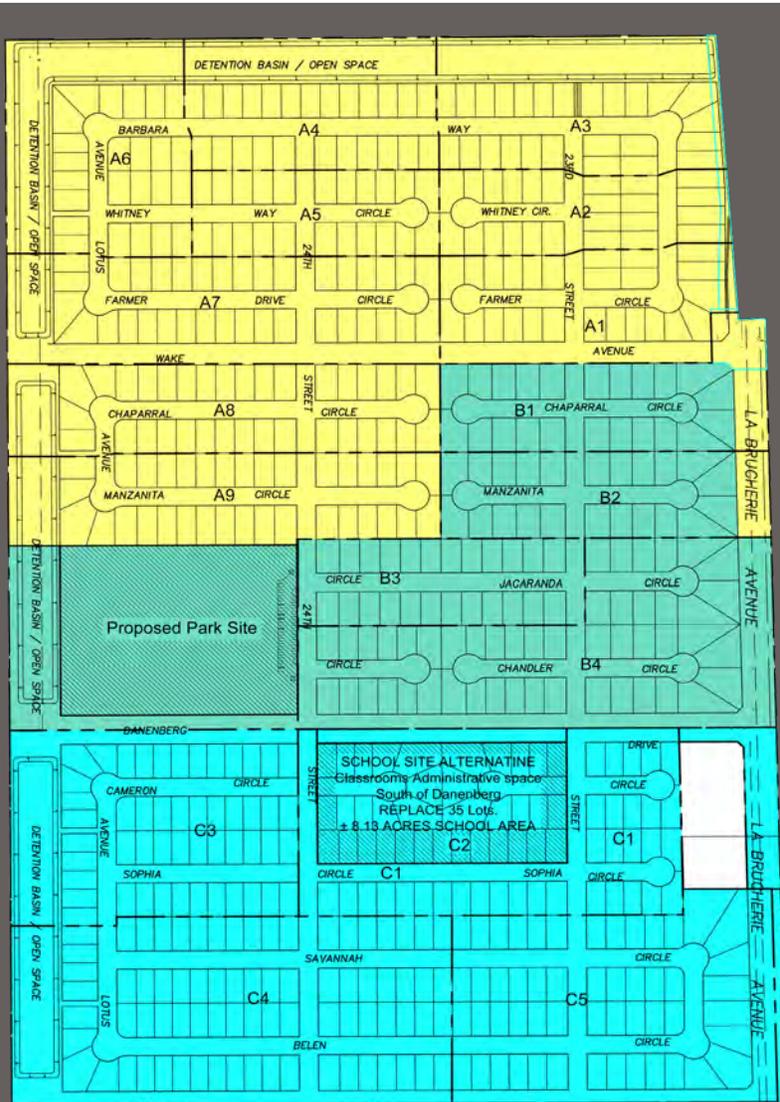


EXHIBIT G

MARCH 2016

FINAL LOTUS RANCH ENVIRONMENTAL IMPACT REPORT FOR THE ANNEXATION TO THE CITY OF EL CENTRO, PRE ZONE CHANGE OF ZONE #05-07 & TENTATIVE SUBDIVISION MAP



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1.0 – INTRODUCTION

This document is a Final Environmental Impact Report (Final EIR), which provides a review and analysis of the potential environmental impacts that could result from implementation of the proposed Lotus Ranch project. In accordance with CEQA Guidelines Section 15002, an EIR is the public document used by the governmental agency to analyze the significant environmental effects of a proposed project, to identify the alternatives, and to disclose possible ways to reduce or avoid the possible environmental damage. The EIR itself does not control the way in which a project can be developed or constructed; rather, the governmental agency must respond to the information contained in the EIR by one or more of the seven methods outlined in Section 15002(h) which include:

1. Changing a proposed project;
2. Imposing conditions on the approval of the project;
3. Adopting plans or ordinances to control a broader class of projects to avoid the adverse changes;
4. Choosing an alternative way to meet the same need;
5. Disapproving the project;
6. Finding that changing or altering the project is not feasible;
7. Finding that the unavoidable significant environmental damage is acceptable as provided in Section 15093.

The Final EIR, in compliance with Section 15132 of the State CEQA guidelines, includes the following:

The Draft EIR was distributed on October 27, 2015 for the standard 45-day public review period that concluded on December 10, 2015. A Notice of Availability was published at the Imperial County Clerk Recorder's Office, at El Centro City Hall, and in the Imperial Valley Press, a newspaper of general circulation.

1.1 FINAL EIR

Section 2.0 – Executive Summary

The Executive Summary includes a brief project description; summary of significant impacts and mitigation measures; a summary of project alternatives; areas of controversy; and issues to be resolved by the City of El Centro City Council.

Section 3.0 – Response to Comments

Section 3.0 includes the comments received on environmental issues raised during the public review process for the Draft EIR as well as the responses to comments. Each comment is assigned a comment number, which corresponds to a response number and response that appear on the same page.

Section 4.0- Mitigation Monitoring and Reporting Program

Section 4.0 includes the Mitigation Monitoring and Reporting Program (MMRP). The purpose of the program is to ensure that the mitigation measures required by the Environmental Impact Report (EIR) for the City's requested actions are properly implemented. The City will monitor the mitigation measures for construction and operation of the project. The Mitigation Monitoring Checklist provides a mechanism for monitoring the mitigation measures in compliance with the EIR.

1.2 DRAFT EIR AND APPENDICES

The Draft EIR that was previously circulated for public review is an integral element of the Final EIR. This version of the Draft EIR and Appendices includes the errata and revisions in strike-out/underline format, which were developed in response to comments received during the Draft EIR public review period.

The Final EIR is an informational document only. The Final EIR will be used by the City Council, Planning Commissioners, City staff, and decision-makers of other affected agencies or responsible agencies as an informational document for the proposed application in connection with the future development of the Lotus Ranch project. The Final EIR is anticipated to cover the following discretionary actions:

- Annexation from County of Imperial to City of El Centro, subject to LAFCO approval;
- Prezone of R1, Residential pursuant to the City of El Centro Zoning Ordinance;
- Tentative Subdivision Map approval;
- Site Plan Review; and
- Construction and operation of residences and a public park on the site, as well as the requisite infrastructure improvements.

Other agencies may use the information contained in this EIR when considering issuance or authorization of the requisite permits for construction of the specific development projects addressed herein.

2.0 – EXECUTIVE SUMMARY

2.1 PROJECT SYNOPSIS

2.1.1 Location

The site of the proposed project is located in the southeastern portion of the State of California approximately 13 miles from the United States/Mexico international border. The site is currently within unincorporated land in the south-central portion of the County of Imperial (See Figure 2-1 in the Draft EIR). The site abuts the southern incorporated boundary of the City and is within the City’s adopted Sphere of Influence boundaries.

The project site is bound by Interstate 8 (I-8) to the north, the Lotus Canal and Drain in the west, La Brucherie Avenue and the Dahlia Canal in the east, and active agricultural land to the south (See Figure 2-2 in the Draft EIR). Access to the site is provided by La Brucherie Avenue. The site comprises two existing legal lots: County Assessor Parcel Numbers 052-280-021 and 052-380-030. These lots make up a portion of tracts 58 and 61, Township 16 South, Range 13 East, San Bernardino Base and Meridian.

The surrounding properties consist of I-8, Southwest High School, and rural residences to the north; agricultural land, specifically hay storage yard/cattle feed yard to the south; the Farmer Estates Subdivision (which includes single-family homes that are completed and others that are currently under construction to the east); and agricultural land to the west. The Lotus Canal and Drain, facilities of the Imperial Irrigation District, run parallel to each other on the western boundary of the project site. La Brucherie Road marks the eastern boundary of the site.

The site is bordered to the north by the City’s LU (Limited Use Zone, County’s R-1-U (Single-Family Residential-Urban) and A1-L2U (Limited Agriculture) zones; to the west by County A2U (General Agriculture – Urban) zone; to the east by the City’s R-1, (Single-Family Residential) and County’s A2U zone; and to the south by the County’s A3 (Heavy Agriculture) zone. Currently, the project site is fallowed, and within unincorporated land of the county and designated Urban Area. Per the City’s General Plan the land use designation for the site is low-density residential.

2.1.2 Project Description

The project proposes annexation of an approximately 213-acre area from the County to the City, subdivision of the existing lots, and construction and occupation on those lots of a 609-unit single-family residential development and one park consisting of ±10.8 acres. G-MAC Development has prepared a tentative subdivision map. Detailed descriptions of these aspects of the project are provided.

Project implementation requires the following agency approvals: 1) approval by LAFCO for annexation of the site from the County of Imperial to the City; 2) establishment of a pre-zone of R1 Residential under the City Zoning Ordinance; and 3) City approval of a tentative subdivision map to allow the construction of 609 single-family residential lots and public park on the approximately 213-acre site. Annexation and pre-zone to R1 residential of the two “out parcels” adjacent to La Brucherie Avenue is included as part of the project.

To prepare the site for development, all structures existent within the site’s boundaries would be demolished. Structures to be demolished include a single-family residence and several accessory buildings located along the site’s eastern boundary and north of an existing east-west dirt road (future alignment of Wake Avenue). There are two additional single-family residences and accessory structures located along the site’s eastern boundary and south of an existing east-west dirt road (future alignment of Danenberg Drive). The residences are not within the project boundaries and would not be demolished as part of the project; however, two structures accessory to the northern of these two residences are within the project boundaries and would be demolished. Grading would be conducted to create building pads for the residential lots and the park; however, grading is anticipated to be minimal due to the site’s flat topography.

Residential

The residential component of the proposed project would entail construction and occupation of 609 single-family detached residential units on approximately 174 acres of the 213-acre site. Lot sizes would range from approximately 7,200 square feet (sf) to approximately 19,411 sf, with an average lot size of 8,494 sf. Residences would vary between one and two levels and would be consistent in size and appearance with existing and planned residences in the vicinity of the site. Each lot would feature a garage and landscaped yards. According to the phasing map, the proposed residences would be constructed in three (3) phases.

