximum density of 6 dwelling units per acre and 200 people per acre on other uses. Acceptable uses in the C zone include parks, playgrounds, low intensity retail, offices, low intensity manufacturing, food processing, and two-story motels. Planned land uses consist of all land use categories to some extent with the highest density residential being high density residential (30 dwelling units per acre). Existing land uses include a plethora of vacant lots, single family dwelling units, commercial buildings, the IID Main Office, Imperial High School, Imperial High School District Offices, Frank Wright Middle School, the Border Patrol Station and recreational land uses. There are numerous uses that are not compatible with the Airport Land Use Compatibility Plan.

Zone D- The D zone poses a negligible risk, and has a potential for annoyance from over flights. There are no density limits in the D zone, and the zone only prohibits hazards to flight. If development is residential, a deed notice is required. The land use designations into these areas include Specific Plan, Open Space, Public Use, Residential Low Medium Density, and Light Industrial. Current development consists of varying levels of these land uses. Existing land uses consist of two residential subdivisions, multiple scattered single family homes, two apartment complexes, multiple commercial lots, and various vacant lots.

Emergency Preparedness

The City of Imperial adopted an Emergency Operations Plan in November 2015. This plan reflects local, regional and national advances in emergency management capabilities and changes in the Emergency Services Act (ESA). The basic purpose of the plan is designed to establish planning and to set forth the actions to be taken whenever the City of Imperial is faced with a disaster beyond the scope of normal day-to-day emergencies. Its goal is to prevent such disasters if possible and if not, to reduce the vulnerability of the City to such disasters; and to be able to respond quickly because of forethought and preparedness to restore life to normal in the City if and when disaster occurs.

The EOP addresses mitigation, preparedness, response, and recovery activities. There are three basic parts to the Imperial EOP. Part I is the basic plan, describing the hazards that could be faced in the City of Imperial, the emergency management organizations, the Standardized Emergency Management System (SEMS), the National Incident Management System (NIMS), emergency declarations, roles and responsibilities, and administrative practices. Part II consists of an overview of the organization for response and recovery operations, including City agencies and other organizations with lead and support responsibilities. Part III is a listing of plans and documents that are identified as references to the Imperial EOP. Included are laws, regulations, roles, orders, plans, training material, resource manuals, and agreements that support this plan. They provide additional detailed information for the conduct of emergency operations and performance of emergency duties.

3.7.2 THRESHOLDS OF SIGNIFICANCE

Per State CEQA Guidelines, the proposed project would have an effect on the environment, if any of the following occur:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Create a significant hazard to the public or the environment through reasonable, foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter mile of an existing or proposed school;
- Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment;
- Result in a safety hazard for people residing or working in the vicinity of a private airstrip or within the Airport's Land Use Compatibility Zone;
- Impair the implementation of, or physically interfere with an adopted emergency evacuation plan; or
- Expose people or structures to a significant risk or loss, injury or death involving wildland fires.

3.7.3 IMPACT ANALYSIS

The City is susceptible to multiple hazards as noted under the existing environmental conditions. A listing of Federal and State databases was reviewed including Envirostor and Geotracker and one Hazardous Waste facility was identified as the nearest hazardous disposal site 3.96 miles away. Caspian Inc. is located off of Aten Road, at the intersection of W. Aten Road, and Patrol Road and currently undergoing closure. There are no unusual levels of risk for hazards associated with hazardous material, fires, or flooding however, emergency response may be in a issue as it relates to location of fire stations in relation to the eastern half of the City and it's separation by the Union Pacific Railroad. The UPPR is an active rail-line that restricts access to the east side of town while in operation. The current procedures in response to a fire on the east of town, while the railroad is in operation is to contact the El Centro Fire Department for mutual aid. The City of Imperial has a number of policies in place under the Safety Element to help offset these challenges, in addition to response to other potentially unforeseeable hazards:

Safety Element Goal #5 Maintain a system of emergency services and disaster response preparedness that will save lives, protect property, and facilitate recovery with a minimum public disruption.

- **Safety Element Policy 5.1** Continue to develop and implement local preparedness planning and operations consistent with the Standardized Emergency Management System (SEMS) and National Incident Management System (NIMS) and participate in multi-jurisdictional disaster preparedness planning and operations.
- **Safety Element Policy 5.2** Ensure fast and efficient access to all areas of the City during fires, earthquakes, and other emergencies.

Hazardous Material Impacts-Numerous laws and regulations have been enacted to regulate the management of hazardous materials and waste to protect the public and the workplace. Release of hazardous materials into the environment could cause serious problems, however, the degree of threat posed to life or property is dependent on the type, location, and concentration of the material released as well as weather conditions, such as wind speed, wind direction and precipitation. The proposed Land Use Element has taken into account industrial land use distribution and land use location in a manner that will minimize these exposures and risks to residential uses.

There has been a desire to reduce the net amount of designated industrial land, relocate industrial sites away from inner neighborhoods as feasible, strategically locate industrial land use designations in peripheral areas and along key transportation corridors. The placement of industrial land is further detailed under the Land Use section of this EIR, however, for the purpose of hazard mitigation, the proposed location of industrial land uses has been strategically situated along the Union Pacific Railroad. This placement of industrial land uses has been assigned with the purpose of maintaining satisfactory response times in relation to the current fire station location, access to and from major transportation routes without the need to transport dangerous materials through residential neighborhoods, and availability of resources.

All industrial land uses and sites will need to conform with California law which requires detailed planning to ensure that hazardous materials are properly handled, stored, and disposed of and to prevent or mitigate injury to human health or the environment resulting

from hazardous material. Of particular local concern is the use of pesticides related to agricultural operations. The array of licensing, permitting and registration requirements, together with the manifold restriction on the application, use, and handling of pesticides, reflects a growing desire to evaluate environmental effects accurately and to oversee all pesticide related activities. Because of the presence in groundwater, and surface water and air, pesticides are regulated in California under federal and state water quality laws, safe drinking water laws, and air laws. Policies and Goals in the adopted General Plan Safety Element and proposed elements to mitigate against again potential hazardous material and waste are noted as follows:

Safety Element Goal #4 Protect life and property from potential short- and long-term adverse effects associated with the transportation, storage, treatment, and disposal of hazardous materials.

- **Safety Element Policy 4.1** Ensure proper buffer zones and mitigation is incorporated in new development where residential units are constructed in close proximity to hazardous materials areas or sites.
- **Safety Element Policy 4.4** Continue to identify toxic disposal or leakage sites and pursue expeditious cleanup of these sites through actions by appropriate County, state, and federal agencies and by promoting available resources.

Fire Hazard Impacts-Although there is minimal risk for wildfires, the City of Imperial has also adopted several goals and policies found in the Safety Element to mitigate the risk of exposure to hazards from fire dangers to an acceptable level through the proper planning and regulation of human activity as follows:

Safety Element Goal 3 Minimize the potential for loss of life, physical injury, property damage, and social disruption resulting from fires.

- **Safety Element Policy 3.1** Require all new development within the City of Imperial to comply with applicable provisions of the Uniform Fire Code, National Electrical Code, and applicable Nuisance Abatement codes.
- **Safety Element Policy 3.3** Monitor and measure fire-flows within the City's existing water system and improve water standards to those sections of the City with inadequate fire flow protection.

Flood Hazard Impacts-While the Planning Area is entirely outside the 100-Year floodplain, there are issues of localized flooding within the Planning Area and the continued need for an efficient stormwater conveyance system and drainage basins as development occurs. Increased development associated the build-out of the General Plan Land Use Element may lead to an increase in impervious surfaces being created where permeable soils currently exist. As a result, local and regional detention basins may be needed to control stormwater flow into surface drains that ultimately flow into the New River. This system is critical in order to minimize the occurrence of flooding.

The City of Imperial takes this responsibility seriously and has included many policies and objectives to provide efficient and safe drainages systems to protect the citizens of Imperial from the dangers of flooding. The City of Imperial has adopted design guidelines including minimum Standards, Details, and Specifications for storm-water infrastructure in addition to the following General Plan goals and policies:

Safety Element Goal #2 Minimize the potential for loss of life, physical injury, property damage, and social disruption resulting from flooding.

- **Safety Element Policy 2.1** Ensure that new development projects evaluate potential flooding hazards and incorporate design elements, such as storm drains, catch basins, and detention basins, to minimize or eliminate flooding hazards, as necessary.
- **Safety Element Policy 2.2** Encourage the formation of a Countywide Flood Control District to manage Countywide flooding issues.

3.7.4 SIGNIFICANT IMPACTS

The City of Imperial policies adopted in the General Plan and presented as updates in the Land Use Element are designed to substantially mitigate any potential hazards. The adopted goals and policies are actively implemented in action programs and are consistent with the City's adopted Emergency Plans and Development Standards, Details, and Specifications. These regulations demonstrate a strong commitment on the part of the City of Imperial to implement all feasible measures to mitigate impacts from natural and manmade hazards. Therefore, the effects of this impact are reduced to the level of less than significant and need no further mitigation measures.

3.7.5 MITIGATION MEASURES

No additional mitigation measures are required.

3.8 HYDROLOGY/WATER QUALITY

The California Environmental Quality Act requires an assessment of potential impacts to hydrology and water quality. An assessment of water quality standards, supplies, and drainage patterns is considered for potentially adverse impacts. Large sealed surfaces can substantially increase the existing rates of runoff and any increase in paved areas can potentially create new sources of polluted runoff. This section provides a description of the City of Imperial Planning Area hydrology, including water resource availability, quality, regulation, and planning.

3.8.1 EXISTING CONDITIONS

Background

On a regional level, Hoover Dam and several other dams, including Imperial Dam have been built along the Colorado River to provide an effective and efficient flood management water storage system. Local drainage patterns within the valley have been altered through agricultural activities. Water to irrigate virtually the entire Imperial Valley originates from the Colorado River. The Imperial Irrigation District (IID) maintains approximately 1,600 miles of irrigation drainage structures which collect surface water runoff and subsurface drainage from some 32,200 miles of agriculture tile drains. The flow is channeled into the New River and the Alamo River, which ultimately drain into the Salton Sea. Most of these drains and laterals are open and unprotected.

The City of Imperial's storm water drainage facilities include many ditches, pipes and detention basins which function to divert storm runoff and standing water away from residences and business within the City. These facilities convey storm water runoff into the main water drainage system managed by the Imperial Irrigation District (IID). However, the IID has communicated interest in abandoning all facilities within the City limits for the City to take over the system. Additionally, as future development occurs and drainage facilities are no longer used for agricultural drainage, the IID will abandon those facilities to the City, so that the IID only manages drains used for agricultural.

Water treatment and distribution facilities include the City of Imperial's Water Treatment Plant and the distribution pipelines that convey potable water to residences and business within the service areas. Water facilities also includes water transmission lines and pump systems necessary for conveyance of water.

Potable water must meet or exceed water quality standards established by the California Department of Health Services and the US Environmental Protection Agency. The California Department of Public Health further requires that specific system pressures be maintained under normal and peak demand conditions. The design criteria are based on Maximum Day Demand (MDD) plus fire flow. The potable water system must be able to adequately treat and provide 150 gallons per person per day as well as fire flow.

Although there are no adopted Performance Standards for water distribution, there are design criteria that must be met to ensure that adequate potable water supply and fire flow needs are provided. The design criteria are based on the Maximum Day Demand @ Peak Hour plus fire conditions (MDPHF). Peaking factor is 1.78. The treatment plant capacity shall further meet the demand of the maximum daily flow, plus provide an operational storage capacity of at

least 25 percent of the maximum day demand used. Storage required is one maximum average day demand plus a 2,500 GPM fire flow for a four-hour duration. The design criteria includes the following:

**Table 3.8-1
Water Flow Standards**

Flow Demand	Maximum Velocity	Pressure Level
Maximum Day Demand + Fire Flow ¹	15.0 FT per second	20 psi – 35 psi
Maximum Day Demand	3.0 FT per second	32 psi ≥ 20 psi

Fire flow minimums are targeted at 1,200 GPM for residential, 2,000 GPM for commercial, and 2,500 GPM for industrial.

The City of Imperial owns, operates and maintains a system for the treatment, storage and distribution of potable water resources that serves approximately 5,015 (January 2015) water service connections for residences and businesses within the City’s service area and Sphere of Influence. The City purchases all of its untreated water from the Imperial Irrigation District, which is conveyed to City facilities via IID’s Dahlia Canal via a 24-inch diameter raw water pipeline, and the Newside Canal as a secondary source via 27-inch and 16-inch diameter pipelines.

All information for this section was acquired from the Master Plan for the Water Distribution System for the City of Imperial prepared by BJ Engineering and Surveying, Inc. and dated 2008. Some of the information provided in this section is paraphrased while other parts are used word-for-word from the Master Plan.

A majority of the storm water collected within the City of Imperial uses surface drainage ditches to convey storm water to the IID drains. The primary drainage facilities receiving the City of Imperial’s storm water, and managed by the Imperial Irrigation District, include the North Central Drain, North Central Drain No. 2, Newside Drain No. 1, Dahlia Drain No. 8, Dolson Drain No. 2 and the McCall Drain No. 5A and 5B.

The five primary drainage zones within the City can be geographically described as southwestern portion (SW), central west portion (CW), central east portion (CE), eastern portion (E), and northeast portion (NE). The zones are described in more detail below.

SW Drainage Zone: The southwestern portion of the City near the Sandalwood and Wildflower subdivisions and the industrial area at Aten and La Brucherie use a series of retention basins to restrict the flow of storm water before entering the underground storm water conveyance pipes. There is a small lift station adjacent to Aten Road, which assists with the conveyance of storm water for the Sandalwood and Wildflower subdivisions into the storm water conveyance system. The system then transports the storm water to the North Central Drain No. 2 which ultimately flows to the main North Central Drain.

CW Drainage Zone: The central portion of the City, north of the airport and west of Highway 86, conveys storm water through surface drainage ditches to a primary surface

drainage ditch located adjacent to Highway 86. This drainage ditch flows north adjacent to Highway 86 to the IID Dahlia No. 8 drain.

CE Drainage Zone: The central area east of Highway 86 and west of the railroad tracks also uses surface drainage ditches to convey storm water to a primary drainage ditch adjacent to M Street. The M Street drainage ditch flows north to Fifteenth Street. At Fifteenth Street, the M Street ditch storm water enters the IID Dolson No. 2 Drain.

E Drainage Zone: From First Street to Barioni Boulevard east of the railroad tracks, surface drainage ditches convey storm water to an IID drainage pipe at the southeast corner of the intersection of Barioni and P Street. North of Barioni Boulevard, surface drainage ditches convey stormwater west to the primary drainage ditch at Barioni Boulevard and N Street. The N Street drainage ditch flows north to Fifteenth Street. At this point the surface water flows into an 18" pipe which conveys the stormwater west under the railroad tracks and into the IID Dolson No. 2 Drain.

NE Drainage Zone: There are two subdivisions in the northern portion of the City east of Highway 86. Each subdivision contains their respective retention basins and underground stormwater conveyance systems. Water flows out of the retention basins and into the IID Dolson No. 8 and No. 2 Drains.

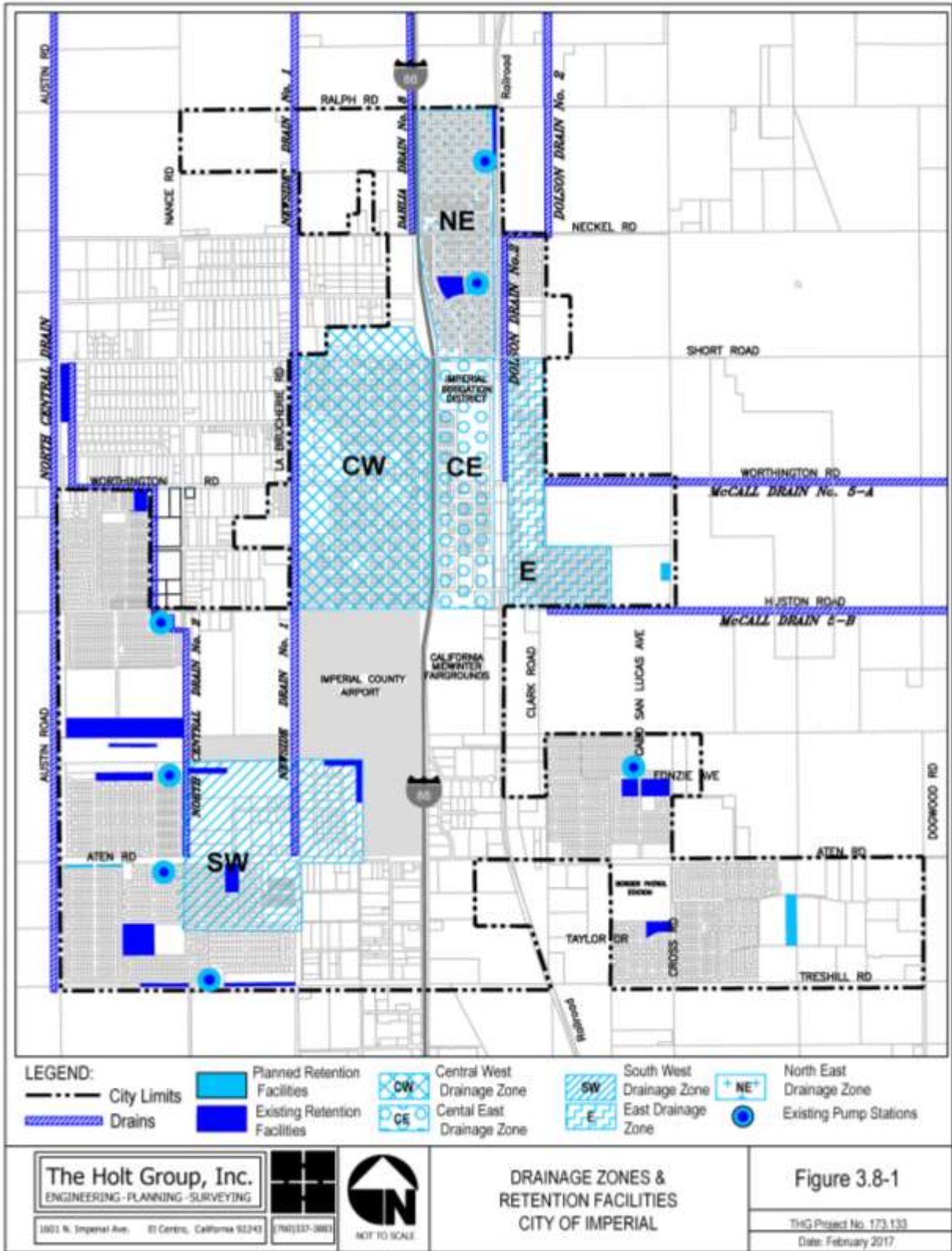
The existing primary drainage system managed by IID is not designed to convey all storm water runoff from urbanization. Therefore, recent and new development must provide for on-site retention of storm water to mitigate against storm water impacts. These retention facilities are designed to control storm water flows into the IID drains. Conveyance out of the retention basins is restricted by the use of 12" pipes.

The City of Imperial Public Works Department provides the maintenance of the City storm water drainage system. The public works crews monitor the flow within the drainage ditches, make minor repairs and clean the ditches on an as needed basis. Additionally, street sweeping occurs throughout the City, which is a preventative method that assists in keeping the drainage ways clean of some debris and sediment. According to the City of Imperial Public Works Director, Jackie Loper, the current system provides adequate conveyance of storm water for events up to a 100-year storm. There were only two instances in the mid - 1970's when the drainage system did not adequately convey storm water in localized low-lying areas.

Topography

Flooding occurs in varying degrees throughout Imperial County. Floodwaters can occur from either sudden downpours or as a result of slow heavy precipitation. Most of the flat irrigated valley is subject to minor shallow flooding and ponding due to the lack of local topographic relief, occasional intense storm events, and low soil infiltration rates that produce rapid runoff flows. The Planning Area presently consists of fairly level land with vegetation consisting of agricultural crops or weedy ones. The potential for slope instability is unlikely in the Imperial planning area due primarily to its flat topography.

Figure 3.8-1 Drainage Zones & Retention Facilities



Regulating Agencies

United States Environmental Protection Agency- The Clean Water Act (CWA) (1972) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The US EPA is responsible for water quality management under the CWA. The CWA makes it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit is obtained. EPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. The US EPA delegates authority to the State Water Resources Control Board who delegates authority to regional Water Quality Control Boards. Imperial is under the Colorado River Regional Water Quality Control Board, Region 7 which regulates water quality from point sources and construction-related stormwater discharges to surface waters via the NPDES program. A construction NPDES permit is required for all projects that disturb more than one acre of land and is required to prepare a Stormwater Pollution Prevention Plan (SWPP).

3.8.2 THRESHOLDS OF SIGNIFICANCE

Per State CEQA Guidelines, the proposed project would have an effect on the environment, if any of the following occur:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality;
- Substantially deplete ground water supplies and resources, or interfere substantially with groundwater recharge so that there would be a net deficit in aquifer volume or the lowering of the local groundwater table;
- Substantially alter the existing drainage pattern, including through the alteration of a course of a stream, or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- Place housing within a 100-year flood hazard area as mapped on a Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map which would impede or redirect the flood flows;
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or
- Cause substantial inundation, flooding, erosion or siltation.

3.8.3 IMPACT ANALYSIS

Development increases the amount of impervious surfaces and adds to the runoff that can result in major downriver flooding. The Imperial Irrigation District limits the outfall capacity of its drainage system in order to reduce downstream flooding potential from combined agricultural and storm runoff until the District can complete the process of preparing a Preliminary Master Drainage Plan.

Development of the proposed land uses and circulation improvements within the Planning Area could have the potential to degrade water quality during construction activities. Implementation of the proposed project area through build-out has the potential to alter the

natural drainage pattern of the area during development. Short-term grading and construction activities may cause an increase in erosion. Pollutants may also be transported from construction areas to downstream location of the Salton Sea. Without proper mitigation, solvents, fuels, lubricants, and chemical wastes may be spilled, dumped, or discarded on sites and these contaminants may be picked up in site runoff and ultimately enter downstream waterways.

Long-term impacts resulting from development of much of the proposed land uses can also substantially increase the existing rates of runoff due to large sealed surface areas. By significantly increasing impervious surfaces, and risk of contaminants from parking lot and other paved areas have the potential to create new sources of polluted runoff. Long-term occupation of the proposed land uses could also introduce non-point sources of pollution such as fertilizers, pesticides, households chemicals, and automobile products (including fuels and lubricants spilled, leaked, or dumped) within the Planning Area. These pollutants may be picked up by stormwater runoff and enter surface water bodies in or downstream from the Planning Area and ultimately the Salton Sea.

There is serious concern that pollutants deposited into and carried by drains are increasing the degradation of the Salton Sea. The City of Imperial reduces pollutants in urban runoff by participating in the National Pollutant discharge Elimination System Program (NPDES). Per the City's NPDES permit, all new development projects and substantial rehabilitation projects are required to incorporate Best Management Practices. Implementation of Best Management Practices will enhance surface and ground water quality in the Planning Area. Additionally, the following General Plan goals and policies help mitigate any potential impacts:

Conservation Element Goal #5: Provide for a safe and efficient water supply to meet the demand of the existing and future population.

- **Conservation Element Policy 5.1:** Continue to implement water conservation strategies that efficiently manage demand of existing urban water use through conservation measures.
- **Conservation Element Policy 5.2:** Ensure development in Imperial is at levels that can be supported by existing and/or future water service capabilities.

Conservations Element Goal #6: Protect water quality and prevent contamination of surface water.

- **Conservation Element Policy 6.2:** Meet the National Pollution Discharge Elimination System (NPDES) water quality standards for run-off from developed areas and from City owned storm water and wastewater effluent discharge.

3.8.4 SIGNIFICANT IMPACTS

The Imperial General Plan policies and implementation programs presented here demonstrate a strong effort on the part of the City of Imperial to implement all feasible measures to mitigate impacts to water supplies and water quality. Therefore, the effects of impacts to hydrology and water quality are reduced to the level of less than significant and need no further mitigation measures.

3.8.5 MITIGATION MEASURES

No additional mitigation measures are required.

3.9 LAND USE AND PLANNING

Changes in land use are not, in and of themselves, are environmental impacts. Land use changes are impacts only relative to the prior use or the site (i.e. conversion of open space, an irreplaceable resource) or the surrounding usage and character (i.e. compatibility between housing and a noise generator, or between different intensities of development).

The purpose of this section of the EIR is to determine the impact and compatibility of the proposed land use modifications on the existing and planned land uses in the area. The information presented and examined in this section has been taken from the City of Imperial Land Use Element and Circulation Element Update that has resulted from a number of Community Workshops.

3.9.1 EXISTING CONDITIONS

The City of Imperial is a rural residential community with more than 50 % of the existing land uses within the incorporated City Limits as residential land uses. Commercial and industrial land uses are limited and concentrated along Imperial Avenue, Highway 86, and the Union Pacific Railroad. The larger industrial operations are located along the Union Pacific railroad which traverses through the eastern section of the City of Imperial.

Residential Land Uses

The residential land uses of the 1992 Imperial General Plan and Land Use Element are organized into six land use designations: 1) Rural Residential, 2) Low Density Residential, 3) Medium Density Residential, 4) Residential Condominium, 5) Multiple Family Residential and 6) Mobile Home Park. These classifications address the various residential uses within the City of Imperial and include their character, applications, and potential impacts. The purpose of this varied land use classifications and zoning designations is to ensure the continued use of residential property in a manner that reflects current and historic practices and considers the desired future of residential growth for the City of Imperial.

- ***Rural Residential-*** The Rural residential category is single family residential at 0.5 to 1 dwelling unit per acre. It is intended to permit the continuation of agricultural and farm uses while allowing the development of single family residential units at a very low density.
- ***Low Density Residential-*** The Low Density Residential category is a transitional area between the Rural Residential areas and other higher density residential areas. The density of this category is 1 to 2 dwelling units per acre.
- ***Medium Density Residential-*** The medium density residential category covers the existing single family residential areas within the current City limits and also includes those new developments with 6,000 square foot or larger lots. The density of this category is 2 to 5 dwelling units per acre.
- ***Residential Condominium-*** The Residential Condominium category bridges the housing gap between the Single Family Residential and the Multiple Family Residential categories. This category represents an opportunity for the first-time homebuyer or the retired person to enter into the ownership market at a reasonable

cost. Units within this category are generally developed as an attached product with densities ranging from 5 to 30 dwelling units per acre.

- **Multiple Family Residential-** The Multiple Family Residential category represents those areas of the City which are located along high traffic corridors or adjacent to concentrations of commercial or industrial land uses. This category includes duplexes, triplexes, fourplexes and other multiple dwelling unit buildings. This category has a density range from 20 to 30 dwelling units per acre and is generally developed as an attached product.
- **Mobile Home Parks-** The Mobile Home Park category is used to designate specific areas for the exclusive development of mobile home units within a park environment. Density in this category ranges from 5 to 8 dwelling units per acre.

Commercial Land Uses

The provision for, and thoughtful placement of, commercial land use classifications is critical for the long-term economic success of the City of Imperial. The commercial land uses of the Land Use Plan are divided into four classifications that branch out into four distinct zoning designations as further described below.

- **Village Commercial-** The Commercial Village designation aims to reintroduce retail commercial shopping. Standards provide the provision of pedestrian facilities, and consolidation of automobile parking, and introduction of landscaping and street furniture.
- **Neighborhood Commercial-** The Commercial Neighborhood designation provides for local community serving commercial uses like grocery stores, drug stores, and ancillary uses that are situated at major intersections within residential neighborhood. Shopping Centers are approximately 10 acres in size.
- **Auto Mall-** The Auto Mall designation provides the development of auto dealerships at the southern and northern portions of the City along Highway 86 and Aten Road.
- **Commercial Office-** The Commercial Office designation provides for uses such as offices, restaurants, theaters, health clubs, and ancillary retail commercial mainly within areas of the City close to southerly portions of the Village Center.

Commercial land uses are currently situated within the central business district, off of Imperial Avenue (SR86) and South Imperial Avenue which traverse the City of Imperial. There are approximately 165 acres designated for commercial development within the City Limits and an approximate, additional 200 acres able to accommodate within the adopted Sphere of Influence. In an overview, these figures suggest a reasonable amount of land available for commercial development to accommodate the future growth and demand.

Many of the sites within the City are suitable for smaller infill developments; however, there are no sites suitable for larger commercial operations and regional shopping. The City has many small lots in the downtown area making it difficult for developers to obtain a large enough site suitable for their needs.

Industrial Land Uses

The industrial land uses of the Land Use Plan consist of three land use classifications that are separated through zoning into three distinct designations. The land use classifications under the General Plan consist of Light Industrial, General Industrial, and Rail-Served Industrial.

The provision for, and thoughtful placement of industrial land use designations was critical for the long-term economic success of the City of Imperial, particularly because it contains an active railroad line that is able to transport freight and because the community is a NAFTA trade route.

- **General Industrial-** The General Industrial is located around the airport for the purpose of taking advantage of airport amenities. Uses range from industrial office parks, research and development, incubator industrial, warehousing, and distribution centers. Fabrication, assembly, packaging, processing, and storage in conjunction with limited retail activities is also envisioned.
- **Rail-Served Industrial-** The Rail Served Industrial designation provides for Industrial/ agricultural uses that require rail access. These uses will be focused within areas along the existing railroad right-of-way or in close proximity to this facility.

Industrial land uses are situated within close proximity to major transportation corridors and also allowed near the airport with restrictions. Rail-Served industrial land uses are also situated adjacent to the railroad to take advantage of the railroad spurs. In total, there are approximately 605 acres designated for industrial land uses.

Agricultural Land Uses

Agricultural lands are comprised of one distinct land use, and under two zoning categories. Areas targeted that allow for all types of crop production are referred to as Agriculture under the proposed Land Use Plan. The Agriculture designation is situated only outside of the City Limits and within the sphere of influence.

- **Agriculture-** The Agriculture designation allows active agricultural and farming activities within the City. These activities may include farming, grazing, livestock rearing, and limited agricultural processing.

The airport overlay zone contains over 1,130 acres of agricultural designations, all located in the sphere of influence of the City and not within City Limits.

Public Facility Land Uses

The Public Facilities Land Use consists of land use classification and one zoning designation P-U (Public Use). The Public Use designation is intended for areas of the City appropriate for government owned facilities, schools, and quasi-public uses. Uses such as the City Hall, recreational buildings, fire station, schools, and State prison are included in this zone.

- **Public Facility-** The Public Facility designation allows for all publically owned property owned by the City, County, State, and Public agencies, or district. Uses include schools, police stations, and Public District Headquarters.

There are approximately 50 acres of Public Facilities within the Planning Area. This includes parks, library, police facilities, fire facilities, and administration facilities.

Imperial County Airport Land Use Compatibility Plan

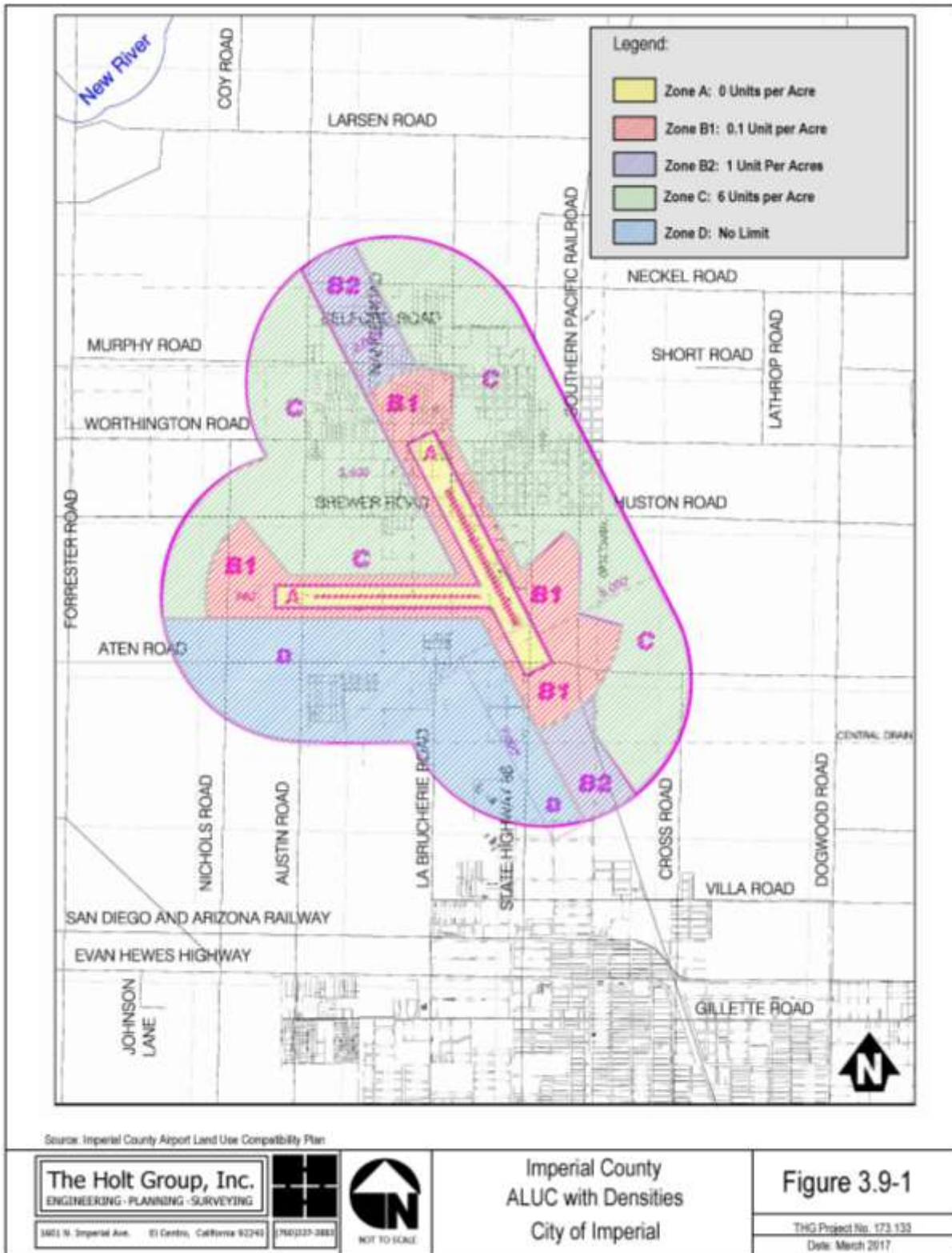
Some of the planning area, as previously noted, is also located within the Airport Land Use Compatibility Plans' Zoning Districts which are a common traffic pattern for aircraft and densities are regulated under the specific overlay zones. The maximum densities of each zone is denoted in Table 3.9 below and the preceding Figure 3.9-1.

**Table 3.9-1
IC Airport Land Use Compatibility Criteria**

Zone	Location	Impact Elements	Maximum Densities		Required Open Land ³
			Residential (du/ac) ¹	Other Uses (people/ac) ²	
A	Runway Protection Zone or within Building Restriction Line	<ul style="list-style-type: none"> High Risk High noise levels 	0	10	All Remaining
B1	Approach/Departure Zone and Adjacent to Runway	<ul style="list-style-type: none"> Substantial risk – aircraft commonly below 400 ft. AGL or within 1,000 ft. of runway Substantial noise 	0.1	100	30%
B2	Extended Approach/Departure Zone	<ul style="list-style-type: none"> Significant risk – aircraft commonly below 800 ft. AGL Significant noise 	1	100	30%
C	Common Traffic Pattern	<ul style="list-style-type: none"> Limited risk – aircraft at or below 1,000 ft. AGL Frequent noise intrusion 	6	200	15%
D	Other Airport Environs	<ul style="list-style-type: none"> Negligible risk Potential for annoyance from overflights 	No Limit	No Limit	No Requirement

Zone	Additional Criteria		Examples	
	Prohibited Uses	Other Development Conditions	Normally Acceptable Uses ⁴	Uses Not Normally Acceptable ⁵
A	<ul style="list-style-type: none"> All structures except ones with location set by aeronautical function Assemblages of people Objects exceeding FAR Part 77 height limits Hazards to flight⁶ 	<ul style="list-style-type: none"> Dedication of avigation easement 	<ul style="list-style-type: none"> Aircraft tiedown apron Pastures, field crops, vineyards Automobile parking 	<ul style="list-style-type: none"> Heavy poles, signs, large tree, etc.
B1 and B2	<ul style="list-style-type: none"> Schools, day care centers, libraries Hospitals, nursing homes Highly noise-sensitive uses Above ground storage Storage of highly flammable materials Hazards to flight⁶ 	<ul style="list-style-type: none"> Locate structures maximum distances from extended runway centerline Minimum NLR⁷ OF 25 dBA in residential and office buildings Dedication of avigation easement 	<ul style="list-style-type: none"> Uses in Zone A Any agricultural use except ones attracting bird flocks Warehousing, truck terminals Single-story offices 	<ul style="list-style-type: none"> Residential subdivisions Intensive retail uses Intensive manufacturing or food processing uses Multiple story offices Hotels and motels
C	<ul style="list-style-type: none"> Schools Hospitals, nursing homes Hazards to flight⁶ 	<ul style="list-style-type: none"> Dedication of overflight easement for residential uses 	<ul style="list-style-type: none"> Uses in Zone B Parks, playgrounds Low-intensity retail, offices, etc. Low-intensity retail, offices, etc. Low-intensity manufacturing, food processing Two-story motels 	<ul style="list-style-type: none"> Large shopping malls Theaters, auditoriums Large sports stadiums Hi-rise office buildings
D	<ul style="list-style-type: none"> Hazards to flight⁶ 	<ul style="list-style-type: none"> Deed notice required for residential development 	<ul style="list-style-type: none"> All except ones hazardous to flight 	

Figure 3.9-1 ALUC Figure with Densities



Existing Zoning

The City of Imperial established classifications of zones and regulations within those land use designations for the purpose of promoting and protecting the public health, safety and welfare of the residents of Imperial, safeguarding and enhancing the appearance and quality of development of the City, and providing for social, physical and economic benefits that result from comprehensive and strategic, orderly planning of land uses and existing resources. The following is a list of the zoning classifications included in the Zoning Map, (**Figure 3.9-2**) within the City of Imperial. The zones include:

- Residential Rural Zone (RR)
- Residential Low Density Zone (RL)
- Residential Single Family Zone (R-1)
- Residential Condominium Zone (RC)
- Residential Apartment Zone (RA)
- Commercial Neighborhood Zone (C-1)
- Commercial General Zone (C-2)
- Village Commercial Zone (VC)
- General Industrial Zone (I-1)
- Rail-Served Industrial Zone (I-2)
- Mobile Home Park Zone (MHP)
- Planned Development Overlay Zone (PD)
- Specific Plan Overlay Zone (SP)
- Agriculture Zone (A)

3.9.2 THRESHOLDS OF SIGNIFICANCE

Per State CEQA Guidelines, the proposed project would have an effect and would result in significant land use impacts if it will:

- Physically divide the physical arrangement of land uses, particularly an established community;
- Conflict with an applicable land use plan, policy, or regulation of the City of Imperial;
- Result in the development of incompatible land uses, such as incompatible non-residential development in proximity to residential areas; or
- Conflict with applicable habitat conservation plan or natural community conservation plan.

3.9.3 IMPACT ANALYSIS

Within the City of Imperial and its Sphere of Influence there are over 5,467 acres of vacant, underutilized, or undeveloped land. The lack of development in some of the undeveloped incorporated areas can be attributed to the centralized located Airport which comes with the added caveat of limiting land uses in the surrounding area due to additional considerations and requirements when developing land and that area further restricted by FAA Part II requirements. As such, the Land Use Element establishes Character Areas for policy focus,

and serve as a guide along with land use designation to guide compatible development. These conditions also exist within other areas of the community. The Land Use Element Update is establishing eleven character areas consisting of 1) Gateway North Character Area, 2) Central Downtown Character Area, 3) East Downtown Character area, 4) Airport Character Area, 5) Fairgrounds Character Area, 6) Established Neighborhoods, 7) Developing Neighborhoods, 8) Rural Neighborhoods, 9) Gateway South, 10) Railroad Corridor, and 11) Regional Park and Equestrian Area. The following is a brief summary of each:

1. **Gateway North Character Area:** This character area is located at the northern entryway to the City along the west side of Highway 86. The area is anticipated to accommodate neighborhood commercial land uses. This character area is adjacent to vacant land west of Highway 86 where residential developments are planned and/or approved (Barioni Lakes). The Vision for the Gateway North Character Area is intended to create a signature look along Highway 86, provide auto-oriented and neighborhood commercial.
2. **Central Downtown Character Area:** As the Downtown Imperial Master Plan is implemented, the Downtown is becoming the civic, social and commercial center of the City. The pedestrian-friendly Downtown will offer a mix of locally-owned retail and restaurants, provide unique cultural experiences, and support higher density mixed use developments.
3. **East Downtown Character Area:** This area, located on the east side of Highway 86 north and south of Barioni Boulevard, provides an opportunity to serve as an extension of Downtown. It is envisioned to offer commercial diversity, while still providing an attractive image for drivers.
4. **Airport Character Area:** This area includes the Imperial County Airport and its environs. This hub has the potential to increase jobs and revenues within the City.
5. **Fairgrounds Character Area:** This character area includes the California Mid-Winter Fairgrounds. With private investment and/or a public-private partnership, this area has the potential to redevelop and create a new economic and job center for the City in the future.
6. **Established Neighborhoods:** The City of Imperial is home to numerous established neighborhoods that foster its strong sense of community, including Sky Ranch, Victoria Ranch, and Wildflower Subdivisions. These and other neighborhoods should be protected and enhanced with future growth and development in the City. Some of the established neighborhoods are still under construction.
7. **Developing Neighborhoods:** With the build-out of existing Specific Plan communities such as Mayfield and Morningside, and the development of new residential neighborhoods to the north and east, Imperial is well-poised to grow in the coming years. This new development is envisioned as a connected series of villages that support the overall existing character of the City. This character area includes the areas east of Highway 86 and the railroad extending up to Dogwood Road within the City's Sphere of Influence.
8. **Rural Neighborhoods:** Rural neighborhoods are an essential part of the City's character. This area includes the mature neighborhoods within Imperial County, not currently within City limits, south of Neckel Road and east of Austin Road abutting the City of Imperial.

9. **Gateway South:** This area includes the area along Highway 86, south of the airport and fairgrounds. Commercial centers in this area include east of Hwy 86: Crown Commercial, Haas Commercial; and west of Hwy 86: Imperial Business Park. This area has the potential to enhance the local economy, provide needed services and employment opportunities, and serve as a gateway to the City.
10. **Railroad Corridor:** The railroad corridor runs parallel with Highway 86 through the City of Imperial. While providing an unparalleled industrial benefit, it also poses a challenge for connecting the east and west portions of the City. Imperial Irrigation District (IID) headquarters are located within this character area.
11. **Regional Park & Equestrian Area:** The Regional Park and equestrian center is to be located along the northern part of the City Limits in an area bound by Larsen Road to the north, Ralph Road to the south and Nance and La Brucherie Roads at the respective west and east boundaries.

This Land Use Element Update proposes to eliminate and combine (re-classify certain Land Uses and Zones). The proposed Land Use Element Update proposes several changes as depicted in the following tables and consistent with the new character areas. Table 3.9-2 identifies the proposed changes in land use classification while maintaining similar uses and densities with some modest increase in densities.

**Table 3.9-2
Land Use Reclassification**

	1992 Adopted General Plan	2015 Draft Land Use Map THG
1	Rural Residential	Residential Rural Density
2	Low Density Residential	Residential Low Density
3	Low Medium Density Residential	Residential Low Medium Density
4	Residential Condominium	Residential Medium Density
5	Multiple Family (Rental) Residential	Residential High Density
6	Mobile Home Park	(Terminate, Now Residential High Density)
7	Village Commercial	Village Commercial
8	Neighborhood Commercial	Commercial Neighborhood
9	Auto Mall	(Terminate, Now Commercial Regional)
10	Commercial Office	(Terminate, Now Commercial Regional)
11	General Industrial	Light Industrial
12	Rail Served Industrial	Rail Served Industrial
13	Agriculture	Agriculture
14	Public Use	Public Use
15		Specific Plan
16		Open Space

The same holds true for zoning re-classifications. The changes are modest as they relate to titles and possible increase in densities. None of the changes proposed were directly result in non-conforming uses. Table 3.9-3 identifies the proposed changes in zoning.

**Table 3.9-3
Zoning Reclassification**

	1992 Adopted Zoning Ordinance	2015 Draft Zoning Map THG
1	Residential Rural (RR)	Residential Rural (RR)
2	Residential Low Density (RL)	Residential Low (RL)
3	Residential Single Family (R-1)	Residential Low Medium (R-1)
4	Residential Condominium Zone (RC)	Residential Medium (R-2)
5	Residential Apartment Zone (RA)	Residential High (R-3)
6	Commercial Neighborhood Zone (C-1)	Commercial Neighborhood (C-1)
7	Commercial General Zone (C-2)	Commercial Regional (C-2)
8	Village Commercial Zone (VC)	Village Commercial (VC)
9	General Industrial Zone (I-1)	Light Industrial (I-1)
10	Rail-Served Industrial Zone (I-2)	Rail Served Industrial (I-2)
11	Mobile Home Park (MHP)	(Terminate, Now Residential High R-3)
12	Planned Development Overlay (PD)	Planned Unit Development (PUD)
13	Specific Plan Overlay (SP)	Specific Plan (SP)
14	Agriculture Zone (A)	N/A
15		Public Use (P)
16		Open Space (OS)

Re-Designation Impacts

Because some of the land use designations will be reclassified within the adopted City Limits, in addition to those outside the City boundaries (but within the City's Sphere of Influence), it is being proposed as part of the Land Use Element and Circulation Element Update to rezone a number of parcels within the incorporated City Limits for consistency to the proposed Land Use Plan. The change will not result in land use restrictions from what currently is allowed to develop. There were a total of fifty three parcels (53) affected, 50 of which are owned by the City or other Public Entities being reclassified as Public Use and or Open Space. Refer to Appendix B for affected parcel list and map of affected areas. The proposed Land Use and Zoning are noted in the preceding Land Use Map and Zoning Map (Figure 3.9-2 and Figure 3.9-3, respectively).

Figure 3.9-2 Proposed Land Use Map

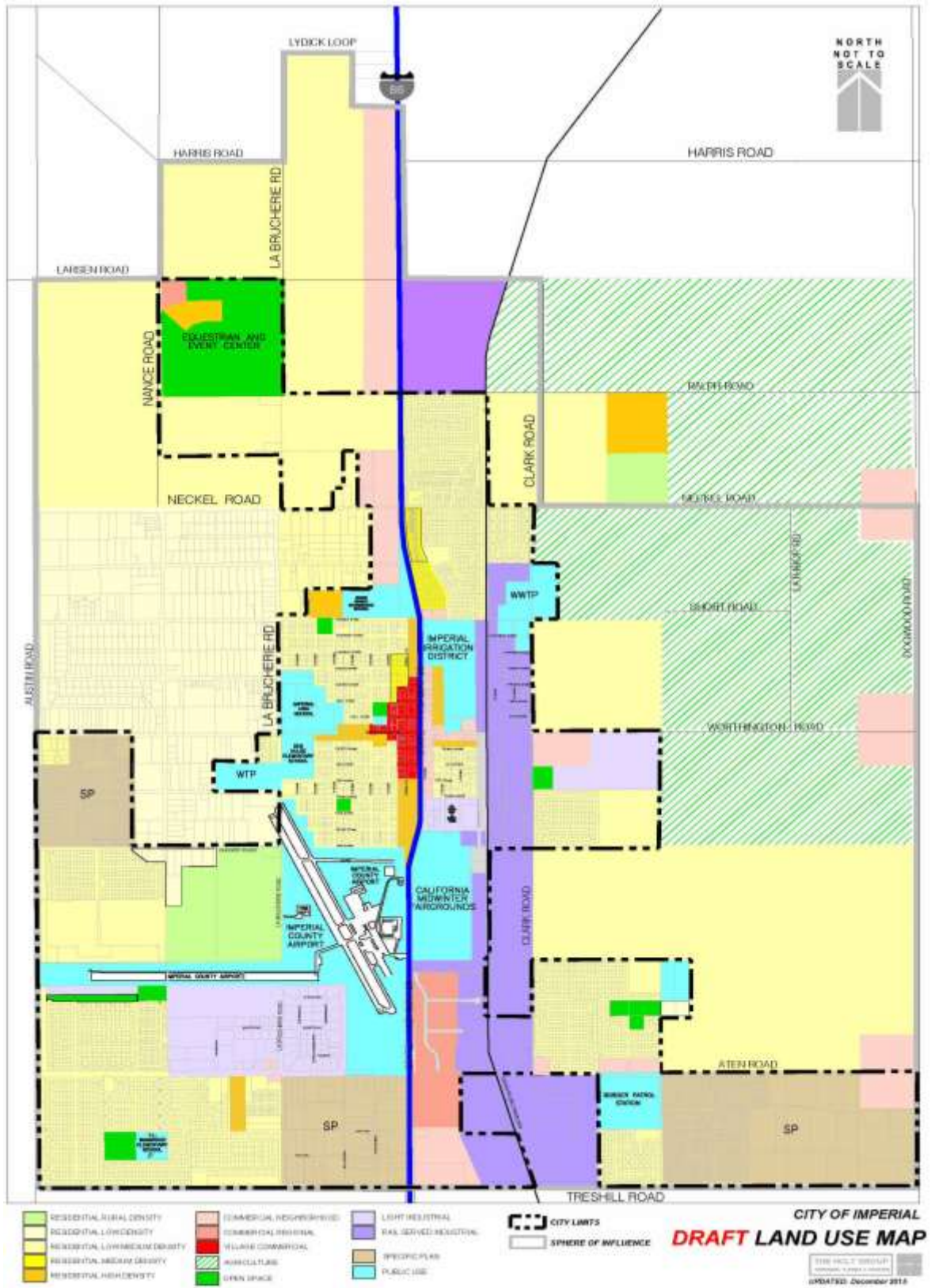
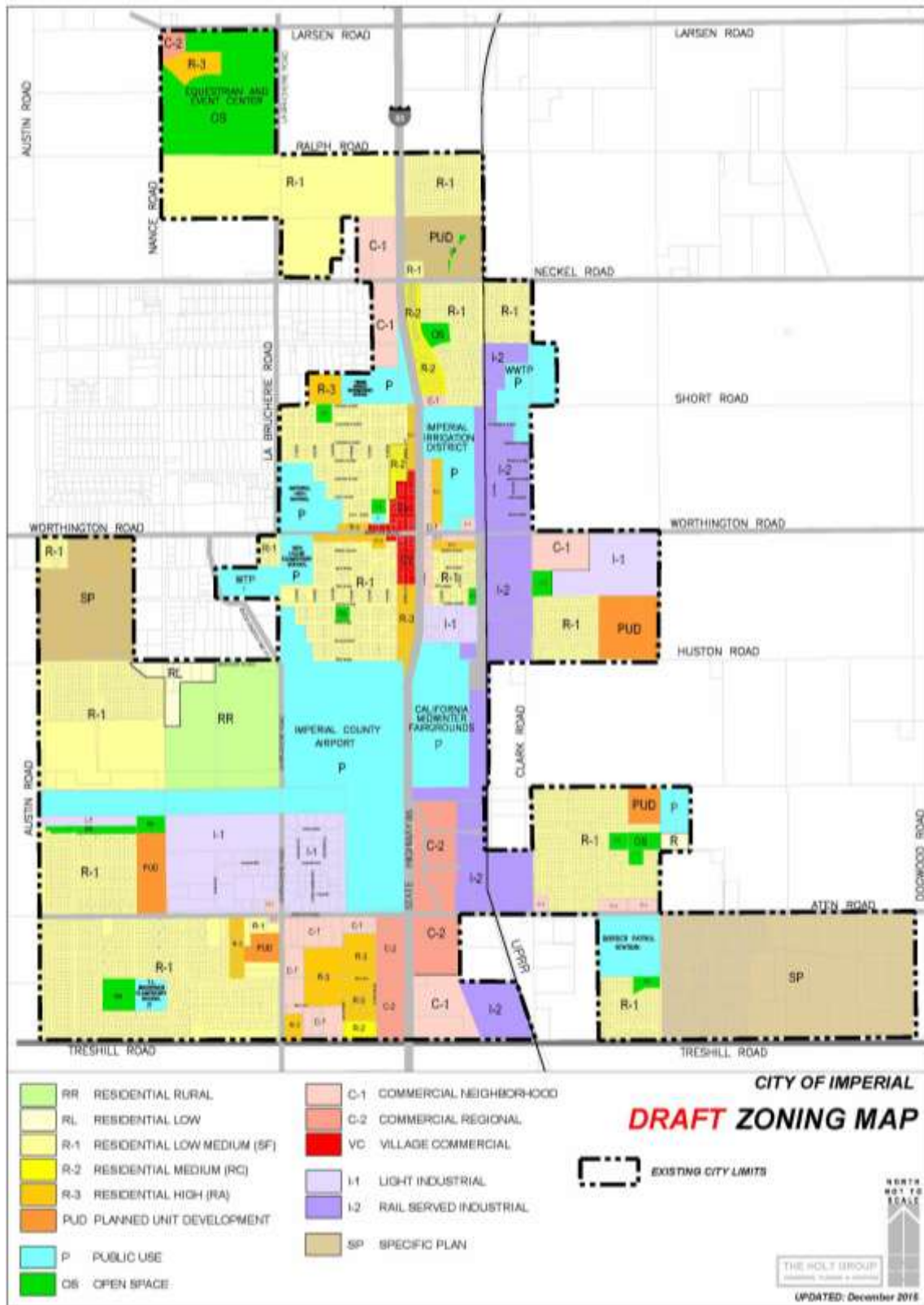


Figure 3.9-3 Proposed Zoning Map



The Land Use and Zoning Reclassifications are further summarized in Table 3.9-4 below as affected parcels by the land use and zoning reclassifications.

**Table 3.9-4
Re-Designation Impacts**

Existing Land Use Designation	Proposed Land Use	Existing Zoning	Proposed Zoning	Affected Parcels
Low Medium Density Residential	Public Use	R-1	P	15
	Open Space	R-1	OS	15
	Open Space	PD	OS	7
Mobile Home Park	Residential High Density	MHP	R-3	4
Rail Served Industrial	Public Use	I-2	P	1
Public Use	N/A	I-2	P	4
Public Use	N/A	I-1	P	1
General Industrial	Public Use	I-1	P	4
Neighborhood Commercial	Specific Plan	C-1	R-3	1
Commercial Office	Rail Served Industrial	I-1	I-2	1
Total				53

The changes in land use designation are modest and necessary to accommodate recent growth trends and desirable development. In order to offset any potential conflict, the City’s General Plan Land Use Element encourages compact infill development and identifies the following land use principles for the future Planning Area, which encompasses the entire City Limits and identified Sphere of Influence.

Land Use Element Goal #3 Quality of Life: Availability of adequate public services and facilities for all existing and proposed development and create an aesthetically pleasing, full service community with an excellent quality of life.

- **Land Use Element Policy 3.1** Strive to create multi-generational, family-friendly public spaces throughout the developed community that are widely used by everyone and to maximize existing infrastructure.

Land Use Element Goal #4 Economic Prosperity: Achieve a balanced and varied economic base which provides a broad range of goods, services, and employment to the City’s residents and the region in a manner that is aesthetically pleasing and consistent with the character areas.

- **Land Use Element Policy 4.3** Imperial Avenue shall be designated as the primary commercial areas for the City that focuses new development into the Downtown and encourage vitality with the continued use and promotion as the civic and social hub of the community.

The Land Use Element in the Imperial General Plan provides direction on how to accomplish these objectives and offers detailed descriptions of the land use designations for the various desired uses throughout the City of Imperial and surrounding Sphere of Influence. The land use designations were created with the intention of maintaining Imperial’s rural, small-town environment as the community grows by defining residential, commercial, and industrial uses, along with agricultural, community facilities and open-space lands. This section of the

EIR offers a brief description of these land use designations in order to provide a basis for many of the environmental constraints and solutions offered in the environmental analysis for this project.

The proposed Land Use Plan takes into account the City's General Plan Elements principles and incorporates them into the Proposed Land Use Plan (**Figure 3.9-1**). All proposed land uses were strategically located to address local and regional needs and the City's goals and objectives while mitigating through land use design measures any potential impacts of compatibility and environmental concern. **Table 3.9-6** provides a breakdown by land use category.