Public Park

One park consisting of ±10.8 acres would be constructed on the site. The park would consist of public-use facilities consisting of grass play areas and play equipment for children, with restrooms, drinking fountains, and security lighting provided. The project applicant will construct the park, but be owned, operated, and maintained by the City of El Centro.

Infrastructure

Infrastructure improvements, including roadways, sewer and water lines, and gas/electric connections, will be installed as part of the project. A grid of roads and cul de sacs to be constructed as part of the project and maintained by the City would serve the project. The street system would be connected to the existing and planned City street system. Access will be provided by the north/south route of La Brucherie Avenue and the east/west routes of Wake Avenue, Danenberg Drive, and Manuel Ortiz Avenue.

The project entails widening a segment of La Brucherie Avenue, which is currently paved within the project area. The existing pavement between I-8 and Wake Avenue would be widened to align with the proposed expanded intersection at Wake Avenue and La Brucherie Avenue. The existing pavement between Wake Avenue and the future alignment of Manuel Ortiz Avenue (the project's southern boundary) would be replaced to a width of approximately 60 feet. Concrete sidewalks and storm water gutters would be constructed along the western side of the roadway, and streetlights installed at regular intervals. Wake Avenue, Danenberg Drive, and Manuel Ortiz Avenue would be paved throughout the project limits and connected with existing and planned alignments extending to adjacent parcels, with sidewalk and utility improvements incorporated. Eighteen additional roads would be constructed with cul de sac terminations and would only serve the project residences.

Sewer, water, and storm drain pipes would be installed beneath the project roadways for service of the project residences. Infrastructure will include a sewage lift station in the northeast portion of the site and stormwater pump stations in the north-central and northeastern portions of the site.

The Lotus Canal and Drain, facilities of the Imperial Irrigation District (IID), run parallel to each other on the western boundary of the project site. These features are part of the large-scale agricultural irrigation and drainage system serving the region. The project will entail undergrounding of the Lotus Drain and the installation of a series of storm drains and stormwater treatment systems to manage stormwater flow from the project site and integrate the project with the larger IID drainage system. Undergrounding of the Lotus Drain would require grading work in this portion of the site.

Storm Water Detention Basins

The proposed subdivision would create three detention basins along the site's western and northern boundary. These lots would encompass 16.5 total acres. Drainage flow from the site would be directed toward these lots, which would slow storm flows during heavy storm events. The lots would also be available to the public for recreational use, and would be operated or maintained by the City Parks and Recreation Division. The basins would also buffer the project's residential uses from the Lotus Canal to the west and I-8 to the north. These storm water treatment systems may be used to comply with the City's Storm Water Ordinance and MS4 requirements.

2.1.3 Land Uses

The project is proposed on currently inactive agricultural land that has been fallowed for a year. The site is within unincorporated land of the County and designated Urban Area in the County General Plan. The project site is currently designated as Low Density Residential by the El Centro General Plan.

Low Density Residential

The Low Density Residential land use designation would allow the single-family residential development proposed for the majority of the site. According to the Land Use Element of the El

Centro General Plan, the Low Density Residential designation allows for single-family detached units, modular homes, accessory dwelling units, mobile home parks, and other compatible uses to serve the needs of single-family residential neighborhoods. The minimum lot size under this designation is 7,200 square feet. The project proposes 609 single-family dwelling units with lots sizes ranging from 7,200 square feet to 19,411 square feet are proposed. The overall average lot size proposed is approximately 8,494 square feet.

2.1.4 Zoning

The project site is currently designated A2U (General Agriculture – Urban) by the County Zoning Ordinance, which would be negated by the proposed annexation from the County to the City. The project proposes a City pre-zone designation of R1 Residential (Single-Family Residential), in accordance with the City’s Zoning Ordinance.

2.2 SUMMARY OF SIGNIFICANT EFFECTS WITH MITIGATION MEASURES

Significant direct (i.e., not cumulative) environmental impacts are discussed and analyzed in detail in Section 4 of the Draft EIR. Significant cumulative impacts are discussed in Section 7 of the Draft EIR. Technical reports were prepared to determine potential impacts to air quality, biological resources, greenhouse gas emissions, hydrology/water quality, transportation/traffic, and noise; their findings have been incorporated into this document, and copies of the reports are provided as Appendices A-H of the Draft EIR.

Project implementation would result in significant direct impacts to agriculture resources, air quality, biology, greenhouse gas emissions, hydrology/water quality, transportation/traffic, noise, and public services. The proposed project will also contribute considerably to significant cumulative impacts to agricultural resources, air quality, greenhouse gas emissions, public services, noise, and traffic. Table S-1, Matrix of Significant Impacts and Mitigation Measures of the Draft EIR presents a matrix of potentially significant impacts associated with the proposed project along with mitigation measures that will reduce or avoid the significant impacts. All impacts can be mitigated by measures listed in the Draft EIR and reduced to less-than-significant levels.

2.3 ENVIRONMENTALLY PREFERRED PROJECT ALTERNATIVE

Two alternatives to the proposed project are considered in Section 5 of the Draft EIR: the School Site Alternative and No Project Alternative.

Section 5 identifies the School Site Alternative as the environmentally superior alternative. Although both the proposed project and the School Site Alternative have similar impacts, the location of a K-6 school site in the future residential neighborhood will reduce impacts to traffic and could promote smart growth principals for walking and biking. These would be accomplished by having a school and park in close proximity to the residential neighborhoods.

Under the No Project Alternative, the site would not be developed and would remain agricultural land. The No Project Alternative would eliminate all potential environmental impacts associated with the implementation of the Proposed Project and the School Site Alternative.

Although the No Project Alternative would avoid the significant environmental impacts associated with both the Proposed Project and School Site Alternative, the No Project Alternative would not meet any of the project objectives identified in Section 2.2 of the Draft EIR.

2.4 AREAS OF CONTROVERSY

As defined by Section 15123(b)(2) of the California Environmental Quality Act (CEQA) Guidelines, certain areas of controversy have been raised by agencies, organizations, and the public through Notice of Preparation (NOP) comment letters (Appendix I). Comments have been received regarding potential impacts to agriculture, traffic, air quality, fire, public services, schools, storm water pollution prevention, water supply, and biological resources.

2.5 INTENDED USES OF THIS EIR

This EIR document provides analysis of the environmental impacts associated with:

- Annexation from County of Imperial to City of El Centro, subject to LAFCO approval;
- Prezone to R1 (Single Family Residential), Residential pursuant to the City of El Centro Zoning Ordinance;
- Tentative Subdivision Map approval;
- Site Plan Review; and
- Construction and operation of residences and a public park on the site, as well as the requisite infrastructure improvements.

Any future ministerial or discretionary approvals that are required will be subject to environmental regulations and policies in effect at the time approvals are requested.

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3.0 – RESPONSES TO COMMENTS

During the 45-day public review period, commencing October 27, 2015 through December 10, 2015, nine letters of public comment were received. Each of the letters received during the public review period is reprinted in the following section along with the corresponding written responses from the City of El Centro. Where revisions to the Draft EIR were required, those changes have been indicated in the responses, and modifications were made accordingly in the text of the final Draft EIR in strike-out/underline format. The following list of agencies, organizations and individuals responded with comments on the Draft EIR:

STATE AGENCIES

- California Department of Conservation, Division of Land Resource Protection, Molly Penberth, Manager, Conservation Support Unit, 12/07/15
- California Department of Transportation, District 11, Division of Planning, Jacob Armstrong, Branch Chief, Development Review Branch, 11/19/15

COUNTY/CITY AGENCIES

- County of Imperial Public Health Department, Alphonso Andrade, Environmental Health Control Specialist II, 11/25/15
- Imperial County Agricultural Commissioner's Office, Connie Valenzuela, Agricultural Commissioner, 12/07/15
- Imperial County Air Pollution Control District, Belen Leon, APC Administrative Analyst II, 12/04/15
- Imperial County Local Agency Formation Commission, Jurg Heuberger, Executive Officer, 11/17/15
- Imperial Irrigation District, Donald Vargas, Environmental Regulatory Compliance Administrator, 12/01/15

OTHER ORGANIZATIONS

- El Toro Export, LLC, William Plourd, President/C.E.O., 12/04/15
- McCabe Union School District, Laura Dubbe, Superintendent, 12/07/15

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Letter of Comment

Response to Comment

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 11, DIVISION OF PLANNING
4050 TAYLOR ST., M.S. 240
SAN DIEGO, CA 92110
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FAX (619) 688-4299
TTY 711
www.dot.ca.gov

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City of El Centro

NOV 24 2015

Community Development
Department



Serious drought.
Help save water!

November 19, 2015

11-IMP-8
PM 36.45
SCH# 2014111045
Lotus Ranch DEIR

Adriana Nava
City of El Centro
1275 Main Street
El Centro, CA 95814

Dear Ms. Nava:

The California Department of Transportation (Caltrans) received the Traffic Impact Study (TIS), dated October 23, 2015, for the proposed Lotus Ranch Draft Environmental Impact Report (DEIR) located near Interstate 8 (I-8). Caltrans has the following comments:

1 Caltrans acknowledges that Phase 1 impacts to I-8 from traffic generated by the project may not be significant. Phase 2 and 3 have impacts, as described in Section 7.3, "The I-8/Imperial Avenue interchange is proposed to be reconstructed to realign the westbound exit and entrance ramps to I-8 and reconstruct the eastbound exit and entrance ramps."

2 The proposed construction appears to provide new direct connection to and from I-8 from Imperial Avenue. As shown on Figure 7-6, 54% of the traffic generated by the total project will be using this proposed segment. The document did not include any study for potential impact on the ramps due to traffic generated by the total project. Please explain or include all entrance and exit ramps for both directions on I-8 to the study and submit for review.