**Table 3.9-6
Land Use Designations**

Land Use Designation	Total Acreage City + Adopted SOI	Total Acreage Proposed Planning Area	Acreage Difference
Residential			
Residential Rural	129 AC ±	129 AC ±	0 AC ±
Residential Low Density	811 AC ±	1,622 AC ±	811 AC ±
Residential Single Family	2,313 AC ±	4,219 AC ±	1,906 AC ±
Residential Condominium	0 AC ±	0 AC ±	23 AC ±
Residential Apartment	8 AC ±	8 AC ±	0 AC ±
Mobile Home Park	6 AC ±	6 AC ±	0 AC ±
Planning Unit Development (PUD)	50 AC ±	50 AC ±	0 AC ±
Total	3,317 AC ±	6,057 AC ±	2,740 AC ±
Commercial			
Commercial Village	4 AC ±	4 AC ±	0 AC ±
Commercial Neighborhood	224 AC ±	364 AC ±	140 AC ±
Total	228 AC ±	368 AC ±	140 AC ±
Industrial			
General Industrial	100 AC ±	100 AC ±	0 AC ±
Rail Served Industrial	505 AC ±	860 AC ±	355 AC ±
Total	605 AC ±	1,860 AC ±	355 AC ±
Agriculture			
Agriculture	109 AC ±	1,385 AC ±	1276 AC ±
Total	109 AC ±	1,385 AC ±	1276 AC ±
Specified Plan Area			
Specified Plan Area	185 AC ±	185 AC ±	0 AC ±
Total	185 AC ±	185 AC ±	0 AC ±
Totals	4,444 AC ±	9,855 AC ±	4,511 AC ±

City of Imperial Service Area Plan 2015

ALUC Compatibility Plan Analysis

As previously noted, the City of Imperial contains the County of Imperial Airport, therefore must take into account the Airport Land Use Compatibility Plan for the Imperial County Airport established by the Imperial County Airport Land Use Commission. The Compatibility Plan sets forth guidelines and restrictions for land uses in the areas surrounding the airport. Within the project area, the Plans boundaries extend approximately from Aten Road at the South, Ralph Road at the North, Nichols Road to the West, and Cross Road to the East (See previously introduced Figure 3.9-1).

Zone A Runway Protection Zone is a high risk area, and contains high noise levels. This area prohibits all structures except those set by aeronautical functions, and is dedicated for aviation easement. Land use designations include Public Use, Residential Low Density (1-2 Dwelling units per acre) and Commercial Regional. There are five changes to land use designations proposed four of which are from General Industrial to Public Use, and one from Residential Low Medium to Public Use. The Public Use designation is consistent with the Airport Land Use Compatibility Plan because it supports the County Airport facility and the runways. However, the Residential Low Medium Density and Commercial Regional land use designations are not compatible with the Airport Land Use Compatibility Plan at the allowed densities. There are currently 30 undeveloped acres in the A Zone. Future development will need to be individually assessed.

Zone B1 is adjacent to the runway and limits the maximum density to .1 dwelling unit per acre, and 100 people per acre for non-residential land uses. Land use designations include Public Use, Open Space, Light Industrial, Rail Served Industrial, Residential Low Density (1-2 units per acre) and Residential Low Medium Density (2-5 dwelling units per acre). There are nine land use designation changes: two parcels are proposed from Public Use to Rail Served Industrial, one from General Industrial to Public Use, two from Residential Low Medium to Public Use, three from Residential Low Medium to Open Space, and one which will only change zoning from General Industrial to Public Use. These land use designation changes are compatible with the Airport Land Use Compatibility Plan. Existing land use designations to remain and which are not compatible with the Airport Land Use Compatibility Plan include the Residential Low Density and Residential Low Medium Density designations and the Public Use for existing school sites. There are currently 195 undeveloped acres in the B1 Zone. Future development will need to be individually assessed.

Zone B2 limits maximum densities to 1 dwelling unit per acre, and 100 people per acre in non-residential land uses. Proposed Land Use Designations include Commercial Neighborhood, Rail Served Industrial, Residential Low Density (1-2 units per acre and Residential Low Medium Density (2-5 units per acre). The Residential Low Density and Residential Low Medium Density land use designations are not compatible with the Airport Land use Compatibility Plan at the maximum densities allowed. There are currently 47 undeveloped planning acres in the B2 Zone. Future development will need to be individually assessed.

Zone C is the common traffic patter and limits maximum densities to 6 dwelling units per acre, and 200 people per acre in non-residential land uses. Currently there are Specific Plan, Residential Rural Density, Residential Low Density, Residential Low Medium Density (2-5 units per acre), Residential High Density (20-30 units per acre), Commercial Neighborhood,

Village Commercial, Open Space, Light Industrial, Rail Served Industrial and Public Use land use designations. The Residential High Density land use designations are not compatible with the Imperial County Airport Land Use Compatibility Plan at the maximum land uses allowed. There are currently 308 undeveloped planning acres in the C Zone of which 8 acres are designated for high density residential. Future development will need to be individually assessed.

Zone D is another area that has a negligible risk from air traffic, and does not have a maximum density, or required open land. Proposed land uses in this area are Low Density Residential, Residential High Density, Open Space, Public Use, Specific Plan and Light Industrial. There are currently 78 undeveloped planning acres in the D Zone.

Goals and polices to address these potential impacts to aeronautical function are incorporated into the Airport Element and updated Land Use Element as follows:

Airport Element Goal #1: Preserve the Imperial County Airport as a viable facility while maintaining a balanced community with new residential, commercial and industrial development.

- **Airport Element Policy 6.A** Deny building permits for buildings and structures that exceed Part 77 height requirements unless the FAA has stated in writing that the proposed use is not considered a hazard to aircraft operations.
- **Airport Element Policy 6.B** Request the County to enforce FAA Part 77 height regulations in unincorporated areas near the airport.

Land Use Element Goal #4 Economic Prosperity: Achieve a balanced and varied economic base which provides a broad range of goods, services, and employment to the City's residents and the region in a manner that is aesthetically pleasing and consistent with the character areas.

- **Land Use Element Policy 4.5** New development adjacent to the Imperial County Airport shall be compatible with the facility, and provide additional opportunities for economic investment and expansion of jobs within the region.

Residential Land Use Analysis

Residential land uses for City of Imperial and Planning Area must take into account the community the character, applications, and potential impacts. The strategic placement of residential land use classifications is to ensure the continued use of residential property in a manner that reflects the City's historic practices and desired future strategic growth for the City of Imperial.

When taking into account the proposed Sphere of Influence expansion area, an approximate additional estimated 2,700 developable acres will be provided for residential land uses to the approximate 3,300 available within the incorporated City Limits, for a total residential acreage of 6,000 acres within the entire Planning Area. At full build-out of the land use plan, residential land uses would constitute approximately 65% of the total Planning Area.

The net increase in residential land uses is consistent with the City's strong desire to remain as an attractive predominantly residential community. Residential land uses to accommodate growth were strategically placed abutting the current City Limits. Placement of residential

land uses to abutting city limit boundaries will encourage timely annexation of future expansion areas.

In addition, the residential land use designations in the proposed Land Use Plan are consistent with the Imperial General Plan goals and policies as follows:

Land Use Element Goal #5 Residential Diversity: Create neighborhoods and housing opportunities that provide housing diversity for all economic segments of the community and take into account the safety and welfare of its residents while encouraging healthy lifestyles.

- **Land Use Element Policy 5.1** The Land Use Plan shall accommodate the Housing Element goals and objectives for an adequate housing balance that meets the regional housing needs assessments.
- **Land Use Policy 5.3:** Residential Neighborhoods should protect and promote the existing rural lifestyle and character of the City of Imperial including low noise levels, limited motorized traffic, and natural open spaces.
- **Land Use Policy 5.4:** Multi-family residential developments of varying types and densities shall be encouraged where compatible with existing land uses and the provision of public services is highest.

Commercial Land Use Analysis

The provision for, and thoughtful placement of, commercial land use designations is critical for the long-term economic success of the City of Imperial. By providing the proper balance of commercial and other uses, the City will ensure the economic stability and vitality of local businesses while minimizing impact on other uses and providing a framework for a job and housing balance.

The commercial land use designations within the City boundaries and together with the sphere of influence areas as the entire Planning Area would provide a net increase of 140 acres for commercial development. The new sites designated outside the City Limits or along new areas within the incorporated City Limits are primarily designed and situated to meet the future demands for regional commercial establishments and services and to mitigate current issues associated with the lack of adequate sites suitable for larger commercial operations and regional shopping.

The commercial land use modifications proposed to the Land Use Plan are consistent with the following General Plan goals and policies:

Land Use Element Goal #4 Economic Prosperity: Achieve a balanced and varied economic base which provides a broad range of goods, services, and employment to the City's residents and the region in a manner that is aesthetically pleasing and consistent with the character areas.

- **Land Use Element Policy 4.1** Commercial land use designations shall allow a full range of retail, office, service and institutional businesses within close proximity to and for the convenience of residents.
- **Land Use Element Policy 4.2** Development along Highway 86 frontage shall be encouraged to not only attract regional sales but to serve as strong character identification and gateway to the City.

- **Land Use Element Policy 4.3** Imperial Avenue shall be designated as the primary commercial area for the City that focuses new development into the Downtown and encourage vitality with the continued use and promotion as the civic and social hub of the community.
- **Land Use Element Policy 4.5** New development adjacent to the Imperial County Airport shall be compatible with the facility, and provide additional opportunities for economic investment and expansion of jobs within the region.

Industrial Land Use Analysis

Land Uses that characterize an industrial designation require consideration of environmental and land use compatibility criteria to optimize their location. Industrial uses should also be located in a manner that provides for proper transportation facilities and should be buffered from sensitive uses that would be impacted by industrial growth.

The proposed General Plan will result in a net increase the amount of designated industrial land by an estimated 350 acres for an approximate 1,860 acres of industrial land under the proposed Land Use Plan and Zoning Code. The proposed Plan restricts designated industrial sites away from residential neighborhoods as much as possible, strategically locates industries along existing utilities and transportation corridors. The proposed Land Use Plan and Zoning Map has taken into account industrial land use distribution and land use location in a manner that will minimize the exposures and risks to residential uses. The Land Use Plan is consistent to the adopted General Plan goals and policies as it relates to the placement of industrial land uses as follows:

Land Use Element Goal #4 Economic Prosperity: Achieve a balanced and varied economic base which provides a broad range of goods, services, and employment to the City's residents and the region in a manner that is aesthetically pleasing and consistent with the character areas.

- **Land Use Element Policy 4.4** Industrial uses shall be diverse, well designed and include functional buildings that meet market demands while providing local economic and supportive benefits.

Agricultural Land Use Analysis

The City of Imperial has had a rich agricultural history which has contributed to its unique rural character. There is a strong desire from the community to maintain and preserve the rural atmosphere and character of Imperial protecting open space and agricultural land uses as much as possible. Under the proposed Planning Area, a total of 1,385 acres is being reserved for agricultural operations.

The agricultural designations within the City's Planning Area will continue to accommodate farming, grazing, livestock rearing, and limited agricultural processing, but most importantly serve as a critical buffer zone between urban land uses and farmland operations. The proposed agriculture land use designations of the project are consistent with the Imperial General Plan policies as follows:

Conservation Element Goal # 1: Preserve and Protect agricultural Prime Farmland and Farmland of Statewide Importance for their numerous benefits to the region.

- **Conservation Element Policy 1.1** Avoid annexation and conversion of farmland to non-agricultural uses, except as necessary to meet the City's housing and economic development goals.

Public Facilities Land Use Analysis

There will be approximately 612 acres of public facility designation within the Planning Area as a result of the proposed Land Use Element Update. Public Facility land uses provided and planned were incorporated to meet future growth demands. These uses will include and/or support government, civic, cultural, recreational, health, education, and infrastructure aspects of the City of Imperial and/or regional community.

The City's adopted Service Area Plan contains guidelines and policies for the provision of public facilities to mitigate any potential impacts from future growth demands. The City of Imperial has adopted the several policies to mitigate the impacts to community facilities through the proper planning and regulation of human activity addressed further under the Public Services.

Recreation- Parks, visual buffers, recreational open space and other natural areas are strategically designated as Public Facility under the proposed Land Use Plan. These areas are intended to be preserved for recreation or in furtherance of visual enhancement of natural resources. The City of Imperial General Plan and Service Area Plan also contains guidelines and policies for the provision of open space and recreational park land to mitigate any potential impacts from future growth demands. Additionally, the provision for, and thoughtful placement of open space, can preserve and enhance the rural character of the City of Imperial. Under the proposed Land Use Plan, the entire Planning Area provides an approximate 612 acres of Public Facility land use designations. The Public Facility land use designations under the proposed Land Use Plan are consistent to the proposed General Plan policies as follows:

Land Use Goal # 3 Quality of Life: Availability of adequate public services and facilities for all existing and proposed development and create an aesthetically pleasing, full service community with an excellent quality of life.

- **Land Use Policy 3.1** Strive to create multi-generational, family-friendly public spaces throughout the developed community that are widely used by everyone and to maximize existing infrastructure.

Land Use Goal #5 Residential Diversity: Create neighborhoods and housing opportunities that provide housing diversity for all economic segments of the community and take into account the safety and welfare of its residents while encouraging healthy lifestyles.

- **Land Use Policy 5.2** New residential development shall incorporate recreation and pedestrian improvements that enhance safety and mobility and provide connections to recreational amenities and services and to encourage healthy lifestyles.

Open Space and Recreation Goal #1: Provide for open space that meets the recreational needs of present and future City residents and visitors.

- **Open Space and Recreation Policy 1.1** Continue to require developers to offset the demand for parks generated by new development by providing new parks, open space or recreation areas at approximately three acres per 1,000 new residents.

Open Space and Recreation Goal #2: Manage urban development to protect open space areas within and surrounding the City.

- ***Open Space and Recreation Element Policy 2.1*** Promote the protection of open space on public and privately owned property for the protection of health and safety through continued application of the Open Space and Recreation land use designations, as appropriate.

3.9.4 SIGNIFICANT IMPACTS

The proposed land use plan will not physically divide an established community or conflict with any other applicable land use plan, policy or regulation of the City of Imperial or regional agency. The Plan does not conflict with any habitat conservation plan or natural community conservation plan and was found to be consistent with the Airport Land Use Compatibility Plan. The implementation of the proposed land use plan will encourage a balanced, desirable and compatible land use pattern complementing the economic, redevelopment, and open space objectives of the Imperial General Plan.

The Imperial General Plan goals and policies presented here and proposed to be actively implemented or incorporated into the proposed land use plan demonstrate a strong effort on the part of the City of Imperial to implement all feasible measures to ensure land use compatibility.

In the isolated cases where incompatible land uses are next to each other, the Imperial Zoning Ordinance establishes firm development restrictions to mitigate any potentially adverse impacts. Therefore, any effects of impact from land use compatibility are reduced to a level of less than significant and need no further mitigation measures.

3.9.5 MITIGATION MEASURES

No additional mitigation measures are required.

3.10 MINERAL RESOURCES

This section evaluates mineral resource impacts from implementation of the proposed project as well as impacts of the surrounding area on the proposed project. This section describes the existing mineral resource conditions in the Imperial Planning Area. Known mineral resources for the Imperial Valley are gold and gypsum as well as limestone, pumice, clay stone, sand and gravel. Mining operations are in the Glamis Plateau area and the Cargo Muchacho and Picacho Mountains are also local resources. The planning area lies in the southern Imperial Valley on largely developed or previously disturbed land that has been historically used for farming. According to the Imperial County General Plan's survey of mineral and soil resources, no unique mineral resources are typically developed in this region of the Valley and there are no known mineral deposits or resource recovery sites shown on the historically adopted City of Imperial general plan.

3.10.1 EXISTING CONDITIONS

The proposed planning area consists largely of undeveloped infill urban land or agricultural disturbed land for the planned annexation areas. No mineral resources that would be of value to the region and the residents of the state have been identified thus far. Mineral resources existing in the area as mentioned previously include gold, gypsum, limestone, pumice, clay stone, sand, and gravel which will not be impacted through the proposed land use and circulation element.

The nearest mineral resources to the City of Imperial are sand and gravel pits used for construction. The nearest site is located 1.75 miles northwest of the planning area.

3.10.2 THRESHOLDS OF SIGNIFICANCE

Per State CEQA Guidelines, the proposed project would have an effect and would result in significant impacts to mineral resources if it will:

- 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; or
- 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;

3.10.3 IMPACT ANALYSIS

There are no impact identified that would result in the loss of known mineral resource that would of value to the region or state, nor have any mineral resource recovery site been delineated on any local plans. There are approximately two mineral resources approximately 1.5 miles outside Imperial's Sphere of Influence which is not foreseeable to be affected by the proposed land use and circulation element update.

3.10.4 SIGNIFICANT IMPACTS

There are no significant impacts.

3.10.5 MITIGATION MEASURES

There are no mitigation measures.

3.11 NOISE

This section evaluates noise impacts from implementation of the proposed project as well as impacts of the surrounding area on the proposed project. This section describes the existing noise conditions in the Imperial Planning Area. Noise is generally defined as unwanted sound or intrusive sound. Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB).

Generally, a project may have a significant effect on the environment if it would substantially increase the ambient noise levels for adjoining areas or expose people to severe noise levels. In practice, more specific professional standards have been developed. The degree to which noise can impact the human environment ranges from levels that interfere with speech and sleep (annoyance and nuisance) to levels that cause adverse health effects. These standards state that a noise impact may be considered significant if it would generate noise that would conflict with local planning criteria or ordinances, or substantially increase noise levels at noise-sensitive land uses. Land uses, or “sensitive receptors” that are considered sensitive to noise impacts include, but are not limited to, schools, residences, libraries, hospitals, and other care facilities.

3.11.1 EXISTING CONDITIONS

As a rural residential and agricultural community, much of the existing land uses in Imperial are particularly sensitive to noise sources except for those within close proximity to major transportation corridors. The Imperial community has a handful of other facilities that may generate excessive noise levels including the Imperial County Airport, the Union Pacific Railroad, in addition to Highway 86. By taking reasonable steps to recognize sources of noise pollution and taking necessary action to mitigate any impacts, the City of Imperial may continue to enjoy a comfortable and calming community.

- The Imperial freight rail system is active with approximately four daily railroad trips. Surrounding land uses include industrial and some isolated single-family residential separated by vehicular roadways which run parallel to the rail spur.
- The Imperial County Airport averages 40 flights per day. Flights include military, commercial, and some small passenger planes. Land uses surrounding the airport property are largely sensitive receptors including a school, a motel, and single family residential.
- Highway 86 is a major transportation corridors and regional and interstate truck routes. Adjacent land uses are predominantly commercial, residential, and some light industrial.

Temporary Noise Sources

Construction of any development within the proposed project area may result in noise levels that are higher than existing ambient levels. Construction activities are likely to include front-end loaders, excavators, trucks, rollers, a grader, air compressor, generators, forklifts, backhoes, etc. The amount of ground vibration that would be experienced at any nearby homes or establishments when these equipment items are being operated depends to a great extent on the soil conditions at the site. Since the soil conditions are unknown, it is estimated that the generated vibration velocity levels of up to 90 dB may be experienced. This exceeds

the ANSI guideline for residential properties unless mitigated. However, these noise levels are temporary and would no longer exist once a construction project is completed.

Implementation/Operation Phase Noise Sources

Permanent or recurring noise sources associated with the development and implementation of the proposed Land Use Element and Circulation Element is vehicular traffic. The primary noise generator in the City of Imperial is the train and the vehicular traffic from Highway 86. Noise from vehicles traveling these roadways either through, to, or from industrial and or commercial establishments is a primary noise source in the community. These would involve the transport of employees, patrons, goods and materials to and from the site. The large truck traffic can dramatically contribute to roadway noise, as the sound generated from jake-brakes, large tires, and diesel engines which greatly exceeds noise from passenger vehicles and light trucks.

Industrial and Commercial Noise Exposure-Industrial land uses and some heavy commercial land uses may also typically have fixed noise sources. Truck scales, auto maintenance shops, car washes, tire shops, shopping centers, etc., are only a few land uses that generate noise within the Planning Area.

Existing Airport Noise Exposure -The Imperial County Airport is one of the primary noise generator in the planning area. The Imperial County Airport Land Use Compatibility Plan provides existing sound exposure contours for the area surrounding the airport. The range of exposure levels considered to be normally acceptable is from 55dBA CNEL up to 65 dBA CNEL. **Figure 3.11.1** Aircraft Related Sound Exposure Contours, identifies exposure levels.

3.11.2 THRESHOLDS OF SIGNIFICANCE

Per State CEQA Guidelines, the proposed project would have an effect and would result in significant impacts to ambient noise levels if it will:

- Expose people to or generate noise levels in excess of 60 dBA CNEL for residential land uses;
- Expose people to generate excessive ground borne vibration or ground borne noise levels;
- Cause a substantial temporary, periodic, or permanent increase in ambient noise levels in the project vicinity above levels existing without the project; or
- Expose people residing or working in the project area to excessive noise levels.
- Expose people to excessive noise levels resulting from a private airstrip or airport.

Figure 3.11-1 Aircraft Related Sound Exposure Contours

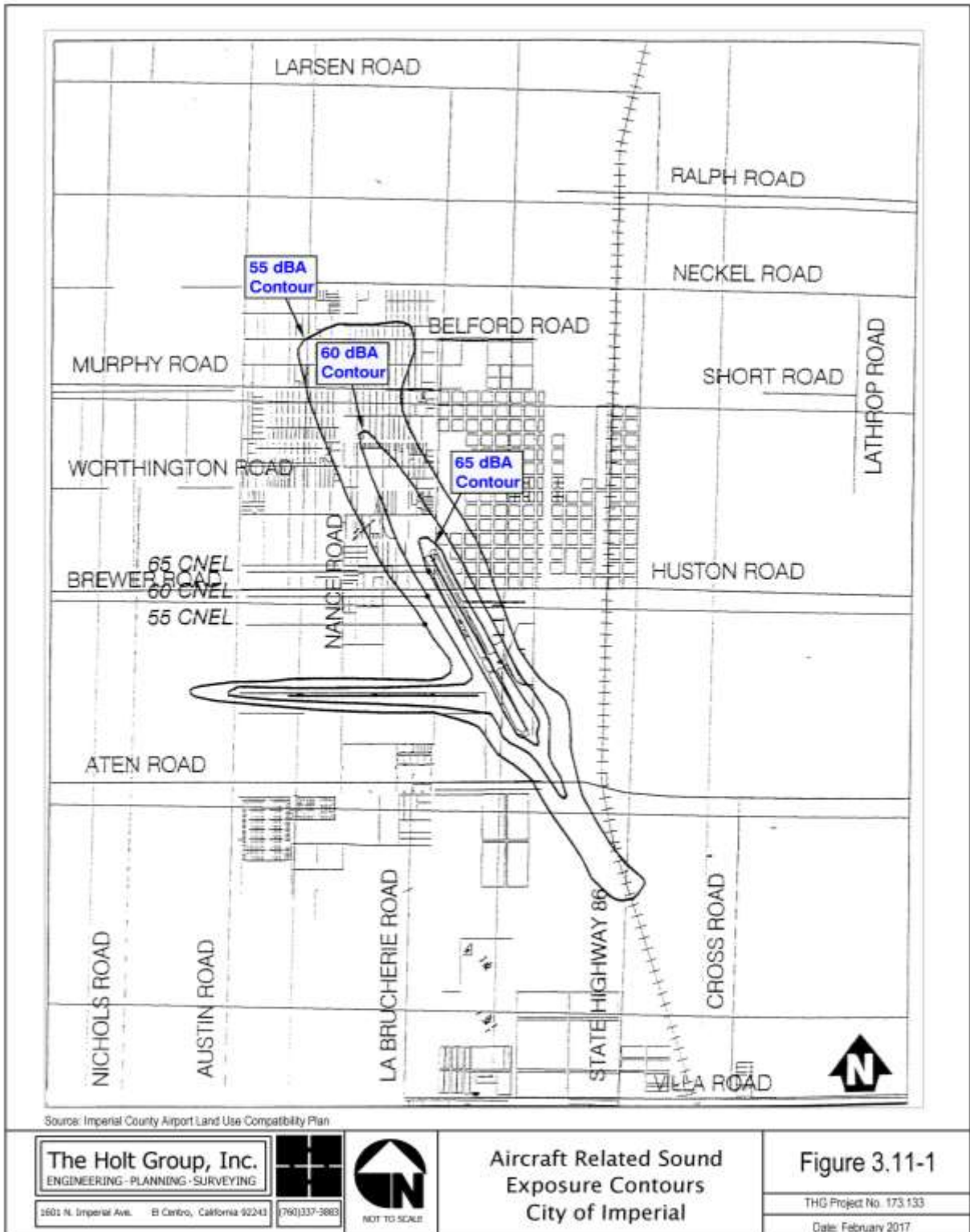


Table 3.11-1 Acceptable Community Noise Exposure by Land Use Category identifies the acceptability levels of certain land uses when exposed to certain levels of noise. The acceptability ranges from normally acceptable levels to clearly unacceptable levels for all types of land uses/receptors ranging from sensitive receptors to industrial and manufacturing land uses.

3.11.3 IMPACT ANALYSIS

The Imperial County Airport, the Southern Pacific Railroad, and Highway 86 will likely continue to be the top noise generators for the community. The Airport contains several noises due to the daily aircraft movement within the airport. A noise generated by the aircraft includes noise on the ground waiting to take off and aircraft in flight during either the takeoff, landing, or during phrase of flight. Highway generated noise occurs as a result of the operation and movement of cars, trucks, and other vehicles on highways and roadways within the City.

State Highway 86 passes through the central portion of the City in a north/south direction and this roadway carries a significant amount of heavy truck traffic, which generates a considerable amount of noise. The Imperial County and the City of Imperial Noise Elements provide noise exposure levels for major roadways and freeways. Under the Noise Elements, State Route 86 is defined as a freeway, and freeways have the highest noise exposure level. As provided in the City Noise Element, a distance of 500 feet from the freeway is required in order to reduce State Route 86 noise exposure levels to 60 dBA. The Imperial county and the City of Imperial Noise Elements also provide noise exposure levels for railroads. Both Noise Elements indicate an existing 51 dBA is achieved at a distance of 2,000 feet from a railroad.

The Noise Element of the General Plan has established acceptable noise levels for new projects within the community consistent with those depicted in Table 3.11-1. The Noise Element has established the goal of minimizing the effects of transportation-related and stationary source noise levels through proper land use and circulation system planning, development techniques, and enforcement of these noise standards.

From a land use planning perspective, fixed source noise control issues focus upon one goal: to take into consideration noise generation in various land uses. The goal can be achieved by applying noise level performance standards to proposed new noise-producing uses. The enforcement of noise standards on individual development projects involves the planned establishment of a noise ordinance to address and respond to noise complaints. The Land Use Element and Circulation Element of the City of Imperial support the land use objectives by placing commercial and industrial land uses along the rail spur and with immediate linkage to the major transportation corridors of State Route 115 and Highway 86.

The City takes this responsibility seriously as evidenced in the General Plan policies it proposes to adopt in order to protect the citizens of Imperial from excessive noise levels in the Planning Area. The applicable goals policies in support of these objectives can be summarized as follows:

Noise Element Goal: Maintain the quiet rural residential nature of the community through the use of sensitive land use planning practices and appropriate noise mitigation measures.

Table 3.11-1 Acceptable Community Noise Exposure by Land Use Category

LAND USE CATEGORY	COMMUNITY NOISE EXPOSURE							
	Ldn or CNEL, dBA							
	55	60	65	70	75	80	85	
RESIDENTIAL - LOW DENSITY SINGLE FAMILY, DUPLEX, MOBILE HOMES	[Blue bar from 55 to 60]		[Yellow bar from 60 to 70]			[Orange bar from 70 to 75]		[Red bar from 75 to 85]
RESIDENTIAL - MULTI-FAMILY	[Blue bar from 55 to 60]		[Yellow bar from 60 to 70]			[Orange bar from 70 to 75]		[Red bar from 75 to 85]
TRANSIENT LODGING - MOTELS, HOTELS	[Blue bar from 55 to 60]		[Yellow bar from 60 to 70]			[Orange bar from 70 to 80]		[Red bar from 80 to 85]
SCHOOLS, LIBRARIES, CHURCHES, HOSPITALS, NURSING HOMES	[Blue bar from 55 to 60]		[Yellow bar from 60 to 70]			[Orange bar from 70 to 80]		[Red bar from 80 to 85]
AUDITORIUMS, CONCERT HALLS, AMPHITHEATRES	[Yellow bar from 55 to 70]			[Orange bar from 70 to 85]				
SPORTS ARENA, OUTDOOR SPECTATOR SPORTS	[Yellow bar from 55 to 70]			[Orange bar from 70 to 85]				
PLAYGROUNDS, NEIGHBORHOOD PARKS	[Blue bar from 55 to 70]			[Orange bar from 70 to 75]		[Red bar from 75 to 85]		
GOLF COURSES, RIDING STABLES, WATER RECREATION, CEMETERIES	[Blue bar from 55 to 70]			[Orange bar from 70 to 80]		[Red bar from 80 to 85]		
OFFICE BUILDINGS, BUSINESS COMMERCIAL AND PROFESSIONAL	[Blue bar from 55 to 70]			[Yellow bar from 70 to 75]		[Orange bar from 75 to 85]		
INDUSTRIAL, MANUFACTURING, UTILITIES, AGRICULTURE	[Blue bar from 55 to 75]			[Yellow bar from 75 to 80]		[Orange bar from 80 to 85]		

[Blue bar]
NORMALLY ACCEPTABLE
 Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

[Orange bar]
NORMALLY UNACCEPTABLE
 New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design

[Yellow bar]
CONDITIONALLY ACCEPTABLE
 New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

[Red bar]
CLEARLY UNACCEPTABLE
 New construction or development should generally not be undertaken.

Source: Guidelines for the Preparation and Content of Noise Elements of the General Plan, California Office of Planning and Research, 2003.

- **Noise Element Policy 2.A:** The location and distribution of land uses throughout the City shall take into account the compatibility of different uses with the various levels of noise.
- **Noise Element Policy 3.A:** The potential for increasing the general neighborhood noise levels shall be considered when planning improvements to the City's circulation system.
- **Noise Element Policy 3.B:** In the event that it is determined that increased noise levels will result from an improvement to the circulation system, mitigation measures shall be required which reduce the noise levels to those determined acceptable.

In addition to City adopted Policies and standards, Title 24 Part 2 of the State of California Code of Regulations establishes uniform minimum noise insulation performance standards to protect persons within new hotels, motels, dormitories, long-term care facilities, apartment houses, and dwellings, other than detached single-family units from the effects of excessive noise, including, but not limited to, hearing loss or impairment and interference with speech and sleep. Title 24 mandates that interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room.

3.11.4 SIGNIFICANT IMPACTS

Although implementation of the General Plan may potentially expose existing noise-sensitive uses to construction-related noise and stationary noise generators may result during operation, the Imperial General Plan policies presented here and proposed to be actively implemented demonstrate a strong effort on the part of the City of Imperial to implement all feasible measures to mitigate impacts to ambient noise levels. Therefore, any effects of impact from noise generators are reduced to a level of less than significant and need no further mitigation measures.

3.11.5 MITIGATION MEASURES

No additional mitigation measures are required.

3.12 POPULATION AND HOUSING

Land use designations and growth projections are fundamental to planning for the provision of adequate services to meet the growing needs of the community. Changes in land use change the amount of amount of land and density levels available for housing and thus are expected to impact population and housing. The purpose of this section of the EIR is to determine the impact and compatibility of the proposed land use modifications on the future population and housing demand for the area. Data to support this analysis was largely obtained from the Service Area Plan drafted by the City in 2015.

3.12.1 EXISTING CONDITIONS

Historical Growth Pattern and Housing Demand

The City of Imperial's population has fluctuated drastically in the last two decades. Based on the Service Area Plan drafted by the City in 2015, the City of Imperial substantial growth. The City's population had the largest increase between the year 2000 and 2010 when it increased by an estimated 91% as seen on Table 3.12-1.

**Table 3.12-1
City of Imperial Population Growth Trends 1980-2012**

Year	Population	Numerical Change	Percentage Change
1980	3,451	--	--
1990	4,413	962	27%
2000	7,714	3,301	74%
2010	14,758	7,044	91%
2012	15,596	838	5%
2015	17,095	1,499	9%

Source: Service Area Plan 2015, Updated in 2017 using U.S. Census Bureau data

Households

A household consists of more than one person living in a home and usually supported by one or two incomes. While a household can be typically thought of as a family structure made up of a husband, wife, and kids, there are many variations including non-related roommates, multiple generations. There has been a continual increase of households in the City of Imperial as depicted by Table 3.12-2. The average household size for Imperial is 3.35 persons per household. This is in average somewhat greater than the State's which was measured to be 2.91 persons per household for the same 2010 Census.

**Table 3.12-2
City of Imperial Household Growth 1990-2010**

Year	No. of Households	Annual Percentage Change
1990	1,372	--
2000	2,308	6.8%
2010	4,405	3.6%
2017	5,400	2.2%

Source: Housing Element (2014) and 2017 California Department of Finance

Current Housing Stock

The City's housing stock is mostly single family housing. Approximately, 680 single family units were built between 2010 and 2014 and only 10 multi-family units were built in that same span (Housing Element, 2014). Since 1990, the number of total housing units has increased as did the vacancy rate. Most construction was of one, three, and four bedroom homes and one, five and six person households also increased. According to the Housing Element of 2014, housing growth within the City of Imperial between 2000 and 2010 was extremely strong with a percentage increase of 90 percent for the period. Single-family housing units comprised the majority of the 2014 housing stock with 75.5% of total units, while multi-family homes consisted of 23.2% and mobile homes made up the remaining 1.3%.

3.12.2 THRESHOLDS OF SIGNIFICANCE

Per State CEQA Guidelines, the proposed project would have an effect and would result in significant impacts to population and housing if it will:

- Induces substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly such as through the extension of roads or other infrastructure;
- Displace substantial numbers of existing housing or displacing the substantial number of people, necessitating the construction of replacing housing elsewhere;
- Conflict with the City's adopted General Plan Housing Element policies, plans, or programs.

3.12.3 IMPACT ANALYSIS

The City's residential land use designations provide for the development of a wide range of housing types including single-family dwellings, mobile homes, manufactures housing, condominiums, multi-family units at various densities, and includes mixed use development (commercial/residential) for areas in the downtown Village Commercial Zone. The land use regulations are not considered a constraint to residential development.

**Table 3.12-3
Probable Changes in Population**

Land Use Designation (Average Dwelling Units Per Acre)	Existing Acreage ¹ & Population if Build- Out At Average DU/A	Proposed Acreage & Population if Build-Out At Average DU/A	Probable Difference in Population at Build-Out
Residential Rural (1)	129 Acres 129 DU 432 persons	129 Acres 129 DU 432 persons	0 persons
Residential Low Density (2)	811 Acres 1,622 DU 5,433 persons	1,622 3,244 DU 10,866 persons	5,433 persons
Residential Single Family (6.0)	2,313 Acres 13,878 DU 46,491 persons	3,309 Acres 19,854 DU 66,510 persons	20,019 persons
Residential Apartment (20)	8 Acres 160 DU 536 persons	8 Acres 160 DU 536 persons	0 persons
Population Totals	52,892 persons at Existing Acreage & LU	78,344 persons at Proposed Acreage & LU	25,452

Service Area Plan, City of Imperial 2015; Applies 3.35 persons per household (California Department of Finance 2010)

The population in the Planning Area is projected to increase due to its underutilized and vacant land compiled with the net increase in acreage designated for the development of residential land uses, as seen on Table 3.12-3. Implementation of the proposed Land Use Plan and build-out of the proposed land uses will result in maximum estimated 23,387 dwelling units (an increase of 7,598 dwelling units) with a corresponding estimated population of 78,344 persons. The Housing Element of 2014 for the City of Imperial has the following policies in place to mitigate any potential impacts resulting from an increase growth in population and housing:

Housing Element Goal #2: Ensure that the City will provide a range of housing that varies sufficiently in terms of cost, design, size location and tenure to meet the housing needs of all economic segments of the community at a level no great than that which can be supported by the infrastructure.

- **Housing Element Policy 2.4:** The City will encourage housing suitable to a variety of income levels and household sizes and types in specific plan zones, subdivision review and individual multi-family development review.

Housing Element Goal #5: Pursue public and private resources available to promote diverse housing opportunities, and particularly to assist in the creation of affordable housing.

- **Housing Element Policy 5.3:** Encourage the private sector to take a role in the assistance to low-income households to rehabilitate substandard or deteriorated units.
- **Housing Element Policy 5.4:** Explore ways to finance, staff and support local community revitalization and housing rehabilitation programs, senior citizens home repair, energy conservation, weatherization and self-help preventive maintenance programs.

Implementation of the proposed General Plan Land Use Plan will not involve the displacement of any housing units nor will it restrict the affordability of new housing. The proposed General Plan has taken into account designation preferences that incorporate and encourage the City’s established housing goals. The City is further able to achieve these goals through the following policies supported by the proposed General Plan Land Use Element in a manner that mitigate any potential housing needs from an increasing population:

Land Use Element Goal #5 Residential Diversity: Create Neighborhoods and housing opportunities that provide housing diversity for all economic segments of the community and take into account the safety and welfare of its residents while encouraging healthy lifestyles.

- **Land Use Element Policy 5.4:** Multi-family residential development of varying types and densities shall be encouraged where compatible with existing land uses and the provisions of public services is highest.

Although at full build out, the City’s population would increase, based on historic population growth trends and future growth rates established by the Southern California Association of Governments, the City’s population is not anticipated to grow beyond 72% for the 23-year span. Table 3.12-4 illustrates that by the year 2035, the City’s population, would be 26,923 persons.

**Table 3.12-4
Growth Forecast for Imperial**

Year	Population	Households
2012	15,596	4,655
2020	19,766	5,900
2035	<u>26,923</u>	8,036
Net Increase (2012-2035)	11,327	3,381

Sources: City of Imperial Service Area Plan, 2015/ SCAG Growth Forecast Appendix 2012

As noted in Table 3.12-4, the households in the City would increase to 5,900 by the year 2020 and in the year 2035 they are estimated to increase to 8,036. The population is estimated to be 19,766 by the year 2020 and 26,923 by the year 2035. The net increase in population is expected to be 11,327 by 2035.

3.12.4 SIGNIFICANT IMPACTS

Although implementation of the Land Use Element and Circulation Element may potentially induce population growth and housing, the 2015 Imperial Service Area Plan and General Plan goals and policies presented here and intended to be actively implemented demonstrate a strong commitment on the part of the City of Imperial to implement all feasible measures to mitigate impacts from potential population increases. Therefore, any effects of impact from housing and population increase are reduced to a level of less than significant and need no further mitigation measures.

3.12.5 MITIGATION MEASURES

No additional mitigation measures are required.

3.13 PUBLIC SERVICES

This section describes the status and adequacy of existing government services. In addition, this section identifies the impacts of the proposed project on local public services and introduces adequate mitigation measures for any potentially significant impacts. Services considered in the analysis include law enforcement services, fire protection and emergency services, schools, parks and recreational facilities, electrical power, natural gas and solid waste. Information for this chapter is based upon the City of Imperial Service Area Plan adopted in September 2015.

3.13.1 EXISTING CONDITIONS

The City of Imperial has public facilities that serve approximately 5.85 square miles (3,744 acres) in size with a household population of 17,415 not including the Sphere of Influence. The following is a brief overview of the existing public facilities and public services:

Fire Protection Facilities & Services-Fire Protection facilities include the fire station and other support equipment including firefighting equipment such as fire engines, water tenders, and other firefighting units. Fire facilities also include the staffing level needed to man and operate the aforementioned equipment and deliver emergency and fire-protection services. The City of Imperial contracts with the County of Imperial for fire protection and emergency services in accordance with the Agreement for Fire Protection Services dated June 18, 2014. The current facility (Fire Station 4) is located at 2514 La Brucherie Road in Imperial.

Police Protection & Law Enforcement Facilities & Services- Police facilities include the police station located at 424 South Imperial and other support facilities and equipment including ten patrol vehicles and six support vehicles which are owned by the City of Imperial. Police facilities further includes the staffing level needed to provide law enforcement and protection services. The City has at least two police officers on duty per twelve hour (12) shifts. Dispatching services are contracted through the City of El Centro Police Department. As of 2015, the City was operating at a deficit of -2,611 SF in law enforcement building space and -10 Officers, -4 Vehicles, and -3 Volunteers per their adopted standards of 1.6 officers per 1,000 in population and two officers per vehicle. Plans are already in progress for the construction of a Public Safety Building.

Library Facilities & Services - Library facilities include the library space at the Imperial Public Library Building located at 200 W. 9th Street, the contents of the library, as well as the Staff that manage the library. It also includes any support equipment such as computers, copy machines, and other office equipment that may be available to the general public. The library was recently expanded in 2016 to an additional 3,474 SF and can adequately serve the projected population growth through 2025.

Park and Recreation Facilities Services-Parks and recreation facilities include open space areas, both improved and unimproved for the purpose of recreational use. The City of Imperial has a robust recreational services department which includes an approximate 63 acres that covers the City's 16 parks.

Sanitary Sewer Facilities-Wastewater treatment and sewer facilities include the City of Imperial Wastewater Pollution Control Plant (Wastewater Treatment Plant) and the sewer collection system that collects and conveys the wastewater to the wastewater treatment

plant. Sanitary Sewer Facilities also includes various sewer lift stations that are owned by the City of Imperial. The wastewater treatment plant has an existing capacity of 2.4 MGD and is operating at 1.73 MGD or 72 percent, which is more than sufficient capacity to address the wastewater demands through 2020.

Domestic Water Treatment Facilities & Services-Water treatment and distribution facilities include the City of Imperial's Water Treatment Plant and the distribution pipelines that convey potable water to residences and business within the service areas. Water facilities also include water transmission lines and pump systems necessary for conveyance of water. Existing water facilities include a 7MGD Water Treatment Plant, 6MG of Storage Tanks, eight pump stations, and distribution lines. The City is currently operating at a 2 MGD demand or 29 percent of the Plant's capacity. The City's existing capacity is more than sufficient to address the service demand through 2025.

Schools & Educational Services- The subject planning area largely lies within the Imperial Unified School District. There are two elementary schools, TL Waggoner Elementary and Ben Hulse Elementary, one middle school (Frank Wright Middle School) and one high school (Imperial High School). There is also Holbrook School which is an adult continuation school. School facilities are currently at capacity.

Power Services-The Imperial Irrigation District's (IID) Energy Division supplies the City of Imperial and the planning area with electrical power. The financing of individual facilities is covered by IID Regulation #15, while larger systems improvements are currently financed out of service revenues on an annual basis.

Natural Gas Services- Southern California Gas currently provides serves to the City, meeting the current demand for services. Existing pipelines are operated by Southern California Gas Company and pipeline extensions into the project planning area would be feasible. Major improvements required for any development are typically financed by developers.

3.13.2 THRESHOLDS OF SIGNIFICANCE

Per State CEQA Guidelines, the proposed project would have an effect and would result in significant impacts to public services if it will:

- Results in a substantial adverse physical impact associated with the provision or need for new or physically altered law enforcement and or emergency facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios;
- Results in a substantial adverse physical impact associated with the provision or need for new or physically altered fire protection enforcement facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios;
- Results in a substantial adverse physical impact associated with the provision or need for new or physically altered educational facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios;
- Results in a substantial adverse physical impact associated with the provision or need for new or physically altered parkland and or recreational facilities, the construction

of which could cause significant environmental impacts in order to maintain acceptable service rations.

3.13.3 IMPACT ANALYSIS

The year 2035 demand would affect response time performance standards by increasing the service area for all public services. Demand for additional personnel for law enforcement and fire protection services is expected as would be an increase in calls for service to the growth areas. The requirements for facilities, personnel, equipment, etc. depend on the actual development timeline and whether the new development is within the incorporated City limits or through new annexation. The City of Imperial has adopted Development Impact Fees to help mitigate the increase in service demand. The current law enforcement facilities are deficient and the need for a new public safety building is eminent.

The school system is also in need of a new elementary school facility which is included in the 2016 Imperial Unified School District School Facility Needs Analysis. The district currently owns a site which is intended to accommodate Cross School Elementary, and additionally proposes to construct 5 classroom buildings, an administration building, and a multipurpose room. Ben Hulse Elementary school has expansion plans consisting of one library/computer lab building, and ten elementary class room buildings (two of which are for kindergarten). Imperial High School classroom expansions plans include six new classroom buildings, and eight new relocatable classrooms. The master plan also includes modernization of a number of school facilities. The aforementioned plans are through the year 2021. 11

As previously noted sewer and water facilities will require expansion by 2020 and 2025 respectively in order to meet the projected demand of the growth in the planning areas. Current sewer facilities operate with a treatment capacity of 2.4 million gallons of water per day. According to the 2015 SAP's projected population, the average daily flow will be approximately 2.5 million gallons per day. The water treatment facilities operate with a capacity of approximately 7 million gallons. The projected average daily flow for the year 2025 will be 7.303 million gallons. Development will need to be examined on a project specific basis. Imposing Development Impact Fee's is an effective means of mitigating these impacts. The following **Table 13.3-1** are the City's most recent adopted Impact Fees:

**Table 13.3-1
Development Impact Fee's**

	Single Family Residential (per dwelling unit)	Multi-Family Residential (per dwelling unit)	Commercial and Industrial
Administrative Facilities	\$253.91	\$253.91	\$235.54 (per 1,000sf)
Fire Facilities	\$116.32	\$116.32	\$107.90 (per 1,000sf)
Law Enforcement Facilities	\$242.17	\$242.17	\$224.65 (per 1,000sf)
Library Facilities	\$263.52	\$245.14	No Fee
Park Facilities	\$1,504.92	\$1,399.92	No Fee
Circulation Facilities	\$514.76	\$357.69	\$22.43 per ADT
Total	\$2,895.59	\$2,615.16	Varies (land use)

Water Capacity Fees = 2,213.78 per equivalent dwelling unit (EDU)
Sewer Capacity Fees = 1,844.82 per equivalent dwelling unit (EDU)

The City charges development impact fees to new development for foreseeable service costs incurred by all public services areas such as police facilities, fire facilities, and so forth. As the City expands through annexation, development project applicants will be required to evaluate their projects fiscal impact on existing and future public safety services. Mitigation for these fiscal impacts are determined on a case by case basis and may include increased development impact fees or the dedication of facilities. Additionally, the City has adopted the following General Plan goals and policies that support mitigation of impacts to public services and any potential adverse effects that may result from project implementation:

Conservation Element Goal #5 Provide for a safe and efficient water supply to meet the demand of the existing and future population.

- **Conservation Element Policy 5.1** Continue to implement water conservation strategies that efficiently manage demand of existing urban water use through conservation measures.
- **Conservation Element Policy 5.2** Ensure development in Imperial is at levels that can be supported by existing and/or future water service capabilities.

Open Space/Recreation Element Goal #1: Provide for open space that meets the recreational needs of present and future City residents and visitors.

- **Open Space/Recreation Element Policy 1.1** Continue to require developers to offset the demand for parks generated by new development by providing new parks, open space or recreation areas at approximately three acres per 1,000 new residents.

Open Space/Recreation Element Goal #2. Manage urban development to protect open space areas within and surrounding the City.

- **Open Space/Recreation Element Policy 2.1** Promote the protection of open space on public and privately owned property for the protection of health and safety

through continued application of the Open Space and Recreation land use designations, as appropriate.

Safety Element Goal #5: Maintain a system of emergency services and disaster response preparedness that will save lives, protect property, and facilitate recovery with a minimum public disruption.

- **Safety Element Policy 5.1** Continue to develop and implement local preparedness planning and operations consistent with the Standardized Emergency Management System (SEMS) and National Incident Management System (NIMS) and participate in multi-jurisdictional disaster preparedness planning and operations.
- **Safety Element Policy 5.2:** Ensure fast and efficient access to all areas of the City during fires, earthquakes, and other emergencies.

The City is further proposing adoption of the following Land Use and Circulation Element Goals in support of Public Facilities:

Land Use Goal #1 Growth & Development: To implement the successful transformation of the City from a small town into a medium, full service City while maintaining its rural character via planned and orderly development.

- **Land Use Policy 1.1** The City shall review its Sphere of Influence on a periodic basis to ensure that anticipated growth within the City can be accommodated and planned for with proper services and facilities.
- **Land Use Policy 1.3** Land use patterns and development densities shall be consistent with the capabilities of existing and planned public services and facilities.

The City's Service Area Plan further incorporates the following mitigation measures to help mitigate impacts from new development on existing public services and facilities:

- **Administrative Facility Mitigation** By 2035 42,771 SF shall be added.
- **Fire Protection Facility Mitigation** All new development shall be assessed and new personnel shall be added to address increased demand.
- **Police Protection and Law Enforcement Facilities Mitigation** Continue to monitor the response time and identify a funding mechanism for a new police station and possible dispatching services.
- **Police Protection and Law Enforcement Facilities Mitigation** Continue to obtain grants for crime prevention services.
- **Library Facility Mitigation** Maintain Efforts to obtain funding in order to continue adequate service level.
- **Library Facility Mitigation** Continue to accept donations of money and supplies as a means of augmenting library services while conserving allocated finances
- **Recreational & Park Facilities Mitigation** Continue to allow developers to dedicate parkland or pay the applicable Development Impact Fees.
- **Recreational & Park Facilities Mitigation** Continue to pursue State and Federal Grant resources.

3.13.4 SIGNIFICANT IMPACTS

Although implementation of the Land Use Element has the potential to impact services and service facilities through build-out, the Land Use Element policies proposed and programs presented here and actively implemented demonstrate a strong effort on the part of the City of Imperial to implement all feasible measures to mitigate potential impacts to public services and facilities. Therefore, any potential impacts would be reduced to a level below significant.

3.13.5 MITIGATION MEASURES

No further mitigation measures are required.

3.14 RECREATION

This section describes the status and adequacy of existing recreational facilities. In addition, this section identifies the impacts of the proposed project on local recreation and introduces adequate mitigation measures for any potentially significant impacts. Information for this chapter is based upon the City of Imperial Service Area Plan adopted in 2015, the City's Open Space and Recreation Element adopted in 2014.

3.14.1 EXISTING CONDITIONS

There are a number of recreational facilities within the City of Imperial including open space areas used for recreation. The City owns over sixteen city parks. City parks offer picnic facilities and recreational opportunities, including baseball and softball diamonds, basketball courts, tot-lots and even a dog park. The City's primary park is Eager Park. Eager Park is centrally located in the City and boasts a splash pad. In addition to these amenities, the City also offers an array of local recreation programs and services for children, adults, and seniors, year round.

The existing public parks within the City of Imperial are owned and operated by the City of Imperial Parks Department. The City of Imperial currently has over 60 acres of parkland as depicted in Table R-1 City of Imperial Park Space.

**Table 3.14.1
City of Imperial Park Space**

Park	Acres
C.A. Irving Sports Complex	2.07
Aviation Park	.89
Imperial Dog Park	4.75
Eager Park	2.07
Evans Park	1.35
Freddie White Park	2.07
Joshua Tree Park	11.50
Paseo Del Sol Park	14.00
Savanna Ranch Green Belt	3.94
Savanna Ranch Park	2.94
Sky Ranch Green Belt	4.59
Sky Ranch Park	2.19
Sunset Park	5.25
Springfield Picnic Areas	1.68
Victoria Basin/Park	2.9
Victoria Park	.68
Total	62.87

Source: City of Imperial Service Area Plan, 2015

3.14.2 THRESHOLDS OF SIGNIFICANCE

Per State CEQA Guidelines, the proposed project would have an effect and would result in significant impacts to public services if it will:

- 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.
- 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.

3.14.3 IMPACT ANALYSIS

The City of Imperial has adopted the Performance Standard of 3.0 acres parkland/1,000 population. This standard is applied to developer impacts, and further stipulated in as a goal in the Open Space and Recreation Element of the Imperial General Plan. The City of Imperial is operating at a park surplus of 10.93 acres according to the Service Area Plan adopted in 2015. The surplus acreage is enough parkland to serve 3,644 additional people. Additionally, on March 16, 2016 the City of Imperial accepted a grant deed for the Imperial Regional Park and Equestrian Center. The Regional Park and Equestrian Center will be developed on a 143- acre parcel and will include a 56.5-acre Equestrian Center with RV Spaces, a 6.25-acre Olive Orchard Mill, a 22.98 Acre Regional Sports Plex, two (2) open space parks for a total of 14.77 acres.

Based on a 2035 population projection of 62,541 the City of Imperial will need 187.62 acres of recreational open space in order to be consistent with the performance standard objective of the General Plan. This indicates that the City will need to obtain an additional 135.37 acres of recreational open space by the year 2035. The City has been planning a Regional Park and Equestrian Center to be located along the northern part of the City Limits in an area bound by Larsen Road to the north, Ralph Road to the south and Nance and La Brucherie Roads at the respective west and east boundaries. The subject area encompasses 144 acres which were annexed in 2016 and which are largely dedicated for open space and recreational facilities.

The City of Imperial actively requires the development community to provide parkland either through the payment of the development impact fee or through parkland donations or improvements as a part of the development approval process. Recreation impacts fees include fees for both parks and library facilities as discussed in the preceding Public Services Section. Fees are required to ensure that impacts to facilities are mitigated prior to development. The City's Recreation Element has the following Goals and Policies adopted to help mitigated any other potential impacts to recreational resources:

Open Space & Recreation Element Goal # 1: Provide for open space that meets the recreational needs of present and future City residents and visitors.

- **Open Space & Recreation Element Policy 1.1:** Continue to require developers to offset the demand for parks generated by new development by providing new parks, open space or recreation areas at approximately three acres per 1,000 new residents.

- **Open Space & Recreation Element Policy 1.2** Maintain and expand youth recreational programs.

Open Space & Recreation Element Goal #2.: Manage urban development to protect open-space areas within and surrounding the City.

- **Open Space & Recreation Element Policy 2.1:** Promote the protection of open space on public and privately owned property for the protection of health and safety through continued application of the Open Space and Recreation land use designations, as appropriate.

Open Space & Recreation Element Goal # 3: Plan and establish tourism recreational services to visitors.

- **Open Space & Recreation Element Policy 3.1:** Continue efforts for high-quality recreational facilities and programs to attract tourists and meet residents' needs including the development of the Equestrian Center.

3.14.4 SIGNIFICANT IMPACTS

Although implementation of the Land Use element has the potential to impact recreation and recreational facilities through build-out, the Goals and policies proposed and programs presented here and actively implemented demonstrate a strong effort on the part of the City of Imperial to implement all feasible measures to mitigate potential impacts to park facilities and recreational. Therefore, any potential impacts would be reduced to a level below significant.

3.14-5 MITIGATION MEASURES

No additional Mitigation Measures Required.

3.15 TRAFFIC AND TRANSPORTATION

This section evaluates traffic and circulation impacts from implementation of the proposed Land Use Element and Circulation Element. The City's commitment to circulation facilities is enhancing circulation and access for its residents, businesses, and visitors in a safe and efficient manner. The foundation of the City's circulation system is the planned transition to a multi-modal transportation network (e.g. ability to serve all the modes of travel) which includes sidewalks and crosswalks, bikeways, roadways, pathways, and public transit routes; as well as the City's movement of goods including a freight rail system, truck routes, and airport facilities. This proceeding section describes the existing traffic and circulation conditions in the City of Imperial.