3 For the proposed construction of Imperial Avenue and for all upgrades of the Imperial Avenue Bridge to connect to I-8, please refer to the following:

- For access rights along interchange ramps, please refer to HDM Sections 504.8 Access Control. <http://www.dot.ca.gov/hq/opd/hdm/hdmtoc.htm>
- For design speed, please refer to HDM Section 101.1 (c)(2) Local Streets or Roads
- For interchange spacing, please refer to HDM 501.3 Spacing and assure that there is adequate distance to the next existing Interchange, SR-86/I-8, as required by the above section of the HDM.
- Caltrans HQ Division of Structures should review all work on the Imperial Avenue Bridge.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability."

1. Comment Noted.
2. Caltrans/Imperial County have an approved Project Study Report/Project Development Support (PSR/PDS) for the Imperial Ave Extension (April 2006) which includes the traffic generated by the proposed project. Therefore, further analysis of the I-8/Imperial Ave interchange as part of the Lotus Ranch Environmental document is not warranted.
3. Comment Noted.

Letter of Comment

Response to Comment

Ms. Adriana Nave
November 19, 2015
Page 2

If you have any questions, please contact Roy Abboud at (619) 688-6968

Sincerely,



JACOB M. ARMSTRONG, Branch Chief
Development Review Branch

Digitally signed by Jacob M. Armstrong, DN: cn=Jacob M. Armstrong, o=San Diego County, ou=Development Review Branch, email=jarmstrong@sdcounty.ca.gov



Executive Officer
Jurg Heuberger, CEP

November 17, 2015

City of El Centro
Community Development Department
1275 Main St.
El Centro, Ca. 92243

RE: DEIR for Lotus Ranch Project

ATTN: Director Villacana

Dear Director:

On behalf of LAFCO, we thank the City and your Department for providing us an opportunity to review the DEIR for the above project.

4 Our comments are brief. The first being that as proposed the project has the potential to create an island if annexed as proposed and with no provisions for dealing with the land to the north. This project as you know, is located directly south of I-8 and south of the Lotus Estates Subdivision (an unincorporated county area) and the City has on record the approved Miller Bursen project located due west of the Lotus Subdivision. Therefore if both projects were to be annexed as has been discussed for years, an island could be created if the Lotus Subdivision is not included with one or the other projects. This DEIR should at least acknowledge and perhaps include a discussion of how to include the area, or if the inclusion of the Lotus Estates area would be impacted or what impacts it would create.

As you know LAFCO cannot approve a project that results in the creation of an island. At the same time while the Miller Bursen project is not currently in the que for annexation, LAFCO also cannot work blindfolded and assume it will never happen. Nor can LAFCO impose an undue hardship on one project versus another.

5 The second comment is that the Lotus Subdivision should be included in the "pre-zone". That would allow LAFCO to consider its annexation concurrent with this project or with a subsequent project to the west. Without this, it places LAFCO in a limited position of alternatives.

6 Third, unless we missed it, there should be a map or figure that acknowledges the "other" approved projects for the cumulative section, as a simple list is difficult to understand for most readers. More importantly and again unless we simply missed it, we do not see the Miller Bursen project listed!

7 Fourth, where mitigation measures are identified and the solution is to "pay a fair share" we respectfully must ask, as we have in prior EIR's that the level of fair share be quantified. Typically this is done in a percentage formula. Absent this information and quantification of estimated total costs it is impossible to evaluate the project's cost impacts to the City of other developments. For example, under Traffic, "T-3" dealing with the signalization of McCabe and LaBrucherie shows a fair share contribution.

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4. Currently the City of El Centro has an approved Tentative Map on the Miller Bursen property but no applicant has come forward to process a final map. Also based on conversations with LAFCO no applicant has come forward to process an annexation for the Miller Bursen property. Therefore, no island will be created if the proposed Lotus Ranch subdivision is approved and annexed into the City since Miller Bursen will remain in the County of Imperial.
5. Considering an annexation of the Lotus Subdivision is not warranted. See Response to Comment #5.
6. A map of other approved projects for Section 7 – Cumulative Impacts, has been included in the Final EIR (Figure 7-1).
7. The fair share percentages for the cumulative traffic impacts and mitigation measures have been included in the Final EIR. The percentages are:
 - b. Imperial Ave/Ocotillo Dr = 2.5%
 - c. La Brucherie Ave/ McCabe Rd = 4.8%
 - d. Wake Ave from La Brucherie Ave to 8th Street = 57.5%

Letter of Comment

Response to Comment

- 7 However there is no explanation of what that amount is or how that signalization cost would be distributed to other project and whether or not that means the mitigation is to a service level "C"?
- 8 Fifth, under the public services section you list the mitigation measures for Law Enforcement and Fire, however not for sewer, water or parks. Under the sewer analysis you specifically state that with mandatory sewer capacity fees paid there would be no impact. This leads one to believe that the City has standard fees for various services. Does the City not have standardized fees for law enforcement or fire protection? If not then under the mitigation measures, what are they for Fire and Police?
You make the same analytical statement for Law Enforcement yet you call this out as a mitigation measure, so why not water, sewer and parks?
- 9 Lastly, could you include in an appendix the current mandatory fees. This would help evaluate some of the project impact costs.

Thanks again.

Sincerely,



Jung Heu Berger, AICP, CEP
Executive Officer to LAFCO

CC: Project File, 50.000, 50.018.

- 8. Yes, the City does have standardized fees for law enforcement and fire protection. The EIR has been updated for clarity purposes.
- 9. An Appendix for the current mandatory fees has been included in the Final EIR (Appendix J).

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Community Development
Department



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Since 1911

December 1, 2015

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

SUBJECT: Lotus Ranch Draft EIR

Dear Ms. Villicana:

On October 27, 2015 the Imperial Irrigation District received from the City of El Centro Community Development Department, the draft Environmental Impact Report for the Annexation to the City of El Centro, Change of Zone No. 05-07 and Vesting Tentative Subdivision Map for the Lotus Ranch development project. The project proposes annexation of an approximately 213-acre area from the County of Imperial to the City, subdivision of the existing lots and development and construction of 609 single-family residential units and a park. The project site is bordered by Interstate 8 to the north, the Lotus Canal and Drain to the west, La Brucherie Avenue and the Dahlia Canal to the east and a hay storage/cattle feed yard to the south.

The IID has reviewed the draft EIR and in addition to our December 15, 2014 comment letter (see attached letter), has the following comments:

- 10. 1. The draft EIR does not consider the impacts that the 609-unit single-family residential development's electrical power requirement/demand will place on the electrical power provider (IID). Developer should be advised to contact the IID Energy Customer Operations & Planning Section at (760) 482-3300 and speak with an IID Service Planner in order to assess the project's energy requirements in relation to existing infrastructure and determine if any new and/or upgraded facility will be required to service the project.
- 11. 2. For long term surface runoff and on-site retention basins, a Storm Water Pollution and Prevention Plan should be implemented and include mitigation measures. The project's draft SWPPP is to be submitted to IID Water Engineering for review prior to submittal to Regional Water Quality Control Board. The SWPPP should contain a site map(s) which shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project. The SWPPP must list Best Management Practices the discharger will use to protect storm water runoff and the placement of those BMPs. Additionally, the SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. Section A of RWQCB's

- 10. Comment Noted. Additional information has been added to the Final EIR reflecting energy impacts associated with electric power requirements. This additional information will reflect that the applicant has contacted the IID Energy Customer Operations & Planning Section to assess the project's energy requirements in relation to existing infrastructure. It was determined that no new or upgraded facilities are required to service the project.
- 11. Comment Noted. The project applicant will submit a Stormwater Pollution Prevent Plan (SWPPP) for review and approval by IID, Regional Water Quality Control Board, and the City of El Centro.

Ms. Norma Villicana
 December 1, 2015
 Page 2

- 11 Construction General Permit describes the elements that must be contained in a SWPPP.
- 12 3. The Water Supply Assessment included in the draft EIR does not meet IID requirements. Developer should be advised to contact Anisa Divine, senior planner at the IID Water Dept. Planning & Technical Services section at (760) 339-9036 for additional information on this matter
- 13 4. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion can be found at the IID website: <http://www.iid.com/home/showdocument?id=3306>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.

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

Respectfully,



Donald Vargas
 Environmental Regulatory
 Compliance Administrator

Kevin Kelley – General Manager
 Mike Pacheco – Manager, Water Dept.
 Tina Shields – Co-Manager, Water Dept.
 Carl Sillis – Manager, Energy Dept.
 Eduwijos A. Lutz – Portfolio Mgmt. Officer
 Jamie Asbury – Deputy Energy Manager, Critical Business & Regulatory Affairs
 Vance Taylor – Asst. General Counsel
 Robert Laurile – Asst. General Counsel
 Jesse Montano – Transmission, Planning and Engineering Oversight
 Angela Evans – Manager Distribution Services & Maintenance Operations
 Oscar Kibriri – Supt. Gen. Project Implementation, Energy Dept.
 Michael P. Kemp – Superintendent, Real Estate & Environmental Compliance
 Harold Walk Jr. – Supervisor, Real Estate
 Randy Gray – ROW Agent, Real Estate
 Jessica Lovecchio – Water Transfer Program Mitigation Oversight

12. The applicant has contacted the IID Water Department Planning. The Water Supply Assessment was reviewed and approved by IID staff on January 22, 2016. An update to the Technical Services Section has been included in the Final EIR.
13. Comment Noted. The applicant or project proponent has submitted an encroachment permit to the IID.



COUNTY OF IMPERIAL
PUBLIC HEALTH DEPARTMENT

ROBIN HODGKIN, M.P.A.
Director
STEPHEN W. MUNDAY, M.D., M.P.H.
Health Officer

November 25, 2015

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

Subject: Lotus Ranch Vesting Tentative Subdivision Map

Dear Ms. Villicana:

The Imperial County Division of Environmental Health (DEH) is in receipt of the request for review and comments dated October 23, 2015, for Lotus Ranch.

DEH has prepared the following response to the submitted application package:

Vector Control

As per the submitted proposal, there will be three new storm water retention basins built, as a part of this new development. Retention basins must be designed in a manner that when storm waste is collected in the basin, the water dissipates at a rate that would not allow for the breeding of mosquitoes.