3.15.1 EXISTING CONDITIONS

The City of Imperial maintains over seventy-one (71) lineal miles of roadway (Source: ICTC, 2015). The existing facilities, identified per the noted classifications are depicted in Figure **3.16-1-City of Imperial Circulation System**. A more detailed discussion for each of the facilities identified is noted below:

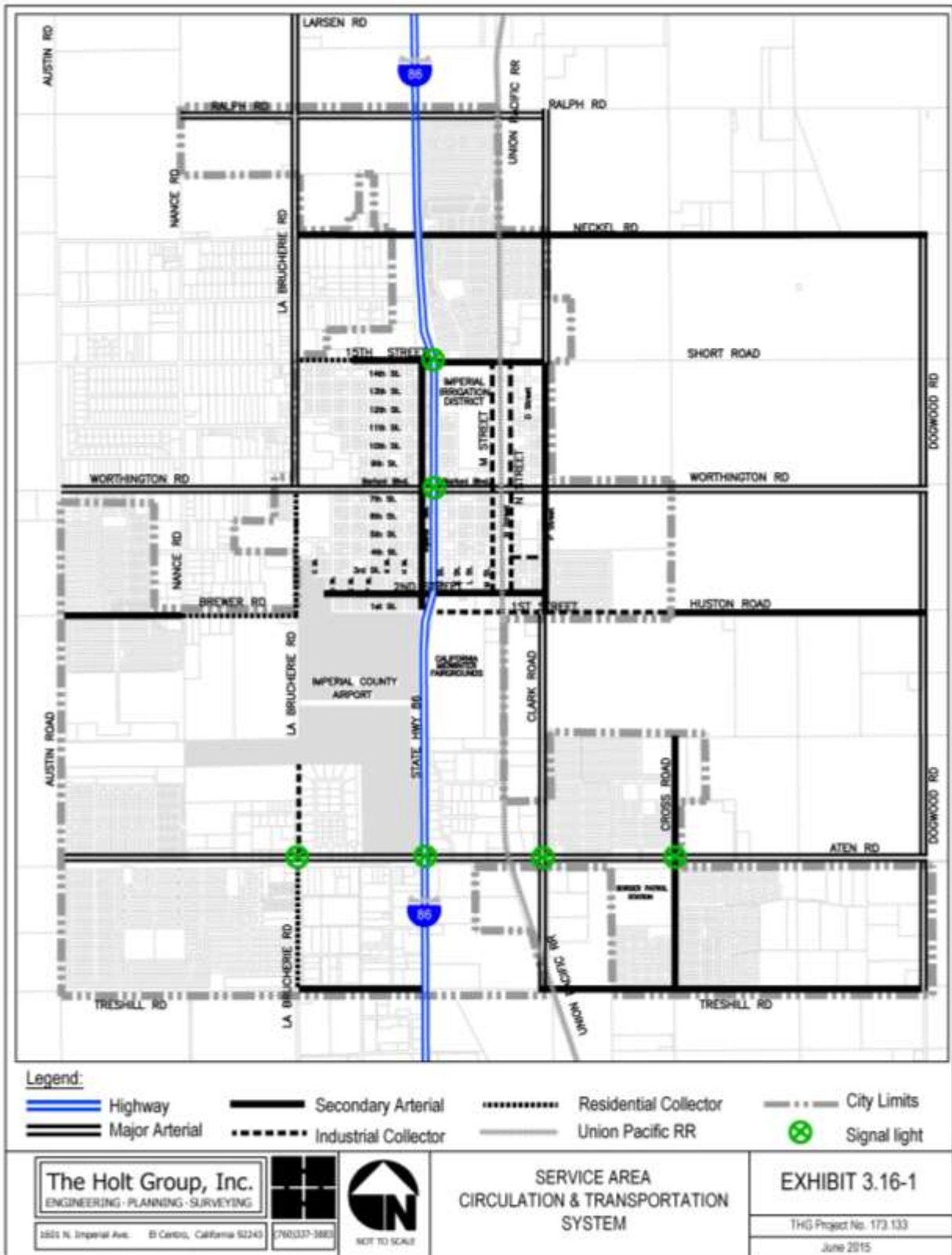
State Highway – Highways are main roads that typically connect major towns or cities and are designed for high speed traffic. Highways collect a large volume of traffic with speed limits from 55 to 70 miles per hour. The City of Imperial has approximately 3.5 lineal miles of highway within its incorporated City Limits. Highway 86, a major four lane Expressway, is located within the City of Imperial but is maintained and managed by the California State Department of Transportation. The State Department of Transportation also controls the State Highway right-of-way.

Major Arterials - Major arterials move traffic through a City from one point to another. Speed limits on major arterials are typically 45 mph and are designed with four lanes. On-street parking should be limited and residential lots should not have direct access onto major arterials. The City of Imperial has over eight (8) lineal miles of existing and planned major arterials within its current incorporated City Limit, Ralph Road, Neckel Road, Barioni Boulevard, Aten Road, La Brucherie, Clark Road, Dogwood Boulevard.

Secondary Arterials - Secondary arterials move traffic in a similar manner as major arterials, except they are designed with two lanes instead of four lanes. These arterials carry a lower volume of traffic and typically have a 35 mph speed limit. On-street parking should be limited and residential lots should not have direct access onto secondary arterials. The City of Imperial has just over seven (7) lineal miles of existing and planned secondary arterials within the current City Limits. Of those, only Imperial Avenue, and Fifteenth Street to designed capacity.

Industrial Collectors - Industrial collectors have a wider curb to curb width in order to facilitate large truck movements. These collectors are designed for low volumes with speed limits 30 to 35 miles per hour. The City of Imperial has over just over three (3) lineal miles of existing and planned industrial collectors within the current incorporated City Limits. The only Industrial Collector Improved at Designed Capacity La Brucherie Road (Aten Road to Airport)

Figure 3.16-1-City of Imperial Circulation System



Residential Collectors - Local collectors collect a smaller volume of traffic from a smaller area. Streets are usually two lanes wide with a speed limit of 25 to 30 miles per hour. Access is not restricted and on street parking is available. The City of Imperial has over fifty (50) lineal miles of existing and planned residential collectors within the incorporated City Limits which are the followings: La Brucherie Road (South City Limits to Aten Road), First Street (west), Third Street, Fourth Street (B Street to M Street), Remaining number and letter streets not previously mentioned.

Signalized Intersections-The City of Imperial contains five signalized intersections which include the intersections of Aten Road/Highway 86, Barioni Boulevard/Highway 86, 15th Street/Highway 86, La Brucherie/Aten Road, and Clark Road/Aten Road. A sixth signal light is currently under construction for the Aten Road/Dogwood road intersection.

Transit Services and Facilities-There are five IV Transit bus routes serving the City of Imperial. Barioni Boulevard, SR-86 and Aten Road are recommended as transit priority routes. There a total of three bus stops equipped with bus shelter facilities within the City Limits as noted below. A fourth bus stop is at Imperial Valley College within a future planned Sphere of Influence. City bus stops are the fires location Imperial Avenue just North of Barioni Boulevard along East East Barioni Boulevard just East of North K Street.

Existing Traffic Volumes

Existing average daily traffic volumes (ADT's) for major roadways within the Planning Area were obtained from the Traffic Impact Analysis of 2005 prepared by Kunzman Associates to best derive a current Level of Service (LOS) for select roadways including SR-86, Aten Road, Forrester Road, Austin Road, and Worthington Road. The Level of Service is a qualitative measure denoting the different operating conditions which occur on a given roadway segment or intersection under various traffic volume loads. The performance of streets and roadways is typically measured by comparing the level of traffic to documented standards for the type of street based on classification, number of lanes, and width. In traffic engineering methodology, roadway levels of service (LOS) are typically rated from LOS A to LOS F. LOS A indicates light traffic conditions, in which drivers have a great deal of freedom to maneuver and little interference from other drivers. A minimum performance standard of performance would be a LOS C which is considered to be consistent with the roadway conditions in smaller cities and rural areas while a LOS F indicates a situation where the traffic relying on a particular facility is beyond the capacity of the facility with significant delays and congestion. Imperial County has developed standards for roadway capacity that are applicable to conditions in the City of Imperial. These roadway performance standards are show in Table 3.16-1.

**Table 3.16-1
Roadway Performance Standards
Maximum Average Daily Traffic by Level of Service**

Roadway Classification	Number	A	B	C	D	E
	of Lanes					
Freeway	3	30,000	42,000	60,000	70,000	80,000
Prime Arterial w/median	4-6	22,200	37,000	44,600	50,000	57,000
Minor Arterial w/median	4-6	14,800	24,700	29,600	33,000	37,000
Major Collector	4	13,700	22,800	27,400	30,800	34,200
Industrial Local	2	2,500	5,000	7,000	8,500	10,000
Minor Collector	2	1,900	4,100	7,100	10,900	16,200
Residential Street	2	*	*	1,500	*	*
Residential or Cul-de-Sac Loop Street	2	*	*	200	*	*

Source: Imperial County 2008 Circulation and Scenic Highway Element

Levels of Service classifications are normally applied to roads carrying through traffic between major trip generating land uses. Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, and not to carry through traffic. According to the Traffic Impact Analysis of 2005, prepared by Kunzman Associated, all the aforementioned major roadways within the Planning Area are operating at levels of service B or better.

3.15.2 THRESHOLDS OF SIGNIFICANCE

For this analysis, impacts to transportation and circulation resulting from the proposed project would be considered potentially significant if the project:

- Causes an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the current street system or causes congestion at intersections;
- Exceeds, either individually or cumulatively, the level of service standard established by the City of Imperial;
- Results in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- Substantially increases hazards due to a design feature including inadequate circulation and or emergency access, dangerous intersections or incompatible uses;
- Conflicts with adopted policies, plans, programs, supporting alternative transportation including bicycle routes, bus routes etc.

3.15.3 IMPACT ANALYSIS

Background

Build out of the proposed Land Use Plan and Circulation Element will undoubtedly generate increased traffic volumes. As the City of Imperial continues to grow, future improvements

will be required to build streets to full improvements. Future roadway improvements should be designed to provide a circulation network that prioritizes and provides safe and convenient and attractive facilities for all users of the system. Additionally, developers will be required to construct frontage improvements along all Circulation Element roadways adjacent to each proposed annexation and future project. Bikeways may be necessary along Major Arterials such as Aten Road.

In order to mitigate the impacts of growth within the Planning Area, new transportation facilities and traffic signals may likely be required by the Year 2035 in response to increased traffic volumes. Average daily traffic forecasts for existing street system for the Year 2035 at full build-out are shown in **Table 3.16-2**.

**Table 3.16-2
Roadway Performance Evaluation – General Plan Conditions**

Roadway	Location	Current	Capacity	LOS
		ADT		
Dogwood	Aten Road to Treshill Road	5,200	15,000	A
15 th Street	La Brucheria to E Street	14,900	20,000	B
Worthington	Nance Road and “B” Street	5,745	15,000	A
Austin	South of Brewer Road	5,924	7,100	A
Brewer	Russell Road and Austin Road	1,810	15,000	A

Traffic Volumes on California State Highways, 2015.

It is projected that new urban development associated with the proposed Land Use Plan may result in increased traffic exceeding Level of Service standards for certain roadway segments or necessitate signalized intersections. The City of Imperial has integrated traffic improvement standards primarily in the Circulation Element through Goals and Policies to mitigate potential impacts to traffic, circulation, and safety. Examples of these goals and policies are as follows:

Circulation Element Goal #2 Safe & Complete Streets: To develop a multi-modal network and balanced transportation system that safely accommodates all modes of travel.

- **Circulation Element Policy 2.1:** Develop effective Transportation Demand Management to manage the amount of vehicles generated by a land use by promoting alternative modes of transportation and continuing to utilize technology and intelligent transportation systems to stabilize street system flow and safety.
- **Circulation Element Policy 2.2:** The City shall coordinate safety measures with the agencies and emergency response personnel to reduce risks to local residents and visitors.

Circulation Element Goal #3 Circulation Efficiency: Provide for the safe and efficient movement of goods throughout the City.

- **Circulation Element Policy 3.3:** Access to major streets shall be limited to maintain capacity, efficiency and safety of the traffic flow within the context of the designated street typologies.

3.15.4 SIGNIFICANT IMPACTS

The General Plan Goals and Policies presented here and proposed to be implemented demonstrate commitment on the part of the City of Imperial to implement all feasible measures to mitigate any potentially adverse impact to traffic and circulation. Therefore, the potential effects to traffic and circulation will be reduced to a level of less than significant.

3.15.5 MITIGATION MEASURES

No additional mitigation measures are required.

3.16 TRIBAL CULTURAL RESOURCES

The section of the EIR discusses tribal cultural resources within the Planning Area and the associated potential impacts resulting from the proposed implementation of the Land Use Element and Circulation Element. A tribal consultation list request, and sacred Lands search request was filed with the Native American Heritage Commission (NAHC) and provided negative results for sacred lands. Information for this chapter are based on historical records and available studies as well as responses provided by tribes during the consultation process.

3.16.1 EXISTING CONDITIONS

The Archaeological resources within Imperial County can be classified into two distinct sections: prehistoric and historic. Prehistoric archeology relates to aboriginal culture and systems which existed prior to Spanish colonization in 1769. Historical archeology deals with uncovering facts for which there is no known historical documentation. The most important feature in the study of the prehistory and history of Imperial County is Lake Cahuilla, the modern iteration of which is the Salton Sea. This enormous lake periodically formed when flooding in the Colorado River broke through low-lying areas and flooded the Salton Trough, inundating up to an average elevation of about 40 feet above mean sea level. Because Lake Cahuilla was a rare source of fresh water in the desert, human populations would have been attracted to live and gather plant and animal resources near the lake. Human occupation sites mark the ancient shorelines both above the high stand mark and along the lower, retreating shorelines.

The Native American Heritage Commission was contacted on November 30, 2017 for early consultation. Thirteen regional tribes listed on the Native American Heritage Commission Form were sent an invitation for early comment. A response was not received from any of the thirteen tribes. Although no sensitive cultural or archeological resource areas were identified, the Land Use Element incorporates policies to ensure all construction projects incorporate mitigation in the unlikely potential that sensitive cultural resource areas are uncovered during excavation activities.

The California Register of Historical Resources was accessed on January 20, 2017 which did show a listed resource in the project area. There is one source, the Site of Fort Romualdo Pacheco, which is noted to be in the City of Imperial, however it is located approximately 6 miles west of the planning area.

3.16.2 THRESHOLDS OF SIGNIFICANCE

For this analysis, impacts to tribal cultural resources would be considered potentially significant if the project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.16.3 IMPACT ANALYSIS

There are currently no known Tribal Cultural Resources noted in either Sacred Lands Files, or on the CHRIS records search. Comments were not provided by tribes during the comment period. While Tribal Cultural Resources were not provided during initial consultation period, comments will be further solicited and considered during the environmental public review period.

All projects, except for infill development, will be subject to an independent CEQA analysis to determine not just a cumulative but independent level of impact and responsibility on tribal resources. The Imperial General Plan including the updated Land Use Element weighed these issues carefully and further mitigates any potential impacts to tribal and cultural resources through the following Goals and Policies:

Conservation Element Goal #3: Identify and promote the preservation of cultural, archaeological, and historic resources that define the historical significance of the City of Imperial.

- **Conservation Element Policy 3.1** Inventory and prevent the loss or compromise of significant historical and cultural resources and landmarks located within the City.

3.16.4 SIGNIFICANT IMPACTS

The General Plan Policies presented here and proposed to be actively implemented demonstrate a strong effort on the part of the City of Imperial to be inclusive of Tribal Cultural needs. Therefore, these policies couple with the independent need of all future projects to have a CEQA review and assessment of potential cumulative and independent effects will be reduced to a level of less than significant.

Although no sensitive cultural or archeological resources have been identified and the planning area is located in an area of low archaeological sensitivity, the following measure is recommended to reduce any potential impact in the unlikely event that resources are discovered during construction activities associated with development: Any new development involving excavations over five feet shall incorporate into the design/construction plans language that stipulates that if buried cultural materials are encountered during construction, work in that area must halt until a qualified archaeologist can evaluate the nature and significance of the finding.

3.16.5 MITIGATION MEASURES

While tribal cultural resources will not be immediately affected by the Land Use and Circulation Element policy documents, this does not exempt future land use and circulation projects from environmental review. The following are mitigation recommendations to avoid and preserve existing tribal cultural resources.

IMPACT TCR-1 Tribal cultural resources may be uncovered during excavating activities by new developments.

MITIGATION TCR 1- Any new development involving excavations deeper than five feet shall incorporate into the design/construction plans language that stipulates that if buried cultural materials are encountered during construction, work in that area must halt until a qualified archaeologist can evaluate the nature and significance of the finding.

3.17 UTILITIES AND SERVICE SYSTEMS

The section of the EIR describes the public facilities and service systems within the Planning Area and the associated potential impacts resulting from the proposed Land Use Element and Circulation Element. Utilities and services considered in the analysis include water supply, wastewater treatment and storm water. Information for this chapter is based upon various resources including a 2008 Water Master Plan, 2008 Sewer Master Plan and the City of Imperial Service Area Plan (2015).

3.17.1 EXISTING CONDITIONS

Water Facilities

The City of Imperial owns, operates and maintains a system for the treatment, storage and distribution of potable water resources that serves approximately 5,015 (January 2015) water service connections for residences and businesses within the City's service area and Sphere of Influence. The City purchases all of its untreated water from the Imperial Irrigation District, which is conveyed to City facilities via IID's Dahlia Canal via a 24-inch diameter raw water pipeline, and the Newside Canal as a secondary source via 27-inch and 16-inch diameter pipelines.

The City's Water Treatment Plant was completely rebuilt in 1995 and is located to the west of town, just west of B Street at the north end of the airport runway. Raw water from the Dahlia and Newside Canals is diverted into open reservoirs located at the Water Treatment Plant. The City of Imperial Water Treatment Plant currently has a capacity of approximately 7.0 million gallons a day (MGD), which is capable of providing adequate service for the entire City and proposed development areas. The Plant is currently operating at 37% capacity.

Surplus water is currently being stored at the water treatment site in a 2.0 MG storage ground facility. A remote 2.0 MG ground-level storage tank is also located at the northeast corner of the 13th and O Street intersection. Another 2.0 MG tank was constructed near Cross Road and Fonzi Road. To maintain sufficient water pressure (currently about 57/33 psi), the City has three pump stations. The pumps are used to keep water available and to assist when higher pressure is required to fight fires. The existing water distribution system includes 63 miles of pipelines ranging in size from 2" to 16."

Waste Water Facilities

The City of Imperial owns, operates, and maintains a wastewater collection and treatment system that services to the City of Imperial, and some isolated areas immediately outside of the City boundary, but within the Sphere of Influence. The Imperial Water Pollution Control Plant (IWPCP) is located at 701 East 14th Street, located just east of the railroad tracks. The existing wastewater treatment plant is currently located on a 4.68 acre site constructed in the 1940's and rebuilt in 1995. The City also owns a 15-acre site, northeast of the above-mentioned site, which is occupied by treatment ponds for emergency use. The most recent expansion was completed in 2004, and has a current treatment capacity of 2.4 million gallons per day (MGD). Over the last few years, the average daily flow to the City of Imperial Wastewater Treatment Plant has varied, with monthly averages ranging from 1.4 million gallons per day (MGD) to 1.6 MGD during the 2014 calendar year, demonstrating sufficient capacity to accommodate new growth.

The existing wastewater collection system consists of approximately 63 miles of gravity sewers ranging in size from 6 to 24 inches in diameter, 16 lift stations, and 6 miles of force mains. Trunk sewers in the major roads transport wastewater to the treatment plant.

Drainage and Stormwater

Drainage facilities in the entire Imperial Valley are generally within the jurisdiction of the Imperial Irrigation District (IID). In conjunction with an irrigation network that includes more than 1,600 miles of canals, IID operates and maintains an agricultural drainage system consisting of more than 1,400 miles of surface drains. The City of Imperial discharges into IID drains which ultimately drain into the Alamo River, a tributary to the Salton Sea. It should be noted, however, that the primary drainage system managed by IID is not designed to convey all stormwater runoff from urbanized areas. Therefore, new development must provide for on-site retention of stormwater to mitigate against stormwater impacts. Additionally, as future development occurs and drainage facilities are no longer used for agricultural drainage, the IID will abandon those facilities to the City, so that the IID only manages drains used for agricultural.

A majority of the storm water collected within the City of Imperial uses surface drainage ditches to convey storm water to the IID drains. The primary drainage facilities receiving the City of Imperial's storm water, and managed by the Imperial Irrigation District, include the North Central Drain, North Central Drain No. 2, Newside Drain No. 1, Dahlia Drain No. 8, Dolson Drain No. 2 and the McCall Drain No. 5A and 5B. There are five primary drainage zones that tie into these drains as depicted in **Figure 3.17-1-Drainage Zones and Retention Facilities**. The five primary drainage zones within the City can be geographically described as southwestern portion (SW), central west portion (CW), central east portion (CE), eastern portion (E), and northeast portion (NE).

Waste Management Facilities

Allied Waste (Republic Services), a private firm under contract with the City of Imperial, transports municipal solid waste from the City to the Allied Imperial Landfill and Recycling Facilities located in the County of Imperial. The landfill is a 162-acre Class III landfill and has an expected closure date of December 31, 2040. Solid waste can also be disposed of at other landfills within Imperial County if Allied Waste negotiates agreements with them. There are currently four (4) Imperial County-owned landfills, near Imperial, Calexico, Niland, and Bombay Beach. Additionally, there are two (2) privately owned landfills which are located in Salton City and Brawley.

3.17.2 THRESHOLDS OF SIGNIFICANCE

For this analysis, impacts to public facilities and service system resulting from the proposed project would be considered potentially significant if the project would:

- Exceed the City's wastewater treatment requirements as identified by the City's Water and Wastewater Master Plan, the construction of which could cause significant environmental effects;
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;

Generate demands for potable water services that exceed the capacity of the existing or planned water supply and infrastructure as identified by the City Water Master Plan;

- Be serviced by a landfill with insufficient permitted service capacity or is unable to comply with federal, state, and local statues and regulations related to solid waste.

3.17.3 IMPACT ANALYSIS

Water- The water treatment facility is currently operating at 37% of its designed capacity. Since the Water Treatment Plant has a current capacity of 7.0 MGD, the existing facility can provide for an adequate supply of potable water through the year 2035 into several areas planned for annexation and development. The existing water storage capacity of 6 MG is adequate to support much of the planned development in the Land Use Plan. The City’s Service Area Plan has phased improvements consistent with the planned population growth.

Wastewater- The wastewater treatment facility has a design flow of 2.4 million gallons per day (MGD). Even with current planned development, the flow would not increase to designed capacity until 2020. The current wastewater treatment plant underwent a \$3 Million capital improvement project in 2015. The improvements consist of improvements to the headworks screening and some internal pipeline reorganization. Pump stations are constructed as development occurs. Assuming a conservative impact of 100 GPD (gallons per day) per capita on the wastewater treatment facilities, the City projected Average Daily Flow wastewater flow demand is as follows:

**Table 3.17-1
Daily Sewer Flow Projections**

Year	Projected Population	Average Daily Flow
2020	29,476	2.497 MGD
2025	48,692	4.869 MGD
2030	53,533	5.353 MGD
2035	62,541	6.254 MGD

Demand is based on an assumed impact of 100 gallons per day per capita.

As previously noted, the City of Imperial average household size is 3.35 persons per household. The average discharge of wastewater is 100 gallons per day per person, thus each dwelling units discharges an average of 335 gallons per day. Assuming an impact of 335 GPD (gallons per day) per Equivalent Dwelling Unit (EDU) on the wastewater treatment facilities, the City is also able to project nonresidential impacts to water facilities from commercial and industrial operations. The projected average daily wastewater flow demand for all “units,” including nonresidential equivalent dwelling units, is noted in Table 13.17-2.

**Table 13.17-2
Daily Sewer Flow Projections with EDU's**

Year	Total Planned Cumulative Development Dwelling Units	Planned Cumulative Non- Residential Equivalent Dwelling Units	Total Equivalent Dwelling Units	Average Daily Flow Demand
2020	8,799	12,170	20,969	7.025 MGD
2025	14,535	16,936	31,471	10.542 MGD
2030	15,980	16,997	32,977	11.047 MGD
2035	18,669	17,057	35,726	11.968 MGD

Average Daily Flow is based on an assumed impact of 335 gallons per EDU

The City of Imperial has plans to relocate the treatment facilities out to the Mesquite Lake area and build a regional Keystone Reclamation Plant to serve a number of unincorporated commercial/industrial operations, the Imperial Valley College and all of the City's anticipated growth areas. The proposed wastewater treatment facility is to be located near the Keystone/Mesquite Specific Plan Area north of the City of Imperial in the jurisdiction of the County of Imperial and it will be a shared facility. The City and the County are currently working together to plan, construct and operate the treatment facility.

Drainage- The existing primary drainage system managed by IID is not designed to convey all storm water runoff from urbanization. Therefore, recent and new development must provide for on-site retention of storm water to mitigate against storm water impacts. These retention facilities are designed to control storm water flows into the IID drains. Conveyance out of the retention basins is restricted by the use of 12" pipes. The City of Imperial Public Works Department provides the maintenance of the City storm water drainage system. The public works crews monitor the flow within the drainage ditches, make minor repairs and clean the ditches on an as needed basis.

As future development occurs, storm water drainage systems must be installed into the project area to ensure adequate collection and conveyance of runoff. The type and extent of the development proposed will affect the demand of facilities. A significant increase in the amount of impervious surfaces will result in a greater amount of surface runoff. The exact size and location of future facilities will be determined at the time development is proposed and processed through the City of Imperial. All future development must continue to comply with IID policies regarding temporary retention of storm water to reduce the impacts to the IID drains. Storm water runoff as well as other contributing factors has degraded both the New and Alamo Rivers. The recently updated Water Quality Control Plan for the Colorado River Basin Region prepared by the California Regional Water Quality Control Board contains strict requirements for the water quality conveyed into these rivers. Future facilities must be designed to adhere to the latest pollution control devices and NPDES requirements.

The construction of future storm water drainage facilities is based on the rate of new development within the City of Imperial. Additional storm water drainage facilities will be

needed in the proposed annexation areas in order to convey storm water into the IID drainage system. The future storm water management systems for the annexation areas will be designed during the Tentative Map and Final Map stage of development.

All projects, except for infill development, will be subject to an independent CEQA analysis to determine not just a cumulative but independent level of impact and responsibility. The Imperial General Plan including the updated Land Use Element and Circulation Element weighed these issues carefully and further mitigates any potential impacts to public utilities and service systems through the following Goals and Policies:

Land Use Goal #1 Growth & Development: To implement the successful transformation of the City from a small town into a medium, full service City while maintaining its rural character via planned and orderly development.

- **Land Use Policy 1.1** The City shall review its Sphere of Influence on a periodic basis to ensure that anticipated growth within the City can be accommodated and planned for with proper services and facilities.
- **Land Use Policy 1.3** Land use patterns and development densities shall be consistent with the capabilities of existing and planned public services and facilities.

Land Use Goal #3 Quality of Life: Availability of adequate public services and facilities for all existing and proposed development and create an aesthetically pleasing, full service community with an excellent quality of life.

- **Land Use Policy 3.1** Strive to create multi-generational, family-friendly public spaces throughout the developed community that are widely used by everyone and to maximize existing infrastructure.

The City's Service Area Plan further incorporates the following mitigation measures to help mitigate impacts from new development on existing public utilities and service systems:

- **Sanitary Sewer Mitigation S-1** Facilities identified in the Wastewater Master Plan update shall be constructed as new development and annexation of land occurs.
- **Sanitary Sewer Mitigation S-2** Prior to the recordation of a final map within any of the annexation areas, a development agreement must be in place to ensure that adequate wastewater facilities will be provided during the PWWF conditions for the wastewater conveyance system being utilized by said annexation area.
- **Sanitary Sewer Mitigation S-3** All system improvements shall be designed and constructed in accordance with Federal, State and local regulations.
- **Sanitary Sewer Mitigation S-4** Construct new wastewater treatment facility at Mesquite Lakes.
- **Domestic Water Mitigation W-1** Facilities identified in the Water Master Plan update shall be constructed as needed as new development and annexation of land occurs.
- **Domestic Water Mitigation W-2** Prior to the recordation of a final map within any of the annexation areas, a development agreement shall be in place to ensure that adequate water pressures will be provided during the MDPHF conditions for the water distribution system being utilized by said annexation area.

- ***Domestic Water Mitigation W-3*** A potable water supply shall be provided for all annexation areas.
- ***Domestic Water Mitigation W-4*** Adequate fire flow, subject to the approval of the fire department, shall be provided for all annexation areas.
- ***Domestic Water Mitigation W-5*** All system improvements shall be designed and constructed in accordance with Federal, State and local regulations.
- ***Drainage and Stormwater Mitigation D-1*** All future development in the City of Imperial shall be required to construct storm drain facilities in accordance with the design standards of the Engineering Department and the IID necessary to convey storm water into existing drains managed by IID.
- ***Drainage and Stormwater Mitigation D-2*** All future development shall retain storm water on-site or within existing retention basins to restrict storm water flow for a minimum period of 72 hours before discharging into IID facilities.
- ***Drainage and Stormwater Mitigation D-3*** All future development shall ensure compliance with all local, state and federal rules and regulations related to the discharge of storm water.
- ***Drainage and Stormwater Mitigation D-4*** All development shall provide improvements constructed pursuant to best management practices as referenced in the California Storm Water Best Management Practices Handbook.

3.17.4 SIGNIFICANT IMPACTS

The General Plan Policies presented here and proposed to be actively implemented demonstrate a strong effort on the part of the City of Imperial to mitigate any potential impacts to public utilities and service systems. Therefore, these policies couple with the independent need of all future projects to have a CEQA review and assessment of potential cumulative and independent effects will be reduced to a level of less than significant and no further mitigation measures are required at this time.

3.17.5 MITIGATION MEASURES

No additional mitigation measures are required.

IV. STATUTORILY REQUIRED SECTIONS

The California Environmental Quality Act (CEQA) requires an EIR to address specific categories of impacts that would result from the proposed project: growth-inducing, cumulative, significant irreversible, and significant-and-unavoidable. This chapter analyzes impacts related to the City of Imperial Land Use Element and Circulation Element Update.

4.1 GROWTH INDUCING IMPACTS

An EIR must discuss the ways in which a proposed project could foster economic or population growth in the vicinity of the project and how that growth would, in turn, affect the surrounding environment (see CEQA Guidelines §15126.2(d)). Growth can be induced in a number of ways, including through the elimination of obstacles to growth, or through the stimulation of economic activity within the region. The discussion of the removal of obstacles to growth relates directly to the removal of infrastructure limitations or regulatory constraints that could result in growth unforeseen at the time of project approval.

Several issues must be considered when assessing the growth-inducing effects of development plans. The following is a discussion of potential impacts that may result from the implementation of the proposed Land Use Element and Circulation Element.

4.1.1 ELIMINATION OF OBSTACLES TO GROWTH & ECONOMIC EFFECTS

Under this section, the extent to which infrastructure capacity provided to accommodate the proposed project and how it would allow additional development in surrounding areas is evaluated. The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing effect. A physical obstacle to growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that would not be currently provided with these services, would be expected to support new development by inducing other landowners in the area to convert their property to other uses.

Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth. Indirect growth-inducing impacts include the additional demand for housing, commodities, and services that new development causes or attracts by increasing population in an area.

The extent to which development of the proposed planning areas could cause increased activity in the local or regional economy is evaluated under this section. If the proposed Land Use and Circulation Elements are implemented, at build-out, the anticipated increase of jobs within the City could also induce additional population growth during the 20-30 year effective life of the General Plan. The City, however, periodically updates and assesses the growth and needs establishing specific actions and plans for mitigation under the City's Service Area Plan, thus mitigating any potential impacts.

The implementation of the proposed Land Use Element and Circulation Element Update would not directly promote development on parcels adjacent to the Planning Area. Any changes in Sphere of Influence boundaries would require a General Plan Amendment and approval by the Imperial County Local Agency Formation Commission (ICLAFCo). The

anticipated economic growth from the project would not directly result in new housing or population growth above the densities identified in the proposed General Plan.

4.2 CUMULATIVE IMPACTS

A cumulative impact results from the incremental impact of the project when added to other past, present, and reasonably foreseeable future projects. The intent of the cumulative impacts discussion, as required by Section 15130 of the State CEQA Guidelines, is to account for any impact that may not be considered significant on a case-by-case basis, but may be part of a larger regional trend that would be considered significant and should be addressed. By requiring an evaluation of cumulative impacts, CEQA attempts to minimize the potential that large-scale environmental impacts would be ignored due to the project-by-project nature of project level analyses contained in EIRs.

Under the changes made to the CEQA Guidelines in 1999, a significant cumulative impact occurs if the project's contribution is determined to be cumulatively considerable. Discussion of cumulative impacts should reflect the "severity of the impacts and their likelihood of occurrence." (Section 15120 (b)).

Implementation of the proposed Land Use Element and Circulation Element Update, in conjunction with consistent development in the vicinity of the planning area and within the region, would contribute to cumulative environmental impacts. Cumulative impacts are summarized below.

4.2.1 AGRICULTURAL RESOURCES

The major impact affecting the long-term state of the environment will be the potential conversion of a significant amount of farmland to urban uses. Once this farmland is converted to urban uses it will be permanently lost for agricultural production. This will have a long-term impact on agricultural productivity in the Imperial Valley. The loss of this farmland is cumulatively significant when the entire Imperial Valley area is considered. There is a finite amount of irrigated farmland available in the Imperial Valley region, and once this irrigated farmland is developed with urban uses, it will not be replaced within the Planning Area anytime in the future.

The conversion of this farmland to urban uses satisfies the short term need for additional housing and commercial development land, however, the long term agricultural productivity of the region is adversely affected due to the permanent loss of this important agricultural land. When all current and future development projects within the Imperial Valley are considered, several thousand acres of farmland could be taken out of production in the next 20-30 years.

The Imperial Land Use Element and Circulation Element are designed as a long-term plan where development will be phased in response to local needs and demands. The Imperial General Plan and Imperial County General Plan have adopted policies to control the premature conversion of farmland within the project site. The use of open space buffers between agricultural land and new development projects will alleviate potential impacts to the long-term productivity of the existing farms located adjacent to the Planning Area.

4.2.2 BIOLOGICAL RESOURCES

Much of the Imperial Valley has long been used for agricultural production. The same is true for the greater part of the undeveloped Planning Area and cumulative urbanization projects in the Imperial Valley. As such, there are limited sensitive biological habitats due to the continual disturbance of agricultural land under production; however, one species of concern is the burrowing owl, which has adapted to the agricultural character of Imperial County and is known to occur within the Imperial Planning Area. Because of this adaptation, the relocation of owl pairs or burrows to undeveloped areas is considered acceptable as mitigation.

The rural nature of the County provides abundant habitat suitable to the burrowing owl. The City's commitment to mitigate any potential impacts to biological resources as demonstrated through the policies and programs identified in this EIR and the commitment of the surrounding jurisdictions mitigate any cumulative impact to burrowing owls and would result in a less than significant cumulative impact when all mitigation measures are implemented.

4.2.3 AIR QUALITY

The cumulative context for air quality includes anticipated development in areas outside of the City's Sphere of Influence/Planning Area and other projects within the Imperial County Air Pollution Control District's (ICAPCD) jurisdiction. The full implementation of the proposed Land Use Element and Circulation Element would contribute to existing and future emissions in the form of additional motor vehicle trips and potential stationary emissions from industrial operations. However, the proposed Land Use balance supports and implements standards that attempt to reduce the additional sources by establishing a more sustainable and balanced community.

In order to keep low levels of air pollutants generated from vehicles in the future, the City of Imperial integrates air quality planning with land use and transportation planning as noted in the policies and programs identified under the Land Use Element and Circulation Element and the Air Quality impact analysis of this EIR. Land use decisions are based on the desire for a balance of and uses that create a community where people can live, shop, work, and recreate thus reducing the overall commute of Imperial residents.

The numerous Policies and Programs presented in the Imperial Land Use Element and Circulation Element and commitment from the City of Imperial and the surrounding jurisdictions to comply with the Imperial County Air Pollution Control District will guide the initiative to improve and/or reduce the impacts to the ambient air quality and thus result in less-than-significant impacts.

4.3 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL EFFECTS

The proposed Land Use Element and Circulation Element will permanently commit County agricultural lands to urban uses. It is recognized that the City of Imperial could not substantially grow without removing some agricultural land from production. This will be an irreversible environmental effect.

The conversion of this farmland for new urban uses will also result in the removal of some potential habitat for sensitive species such as the burrowing owl. This impact will be caused

by undergrounding of canals and drains within the project area. The undergrounding of canals and drains will also remove some wetland habitat thereby affecting various species of fish, reptiles, and amphibians.

The implementation of the proposed Land Use Element and Circulation Element and development of the planning area with new homes and businesses will also create an increase in traffic volumes and congestion, along with increased traffic noise in the area. The traffic will also result in an increase in air pollution from the additional vehicle exhaust emissions in the project area.

4.4 EFFECTS FOUND NOT TO BE SIGNIFICANT

The purpose of this section is to comply with Section 15128 of the CEQA Guidelines which requires that an EIR briefly describe any potential environmental effect that were determined not to be significant during the Initial Study environmental review process or through analysis of the EIR process.

4.4.1 EFFECTS FOUND NOT TO BE SIGNIFICANT THROUGH THE INITIAL STUDY

The Initial Study assumed that potentially significant impacts could result from the implementation of the Draft Circulation and Land Use Element without further examination of the subject areas of concern.

4.4.2 EFFECTS FOUND NOT TO BE SIGNIFICANT AS PART OF THE EIR PROCESS

All of the areas of potential effect were discussed in the EIR as part of the EIR review process regardless of whether they were found to be significant or not through the Initial Study. Effects found not to be significant, as part of the EIR Process, are as follows:

Aesthetics

Although implementation of the Land Use Element and Circulation Element would permanently alter the nighttime views in the planning area, mitigation measures are in place to bring the impacts to a level below significant.

Mineral Resources

The proposed Planning Area is either developed with urban uses or located in areas that have been used primarily for agriculture. No mineral resources that will be of value to the region and the residents of the state have been identified. In addition, no locally important mineral resource recovery sites are delineated on a local plan, specific plan or general plan in the vicinity and therefore, no impact is anticipated.

Cultural Resources

The planning area has been actively farmed and no significant cultural resources have been identified. Should cultural resources be discovered or identified through future development of the subject area, there are proper mitigation measures in place to bring the impacts to a level below significant.

Geology and Soils

The soil and geology conditions are consistent throughout the entire Planning Area. Development restrictions have been placed in areas of concern. The numerous construction requirements that are in place and the policies and programs of the Imperial General Plan reduce potential impacts from geology and soil conditions to a level less than significant.

Hazards and Hazardous Materials

All potentially significant impacts identified with a potential to result from the implementation of the proposed Land Use Element and Circulation Element are actively mitigated through numerous policies, programs and regulations, therefore the potential impacts from hazards and hazardous materials is reduced to a level below significant.

Hydrology, Flood Control and Water Quality

Implementation and future development of the Planning Area will need to conform to the City of Imperial development standards. Future development will be subject to NPDES requirements and the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of Best Management Practices (BMPs) as it relates to stormwater for every project meeting the minimum conditions of significance. The impacts to hydrology and water quality are therefore mitigated to a level below significant.

Land Use and Planning

The modifications presented in the proposed Land Use Plan will encourage a balanced, desirable and compatible land use pattern complementing the Land Use Element goals and objectives. The impacts to Land Use and Planning are less than significant.

Noise

Impacts that may result from implementation of the proposed Land Use Element and Circulation Element are mitigatable and there are numerous development standards and policies in place to mitigate the potential impacts to levels below significant.

Population and Housing

Implementation of the proposed Land Use Element will result in increased population levels, however, the increase in population will be phased and all potential impacts resulting from growth and in housing demand are mitigated by numerous policies and programs in the Imperial General Plan and Service Area Plan to bring the potential impacts to a level less than significant.

Public Services

The proposed Land Use Element and Circulation Element at build-out will necessitate new public services and facilities for fire protection, police, schools, and other public services. The Imperial Unified School District, City General Plan and Service Area Plan have policies in place to mitigate the potential impacts for a less than significant impact.

Recreation

The proposed Land Use Element and the adopted development standards allow for a network of open space areas and neighborhood parks to serve the increasing population as build-out of the Land Use Plan is phased. Any potentially significant impacts have therefore been reduced to a level less than significant.

Transportation and Traffic

The numerous adopted policies, programs and development standards of the City of Imperial mitigate any potentially significant impacts from traffic and circulation. The mitigation measures in place will result in a less than significant impact.

Utilities and Service Systems

The impacts to potable water services, wastewater, and solid waste are reduced through the enforcement of regulations and the implementation of adopted policies, plans, fees and programs to level less than significant.

4.5 ALTERNATIVES TO THE PROPOSED PROJECT

Section 15126.6(a) of the CEQA Guidelines requires environmental impact reports to “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” Further, the Guidelines state that “the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly” (CEQA Guidelines 15126.6[b]). The feasibility of an alternative may be determined based on a variety of factors including, but not limited to, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and site accessibility and control (CEQA Guidelines Section 15126.6[f][1]).

The requirement that an EIR evaluate alternatives to the proposed project or alternatives to the location of the proposed project is a broad one; the primary intent of the alternatives analysis is to disclose other ways that the objectives of the project could be attained while reducing the magnitude of, or avoiding, the environmental impacts of the proposed project. Alternatives that are included and evaluated in the EIR must be feasible alternatives. The alternatives to the proposed project are described below.

4.5.1 NO PROJECT ALTERNATIVE

The “No Project” alternative would essentially mean that the Land Use Element Update and Circulation Element Update would not be implemented, and that City growth would occur adhoc or under the existing and outdated 1992 Land Use Element and Circulation Element. In absence of the proposed Elements, the City of Imperial would continue to use the General Plan adopted in 1992 which incorporates outdated land use and circulation system designations despite major changes in market trends, local needs, and regional transportation factors. A no development alternative was not considered for the Planning Area under any alternative because the City of Imperial is in need of suitable development sites to accommodate growth demand.

4.5.2 LOWER DENSITY ALTERNATIVE

The lower density alternative includes development that places more importance on keeping development sprawled and rural. The build-out of this alternative would reduce the number of people and dwelling units generated. This alternative would emphasize agricultural operations and single family residential and de-emphasize commercial and industrial

development and conservation of open space. These land use practices would not help mitigate green house gas emission and it would severely hinder housing affordability as an unsustainable measure that uses resources inefficiently.

4.5.3 IMPACT ASSESSMENT OF PROJECT ALTERNATIVES

Aesthetics

No Project Alternative-The no project alternative would result in the implementation of the existing General Plan Elements which are outdated and could permanently alter the nighttime views in the area without proper mitigation.

Lower Density Alternative-Implementation of this alternative could also permanently alter the nighttime views in the area, however, mitigation measures would bring the impacts to a level below significant.

Cultural Resources

No Project Alternative-The project site has been actively farmed and no significant cultural resources have been identified. Impacts to cultural resource would be at a level below significant.

Lower Density Alternative- The project site has been actively farmed and no significant cultural resources have been identified. Impacts to cultural resource would be at a level below significant.

Geology and Soils

No Project Alternative-The soil and geology conditions are consistent throughout the entire Planning Area. Development restrictions have been placed in areas of concern. The numerous construction requirements that are in place and the policies and programs of the Imperial General Plan Elements reduce potential impacts from geology and soil conditions to a level less than significant.

Lower Density Alternative-The soil and geology conditions are consistent throughout the entire Planning Area. Development restrictions have been placed in areas of concern. The numerous construction requirements that are in place and the policies and programs of the Imperial General Plan Elements reduce potential impacts from geology and soil conditions to a level less than significant.

Hazards and Hazardous Materials

No Project Alternative-The potential impacts from hazards and hazardous materials would be higher under the existing General Plan Elements. However, all potentially significant impacts identified with a potential to result from the implementation of the proposed Land Use Element and Circulation Element are actively mitigated through numerous policies, programs and regulations, therefore the potential impacts from hazards and hazardous materials is reduced to a level below significant.

Lower Density Alternative-The number of people that would be potential exposed to impacts from hazards and hazardous materials would be reduced under this alternative. However, all potentially significant impacts identified with a potential to result from the implementation of the proposed Land Use Element and Circulation Element Update are actively mitigated through numerous policies, programs and regulations, therefore the potential impacts from hazards and hazardous materials is reduced to a level below significant.

Hydrology, Flood Control and Water Quality

No Project Alternative-Implementation and future development of the Planning Area will need to conform to the Imperial General Plan and development standards. Future development will be subject to NPDES requirements and the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of Best Management Practices (BMPs) as it relates to stormwater. The impacts to hydrology and water quality are therefore mitigated to a level below significant.

Lower Density Alternative-Implementation and future development of the Planning Area will need to conform to the Imperial General Plan and development standards. Future development will be subject to NPDES requirements and the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of Best Management Practices (BMPs) as it relates to stormwater. The impacts to hydrology and water quality are therefore mitigated to a level below significant.

Land Use and Planning

No Project Alternative-There are a number of inconsistent land use designations in the existing General Plan Land Use Element that would not be modified under this alternative and do not represent a balanced, desirable and compatible land use pattern.

Lower Density Alternative-The lower density alternative would address a number of inconsistent land use designations in the existing Land Use Element and still be able to provide a balanced, desirable and compatible land use pattern, but would not maximize sustainability. Impacts to Land Use and Planning under this alternative are less than significant.

Noise

No Project Alternative-Impacts that may result from implementation of the existing General Plan are mitigatable. In addition there are numerous development standards and policies in place to mitigate the potential impacts to levels below significant.

Lower Density Alternative-Noise impacts that may result from implementation of this alternative are mitigatable. In addition there are numerous development standards and policies in place to mitigate the potential impacts to levels below significant.

Population and Housing

No Project Alternative-Implementation of the existing Land Use Element will result in increased population levels, however, the increase in population will be phased and all potential impacts resulting from growth and in housing demand are mitigated by numerous policies and programs in the Imperial General Plan and Service Area Plan to bring the potential impacts to a level less than significant.

Lower Density Alternative-Implementation of this alternative will result in a net reduction of population and housing levels. The increase in population will continue to be phased and all potential impacts resulting from growth and in housing demand would be mitigated by numerous policies and programs in the Imperial General Plan and Service Area Plan to bring the potential impacts to a level less than significant.

Public Services

No Project Alternative-The existing Land Use Element at build-out will continue to necessitate new public services and facilities for fire protection, police, schools, and other public services. The Imperial Unified School District, City General Plan and Service Area Plan have policies in place to mitigate the potential impacts for a less than significant impact.

Lower Density Alternative-This proposed alternative will continue to necessitate new public services and facilities for fire protection, police, schools, and other public services at a lesser demand. The Imperial Unified School District, City General Plan and Service Area Plan have policies in place to mitigate the potential impacts for a less than significant impact.

Recreation

No Project Alternative-The existing Land Use Element, Recreation Element and the adopted development standards allow for a network of open space areas and neighborhood parks to serve the increasing population as build-out of the Land Use Plan is phased. Any potentially significant impacts have therefore been reduced to a level less than significant.

Lower Density Alternative-This alternative would decrease the demand for parks and recreation but would also need to comply with the adopted development standards which allow for a network of open space areas and neighborhood parks to serve the increasing population as build-out of the Land Use Plan is phased. Any potentially significant impacts will therefore continue to be reduced to a level less than significant.

Transportation and Traffic

No Project Alternative-The existing Land Use Element and Circulation Element has incompatible land uses adjacent to an existing highway. Although there are numerous adopted policies, programs and development standards of the City of Imperial to mitigate any potentially significant impacts from traffic and circulation, a no project alternative will result in increased impacts from traffic.

Lower Density Alternative-This alternative reduces the impacts to traffic and circulation that result from higher densities. The numerous adopted policies, programs and development standards of the City of Imperial mitigate any potentially significant impacts from traffic and circulation and reduce any potential impacts to a level less than significant.

Utilities and Service Systems

No Project Alternative-Implementation of the existing Land Use Element and Circulation Element would impact potable water services, wastewater, and solid waste, however, these impacts are reduced through the enforcement of regulations and the implementation of adopted policies, plans, and programs to a level less than significant.

Lower Density Alternative-Implementation of this alternative would reduce the impacts to potable water services, wastewater, and solid waste. These impacts are further mitigated through the enforcement of regulations and the implementation of adopted policies, plans, and programs to a level less than significant.

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VI. APPENDICES

Appendix A

Initial Study and Notice of Preparation

Initial Study & Environmental Checklist Land Use & Circulation Element Updates

Prepared for:
CITY OF IMPERIAL

Contact:
Jorge Galvan, City Planner



December 2016

Prepared by:
The Holt Group, Inc.

Contact:
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El Centro, CA. 92243
(760) 337-3883

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BACKGROUND AND INTRODUCTION

The proposed project consists of the review and update of the City of Imperial Circulation and Land Use Elements. The proposed planning area is within the City of Imperial City Limits and surrounding sphere of influence. The total planning area encompasses approximately 5.85 square miles. The primary purpose of the update is to adequately plan for the anticipated growth within the Imperial Community and with the purpose of allocating specific areas for development that will result in the maximum use of existing facilities and the least impact to the environment and existing resources. The City of Imperial Land Use and Circulation Element sets forth the City's strategy to accommodate future growth.

This Initial Study evaluates the environmental impacts associated with the adoption and subsequent implementation of the City of Imperial Land Use and Circulation Elements. As part of the Land Use and Circulation Elements' environmental review, the City of Imperial authorized the preparation of this Initial Study. The primary purpose of the environmental review is to ensure that decision-makers and the public understand the environmental implications of a specific action or project. An additional purpose of the Initial Study is to ascertain whether the Land Use and Circulation Elements will have the potential for significant adverse impacts on the environment once they are implemented. Additional purposes of this Initial Study, and pursuant to CEQA Guidelines, are to provide the City of Imperial with information to use as the basis for deciding whether to prepare a Negative Declaration, Mitigated Negative Declaration (MND) or Environmental Impact Report (EIR).



Initial Study, Environmental Checklist & Negative Declaration 2014-2021

- 1. Project Title:** City of Imperial Land Use and Circulation Element Update & Adoption

- 2. Lead Agency:** City of Imperial
Name, Address and Phone Number 420 South Imperial Avenue
Imperial, CA 92251
Contact: Jorge Galvan, City Planner
(760) 355-4371

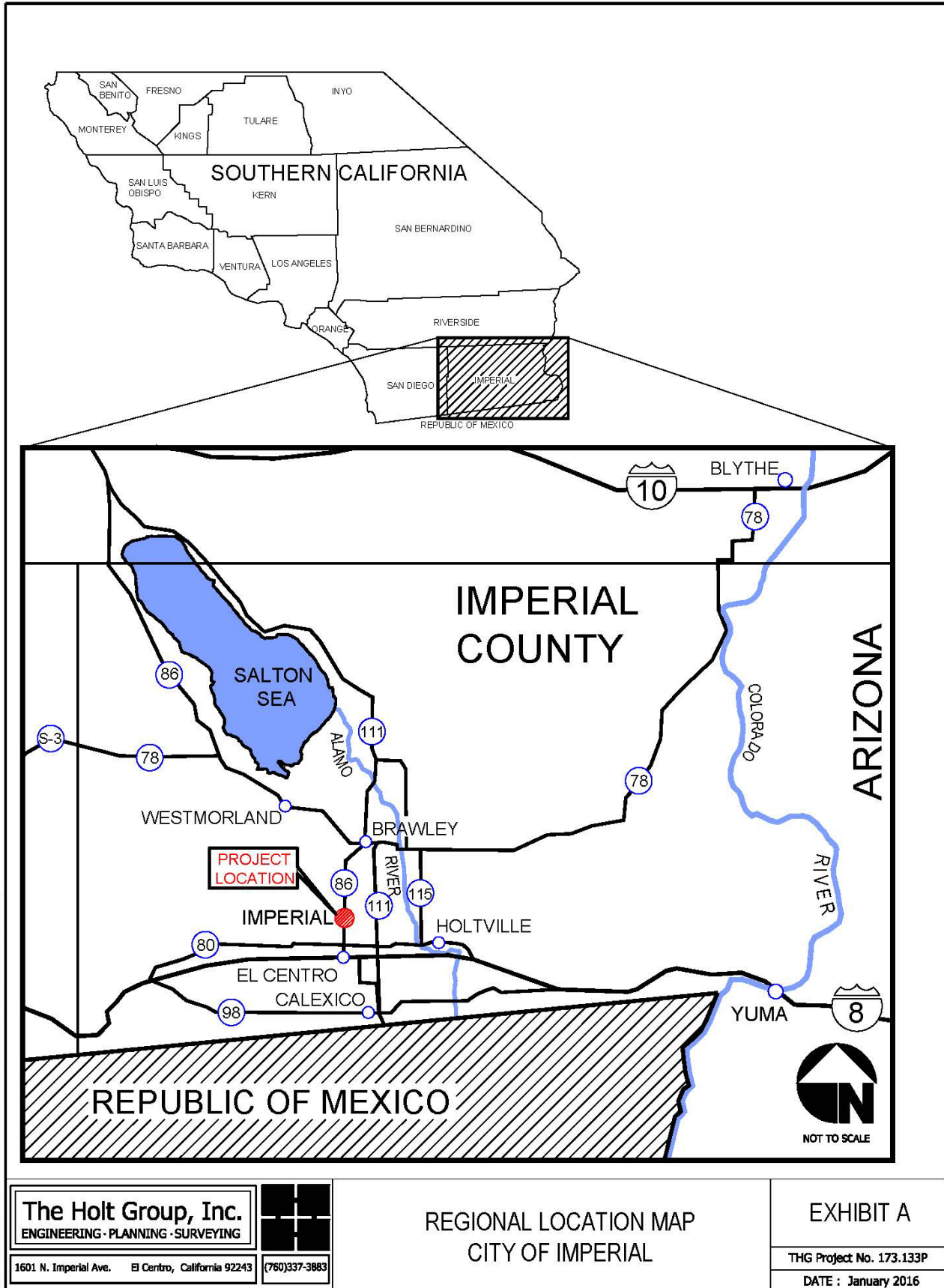
Additional Contact: Justina Gamboa-Arce
The Holt Group (760) 337-3883

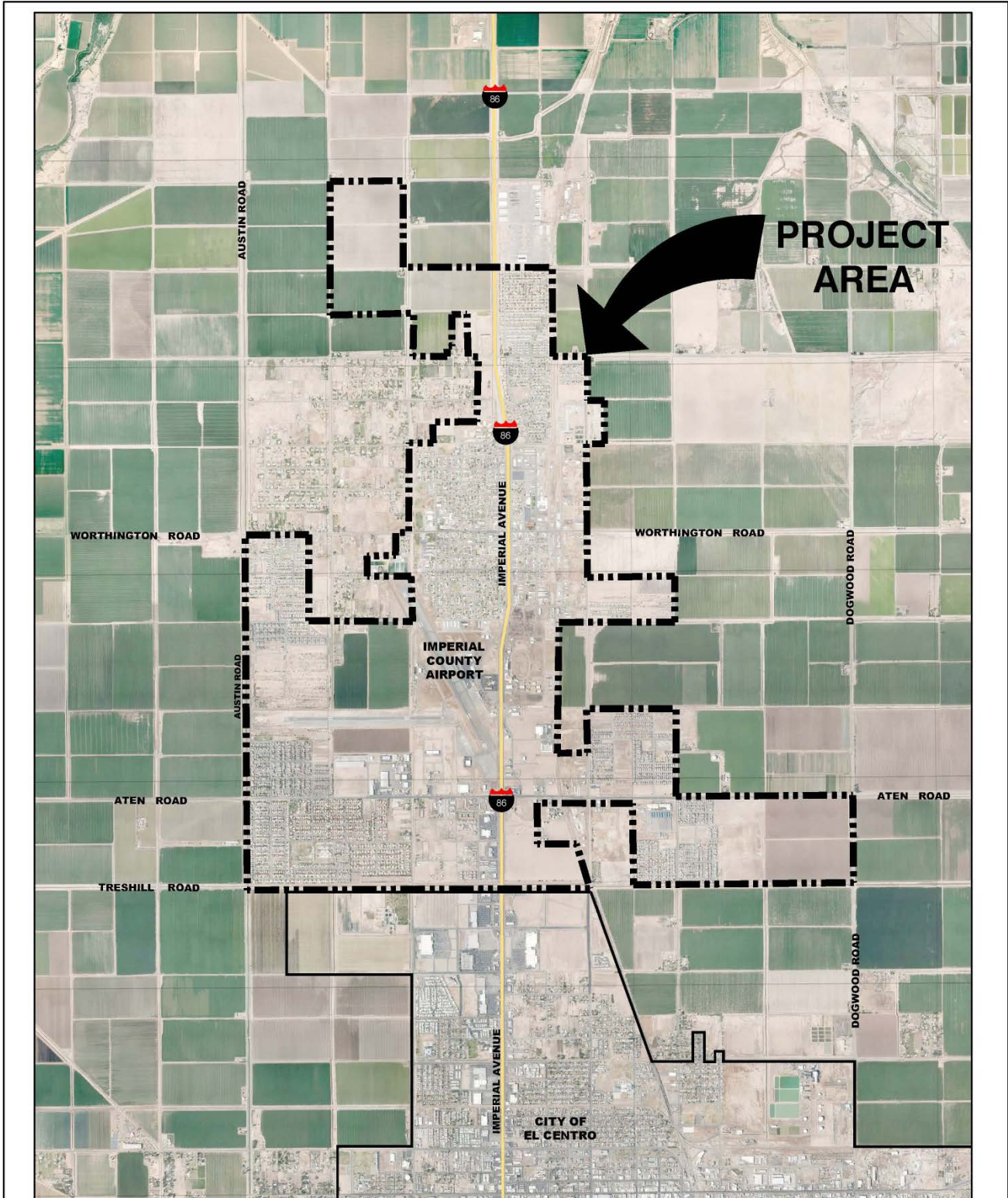
Co-Lead Agency: N/A
Name, Address and Phone Number

- 3. Project Sponsor:** City of Imperial
Name, Address and Phone Number 420 South Imperial Avenue
Imperial, CA 92251
(760) 355-4371

- 4. Project Location:** The entire Imperial City Limits and Sphere of Influence. Please
Map Attached refer to the Regional Location Map (Exhibit A).