During the design of the proposed Lotus Ranch development basins, special attention must be paid to incorporating features that would prevent water standing within the basins for greater than 72 hours and that nuisance waters are diverted from the basins. We ask that the applicant submit a mosquito abatement plan to DEH outlining how the storm water retention basins will be kept from breeding mosquitoes. Please contact DEH in order to obtain information about creating a mosquito abatement plan.

Should you have questions, please do not hesitate to contact us at (442) 265-1888.

Sincerely,

Alphonso Andrade- Environmental Health Compliance Specialist II

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City of El Centro

DEC - 2 2015

Community Development
Department

Division of Environmental Health, 797 Main Street, Suite B, El Centro, CA 92243
(442) 265-1888 • (760) 352-1309 Fax • icphd.org

14. As part of the detention basin design, the Applicant will submit a Mosquito Abatement Plan to the DEH for review and approval, prior to development.

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 1495 La Graciosa Road
 El Centro, California 92243
 Phone: (760) 352-4157
 Fax: (760) 352-5754



Small Business Office
 4748 Highway 111
 Brawley, California 92227
 Phone: (760) 344-0188
 Fax: (760) 344-1849

P.O. Box 1109 • El Centro, California, 92243 • Phone (760) 352-4157 • Fax (760) 352-5754
 eltoro@eltoroexport.com

December 4, 2015

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

Subject: Lotus Ranch Housing Development

Ms. Villicana,

El Toro Export is submitting the following comments after carefully reviewing the October 2015 Environmental Impact Report (EIR) prepared for the City of El Centro for the Lotus Ranch Housing Development. This letter specifies the area in the EIR followed by our comments and/or concerns:

Page 3, Table S-1

AGR 1.1

15 The proposed use of Manuel Ortiz Avenue as an effective "buffer zone" between project housing and the Ag Operations to the south is inadequate. It is simply too narrow to provide an effect buffer to potential issues. As previously requested the project should be modified and a storm water retention basin should be placed along the entire southern border of the property. This would provide a much wider buffer zone.

16 A suggestion would be the placement of a park at the southern end of the Lotus Ranch Development. On page 118 and 149 of the EIR, the City discusses its parkland deficit. The Lotus Ranch community, the city, and El Toro Export could all benefit from a large park placed at the southernmost edge of the planned development to help reduce the City's 116.17 acre parkland deficit, provide more park space for the community, and create a larger "buffer zone" between the Lotus Ranch and El Toro Export.

AGR 1.2

17 We agree with the building a barrier wall along the southern boundary of the project. Specifically this wall needs to be a height of 15 to 20 feet and constructed of a solid or brick type material to be most effective.

- 15. The storm water retention system has been designed to effectively drain the property in association with city requirements, and subsequently could not effectively achieve appropriate drainage along the southern boundary of the property. However, it has been concluded that Manuel Ortiz Avenue, in association with a 6 foot wall would adequately buffer the development from the agricultural activities to the south.
- 16. Comment Noted. The park's proposed central location is designed to reduce vehicle trips and encourage future residents to bike and walk.
- 17. Comment noted. Based on anticipated agricultural impacts, a wall of six (6) feet is anticipated to be adequate. Please see Mitigation Measure AGR 1.2.

Letter of Comment

Response to Comment

Page 6, Noise

18

No specific mitigation is proposed of Noise Mitigation along the southern border and the Ag Operations at El Toro Export. A wall needs to be built at the location. It is noted later in the EIR (page 110) that a noise study done along the southern border of the project and El Toro Export showed no significant noise mitigation would be required. We disagree with this analysis. Much of the equipment we use is operated day and night at the El Toro Export operation is required to be equipped with "back up horns" for the safety of our employees. These "back up horns" are sounding off routinely during day and night operations and are required to be at a high decibel level.

Page 11, Traffic/Intersections/Driveways

C-T 3

19

The project will contribute to a significant increase in fast moving vehicular traffic north and south bound along LaBrucherie Road between Wake Avenue and McCabe Road. This roadway currently has a significant amount of slow moving Ag equipment moving along LaBrucherie Road. This increase in fast moving vehicular traffic will present a significant road risk since the fast moving vehicles are constantly trying to overtake and pass the slower moving Ag Equipment. While C-T 3 provides that the applicant will provide for a share of the cost of widening LaBrucherie to 4 lanes there is no timeline set for the widening. It's therefore requested that LaBrucherie Road become a no passing zone from Wake Avenue to McCabe Road and reduce the current speed limit from 55 mph to 40 mph to help eliminate traffic risk.

Phasing Map, figure 2-4

20

The School Site Alternative potentially opens up significant issues as the school site is more sensitive to our Agricultural Operations.

Page 37, 4.1.3 Impact Analysis

21

The EIR discusses the requirement under the "Right-to-Farm Ordinance to notify purchasers of the potential problems and inconveniences associated with living next to Agricultural Operations. We specifically request that potential buyers of homes in the projects be advised of this issue in writing during the initial sales contract signing, leaving nothing undisclosed in the early stages of the purchase decision. We also request that this notice be recorded on the deed to the property.

Page 110, 4.8.3 Impact Analysis

Operational Impacts

22

We do not agree with the analysis that the operations of the El Toro Export facility and the Cattle Feed Lot will not have significant noise impacts to future residence in the Lotus Ranch Project. Any noise

18. The noise analysis (see Appendix G – Addendum to the Noise Report) measured noise impacts from traffic generated from both the project and adjacent El Toro Export Company, machinery from El Toro Export, and potential noise impacts associated with the School Site Alternative. A 24-hour measurement was taken that showed that existing noise from the El Toro Export operation did not exceed the allowable standard thresholds from the City of El Centro’s Noise Element. Therefore no mitigation measures are needed in regards to noise impacts along the southern boundary. Although no specific mitigation measures relating to noise impacts from the El Toro Export operation are needed, the project will include a six (6) foot barrier fence or wall on the southern boundary of the property (Please see Mitigation Measure AGR 1.2).
19. Based on the 4,358 ADT forecasted in the near-term scenario and the Traffic Impact Analysis, there is no nexus for reducing the speed limit or designating a no-passing zone for this segment at this time. However, the City and County should continue to monitor speeds along this segment and implement measures if necessary.
20. Comment Noted.
21. The “Right-to-Farm” Ordinance already notifies purchasers of potential environmental issues related to existing agricultural operations during the sales contract signing and recorded on the deed. CEQA focuses on a proposed project’s impacts to the environment, not necessarily the environment’s impacts to a proposed project. Further discussion is included in Section 4.2.3 of the DEIR.
22. Noise measurements were taken during the El Toro Export’s high-demand, summer season (on July 9, 2015) which was based on the consultation of El Toro Export.

Letter of Comment

Response to Comment

22 study perform on July 8 and 9, 2015 was done without the consultation of El Toro Export to determine if normal operations were being measured. Relying on this two day study to be accurate would be misleading to the reader of this section of this EIR.

Final General Comment

23 In our previous comments given at the Lotus Ranch scoping meeting January 21, 2015 and in our written comments to the City of El Centro in our letter dated March 5, 2015 we have requested the City place a permanent ordinance for this project prohibiting the use of fireworks in the development. We'd like to reiterate that request again and expand it to include no open fires in the community. The risk of fires in the Ag Operations to the south is a significant issue.

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

Sincerely,

EL TORO EXPORT, LLC



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

23. The Final EIR has been updated to include an additional mitigation measure for Agricultural Resources that recommends the City enact an ordinance prohibiting the use of fireworks and open fires on the Project Site.

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2859

AIR POLLUTION CONTROL DISTRICT



TELEPHONE: (442) 265-1800
FAX: (442) 265-1799

December 04, 2015

Norma Villacaña
Planning and Zoning Director
City of El Centro
1275 Main Street
El Centro, CA 92243-2816

SUBJECT: Draft Environmental Impact Report (DEIR) for the Annexation to the City of El Centro, PreZone (Change of Zone #05-07) and Lotus Ranch Vesting Tentative Subdivision Map

Dear Mrs. Villacaña,

The review of the Draft Environmental Impact Report (DEIR) for the Annexation to the City of El Centro, PreZone (Change of Zone #05-07) and Lotus Ranch Vesting Tentative Subdivision Map (Lotus Ranch) has been finalized. The Imperial County Air Pollution Control (Air District) would like to thank you for allowing us to comment on your project. The project as described in the DEIR is a 509 single-family (low density) residential project consisting of a ± 10.8 acre park and offsite improvements. The project location is bounded by Interstate 8 to the north (Southwest High School and residences), La Brucherie Ave to the East (residential homes), agricultural lands to the west and a hay storage and cattle feedlot to the south.

The Air District reviews all projects for consistency and verifiable, that is substantiated evidence, conclusions and solutions. It is a far gone conclusion that concentrations of individuals in a localized area naturally invite sources of air emissions which have the potential to adversely affect the ambient air. Therefore, in order to educate and inform the public of these potential impacts, the Air District adopted its CEQA Air Quality Handbook (CEQA handbook) November 6, 2007. The intent of the handbook is to establish protocol to serve as guidance for agencies, consultants and Air District staff when an air quality analysis is necessary. The handbook identifies the preferred methodology, thresholds of significance (construction and operational) and feasible mitigation measures for proposed projects. When project proponents or other agencies choose not to adhere or otherwise abide by the most current guidance document then justification of the use of other methodology is imperative.

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

The air quality analysis presented for the Lotus Ranch DEIR contained language, references and methodology in accordance with the most current South Coast CEQA handbook, Chapter 11. However, note that South Coast calculation methodologies are found in Chapter 9 and the Appendix to Chapter 9 of the South Coast CEQA Handbook.