- 5. Project Description:** The Land Use & Circulation Element proposed update is based on policy guides to evaluate existing policy and land availability in order to address and meet the future growth demand of the City in an efficient manner. The proposed project consists of the review and update of the City of Imperial Circulation and Land Use Elements. The proposed planning area is within the City of Imperial City Limits and surrounding sphere of influence. The total planning area encompasses approximately 5.85 square miles. The primary purpose of the update is to adequately plan for the anticipated growth within the Imperial Community and with the purpose of allocating specific areas for development that will result in the maximum use of existing facilities and the least impact to the environment and existing resources. The City of Imperial Land Use and Circulation Element sets forth the City's strategy to accommodate future growth.
- 6. General Plan Designation:** **Existing:** Varies within incorporated City Limits.
Proposed: No Proposed Changes.
- 7. Zoning:** **Existing:** Multiple Designations where residential construction is permitted or restricted in Land Use and Circulation Elements.
Proposed: Changes to Public Facilities and Open Space Areas.
- 8. Surrounding Land Uses and Setting:** The City of Imperial is located in the southern portion of the Imperial County, approximately 120 miles east of San Diego, 100 miles south of Palm Springs and 17 miles north of the United States-Mexico border. Regional access to the City is provided via Highway 86 from the north and the south. Agricultural fields border the western, northern, and eastern City Limits and Imperial shares its southern border with the City of El Centro.
- 9. Other Agencies whose approval is required: (e.g., permits, financing approval, or participation agreement)**
a) None
- 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 and has consultation begun?**
Tribal Consultation began December 15, 2016 and ended January 16, 2017
Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.





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NOT TO SCALE

VICINITY MAP
CITY OF IMPERIAL

EXHIBIT B

Project No. 173.133

Date: January 2016

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:


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

X	Aesthetics	X	Agricultural Resources	X	Air Quality
X	Biological Resources	X	Cultural Resources	X	Geology/Soils
X	Greenhouse Gas Emissions	X	Hazards & Hazardous Materials	X	Hydrology/Water Quality
X	Land Use and Planning	X	Mineral Resources	X	Noise
X	Population and Housing	X	Public Resources	X	Recreation
X	Transportation/Traffic	X	Tribal Cultural Resources	X	Utilities and Service Systems
X	Mandatory Findings of Significance				

ENVIRONMENTAL REVIEW COMMITTEE DETERMINATION:

On the basis of the attached Initial Study, the City of Imperial Environmental Review Committee finds that:

The proposed project could not have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
The proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.	
The proposed project MAY have a significant effect(s) on the environment and an ENVIRONMENTAL IMPACT REPORT is required	X
The proposed project MAY have a significant effect(s) 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, if the effect is a "Potentially Significant Impact" or "Potentially Significant Unless Mitigated." A FOCUSED ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
Although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because all potentially significant effects (1) have been analyzed in an earlier EIR pursuant to applicable standards and (2) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project. No further action is required.	

No Impact Finding	<input type="checkbox"/> Yes <input type="checkbox"/> No		Yes	No	Abstain	Members of the EEC
	 Jorge Galvan, AICP City Planner			X		
			X			Police
			X			Fire
Date 1/17/2017			X			Planning
			X			Finance

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e. g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e. g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 17, "Earlier Analysis," may be cross-referenced).
- 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the follow:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

Authority: Public Resources Code Sections 21083 and 21087. Reference: Public Resources Code Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.3, 21093, 21094, 21151; *Sundstrom v. County of Mendocino*, 202 Cal. App. 3d 296 (1988); *Leonoff v. Monterey Board of Supervisors*, 222 Cal. App. 3d 1337 (1990).

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

I. AESTHETICS – Would the project:					
		Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Have a substantially adverse effect on a scenic vista or scenic highway?	X			
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c)	Substantially degrade the existing visual character or quality of the site and its surroundings?	X			
d)	Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	X			

Aesthetics Impact Discussion:

The Draft Land Use and Circulation Element identifies opportunity areas for future development and strategies to achieve safe and efficient circulation goals. Updates to the Land Use and Circulation Elements are made for consistency to the policy updates of the 2014-2021 Housing Element and other Elements of the Imperial General Plan. Aesthetic resources in the Imperial Valley are limited to desert landscapes and some mountain views. The City of Imperial has limited views of the Superstition and Laguna Mountains to the west. Increased residential density proposed to be allowed through future zoning amendments may alter visual qualities in the area and potentially have impact on a scenic vista. The Land Use and Circulation Elements, however, are policy documents and would not in itself result in actual construction or direct development but may guide intensities and heights of future development. An Environmental Impact Report (EIR) will be prepared to further discuss the potentially significant issues.

- a) **Have a substantially adverse effect on a scenic vista or scenic highway? Potentially Significant Impact-** There are scenic vistas in the vicinity of the proposed project; this issue will be examined further in proposed EIR.
- b) **Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? No Impact-** According to the California Scenic Highway Mapping System of the California Department of Transportation, there are no state scenic highways in the vicinity of the proposed project, therefore, there will be no impact to this resource.
- c) **Substantially degrade the existing visual character or quality of the site and its surroundings? Potentially Significant Impact-** The proposed project does not grant any development entitlements but may result in changes to planned land uses and intensities. This issue will be examined further in the proposed EIR.
- d) **Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? Potentially Significant Impact-** The proposed project does not grant entitlements for project development. The Land Use Element, however, may alter height, bulk, or other development standards allowances within the incorporated areas of the City of Imperial and undeveloped areas; therefore, this issue will be examined further in the proposed EIR.

II. AGRICULTURAL RESOURCES – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of State-wide Importance, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	X			
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	X			
c) Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	X			

Agricultural Resources Impact Discussion:

According to the Farmland Mapping and Monitoring Program the lands surrounding the City of Imperial consist of Prime Farmland and Farmland of Statewide Importance. In addition, the 2012 Williamson Act Map from the California Department of Conservation shows several lands surrounding the planning area in contracts for farmland preservation. Although the Land Use and Circulation Elements will not directly result in development, the land use policies would influence development of areas that may be dedicated or currently consist of open space, agriculture production, easements or other similar uses.

- a) **Convert Prime Farmland, Unique Farmland, or Farmland of State-wide Importance, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? Potentially Significant Impact-** The planning area for Land Use and Circulation Element implementation consists of both urban area with infill development opportunities and rural area with vacant land some of which is used for agriculture production. The project does propose land use designation changes in currently unincorporated areas, therefore this issue will be further assessed under the proposed EIR.
- b) **Conflict with existing zoning for agricultural use, or a Williamson Act contract? Potentially Significant Impact-** The planning area is not just within the incorporated City Limits but encompasses planning areas within the sphere of influence where some agricultural land uses currently exist. The planning area and goals include future annexations of agricultural land that may conflict with lands designated for agricultural use or Williamson Act contracts; therefore this issue will be further assessed under the proposed EIR.
- c) **Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non-agricultural use? Potentially Significant Impact-** The planning area (incorporated City Limits and potential areas of annexation) do abut land used for agricultural production. Although the proposed Land Use Element incorporates policies to preserve agricultural land uses the issue of the potential conversion of farmland will need to be looked at closer under the proposed EIR.

III. AIR QUALITY – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?				X
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	X			
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	X			
d) Expose sensitive receptors to substantial pollutant concentrations?	X			
e) Create objectionable odors affecting a substantial number of people?	X			

Air Quality Impact Discussion:

The proposed Project site is located within the Salton Sea Air Basin and is under the jurisdiction of the Imperial County Air Pollution Control District (ICAPCD). The Imperial Valley has been designated as a “non-attainment” area with respect to State Standards for particulate matter (PM10) and ozone (smog). The ICAPCD recommends that construction projects in the Imperial Valley follow the standard and discretionary mitigation measures outlined in Section VII of the ICAPCD CEQA Air Quality Handbook in order to minimize PM10 and emissions generation on-site. The Land Use and Circulation Elements, have the potential to indirectly generate significant levels of construction and generate traffic both of which could have a temporary and/or permanent impact to air quality. This issue will need to be further addressed in an Environmental Impact Report.

- a) **Conflict with or obstruct implementation of the applicable air quality plan? No Impact-** The proposed Land Use and Circulation Elements, as drafted, do not conflict or obstruct implementation of any applicable air quality plans; therefore, there will be no impact to adopted air quality plans.
- b) **Violate any air quality standard or contribute substantially to an existing or projected air quality violation? Potentially Significant Impact-** Imperial County is a non-attainment area for both particulate matter (PM10) and ozone. Construction of future projects may contribute substantially to the projected air quality levels. Future project intensities and circulation systems will be largely influenced by the proposed Circulation and Land Use Element and any indirect impacts will need to be further assessed in the proposed EIR.
- c) **Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)? Potentially Significant Impact-** Imperial County is a non-attainment area for both particulate matter (PM10) and ozone. Although the Land Use and Circulation Elements do not grant any development entitlements, the future build-out of land uses proposed within the planning area may result in a significant increase in construction related pollutants and long term pollutants associated with increased traffic levels for the area. Although this may potentially contribute to the

increase in existing non-attainment of particular criteria pollutants in the Imperial Valley, planned growth is already anticipated under the adopted air quality management plans but will be further assessed under the proposed EIR.

- d) **Expose sensitive receptors to substantial pollutant concentrations? Potentially Significant Impact-** Adoption of the Land Use and Circulation Elements would modify land uses which may indirectly result in an air quality impact. The potential future development within the planning areas through 2025 could lead to fugitive emissions and other pollutants affecting adjacent sensitive land uses such as schools, hospitals, parks or other sensitive uses, thus this issue will be further assessed under the proposed EIR.
- e) **Create objectionable odors affecting a substantial number of people? Potentially Significant Impact-** The Land Use Element restricts development per the adopted land use policies and although it does not grant entitlements for development the proposed policies and standards may result in land uses that could create objectionable odors, thus this issue will be further evaluated under the proposed EIR.

IV. BIOLOGICAL RESOURCES – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	X			
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	X			
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any 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?	X			
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

Biological Resources Impact Discussion:

The Imperial Valley provides a mix of arid desert and wetland habitat areas than can support a broad range of wildlife species. It should be noted that to a large extent the City of Imperial and planning area have been disturbed by human activity and do not provide suitable habitat for special-status plant and wildlife species. The planning areas of potential annexation and currently outside urban land uses have been actively farmed in the past and any vegetation on the site consists of non-native weedy ones. The sites have been substantially graded thus the heavily disturbed condition of the areas and proximity to highly traveled roadways provide minimal habitat values. Surrounding agricultural lands however, are known to provide habitat for the Burrowing Owl as well as foraging and roosting habitat for migratory birds that winter in the area. The Land Use and Circulation Elements are policy level documents that may indirectly result in the development of specific projects into areas that could potentially impact biological resources, therefore, this issue will be further assessed under the proposed EIR.

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? Potentially Significant Impact-** The Land Use & Circulation Elements Update may result in the indirect conversion of agricultural lands into urbanized uses. Although the proposed project does not grant any development entitlements, the Land Use Element has the potential to guide development into areas that if developed could have an adverse impact to certain species. This issue will be further assessed in the proposed EIR.
- b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? Potentially Significant Impact-** The proposed planning area site is largely undeveloped not just within an urbanized setting but within vast undeveloped lands proposed for annexation. Although, the proposed Land Use and Circulation Elements do not grant any development entitlements, they do incorporate policies for development. Any potential indirect and adverse impacts to vegetation or riparian habitat areas will need to be further assessed under the proposed EIR.
- c) **Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? No Impact-** The planning area does not contain areas targeted for preservation and enhancement of Wetlands, therefore there will be no impact to wetlands.
- d) **Interfere substantially with the movement of any 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? Potentially Significant Impact-** The proposed planning area is largely urbanized within the incorporated areas and largely undeveloped within proposed future annexation areas. Although the Conservation Element incorporates policies for wildlife protection and the Land Use Element does not grant any development entitlements; further assessment of impacts to the movement of wildlife will need to be assessed under the proposed EIR.
- e) **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? No Impact-** There is no local ordinance or local policy in effect protecting biological resources. Recent updates to the Conservation Element further incorporate policies for biological resource protection. The proposed Land Use Element and Circulation Element are consistent with the adopted Conservation Element, therefore, this project will not conflict with any locally established policy.
- f) **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? No Impact-** The proposed planning area is not located within or in the vicinity of any adopted Habitat

Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan; therefore, there will be no impact to adopted plans.

V. CULTURAL RESOURCES – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	X			
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	X			
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	X			
d) Disturb any human remains, including those interred outside of designated cemeteries?				X

Cultural Resources Impact Discussion:

Approximately 200 historic sites have been recorded in Imperial County. A record search through the South Coastal Information Center (SCIC) located at San Diego State University did not identify any known historical resources eligible for the California or National Register at or near the proposed planning area. Literature searches of information archived with the California Historical Research Information System identified three recorded cultural resources one of which was demolished in the early 21st century (Imperial Water Tower). The two remaining cultural resources include the Niland–Calexico Railroad and the Dahlia Canal. The Dahlia Canal is within the proposed planning area.

- a) **Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? Potentially Significant Impact-** The planning area is largely undeveloped land. Some buildings and/or structures which hold historic value are within the planning area. The Land Use and Circulation Elements are consistent with the City's adopted Conservation element which incorporates policies for the preservation of cultural resources. Although the Land Use Element does not grant any development entitlements the adopted policies may have the potential to guide development into areas that have not yet had significant soil disturbance. This issue will be further assessed under the proposed EIR.
- b) **Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? Potentially Significant Impact-** The planning area includes vast areas of undeveloped land. Although the proposed Circulation and Land Use Elements updates do not grant any development entitlements, a more detailed assessment of potential archeological resources will be further reviewed under the proposed EIR.
- c) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? Potentially Significant Impact-** The planning area is largely undeveloped land. The potential for paleontological resources and significant known geologic sites or unique geologic features will be further assessed under the proposed EIR.
- d) **Disturb any human remains, including those interred outside of designated cemeteries? Potentially Significant Impact-** The proposed Land Use and Circulation Elements' planning area does not contain any known burial sites; therefore, there will be no impact.

VI. GEOLOGY AND SOILS – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including risk of loss, injury, or death involving:				
1) 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.	X			
2) Strong seismic ground shaking?	X			
3) Seismic-related ground failure, including liquefaction?	X			
4) Landslides?	X			
b) Result in substantial soil erosion or the loss of topsoil?	X			
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse?	X			
d) Be located on expansive soil, as defined of the latest Uniform Building Code, creating substantial risk to life or property?	X			
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	X			

Geology and Soils Impact Discussion:

The Project site is located in the Imperial Valley portion of the Salton Trough, a topographic and geologic depression resulting from large scale regional faulting. Tectonic activity that formed the Trough continues at a high rate and therefore, the planning area is considered likely to be subjected to moderate to strong ground motion from faults in the region, including the Brawley, Superstition Hills, and Imperial Faults. The area does not lie within a State of California, Alquist-Priolo Earthquake Fault Zone and therefore, surface fault rupture, seismically induced flooding and landslides are considered low to negligible in this area. The planning area is located in Seismic Zone 4 of the Uniform Building Code (UBC) and therefore, guidelines for construction of buildings within Zone 4 must be adhered to.

Due to the shallow groundwater depth and alluvial nature of the soils present in the Imperial Valley (silts, sands and sandy silts), the risk from liquefaction as a result of a major earthquake is considered moderate. In addition, silty clays and clays found in the much of the near surface soils in the Imperial Valley are moderate to highly expansive and measures should be taken during construction to mitigate these potential swelling forces. This issue will need to be further assessed under the proposed EIR.

a) Expose people or structures to potential substantial adverse effects, including risk of loss, injury, or death involving:

1) 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? Potentially Significant Impact- The proposed planning area is located within Seismic Zone 4, thus this issue will be further assessed under the proposed EIR.

2) **Strong seismic ground shaking? Potentially Significant Impact-** The City of Imperial, as well as the entire Imperial Valley, is considered to be a seismically active area. The entire planning area is susceptible to potentially strong seismic ground shaking because of the nearby Brawley Fault, Calipatria Fault, and Superstition Hills Fault. The Superstition Hills Fault passes approximately 0.8 miles to the west of the existing City limits. This issue will be further assessed under the proposed EIR.

3) **Seismic-related ground failure, including liquefaction? Potentially Significant Impact** – Although the Land Use and Circulation Elements do not grant any development entitlements, site specific geotechnical reports within the planning areas have demonstrated potential for liquefaction thus this issue will be further assessed under the proposed EIR.

4) **Landslides? Potentially Significant Impact-** The land within the planning area and its surrounding vicinity is relatively flat reducing any impacts resulting from mudslides, however, this issue will be further reviewed under the proposed EIR.

b) **Result in substantial soil erosion or the loss of topsoil? Potentially Significant Impact-** The City of Imperial is within flat-lying land. The proposed Land Use and Circulation Elements furthermore do not grant any development entitlements however, grading and drainage are of special concern due to the impermeable soils common to the area, thus this issue will be further assessed under the proposed EIR.

c) **Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse? Potentially Significant Impact-** The proposed planning area is not located within a known unstable geologic unit. However soil stability, as previously noted is a potential, inclusive of liquefaction. This issue will be further reviewed under the proposed EIR.

d) **Be located on expansive soil, as defined of the latest Uniform Building Code, creating substantial risk to life or property? Potentially Significant Impact-** The region has been found to contain underlain clays of moderate expansion potential. This issue will need to be further assessed under the proposed EIR.

e) **Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? Potentially Significant Impact-** The planning area includes unincorporated areas where septic tanks may already be present; therefore, this issue will be further assessed under the proposed EIR.

VII. GREENHOUSE GAS EMISSIONS – would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have significant impact on the environment?	X			
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X

Greenhouse Gas Emissions Impact Discussion:

The Land Use and Circulation Elements in themselves would not produce impacts related to Greenhouse Gas Emissions. The Land Use Element identifies adequate sites under current zoning regulation that can

accommodate future growth through 2035 and circulation goals to accommodate anticipated traffic levels, thus potential indirect impacts resulting from future development may occur. This issue will need to be further assessed during the preparation of the Environmental Impact Report.

- a) **Generate greenhouse gas emissions, either directly or indirectly, that may have significant impact on the environment? Potentially Significant Impact** - The Land Use and Circulation Element updates do not grant entitlements for development but the Land Use Element does propose to extend land use designations beyond previously existing boundaries. Future construction in the planning area could result in the generation of greenhouse gas emissions. Construction phase activities such as demolition, grading, and the operation of machinery will temporary generate greenhouse gasses. In the long term, domestic electrical power demand and increase in vehicle trips derived from new development will also contribute to regional greenhouse gas emissions. This issue will need to be reviewed in the proposed EIR.
- b) **Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? Potentially Significant Impact**- The Land Use and Circulation Elements Update do not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gas emissions. Incorporated land use and circulation goals further the Goals by incorporating land use strategies, nonetheless, this issue will be further reviewed under the proposed EIR.

VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	X			
b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	X			
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?	X			
d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	X			
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	X			
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	X			
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X

Hazards and Hazardous Materials Impact Discussion:

The Land Use and Circulation Elements are policy level documents and will not result in any direct development that could result in hazards or a hazardous material impact. Successful implementation of the Land Use and Circulation Elements could contribute to future long-term growth in the City of Imperial and immediate surrounding area that could result in potential hazards. Future, commercial and industrial land uses could include the routine use, transport, disposal or release of hazardous waste. Future development projects would be required to implement Safety Element policies related to hazardous materials as well as State Regulations and be limited to certain transportation routes. This issue will need to be assessed further under the proposed EIR.

- a) **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? Potentially Significant Impact-** The proposed Land Use and Circulation Elements are consistent with other General Plan Elements. The Land Use Element will guide future commercial and industrial development that may contain or use hazardous substances during operation. Proper buffer zones and or compatibility factors are required to be considered and this issue will be further assessed during the preparation of the proposed EIR.
- b) **Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment? Potentially Significant Impact-** The Safety Element incorporates policies for safety and hazard mitigation. The Land Use Element and Circulation Element are consistent with the Safety Element and support the strict adherence to hazardous substance storage, use, transportation and removal guidelines are on-going for all operations which could result in accidents in order to mitigate any foreseeable significant hazard of upset or accidental conditions involving the release of hazardous materials from pre-existing uses. Nonetheless, any potential impacts will be further assessed during the preparation of the EIR.
- c) **Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school? Potentially Significant Impact-** This proposed Land Use Element and Circulation Element are consistent with each other and the remaining Elements of the adopted General Plan. Although hazardous material may be used during construction of future development and that may result from future ongoing commercial and industrial operations, policy updates in the Safety Element for the use, transport and disposal of hazardous material are incorporated and strictly regulated. This issue will be further reviewed in the proposed EIR.
- d) **Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? Potentially Significant Impact-** There is one site within the proposed planning area listed as a hazardous material site per GCS 65962.5; the site is 287 West Aten Road, and located outside of the City Limits but within a future potential development area. This issue will be further assessed during the preparation of the proposed EIR.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? Potentially Significant Impact-** A public airport is within the proposed planning area. The Land Use and Circulation Element do incorporate policies that support clear-zones consistent with the Imperial County Airport Land Use Compatibility Plan. Land Use compatibility issues have been addressed in the draft Land Use Element and this issue will be further reviewed under the proposed EIR.
- f) **For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? NO Impact-** There will be no impact from any private airstrip as none is within the vicinity of the proposed planning area.
- g) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? Potentially Significant Impact-** The proposed Land Use and Circulation Elements are consistent with other adopted Elements of the General Plan. Full build-out of the planning area and implementation of the planned circulation system as a result of the proposed Elements should not adversely interfere with any emergency response thus this issue will be further assessed under the proposed EIR.
- h) **Expose people or structures to a significant risk of loss, injury or death involving wildland fires including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? No Impact-** There are no wildlands in the vicinity of the proposed project, therefore there will be no impact.

IX. HYDROLOGY AND WATER QUALITY – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	X			
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (<i>e.g.</i> , the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or situation on- or off-site?	X			
d) Substantially alter the existing drainage pattern of the site, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	X			

e)	Create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	X			
f)	Otherwise substantially degrade water quality?	X			
g)	Place housing within a 100-year flood hazard area as mapped on a Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
h)	Place within a 100-year flood area structures which would impede or redirect the flood flows?				X
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				X
j)	Inundation by seiche, tsunami, or mudflow?	X			

Hydrology and Water Quality Impact Discussion:

The planning area does not lie within a flood zone. Water quality for all surface water and groundwater for the entire Imperial Valley is regulated under the jurisdiction of the Colorado River Basin Regional Water Quality Control Board Region 7. The proposed Land Use and Circulation Elements are policy level documents that will not result in any direct development that could result in hydrology and water quality issues, future development resulting from implementation of the Element policies would be required to comply with all applicable federal, State and local water quality regulations. During construction, future development projects would be required to obtain coverage under the State’s General Permit for construction activities which is administered by the CRBWQCB. Nonetheless, this issue will be examined further under the proposed EIR.

- a) **Violate any water quality standards or waste discharge requirements? Potentially Significant Impact-** The Land Use and Circulation Elements do not grant development entitlements and will not directly violate any water quality standards. Any future development that will likely convert undeveloped land to urban uses due to its implementation must adhere to Best Management Practices during construction to control runoff and storm water pollution. This issue will be assessed further under the proposed EIR.
- b) **Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? No Impact-** There are no known aquifers within the incorporated City Limits and planning area that might be impacted by the implementation of the Land Use and Circulation Elements. The subject elements furthermore do not grant any development entitlements, therefore there will be no impact to groundwater supplies.
- c) **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or situation on- or off-site? Potentially Significant Impact-** The proposed planning areas under the Land Use and Circulation Elements may result in future development that will likely convert undeveloped land to urban uses; and thus it may potentially impact the existing rates of runoff due to large sealed surface areas. This issue will be further assessed under the proposed EIR.

- d) **Substantially alter the existing drainage pattern of the site, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? Potentially Significant Impact-** The proposed Circulation and Land Use Element planning areas may result in future development that will likely convert undeveloped lands to urban uses and thus potentially impact the existing rates of runoff due to large sealed surface areas. Adequate drainage plans are required to prevent flooding; therefore, this issue will be reviewed further under the proposed EIR.
- e) **Create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff? Potentially Significant Impact-** Future individual projects within the proposed planning area have the potential to significantly increase impervious surfaces. All new development may contain contaminants from parking lot areas and other paved areas for the potential to create new sources of polluted runoff. Development standards must be in place to mitigate these potential impacts thus this issue will be assessed further under the proposed EIR.
- f) **Otherwise substantially degrade water quality? Potentially Significant Impact-** The development of future projects may result in increased runoff due to sealed surfaces. Any drainage system to be designed to accommodate any future development project is expected to ensure that the water quality is not degraded. This item will be further assessed under the proposed EIR.
- g) **Place housing within a 100-year flood hazard area as mapped on a Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? No Impact-** The proposed planning area does not contain any areas identified as within a 100-year flood hazard area, therefore there will be no flooding impact to future residential development.
- h) **Place within a 100-year flood area structures which would impede or redirect the flood flows? No Impact-** The proposed planning area does not contain any areas identified as within a 100-year flood hazard area and the Land Use and Circulation Elements are further consistent with the adopted Safety Element and will not impact or redirect any potential flood water; therefore, there will be no impact.
- i) **Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? No Impact-** The planning area is not identified at risk from flooding due to levee or dam failure; therefore, there will be no impact.
- j) **Inundation by seiche, tsunami, or mudflow? No Impact-** The planning area is not located in the vicinity of substantial bodies of water and is located in flat lagging land. Therefore, there is no risk of inundation by sieche, tsunami, or mudflow.

X. LAND USE AND PLANNING – Would the proposal:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?				X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	X			
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				X

Land Use and Planning Impact Discussion:

The Land Use and Circulation Elements are policy driven documents that do not include site-specific development plans. Adoption of the Land Use and Circulation Elements will result in some modifications to the existing General Plan land use designations and zoning, within the City limits and future planning areas. The subject elements, as proposed, are further consistent with all other adopted elements. These land use and planning issues will be further assessed under the proposed Environmental Impact Report.

- a) **Physically divide an established community? No Impact-** The proposed planning area is contiguous and no physical division of any established community will result from its implementation. All future annexations must further meet this requirement per LAFCo.
- b) **Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? Potentially Significant Impact-** The proposed Land Use and Circulation Elements will result in changes to the current adopted General Plan Land Use designations that further will affect unincorporated areas as they become annexed. This issue will be further reviewed under the proposed EIR.
- c) **Conflict with any applicable habitat conservation plan or natural community conservation plan? No Impact-** There are no Natural Community Conservation or Habitat Conservation Plans applicable to the planning area, therefore there will be no impact.

XI. MINERAL RESOURCES – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	X			
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?	X			

Mineral Resources Impact Discussion:

Known mineral resources for the Imperial Valley are gold and gypsum as well as limestone, pumice, clay stone, sand and gravel. Mining operations are in the Glamis Plateau area and the Cargo Muchacho and Picacho Mountains are also local resources. The planning area lies in the southern Imperial Valley on largely developed or previously disturbed land that has been historically used for farming. According to the Imperial County General Plan's survey of mineral and soil resources, no unique mineral resources are typically developed in this region of the Valley and there are no known mineral deposits or resource recovery sites shown on the historically adopted City of Imperial general plan. Nonetheless, this issue will be further assessed under the proposed Environmental Impact Report.

- 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? Potentially Significant Impact-** The proposed planning area consists largely of undeveloped infill urban land or agricultural disturbed land for the planned annexation areas. No mineral resources that would be of value to the region and the residents of the state have been identified thus far, nonetheless this issue will be further assessed under the proposed EIR.
- 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? Potentially Significant Impact-** There are no important mineral resource recovery sites delineated on any local plans in the vicinity of the proposed planning area, nonetheless, this issue will be further reviewed under the proposed EIR.

XII. NOISE – Would the project result in:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	X			
b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	X			
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	X			
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	X			
e) For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	X			
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	X			

Noise Impact Discussion:

Project related noise levels can be related to construction activities, transportation, or from the nearby Imperial County Airport. The planning area includes the Imperial County Airport which is located within

the Imperial City Limits which subjects the planning area to significant and frequent noise intrusion. Land Use is regulated by the Airport Land Use Compatibility Plan. Highway 86 which traverses the City at a north/south orientation is also a major transportation related noise levels are governed under the City's Noise Element. Noise levels adjacent to any major roadway within residential zones should not exceed 60dBA for Single-Family Zones and 65 dBA for Multi-Family Zones. Commercial Zones and Industrial Zones have acceptable levels of 70 dBA and 75 dBA respectively. The City of Imperial has further adopted the California Code of Regulations (CCR), Title 24, Noise Insulation Standards which states that multi-family dwellings, where the CNEL exceeds 60 dBA, must obtain an analysis concluding that the development design will limit indoor noise to less than 45 dBA CNEL. Although the Land Use and Circulation Elements are policy level documents that will not result in any direct development that would be exposed to adverse noise levels, new development guided by policies under these elements could result in noise generating sources. This issue will be further assessed under the proposed Environmental Impact Report.