24 Although the Lotus Ranch DEIR is in accordance with the most current CEQA handbook for Imperial County it is worth reiterating those identified mitigation measures that is not properly monitored and applied will render the "less than significant" finding null. All mitigation measures identified as AQ 1.1 thru AQ 3 are essential but specifically AQ 2.2 and AQ 3. While the DEIR discusses the issue with odor impacts and clarifies that the significance level of the odors does not reach the level of "significant adverse impacts as defined by CEQA" there is enough historical precedent in Imperial County that such operations do in fact cause a nuisance perhaps not to the level of regulatory infraction but certainly enough to cause discomfort. Therefore, following through with mitigation measure AQ 3 is essential. Finally, with the nonattainment status of PM_{2.5} in Imperial County, assurances that all new fireplaces are gas operated as opposed to wood burning would help defer any future regulatory adoption prohibiting wood burning devices because of elevated concentrations of PM_{2.5}.

ADDITIONAL COMMENTS

25 The following are administrative comments regarding the Lotus Ranch DEIR. The DEIR uses the Salton Sea Air Basin (SSAB) interchangeably with the Imperial County designated areas of nonattainment and attainment. Please note, the SSAB is composed of the southern portion of Riverside County and all of Imperial County. The southern portion of Riverside County includes among other areas the Coachella Valley which is currently in attainment of the PM₁₀ NAAQS.

26 In addition, on page 41, within the description of the "Geographic Setting" the boundary for SSAB is incorrectly described as the boundary for Imperial County (refer to paragraph above.) Similarly, it is unclear why the western boundary is described as the Coyote and Fish Creek Mountains when in fact the western boundary is San Diego County.

27 Another aspect that is important to note, because Imperial County is use interchangeably with the SSAB, on page 43 under "State Regulations" about midway within the first paragraph the lead agency incorrectly states that, "[t]he ICAPCD is responsible for preparing and implementing the portion of the SIP applicable to the SSAB." The South Coast Air Quality Management District (SCAQMD) is responsible for the SIP portion known as the Coachella Valley which is part of the SSAB and not the ICAPCD.

In closing, the Air District would like to reiterate it's appreciation for allowing the review of the Lotus Ranch DEIR by the Air District. All Rules and Regulations, policies and guidance documents are available on the web at www.co.imperial.ca.us under "Air Pollution". Should you have any further questions please do not hesitate to call at (442) 265-1800.

24. Comment Noted.

25. Comment Noted.

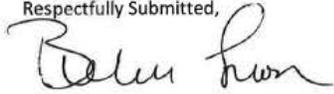
26. The Geographic Setting description has been updated in the Final EIR.

27. The State Regulations description has been updated in the Final EIR.

Letter of Comment

Response to Comment

Respectfully Submitted,



Belen Leon
APC Administrative Analyst II

Cc: Brad Poiriez
Monica Soucier



State of California • Natural Resources Agency
 Department of Conservation
Division of Land Resource Protection
 801 K Street • MS 18-01
 Sacramento, CA 95834
 (916) 324-0850 • FAX (916) 327-3430

Edmund G. Brown Jr., Governor
 John M. Lowie, Assistant Director

December 7, 2015

VIA EMAIL: ANAVA@CI.EL-CENTRO.CA.US

Ms. Adriana Nava
 Community Development Department
 1275 Main Street
 El Centro, CA 92243

Dear Ms. Nava:

LOTUS RANCH DRAFT ENVIRONMENTAL IMPACT REPORT, SCH# 2014111045

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Draft Environmental Impact Report (DEIR) for the Annexation, Pre-zone and Lotus Ranch Vesting Tentative Subdivision Map submitted by the City of El Centro (City). The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the proposed project.

Project Description

The proposed project would develop 213 acres of agricultural land into 609 single family residences, three storm water detention basins that would also serve as passive public open space, one park consisting of 10.8 acres, and offsite improvements to serve the project. The project requires an Annexation, Pre-Zone, Vesting Tentative Subdivision Map, and Development Agreement. The project is located at the southwest quadrant of Interstate 8 and La Brucherie Avenue, adjacent to the southwestern city limits of El Centro (Assessor's Parcel Numbers 052-280-012 and 052-380-030).

Currently, the Department of Conservation's Farmland Mapping and Monitoring Program categorizes the site as approximately 30 percent Prime Farmland and 70 percent Farmland of Statewide Importance. Construction of the project as proposed would result in the conversion of 213 acres of agricultural land to a non-agricultural use. The project site is currently restricted by a Williamson Act contract; however, the contract is in the process of non-renewal.

Public Improvements--Acquisition Notification Process

The Williamson Act requires public agencies to notify the Director of the Department of the possibility of acquisition of Williamson Act contracted land for public improvements (Government Code (GC) §51291). Notice is required in the following instances:

28. 1. Notice before making a decision to acquire property located in an agricultural preserve;
2. Notice within 10 days when the property is actually acquired;
3. Notice if the public entity proposes any significant changes to the acquisition; and

28. The Project site is not under a Williamson Act contract.

Mrs. Adriana Nava
 December 7, 2015
 Page 2 of 3

4. Notice after acquisition if the acquiring public agency decides not to acquire the property for the intended purpose.

The storm water detention basins and parks constitute public improvements that require notice to the Department. Enclosed for your benefit is a copy of the Public Acquisition Notification Provisions of the Williamson Act, which we offer as a guide for the public process.

Annexation and the Williamson Act

Please note that under GC § 51243, if a city annexes land under a Williamson Act contract, the city must succeed to all rights, duties and powers of the county under the contract unless conditions in GC § 51243.5 apply to give the city the option to not succeed to the contract. The local LAFCO also must notify the Department within 10 days of a city's proposal to annex land under contract (GC § 56753.5).

If the City must succeed to the contract, the Department strongly recommends that the City wait for the contract to expire via nonrenewal prior to the County considering the project. This action would insure that the proposed project and land use do not conflict with existing law.

As a general rule, land can only be withdrawn from a Williamson Act contract through nonrenewal, annexation, or cancellation. Immediate termination via cancellation is reserved for extraordinary situations. The city or county of jurisdiction must approve a request for contract cancellation, and base that approval on specific findings that are supported by substantial evidence (GC § 51282). If Williamson Act contract cancellation is proposed, we recommend that a discussion of the findings be included in the Final Environmental Impact Report (FEIR). Finally, the notice of the hearing to approve the tentative cancellation, and a copy of the landowner's petition, must be mailed to the Director of the Department ten working days prior to the hearing.

Agricultural Impacts and Mitigation Measures

Although direct conversion of agricultural land is often an unavoidable impact under CEQA analysis, mitigation measures must be considered. In some cases, the argument is made that mitigation cannot reduce impacts to below the level of significance because agricultural land will still be converted by the project, and therefore, mitigation is not required. However, reduction to a level below significance is not a criterion for mitigation under CEQA. Rather, the criterion is feasible mitigation that lessens a project's impacts. Pursuant to CEQA Guideline § 15370, mitigation includes measures that "avoid, minimize, rectify, reduce or eliminate, or compensate" for the impact. Therefore, all mitigation measures which could lessen the project's impacts should be included for the Lotus Ranch Project. A measure brought to the attention of the Lead Agency should not be left out unless it is infeasible based on its elements.

The conversion of agricultural land represents a permanent reduction in the State's agricultural land resources. Conservation easements are an available mitigation tool and considered a standard practice in many areas of the State. As such, the Department advises the use of permanent agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land. Conservation easements will protect a portion of those remaining land resources and lessen project impacts in accordance with CEQA Guideline § 15370. The Department highlights this measure because of its acceptance and use by lead

29. Comment Noted.

28
 (cont.)

29

Mrs. Adriana Nava
December 7, 2015
Page 3 of 3

agencies as an appropriate mitigation measure under CEQA and because it follows an established rationale similar to that of wildlife habitat mitigation.

Mitigation via agricultural conservation easements can be implemented by at least two alternative approaches: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence, the search for replacement lands should not be limited strictly to lands within the project's surrounding area.

29
(cont.)

A source that has proven helpful for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

<http://www.calandtrusts.org/resources/conserving-californias-harvest/>

Another source is the Division's California Farmland Conservancy Program (CFCP), which has participated in bringing about conservation easements throughout the State of California involving many California land trusts. Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered.

Thank you for giving us the opportunity to comment on the Draft Environmental Impact Report for the Annexation to the City of El Centro, Pre-Zone and Lotus Ranch Vesting Tentative Subdivision Map. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Environmental Planner at (916) 324-7347 or via email at Farl.Grundy@conservation.ca.gov.

Sincerely,



Molly A. Penberth, Manager
Division of Land Resource Protection
Conservation Support Unit

Enclosure

cc: State Clearinghouse

cc: Imperial County LAFCO

Connie L. Valenzuela
Agricultural Commissioner
Sealer of Weights and Measures

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



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December 7, 2015

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

RECEIVED
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DEC 07 2015
Community Development
Department

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

Dear Ms. Villicana,

This letter is in response to the Lotus Ranch Draft Environmental Impact Report received on October 27, 2015. The applicant is proposing a development of 609 single-family residential units including a park and 3 detention basins to be completed in three phases.

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

In our comment letter dated January 15, 2015 we pointed out the agricultural businesses located to the west and south and the noise, light, and air quality impacts of these immediately-adjacent operations on the proposed development. To the south: hay storage yard, feedlot, and hay compressing facility. To the west: farmland, which would include use of farm equipment such as balers, tractors, etc. There is additional farmland to the east, on the south side of Farmer Estates.

31 Impacts include noise from semi-trucks, tractors, and other equipment 24/7; light from stationary yard lights and vehicle lights all night; odors from the feedlot and from use of pesticides and fertilizers by the surrounding Ag operations; dust & hay chaff; and the close proximity of flammable stacks of hay. Our comments included the need for the EIR to study these issues and provide mitigations for them.

32 Specific to noise issues, our comments suggested use of noise barriers between the development and the agricultural operations. This would be more important on the south side of the development because the noise and other impacts from that operation would occur 24/7.

- 30. Cumulative impacts to agricultural resources are addressed in Section 7.2.
- 31. The EIR addresses these issues in Section 4.2.
- 32. The noise analysis (see Appendix G – Addendum to the Noise Report) measured noise impacts from traffic generated from both the project and adjacent El Toro Export Company, machinery from El Toro Export, and potential noise impacts associated with the School Site Alternative. A 24-hour measurement was taken that showed that existing noise from the El Toro Export operation did not exceed the allowable standard thresholds from the City of El Centro’s Noise Element. Therefore no mitigation measures are needed in regards to noise impacts along the southern boundary. Although no specific mitigation measures relating to noise impacts from the El Toro Export operation are needed, the project will include a six (6) foot barrier fence or wall on the southern boundary of the property (Please see Mitigation Measure AGR 1.2).

33 Staff from our office attended the El Centro City Council meeting on January 21, 2015 and commented that an updated noise study needed to be performed to look at the noise levels from the hay storage/feedlot/hay compress agricultural operation to the south.

34 The July 31, 2015 letter from Recon states that their analysis would describe the results of baseline noise level measurements taken for the Lotus Ranch Project at and near the El Toro Export Company in El Centro, however it does not. Two short-term noise measurement locations located 50' north of the El Toro Export Company were used. Additionally, they located one short-term measurement meter and one 24-hour measurement meter next to La Brucherie Road approximately 1/3 to 1/2 mile away from El Toro Export. The noise levels for all three short-term meters were averaged, thereby including traffic noise on La Brucherie in with noise levels from the El Toro Export Company's operation.

35 Also, the only 24-hour noise meter used was situated 1/3- 1/2 mile away from El Toro along La Brucherie Road, and therefore was not in a position to analyze nighttime noise levels from El Toro Export, when indoor noise levels within the development are required to be lower. In addition, all of the analysis from these 4 noise measurement meters is relative to distance from La Brucherie Road, not distance from El Toro Export. Therefore, this addendum to the original noise study still fails to provide data that would determine whether or not the proposed development would be required to mitigate noise levels by requiring noise buffering barriers or noise insulation to reduce indoor noise levels to 45 dBA CNEL in order to ensure compliance with City of El Centro noise regulations for new developments. Mitigating noise levels, if necessary, would also reduce conflicts between the residents and El Toro Export.

36 The EIR should address ways to mitigate these and other impacts to the development in order to reduce conflicts between the residents and the Ag industry. The draft EIR mentions the Imperial County Right to Farm Ordinance located in Chapter 5.56 of the County Ordinances. Section 5.56.030 states that no present or future lawful agricultural operation conducted in a manner consistent with proper and accepted customs and standards shall ever become a nuisance if it was not a nuisance when it began.

A correction is needed in this section of the draft EIR:

37 Under Agricultural Resources, Impact Analysis section 4.1.3 you state, "To eliminate health effects on residents resulting from agricultural use, the Imperial County Agricultural Commission adopted Pesticide Use Policies that restrict the aerial and ground applications of pesticides. This policy prohibits the use of aerial applications within 1/2 mile of residential areas, and ground applications within 1/4 mile of residential areas. Therefore, the western agricultural field adjacent to the project site would be prohibited from both ground and aerial applications given its location within both the 1/4 and 1/2 mile distance requirements."

This statement is incorrect. Aerial applications of restricted material pesticides to fields adjacent to inhabited properties or sensitive environmental areas shall utilize a sufficient buffer zone, not less than 100 feet, to prevent adverse impact to these areas. A conditioned permit map may require that restricted materials be applied by ground equipment only. However, non-restricted pesticides may both be applied aerially or by ground equipment next to the development.

38 Additionally, mitigation measure AGR 1.1 includes a "buffer zone" between homes and farmland to reduce potential land use conflicts between the proposed single-family homes and adjacent agricultural lands. We feel the buffer zone consisting of storm water detention basins to the west will be helpful in reducing conflicts and impacts, however the road on the south side of the project, Manuel Ortiz

33. An updated noise study was completed as per your request. The noise study was completed during El Toro's peak operations consistent with your request.

34. The Noise Addendum (Appendix G) has been updated in the Final EIR to include the description of the results of baseline noise measurements.

35. Figure 1 of Appendix G – Noise Addendum confirms that measurements were taken adjacent to the El Toro Export facility. The Final EIR has been updated to include the construction of a six (6) foot barrier fence or wall along the southern boundary of the Project Site. See Response to Comment #18 and #19.

36. Cumulative impacts to agricultural resources are addressed in Section 7.2.

37. The statement in the Impact Analysis (Section 4.1.3) has been updated in the Final EIR.

38. Based on anticipated agricultural and noise impacts, a wall of six (6) feet along the southern border of the development is anticipated to provide an adequate addition to the buffer zone already created by Manuel Ortiz Avenue. Please see Mitigation Measure AGR 1.2. Also, please see response to Comment #18.

38 Avenue, is not a wide enough buffer zone to provide any sort of mitigation to reduce impacts for the development. We recommend the installation of a noise wall on the south side of the project; the draft EIR is recommending a "barrier fence or wall". A fence would not be a sufficient barrier to assist with mitigating noise and some other impacts from the neighboring Ag operation. If the detention basins on the north side of the development could be put on the south side, along with the noise wall, this would further mitigate impacts to the development.

39 Section 5.2.2 School Site Alternative:
We request the following change if the School Site Alternative is chosen: the best location for the school is as close to the existing Southwest High School site as possible, which would also put it as far away from agricultural operations as possible. This would greatly reduce impacts to surrounding farmland due to differing regulations, ordinances, and conditions of use that apply to residential areas versus school sites. Therefore situating the school in the North East corner of the project area would reduce conflicts between the school and the agricultural operations.

If you have any questions, please don't hesitate to contact me.

Respectfully,



Connie Valenzuela
Agricultural Commissioner

39. An elementary school site close to Southwest High School would not be possible, due to proximity to the I-8 Freeway and associated air quality impacts.

McCABE UNION ELEMENTARY SCHOOL DISTRICT

701 West McCabe Road, El Centro, California 92243

District Office / Courthouse Site: Phone: (760) 833-5200 - McCabe School Site: Phone: (760) 832-5443

ADMINISTRATION

- LUCRA DUBIE
Superintendent
- ARLYN ATADERO
Asst. Superintendent
- ARMANDO LOPEZ
Principal
- GINA SANCHEZ-MACIAS
Asst. Principal
- KRISTIN WELLS
Asst. Principal



BOARD OF TRUSTEES

- MIKE McFADDEN
President
- CHIP COREMAN
Member
- MAIK LARSON
Member
- JUDY PAGE
Member

December 7, 2015

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City of El Centro

DEC - 7 2015

Community Development
Department

Ms. Yvonne Cordero
Community Development, Planning Division
City of El Centro
1275 Main Street
El Centro, CA 92243

Subject: Comments on Draft Environmental Impact Report for the Lotus Ranch Subdivision

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (EIR) for the Lotus Ranch Subdivision.

The project proposes 617 single-family residential units. A years ago the McCabe District submitted a response to the Notice of Preparation (NOP) dated November 20, 2014, requesting the inclusion of a school alternative. The Lotus Ranch Developer has included the option of a school within this subdivision in the current document that is being reviewed, and our District is pleased with the consideration.

40 After reviewing the Draft EIR the McCabe District would like to call attention to two specific concerns. The first concern is regarding the potential impact in the area of Transportation and Traffic that does not identify the significant increase in delay to the intersection of McCabe Road and Austin Road. The westbound traffic generating from the Lotus Ranch subdivision has the capacity to significantly increase the delays to this already impacted intersection. Of greatest concern with this intersection is the bridge that is built over the Central Main Canal, running parallel to Austin Road, and the limitation of the possibility of expanding that intersection to accommodate an increased traffic flow.

41 Of equal concern is the impact of the timeline for phasing in Phase 1 (247 homes), Phase 2 (116 homes and park), and Phase 3 (246 homes). The ability of the District to absorb students from

40. The project is calculated to add less than 50 peak-hour trips to the McCabe Road / Austin Road upon project buildout, an insignificant amount of traffic. In addition, the planned extension of Imperial Avenue between I-8 and McCabe Road will add additional capacity. Therefore, additional analysis of this intersection is not warranted.

41. Comment Noted.

41
(cont.) the initial phase of the Lotus Ranch development is limited, as the EIR clearly captures the overcrowded conditions that already exist on our campus. Information on the rate of acceleration through the phases will assist the District in planning and managing the influx of students. Future discussions with the Lotus Ranch Developer on the school site alternative that is tentatively mapped for a 35 acre area within the development, will also address this concern.

42 In addition to the two primary concerns on the EIR Report, there is also a correction needed on page 123 in the following school description, "McCabe operates *two* K-8 facilities...", the McCabe K-8 campus has the appearance of two adjacent facilities, however it is formally recognized by the state as one K-8 school.

The District looks forward to collaborating with the City and developers of the project. Should you have any questions or concerns regarding the comments included in this response, please feel free to contact me at your earliest convenience.

Sincerely,

Laura Dubbe
Superintendent

42. The description of the McCabe School District on Section 4.9 has been updated in the Final EIR.

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4.0 – MITIGATION MONITORING AND REPORTING PROGRAM

The purpose of the program is to ensure that the mitigation measures required by the Environmental Impact Report (EIR) for the City's requested actions are properly implemented. The City will monitor the mitigation measures for construction and operation of the project. The Mitigation Monitoring Checklist provides a mechanism for monitoring the mitigation measures in compliance with the EIR. General guidelines for the use and implementation of the monitoring program are described below.

PURPOSE OF THE MONITORING AND REPORTING PROGRAM

The purpose of the program is to ensure that the mitigation measures required by the Environmental Impact Report (EIR) for the City's requested actions are properly implemented. The City will monitor the mitigation measures for construction and operation of the project. The Mitigation Monitoring Checklist provides a mechanism for monitoring the mitigation measures in compliance with the EIR. General guidelines for the use and implementation of the monitoring program are described below.