- a) **Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? Potentially Significant Impact-** Although the Land Use Element plans for urban land uses it does not grant any development entitlements and any future development would be required to be consistent with the adopted Noise Element and State Standards to ensure compatibility issues have been addressed. Since the Land Use Element and Circulation Element may indirectly expose individuals to noise levels above adopted standards this issue will be further assessed under the proposed EIR.
- b) **Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels? Potentially Significant Impact-** The Land Use Element plans for urban land uses. The implementation of the plan could result in new construction that may temporarily or permanently create loud ground borne vibrations; therefore, this item will be further assessed under the proposed EIR.
- c) **A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? Potentially Significant Impact-** Neither the Land Use Element or Circulation Element updates grant development entitlements and any future development would be consistent with the adopted Noise Element. The Land Use Element further incorporates guidelines for compatibility to prevent noise issues. However, development of the proposed planning area may result in increased noise levels from what is currently available in the undeveloped areas thus this issue will be further assessed under the proposed EIR.
- d) **A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? Potentially Significant Impact-** The Land Use and Circulation Element do not grant any development entitlements and any future development would be consistent with the adopted local ordinance and development standards for temporary noise impacts during construction or long term operation. Development of the proposed planning area may cause temporary noise increases thus this issue will be further assessed under the proposed EIR.
- e) **For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? Potentially Significant Impact -** Imperial County Airport is located within the proposed planning area, impacts on future development may indirectly result from the proposed Land Use Plan implementation, thus this issue will be further assessed during the preparation of the proposed EIR.
- f) **For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? Potentially Significant**

Impact- The proposed planning area does contain a private airstrip; therefore, this issue will be further addressed under the proposed EIR.

XIII. POPULATION AND HOUSING – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	X			
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X

Population and Housing Impact Discussion:

The Land Use and Circulation Element updates will not adversely impact housing or displace residents as a result of planned development. The proposed Land Use and Circulation element updates incorporate policies that regulate development. Although the adoption of the Land Use Element and Circulation Element will not result in any direct population growth, the successful implementation of their policies may result in residential population increases resulting from new housing and employment opportunities. The projected growth would be located on land already served by the necessary infrastructure and in new annexation areas requiring new infrastructure. Thus this issue will be further assessed under the proposed Environmental Impact Report.

- a) **Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? Potentially Significant Impact-** The proposed Land Use and Circulation elements may indirectly induce population. The proposed land use policies will change residential land use designations within proposed annexation areas and offers density flexibilities within the incorporated City Limits. If the Elements are successfully implemented, they could indirectly result in a substantial population growth beyond the City's current infrastructure capacity. This issue will be further reviewed under the proposed EIR.
- b) **Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? No Impact-** The proposed Land Use Element does not propose any changes to convert residential land use to non-residential land use designations, nor does it grant development or demolition entitlements; therefore, the updates will not displace any existing housing.
- c) **Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? No Impact-** The proposed Land Use and Circulation Elements do not propose any changes to land use designations nor does it grant development or demolition entitlements; therefore, the updates will not displace any people.

XIV. PUBLIC SERVICES:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1) Fire protection?	X			
2) Police protection?	X			
3) Schools?	X			
4) Parks?	X			
5) Other public facilities?	X			

Discussion for Impact to Public Services:

The City's adopted Service Area Plan addresses the requirements of the City for the provision of adequate services. Implementation of the Land Use Element and Circulation Element at full build-out will create an increase in the demand for additional services to municipal service departments including fire protection, police protection and park facilities. Development Impact Fees and on-site facility improvement requirements are in place to mitigate any direct impacts to levels less than significant. Development projects are also required to make fair share contributions and capacity fees towards the ongoing services and improvements necessary in order to maintain acceptable service ratios, response time or other performance objectives. The development of a Lighting, Landscaping, and Maintenance Districts has also been implemented in residential projects as necessary. Impacts to Public Services will be further assessed under the proposed Environmental Impact Report

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

- 1) **Fire protection? Potentially Significant Impact-** Future residential development of the proposed implementation of the Land Use Element within the planning area has the potential of significantly increasing demand for fire protection services. Although the Land use Element does not grant any development entitlements it has the potential to increase demand of Fire Protection from what is currently planned and thus this issue will be further assessed in the proposed EIR.
- 2) **Police protection? Potentially Significant Impact-** Future urban development of the proposed planning area has the potential of significantly increasing demand for law enforcement services. Although the subject elements do not grant any development entitlements their successful implementation may increase demand in Police Protection thus this issue will be further reviewed under the proposed EIR.
- 3) **Schools? Potentially Significant Impact-** Future urban development of the proposed planning area as a result of Land Use Element implementation has the potential of significantly increasing demand for schools. Although the Elements do not grant any development entitlements they may indirectly increase demand in school service from what is planned for by the Imperial Unified School District for school facilities and educational services. This issue will be further evaluated under the proposed EIR.

- 4) **Parks? Potentially Significant Impact-**Residential development of the proposed planning area as a result of Land Use Element implementation has the potential of significantly increasing demand for park facilities. Although the Land Use Element does not grant any development entitlements its implementation may indirectly impact parks demand and thus this issue will be further reviewed under the proposed EIR.
- 5) **Other public facilities? Potentially Significant Impact-** Residential development of the proposed planning area during Land Use Element Implementation has the potential of significantly increasing demand in public facilities including, but not limited to, public libraries, community centers etc. Although the subject elements do not grant any development entitlements and each future development would be assessed on a project specific basis the indirect impacts will be further assessed under the proposed EIR.

XV. RECREATION:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	X			
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?	X			

Recreation Impact Discussion:

The proposed Land Use and Circulation Elements are policy-level documents that do not include site-specific development plans. Although successful implementation of the elements could result in an increased demand for recreational services and may generate increased use of existing parks and other recreational facilities, the City's Recreation Element does incorporate policies to preserve and enhance recreational resources and to meet future demands. Additionally, all future development would be required to comply with the established park fees to mitigate any potential impacts to less than significant. The City of Imperial requires that three (3) acres of parkland be provided for every 1,000 residents resulting from a proposed development project. Parkland is required to be improved for larger residential developments or impact fees paid in lieu for smaller development projects for a less than significant impact. These issues will be evaluated further under the proposed Environmental Impact Report.

- a) **Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? Potentially Significant Impact-** The implementation of the proposed Land Use Element through future development within incorporated areas and areas proposed for annexation, may impact the demand on existing neighborhood parks and regional recreational facilities; however, the City's proposed Open Space & Recreation Element policies and adopted development standards require that new residential development pay impact fees and/or incorporate recreational facilities as a part of their project preventing adverse effects to existing facilities. This issue will be further reviewed under the proposed EIR.
- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment? Potentially Significant Impact-** The implementation of the proposed Land Use Element through future development may indirectly result in or require new recreational facilities. The Open Space

& Recreation Element and adopted development standards mitigate against any possible adverse environmental effects prior to approving new facilities, thus this issue will be further assessed under the proposed EIR.

XVI. TRANSPORTATION AND TRAFFIC – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads or congestion at intersections)?	X			
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion/management agency for designated roads or highways?	X			
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	X			
e) Result in inadequate emergency access?	X			
f) Result in insufficient parking capacity?	X			
g) Conflicts with adopted policies, plans, programs, supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				X

Transportation and Traffic Impact Discussion:

The Land Use and Circulation Elements are policy level documents and do not include site specific proposals that would directly impact traffic and circulation. Nonetheless, the City of Imperial is proposing adoption of policies and standards for roadways, street design capacities and levels of service under the proposed Circulation Element. "Levels of service" (LOS) describe the operating conditions as experienced by motorists. LOS is a qualitative measure of the effect of a number of factors, including speed and travel time, traffic interruptions, freedom to maneuver, driving comfort, and convenience. The levels are designated A through F from best to worst, and cover the entire range of potential traffic operations and occurrences. The City of Imperial and County of Imperial General Plans continue to require intersections to operate at LOS C or better. New policies are further being incorporated for Complete Streets. It is the City's practice that all future residential development projects would be evaluated on a project by project basis for service review, potential safety impacts and to determine adequacy of emergency access prior to any development approval. Issues associated with Transportation and Traffic will be further assessed under the proposed Environmental Impact Report.

- a) **Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads or congestion at**

intersections)? Potentially Significant Impact- The proposed Land Use and Circulation Elements do not grant any development entitlements. However, implementation of the Land Use Plan via future urban development may result in increases to traffic and increased demand to the circulation system. There are adopted standards in place to ensure that there are no adverse impacts to traffic beyond the capacity of the current and/or planned street system and thus this issue will be further reviewed under the proposed EIR.

- b) **Exceed, either individually or cumulatively, a level of service standard established by the county congestion/management agency for designated roads or highways? Potentially Significant Impact-** The proposed Land Use and Circulation Elements do not grant any development entitlements. However, implementation of the Land Use Plan via future urban development may result in a traffic increase. There are adopted standards in place to ensure future development does not directly and/or cumulatively exceed the level of service standards established by the City of Imperial, Imperial County and the California Department of Transportation, thus these issues will be further assessed under the proposed EIR.
- c) **Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? No Impact-** The proposed implementation of the Land Use Element and Circulation Element could not change air traffic levels, patterns or locations of the Imperial County Airport. Therefore, there will be no impact.
- d) **Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? Potentially Significant Impact-** Implementation of the Land Use Element via infill development and new annexations will not directly result in increased hazards associated with intersections or incompatible uses as the proposed Circulation Element incorporates standards for safety that would need to be strictly adhered to. Any future projects will need to meet the adopted standards thus this item will be further assessed under the proposed EIR.
- e) **Result in inadequate emergency access? Potentially Significant Impact-**The proposed Land Use and Circulation Element updates are consistent with one another and do not grant any development entitlements. Implementation of the Land Use Element via future urban development consistent with the adopted Land Use Plan and Circulation Plan is designed to mitigate any adverse impacts to emergency access. This issue will be reviewed further under the proposed EIR.
- f) **Result in insufficient parking capacity? Potentially Significant Impact-** The proposed Land Use and Circulation Elements have incorporated policies so that any future development resulting from its implementation would be required to meet the parking capacities established by the local ordinance. These adopted standards ensure that there are no impacts from inadequate parking. However, density flexibilities may indirectly impact parking capacity and thus this issue will be further assessed under the proposed EIR.
- g) **Conflicts with adopted policies, plans, programs, supporting alternative transportation (e.g., bus turnouts, bicycle racks)? Potentially Significant Impact-** The proposed Circulation Element incorporates a number of policies in support of alternative transportation and Land Use Plan patterns are designed to maximize support of the systems. The impacts will be further assessed under the proposed EIR.

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

Background: A record search through the South Coastal Information Center (SCIC) , and a search through the California Historical Resources Information System did not provide any tribal cultural resources. A consultation with the Native American Heritage Commission also had negative results for sacred lands. The only two historic sites, located in the project area is the Dahlia Drain No. 8 located on the west side of Highway 86(starting on Neckel Road, and ending approximately .25 miles north of Harris Road), and the Niland-Calexico Railroad that traverses the City of Imperial, that runs north/south between Clark Road and Imperial Avenue. No adverse impacts are anticipated.

XVII. TRIBAL CULTURAL RESOURCES IMPACTS AND DISCUSSION:

- a) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or - No Impact-** There are no known cultural resources noted in the California Register of Historical Resources, or known burial site in the project area. The nearest cultural site to the proposed project area, noted in a CHRIS records search preformed on November 30, 2016, is the Site of Fort Romualdo Pacheco approximately 5 miles west and outside of project area. A Sacred Lands Search determined that there were negative results for Native American Cultural Resources.

- b) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.- No Impact-** As mentioned above the nearest cultural resource to the project area is approximately 5 miles west and outside the project area. A tribal consultation with the Native American Heritage Commission was made that determined there were no sacred lands in the project area. An early consultation with tribes regarding cultural significance of the project area was provided to all tribes listed by the NAHC which commenced on December 15, 2016 and concluded on January 16, 2017.

XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	X			
b) Require or result in the construction of new storm water or water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	X			
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	X			
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				X
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	X			
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	X			
g) Comply with federal, state, and local statutes and regulations related to solid waste?				X

Utilities and Service Systems Impact Discussion:

The proposed planning area under the Land Use Element either promotes infill development or development of sites immediately adjacent to urban development that may necessitate the provision and/or extension of utilities and municipal services including water lines, sewer lines, electrical power, natural gas, phone lines, drainage facilities and cable services. The Land Use and Circulation Elements are policy driven documents and do not include site specific proposals. Future development projects within the City would be required to follow the City's adopted regulations and development standards when connecting to City services. Indirect impacts to utilities and service systems will be assessed under a proposed Environmental Impact Report.

- a) **Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? Potentially Significant Impact-** The City owns its wastewater collection and treatment facility and operates under an NPDES Permit through the CRWQCB. The City further has an adopted Sewer Master Plan. The Land Use Element restricts and regulates development and although the proposed Land Use Element does not grant any development entitlements, any future urban development that may result from its implementation must be adequately serviced by the wastewater treatment capacities. Thus this issue will be further assessed under the proposed EIR.

- b) **Require or result in the construction of new storm water or water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? Potentially Significant Impact-** Full build-out of the proposed Land Use Plan planning area will likely result in the demand for new construction or expansion of water treatment facilities. The proposed Elements, however, do not grant any development entitlements. There are policies in place to ensure that any future development resulting from implementation of the proposed policies is adequately serviced with potable water services. This issue will be further review under the proposed EIR.
- c) **Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? Potentially Significant Impact-** Full build-out of the Land Use Element planning area may require new storm water drainage facilities. The proposed Elements, however, do not grant any development entitlements. There are policies in place to ensure that any future development resulting from implementation of the Land Use Plan will be responsible for the construction of new drainage facilities or the adequate connection to existing drainage facilities. This issue will be further assessed under the proposed EIR.
- d) **Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? Potentially Significant Impact-** There are currently adequate water supplies available to the City of Imperial from existing resources. Its raw water source is the Imperial Irrigation District which has established future allotment based on projected population growth. Although the proposed Elements do not grant any development entitlements, there are policies in place to ensure that any future development resulting from implementation of the Land Use Plan is adequately serviced with potable water. This item will be reviewed under the proposed EIR.
- e) **Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? Potentially Significant Impact-** The City of Imperial's existing capacity at the existing wastewater treatment facilities would not be able to support the Land Use Plan at full build-out projected through 2035. The proposed Elements, however, do not grant any development entitlements and any future development will be subject to a project specific review to ensure that any permitted development will receive proper sewer services. This issue will be further assessed under the proposed EIR.
- f) **Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? Potentially Significant Impact-** The Allied Waste Imperial Landfill accommodates solid waste disposal for the Imperial Community. Even though the Land Use and Circulation Elements do not grant any development entitlements, the solid waste site may not have sufficient capacity to accommodate the development goals established under the Land Use Plan, at full build-out, therefore this issue will be evaluated further under the proposed EIR.
- g) **Comply with federal, state, and local statutes and regulations related to solid waste? No Impact-** The solid waste from any future proposed development will be disposed of in compliance with federal, state, and local statutes and regulations; therefore, there will be no impact.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE				
a)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	X		
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.)	X		
c)	Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	X		

Mandatory Findings of Significance Impact Discussion:

Implementation of the proposed Land Use and Circulation Elements will not directly result in adverse impacts to the environment, but may indirectly result in development that could adversely impact the environment either independently or cumulatively. Although the Land Use and Circulation Elements do not grant any development entitlements and all future projects resulting from its implementation would necessitate individual assessment and mitigation an Environmental Impact Report shall be prepared to fully assess the potential impacts.

- a) **Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?** As previously noted, the City of Imperial, and immediate areas for annexation have been previously disturbed by human activity and do not provide suitable habitat for special status plant and wildlife species. It was noted, however, that lands used for agriculture provide habitat for the Burrowing Owl, as well as foraging and roosting habitat. The adopted Conservation Element incorporates biological resource preservation policies. Additionally, the Land Use and Circulation Elements are policy driven documents and do not include site specific proposals. All future development will be subject to individual assessment and mitigation, potential indirect impacts will be further assessed under the proposed EIR.
- 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.)** The project involves the adoption of updates to the Land Use and Circulation Elements and the subsequent implementation. The Elements are policy driven documents designed to assist the City in planning for future development needs and would not result in the actual development of urban uses. Through the City’s environmental review process, future development projects would be evaluated for potential cumulative impacts at the time of actual project development, therefore potential indirect impacts will be further assessed under the proposed EIR.

- c) **Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?** The Land Use and Circulation Elements are policy driven documents designed to assist the City in planning of future development. The Land Use Element does address future land use designations and densities but would not result in the actual development of urban land uses. Through the City's environmental review process, future development projects would be evaluated for potential direct or indirect impacts at the time of actual project development. Potential indirect impacts will be further assessed under the proposed EIR.

SOURCE REFERENCES	
The following documents were used as sources of factual data and are hereby incorporated as part of this Environmental Checklist. Because of the voluminous nature of the documents, copies of the following documents are not distributed with this document but may be obtained from the City of Imperial at 420 South Imperial Avenue in Imperial.	
A	Imperial County Air Pollution Control District CEQA Air Quality Handbook, November 2007
B	California Department of Conservation, Imperial County Important Farmland 2012 Map
C	City of Imperial 2014-2021 Housing Element
D	Center for Historic Resource Information, Accessed July 2014
E	City of Imperial General Plan, 1992
F	City of Imperial Zoning Ordinance, updated 2015
G	City of Imperial, Service Area Plan, September 2015
H	Imperial County Airport Land Use Compatibility Plan, 1996
I	Imperial County General Plan 1993
J	Imperial County Planning and Development Services Department, Williamson Act Properties 2012
K	South Coastal Information Center, Cultural Resources Record Search, July 18, 2014
L	US Environmental Protection Agency, "Current Nonattainment Counties for All Criteria Pollutants" , October 1, 2015
M	California Department of Transportation, California Scenic Highway Mapping System, May 5, 2015
N	City of Imperial Safety Element, 2014
O	City of Imperial Noise Element, 1992
P	City of Imperial Open Space & Recreation Element, 2015
Q	City of Imperial Sewer Master Plan, 2008

City of Imperial
420 S. Imperial Ave.
Imperial, CA 92251



The Holt Group
Engineering, Planning, Surveying
1601 N. Imperial Ave.
El Centro, CA 92243



Notice of Preparation

To: Office of Planning and Research

From: Justina G. Arce, Consultant Planner

140 Tenth Street

(Address)

Sacramento, CA 95814

1601 N. Imperial Avenue

(Address)

El Centro, CA 92243

Air Resources Board
CalEMA Agency
California Highway Patrol
Imperial Unified School District
Caltrans District 11
Caltrans Division of Aeronautics
Colorado River RWQCB
Native American Heritage Commission

Imperial County Department of Public Works
Imperial County Air Pollution Control District
Imperial County Public Health Department
Imperial Valley Housing Authority
Imperial Irrigation District Power/Water
Imperial County Planning Department
Imperial County Land Use Commission
Imperial Irrigation District Environmental

Subject: Notice of Preparation of a Draft Environmental Impact Report

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

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study (☉ is ○ is not) attached.

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

Please send your response to Justina G. Arce, Consultant Planner at the address shown above. We will need the name for a contact person in your agency.

Project Title: City of Imperial Land Use & Circulation Element Updates

Project Applicant, if any: _____

Date 3/21/2017

Signature

Justina G. Arce
Title Consultant Planner

Telephone (760) 337-3883

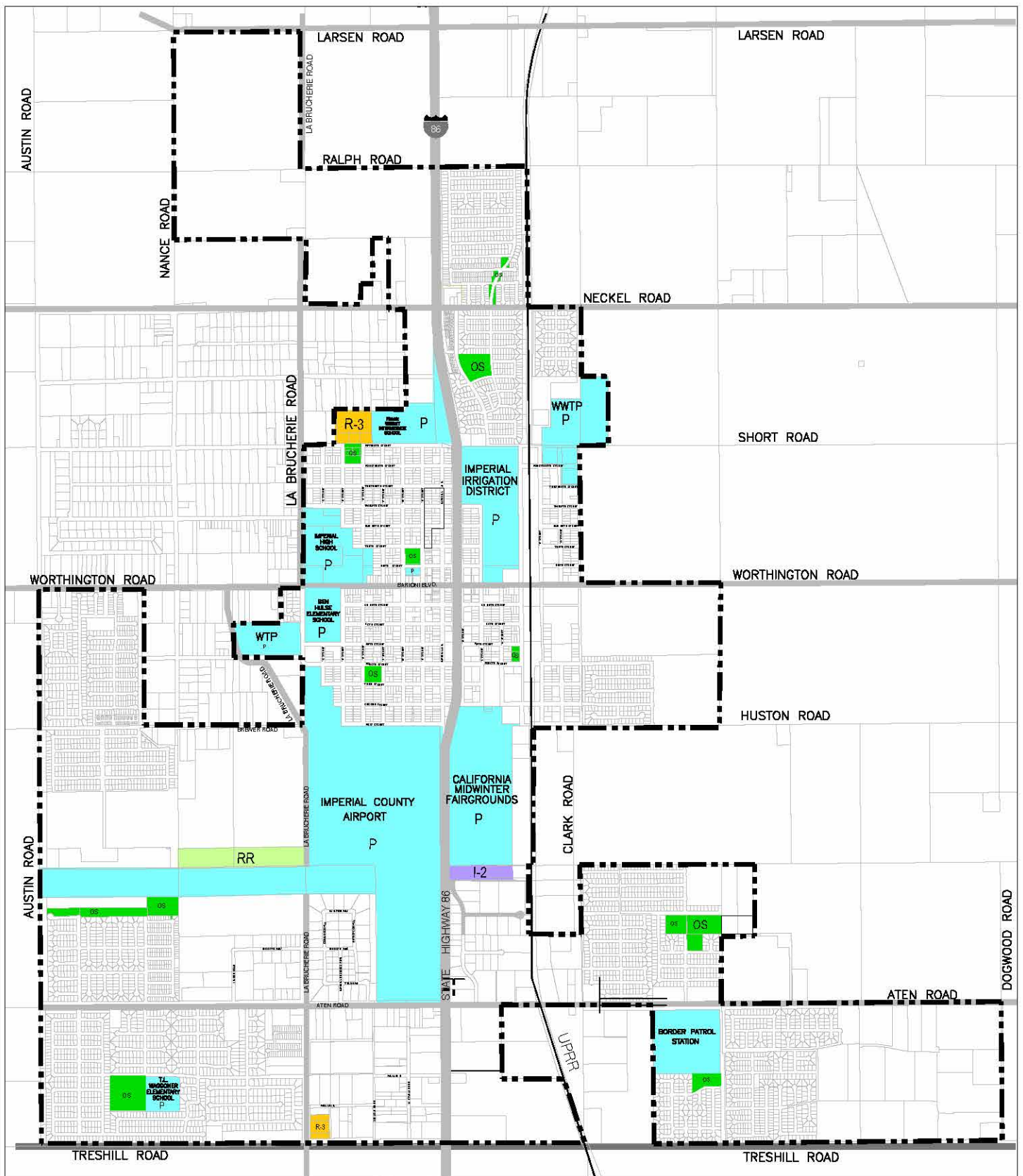
Appendix B

Parcel Affected by Land Use and
Zoning Reclassifications

Appendix B
Parcels Affected by Land Use and Zoning Reclassifications

Item	Owner	APN	Existing LU	Proposed LU	Existing Zoning	Proposed Zoning
1	IUSD	063-040-029	Low Medium Density Residential	Public Use	R-1	P
2	IUSD	063-040-030	Mobile Home Park	Residential High Density	MHP	R-3
3	IUSD	063-040-031	Mobile Home Park	Residential High Density	MHP	R-3
4	IUSD	063-040-032	Mobile Home Park	Residential High Density	MHP	R-3
5	IUSD	063-040-033	Mobile Home Park	Residential High Density	MHP	R-3
6	City of Imperial	063-195-001	Low Medium Density Residential	Open Space	R-1	OS
7	City of Imperial	063-195-002	Low Medium Density Residential	Open Space	R-1	OS
8	City of Imperial	063-195-003	Low Medium Density Residential	Open Space	R-1	OS
9	City of Imperial	063-195-004	Low Medium Density Residential	Open Space	R-1	OS
10	City of Imperial	063-247-001	Low Medium Density Residential	Open Space	R-2	OS
11	City of Imperial	064-051-001	Low Medium Density Residential	Public Use	R-1	P
12	City of Imperial	064-051-004	Low Medium Density Residential	Public Use	R-1	P
13	City of Imperial	063-074-052	Low Medium Density Residential	Open Space	PUD	OS
14	City of Imperial	063-074-011	Low Medium Density Residential	Open Space	PUD	OS
15	City of Imperial	063-073-023	Low Medium Density Residential	Open Space	PUD	OS
16	City of Imperial	063-074-003	Low Medium Density Residential	Open Space	PUD	OS
17	City of Imperial	063-074-004	Low Medium Density Residential	Open Space	PUD	OS
18	City of Imperial	063-072-027	Low Medium Density Residential	Open Space	PUD	OS
19	City of Imperial	063-075-018	Low Medium Density Residential	Open Space	PUD	OS
20	City of Imperial	063-107-022	Low Medium Density Residential	Open Space	R-1	OS
21	City of Imperial	063-090-019	Rail Served Industrial	Public Use	I-2	P
22	City of Imperial	063-090-004	Public Use	N/A	I-2	P
23	City of Imperial	063-111-001	Public Use	N/A	I-2	P
24	City of Imperial	063-113-001	Public Use	N/A	I-2	P
25	City of Imperial	063-114-001	Public Use	N/A	I-2	P
26	City of Imperial	044-661-006	Low Medium Density Residential	Open Space	R-1	OS
27	City of Imperial	044-666-001	Low Medium Density Residential	Open Space	R-1	OS
28	CAL Border Properties	044-200-060	Commercial Office	Rail Served Industrial	I-1	1-2
29	City of Imperial	044-614-012	Low Medium Density Residential	Open Space	R-1	OS
30	USA Dept. of Justice	044-220-069	Low Medium Density Residential	Public Use	R-1	P
31	City of Imperial	044-632-087	Low Medium Density Residential	Open Space	R-1	OS
32	COI/Midwinter Fair CA.	064-180-066	Public Use	N/A	I-1	P
33	Frontier Hospitality LLC	064-230-015	General Industrial	Public Use	I-1	P
34	County of Imperial	064-300-029	General Industrial	Public Use	I-1	P
35	County of Imperial	064-300-040	General Industrial	Public Use	I-1	P
36	County of Imperial	064-300-041	General Industrial	Public Use	I-1	P
37	City of Imperial	064-020-025	Low Medium Density Residential	Public Use	R-1	P
38	IUSD	063-250-011	Low Medium Density Residential	Public Use	R-1	P
39	IUSD of Imperial	063-250-010	Low Medium Density Residential	Public Use	R-1	P
40	IVUHS	063-250-012	Low Medium Density Residential	Public Use	R-1	P
41	IVUHS	063-250-003	Low Medium Density Residential	Public Use	R-1	P
42	IUSD of Imperial	063-250-004	Low Medium Density Residential	Public Use	R-1	P
43	IVUHS	063-250-002	Low Medium Density Residential	Public Use	R-1	P
44	IUSD of Imperial	063-250-001	Low Medium Density Residential	Public Use	R-1	P
45	IVUHS	064-042-008	Low Medium Density Residential	Public Use	R-1	P

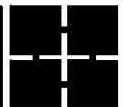
46	IUSD	063-243-007	Low Medium Density Residential	Public Use	R-1	P
47	City of Imperial	064-414-025	Low Medium Density Residential	Open Space	R-1	OS
48	IUSD	064-414-026	Low Medium Density Residential	Public Use	R-1	P
49	TBD	064-434-022	Commercial Neighborhood	Specific Plan	C-1	R-3
50	City of Imperial	064-315-013	Low Medium Density Residential	Open Space	R-1	OS
51	Imperial Valley Investor	064-315-010	Low Medium Density Residential	Open Space	R-1	OS
52	Imperial Valley Investor	064-315-011	Low Medium Density Residential	Open Space	R-1	OS
53	City of Imperial	064-132-001	Low Medium Density Residential	Open Space	R-1	OS



LEGEND:

- RR RESIDENTIAL RURAL
- R-3 RESIDENTIAL HIGH (RA)
- P PUBLIC USE
- OS OPEN SPACE
- I-2 RAIL SERVED INDUSTRIAL
- CITY LIMITS

The Holt Group, Inc.
ENGINEERING • PLANNING • SURVEYING



PARCELS AFFECTED BY LAND USE &
ZONING RECLASSIFICATIONS
CITY OF IMPERIAL

Appendix B

1601 N. Imperial Ave. El Centro, California 92243

(760)337-3883

NOT TO SCALE

THG Project No. 173.133

Date: April 2017

Appendix C

Comments Received During Notice of Preparation
& 45-Day Public Circulation Period

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Appendix D

Response Provided to Commenting
Agencies During Consultation Process

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