MITIGATION MONITORING CHECKLIST

The Mitigation Monitoring Checklist is organized by categories of environmental impacts, (e.g., Air Quality, Biological Resources, Cultural Resources, etc.). The checklist identifies the implementation schedule; the responsible party for implementing the measure; the monitoring mechanism; and the required monitoring and reporting frequency. A description of these items is provided below.

Schedule for Implementation. The mitigation measures required for the project will be implemented at various times as construction proceeds and during operation. Some measures must be implemented before or during construction activities, while others must be implemented on completion. For each mitigation measure, the implementation schedule is identified.

Monitoring Responsibility. The Monitoring Responsibility explains who will ensure that the mitigation measures are properly implemented is identified for each mitigation measure. The City of El Centro shall be responsible for either monitoring each measure, or delegating to an agency or party at their discretion.

Monitoring Mechanism. Verification columns are provided for use by monitoring staff to ensure that measures are included on implementing maps and later installed on site.

Compliance Monitoring and Reporting. Subheadings within this column identify the frequency of required monitoring and reporting.

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Impact	Mitigation Measure	Schedule for Implementation	Monitoring Responsibility
DIRECT IMPACTS			
Agricultural Resources			
<p>AGR 1 The proposed project could potentially create land use conflicts with the adjacent agricultural properties, particularly the cattle feedlot immediately south.</p>	<p>AGR 1.1 The layout of the project site is designed to reduce potential land use conflicts between the proposed single-family homes and adjacent agricultural lands by creating a “buffer zone” between the homes and the farmland. This buffer zone consists of stormwater detention basins located on the west side of the site that also serve as open space for the residents. To the south, Manuel Ortiz Avenue buffers the residences from El Toro Export.</p> <p>AGR 1.2 The development shall include the construction of a six (6) foot barrier fence or wall to further separate the southern-most residences from Manuel Ortiz Avenue and the El Toro Export facilities located south.</p> <p>AGR 1.3 To reduce the risk of fires on the hay storage facility immediately south, the City should enact an ordinance prohibiting the use of fireworks and open fires on the project site.</p> <p>AGR 1.4 To reduce potential conflicts with future residents and existing agricultural operations, and to advise future residents of potential agricultural impacts (traffic, odor, noise, etc.), the Applicant will be required to comply with the “Right to Farm Ordinance” and include an advisory notice on the Title for future purchasers.</p>	<p>Prior to issuance of Final Map</p> <p>Prior to issuance of Final Map</p> <p>Prior to certificate of occupancy</p>	<p>City of El Centro</p> <p>City of El Centro</p> <p>City of El Centro</p>
Air Quality			
<p>AQ 1 Construction-related activities are temporary, short-term sources of air emissions that include fugitive dust from grading activities; construction equipment exhaust; and construction-related trips by workers, delivery trucks, and material-hauling trucks that will have a potentially significant impact on the environment.</p>	<p>AQ 1.1 Standard mitigation measures for construction equipment.</p> <ul style="list-style-type: none"> • Maintain all construction equipment in proper tune according to manufacturer’s specifications. • Fuel all off-road and portable diesel powered equipment, including but not limited to bulldozers, graders, cranes, loaders, scrapers, backhoes, generator sets, compressors, auxiliary power units, with ARB certified motor vehicle diesel fuel. • Maximize to the extent feasible, the use of diesel construction equipment meeting the ARB’s 1996 or newer certification standard for off-road heavy duty diesel engines. • Install diesel oxidation catalyst (DOC), catalyzed diesel particulate, or other District-approved emission reduction retrofit devices. <p>AQ 1.2 Standard mitigation measures for PM₁₀ control.</p> <ul style="list-style-type: none"> • The entire site shall be pre-watered for 48 hours prior to clearing and grubbing. • Reduce the amount of disturbed area where possible. • Water at least twice daily or otherwise stabilize all active construction areas. • All dirt stockpile areas should be sprayed daily as needed. • Pave, apply water three times daily, or apply non-toxic soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites. • Haul trucks shall cover loads or maintain at least 6 inches of freeboard when traveling on public roads. 	<p>Prior to Construction</p> <p>Prior to Construction</p>	<p>City of El Centro and ICAPCD</p> <p>City of El Centro and ICAPCD</p>

Impact	Mitigation Measure	Schedule for Implementation	Monitoring Responsibility		
<p>AQ 2 Operational emissions are projected to be less than the applicable thresholds for all pollutants except ROG after construction of Phase 2 and total buildout. Emissions of ROG are due to mobile sources, the use of fireplaces, and the use of consumer products associated with the project. Impacts would be potentially significant</p>	<ul style="list-style-type: none"> • Pre-moisten, prior to transport, import and export materials that have a silt content of 5 percent or greater. Water all materials with a silt content of 5 percent or greater with a spray bar or cover trucks hauling dirt, sand, or loose materials. Empty trucks and trucks carrying asphalt material are excluded from this requirement. • Sweep streets at the end of each day if visible soil material is carried onto streets, or wash off truck and equipment leaving site. <p>AQ 1.3 Discretionary mitigation measures for PM₁₀ control.</p> <ul style="list-style-type: none"> • Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. When wind speeds exceed 15 mph the operators shall increase watering frequency. • Apply chemical soil stabilizers or apply water to form and maintain a crust on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days). • Apply non-toxic binders (e.g. latex acrylic copolymer) to exposed areas after cut and fill operations and hydro-seeded areas. • Plant vegetative ground cover in disturbed areas as soon as possible and where feasible. • Cover or apply water or chemical suppressants to form and maintain a crust on inactive storage piles. • All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used. • Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site. • Install wheel washers, rumble gates, provide a gravel pad, or pave the area where vehicles enter and exit unpaved roads onto streets; or wash off trucks and equipment leaving the site. 	<p>Prior to Construction</p>	<p>City of El Centro and ICAPCD</p>		
	<p>AQ 2.1 Standard Site Design Measures.</p> <ul style="list-style-type: none"> • Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. When wind speeds exceed 15 mph the operators shall increase watering frequency. • Link cul-de-sacs and dead-end streets to encourage pedestrian and bicycle travel. • Allocate easements or land dedications for bikeways and pedestrian walkways. • Provide continuous sidewalks separated from the roadway by landscaping and on-street parking. Adequate lighting for sidewalks must be provided, along with crosswalks at intersections. • Incorporate energy efficiency measures which meet mandatory, prescriptive and/or performances measures as required by Title 24 			<p>Prior to Construction</p>	<p>City of El Centro and ICAPCD</p>
	<p>AQ 2.2 Require all fireplaces to be natural gas.</p>			<p>Prior to issuance of</p>	<p>City of El</p>

Impact	Mitigation Measure	Schedule for Implementation	Monitoring Responsibility
	<ul style="list-style-type: none"> If the project design includes fireplaces, no wood-burning fireplaces shall be installed; rather, all fireplaces shall be natural gas 	building permit	Centro and ICAPCD
Biological Resources			
BIO 1 The project would disturb land that contains active burrowing owl burrows.	BIO 1.1 Pre-construction surveys will be required at least 14 days prior to ground disturbance to detect the presence of burrowing owls and inform avoidance actions. These surveys will include all areas where suitable habitat is present within the survey area. BIO 1.2 The burrow exclusion and closure technique will apply to culverts being used as burrows along the southern boundary of the southern parcel. BIO 1.3 Formal consultation with CDFW will be required in to develop the appropriate mitigation plans which could include actions such as translocation of burrowing owls, artificial burrow construction, and/or habitat preservation.	Prior to Construction Prior to Construction Prior to Construction	City of El Centro and CDFW City of El Centro and CDFW City of El Centro and CDFW
Geology and Soils			
GEO 1 Soil underlying the site may be subject to seismically induced liquefaction, which could present hazardous conditions. GEO 2 Soil underlying the site may be subject to seismically induced subsidence, which could present hazardous conditions. GEO 3 Soil underlying the site may possess expansive qualities, which could present hazardous conditions on the site.	GEO 1 A site-specific geotechnical investigation shall be prepared to locate and evaluate on-site soils with the potential for liquefaction. Such investigation would detail the design requirements to account for any potential liquefaction conditions. GEO 2 A site-specific geotechnical investigation shall be prepared to locate and evaluate on-site soils with the potential for subsidence. Such investigation would detail the design requirements to account for any potential subsidence conditions. GEO 3 A site-specific geotechnical investigation shall be prepared to locate and evaluate on-site expansive soils. Such investigation would detail the design requirements to account for any potential expansive conditions.	Prior to issuance of grading permit Prior to issuance of grading permit Prior to issuance of grading permit	City of El Centro City of El Centro City of El Centro
Hydrology/Water Quality			
HYD 1 Impacts to Surface Water Quality and Groundwater Quality Due to Construction Related Earth Disturbing Activities and Construction-Related Hazardous Substances. HYD 2 Water quality impacts from construction below the water table.	HYD 1.1 Comply with NPDES General Construction Permit and City's Stormwater Program. HYD 1.2 Implement a Spill Prevention and Control Program HYD 1.3 Implement Measures to maintain groundwater and surface water quality. HYD 2.1 Comply with NPDES General Construction Permit and City's Stormwater Program. HYD 2.2 Implement a Spill Prevention and Control Program HYD 2.3 Implement Measures to Maintain Groundwater or Surface Water Quality HYD 2.4 Provisions for Dewatering	Prior to issuance of building permit Prior to issuance of building permit Prior to issuance of building permit Prior to issuance of building permit Prior to issuance of building permit Prior to issuance of building permit Prior to issuance of building permit	City of El Centro City of El Centro City of El Centro City of El Centro City of El Centro City of El Centro City of El Centro

Impact	Mitigation Measure	Schedule for Implementation	Monitoring Responsibility
<p>HYD 3 Increased amount of surface runoff and associated impacts to drainage facilities.</p>	<p>HYD 3 Implement Best Management Practices to Maximize Storm Water Quality. Comply with City of El Centro storm water ordinance and MS4 requirements as specified by state law.</p>	<p>During Construction</p>	<p>City of El Centro</p>
Traffic			
<p>T 1 Project traffic would cause a significant increase in delay at the La Brucherie Avenue / Wake Avenue intersection.</p> <p>T2 The project would cause an increase the need for public transit services to and from the proposed project site.</p>	<p>T 1 The project applicant shall signalize the intersection of La Brucherie Avenue / Wake Avenue and provide the following lane configurations (prior to the construction of 30 222 dwelling units):</p> <p style="padding-left: 40px;">Northbound: one (1) dedicated left-turn lane, one (1) dedicated thru lane, one (1) dedicated right turn lane</p> <p style="padding-left: 40px;">Southbound: one (1) dedicated left-turn lane, two (2) dedicated thru lane, one (1) dedicated right turn lane</p> <p style="padding-left: 40px;">Westbound: one (1) dedicated left-turn lane, one (1) shared thru/right-turn lane</p> <p style="padding-left: 40px;">Eastbound: one (1) dedicated left-turn lane, one (1) dedicated thru lane, one (1) dedicated right turn lane</p> <p>T2 The project applicant shall coordinate with the ICTC to establish a bus stop curb pullout and location within and/or surrounding the site.</p>	<p>Prior to issuance of certificate of occupancy</p> <p>Prior to issuance of certificate of occupancy</p>	<p>City of El Centro and County of Imperial</p> <p>City of El Centro and County of Imperial</p>
Noise			
<p>N 1 Temporary, localized noise would be received by on-site residences in excess of the acceptable 75-dBA CNEL threshold when project construction occurs within 150 feet of occupied project structures.</p> <p>N 2 Traffic noise levels at the first row of homes nearest to Interstate-8 would be 78 dBA CNEL, which exceeds the City's "Clearly Unacceptable" threshold of 75 dBA CNEL.</p> <p>N 3 Traffic noise levels at the first row of homes facing La Brucherie Avenue would be 65 dBA CNEL approximately 50 feet from the centerline, which is within the limits of the City's "Conditionally Acceptable" threshold of</p>	<p>N 1.1 Construction contracts shall specify that all construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.</p> <p>N 1.2 All existing residential units located within 200 feet of the construction site shall be sent a notice regarding the construction schedule of the proposed project. Signs, legible at a distance of 50 feet shall also be posted at the construction site. All notices and signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.</p> <p>N 2 Prior to completion of the homes nearest to Interstate-8, the developer shall construct a permanent noise barrier to shield the homes and park from freeway noise. The noise wall should be designed to provide at least 8 dBA of noise reduction at the first row of homes. That noise barrier would reduce freeway noise levels at the homes nearest Interstate-8 to the "Conditionally Acceptable" noise compatibility category. The Citywide requirement to meet the Title 24 construction standards for indoor noise would then be adequate to provide a suitable noise environment inside the homes. Further analysis to determine the final height of the wall will be conducted.</p> <p>N 3 The applicant shall be required to install a noise wall to reduce acoustical impacts to outdoor uses on residences along La Brucherie Avenue. The noise barrier shall be designed to reduce the noise impacts to an acceptable level (60 CNEL) in accordance with the City of El Centro Noise Element of the General Plan.</p>	<p>Prior to issuance of a building permit</p> <p>Prior to issuance of grading permit</p> <p>Prior to recordation of final map</p> <p>Prior to issuance of certificate of occupancy</p>	<p>City of El Centro</p> <p>City of El Centro</p> <p>City of El Centro</p> <p>City of El Centro</p>

Impact	Mitigation Measure	Schedule for Implementation	Monitoring Responsibility
70 dBA CNEL.			
Public Services			
<p>PS 1 The project's 609 new residences would result in significant public service impacts due to the lack of existing water infrastructure.</p> <p>PS 2 The project's 609 new residences would result in a significant public services impact on the City's Sewer service since no existing sewer infrastructure currently exists on site.</p> <p>PS 3 The project's 609 new residences would result in significant public service impacts due to the increased demand on ECFD services.</p> <p>PS 4 The project's 609 new residences would result in a significant public service impacts due to the increased demand on ECPD services.</p> <p>PS 5 The project would result in significant public services impacts associated with the predicted increase in enrollment at the McCabe Union School District and the Central Union High School District.</p> <p>PS 6 The project would result in a significant public services impact to park space due to the addition of approximately 1,993 and the additional demand of an additional 10 acres of park space.</p>	<p>PS 1 In order to offset the costs and impacts to water service, including maintenance of infrastructure, the developer will be required to pay development impact fees.</p> <p>PS 2 In order to offset the costs and impacts to sewer service, including maintenance of infrastructure, the developer will be required to pay development impact fees.</p> <p>PS 3 In order to offset the costs and impacts to fire protection services, the developer will be required to pay development impact fees.</p> <p>PS 4 In order to offset the costs and impacts to law enforcement services, the developer will be required to pay development impact fees.</p> <p>PS 5 In order to offset the educational costs associated with increased enrollment in the McCabe Union School District and the Central Union High School District, the project applicant is required to pay State-mandated school impact fees.</p> <p>PS 6 In order to offset the impacts to the availability of park space and maintenance of parks, the developer will construct a 10.8-acre park and will be required to pay development impact fees.</p>	<p>Prior to issuance of building permit</p>	<p>City of El Centro</p>
CUMULATIVE IMPACTS			
Cumulative Agricultural Resources			
<p>C-AG 1 There are significant indirect cumulative impacts to adjacent agricultural land surrounding the project site. The development of the proposed Lotus Ranch project in combination with the other cumulative projects may create additional pressure to remove agricultural land from production..</p>	<p>C-AG 1.1 Minimize indirect impacts on adjacent agricultural lands by creating and maintaining on-site buffer zones in the form of agricultural land, greenbelts, detention basins, recreational or vacant land that protect adjacent agricultural properties from new commercial and non-agricultural uses.</p> <p>C-AG 1.2 For the conversion of agricultural land to urban uses within Urban Areas, require that at least one entire property line of the new uses adjoin an area of existing urban uses.</p> <p>C-AG 1.3 Design implementing projects to increase transportation benefits for the agricultural sector to maximize the efficient transport of products and machinery.</p> <p>C-AG 1.4 Provide adequate buffers in all future development projects in accordance with City of El Centro Zoning Ordinance setback requirements between existing farm operations and property owners.</p>	<p>Prior to recordation of final map</p>	<p>City of El Centro</p> <p>City of El Centro</p> <p>City of El Centro</p> <p>City of El Centro</p>

Impact	Mitigation Measure	Schedule for Implementation	Monitoring Responsibility
Cumulative Air Quality			
<p>C-AQ 1 Based on the estimates of the emissions associated with cumulative projects, forecast emissions are expected to contribute to regional air quality impacts.</p>	<p>C-AQ 1 Prior to the issuance of the first building permit, the applicant will implement discretionary and off-site mitigation measures sufficient to reduce emissions by 100% of the project operational emissions. The calculation of emission reductions will involve the use of the emission reduction factors obtained from Chapter 11 of the South Coast Air Quality Management District CEQA Air Quality Handbook. Table 7-5 presents the emission reduction efficiency rates for each of the mitigation measures. The Air District requested that the residual emissions be addressed by quantifying the CEQA mitigation fees to be paid prior to the issuance of a building permit.</p>	<p>Prior to issuance of a building permit</p>	<p>City of El Centro and ICAPCD</p>
Cumulative Biological Resources			
<p>C-BIO 1 The project would have a substantial adverse effect through habitat modifications on the burrowing owl.</p>	<p>C-BIO 1.1 Take-Avoidance (Pre-Construction) Surveys. Pre-construction surveys will be required at least 14 days prior to ground disturbance to detect the presence of burrowing owls and inform necessary take avoidance actions. These surveys will include all areas where suitable habitat is present within the survey area (CDFW 2012).</p> <p>C-BIO 1.2 Burrow Exclusion and Closure. The CDFW 2012 guidelines state "Burrow exclusion is a technique of installing one-way doors in burrowing openings during the non-breeding season to temporarily exclude burrowing owls, or permanently exclude burrowing owls and close burrows after verifying burrows are empty by site monitoring and scoping." Although there were no formal burrows being used by the burrowing owls detected on-site, the culverts are being used as burrows. The burrow exclusion and closure technique will apply to these culverts along the southern boundary of the southern parcel.</p> <p>C-BIO 1.3 Formal consultation with CDFW will be required in order to develop the appropriate mitigation plans for the Lotus Ranch project. Other mitigation measures such as translocation of burrowing owls, artificial burrow construction, and/or habitat preservation may be required.</p>	<p>Prior to Construction</p> <p>Prior to Construction</p> <p>Prior to Construction</p>	<p>City of El Centro and CDFW</p> <p>City of El Centro and CDFW</p> <p>City of El Centro and CDFW</p>
Cumulative Traffic/Intersections/Highways			
<p>C-T 1 Project traffic would cause a significant increase in delay at the Imperial Avenue / Ocotillo Drive intersection.</p> <p>C-T 2 Project traffic would cause a significant increase in delay at the La Brucherie Avenue / McCabe Road intersection.</p> <p>C-T 3 Project traffic would cause a significant increase in volume/capacity ratio at the segment of Wake Avenue from La Brucherie Avenue to 8th Street.</p> <p>C-T 4 The project could result in significant operational impacts if proper</p>	<p>C-T 1 The project applicant shall contribute a fair share (2.5%) towards the provision of an eastbound right-turn overlap phase (RTOL) at the intersection of Imperial Avenue / Ocotillo Drive.</p> <p>C-T 2 The project applicant shall contribute a fair share (4.8%) towards signaling the intersection of La Brucherie Avenue / McCabe Road and providing a dedicated left-turn lane at each approach.</p> <p>C-T 3 The applicant shall contribute a fair share (57.5%) towards improving the currently constructed portion of Wake Avenue between La Brucherie Avenue and the future extension of Imperial Avenue to City two-lane collector standards and towards the eastbound extension of Wake Avenue and the construction of Imperial Avenue between I-8 and Wake Avenue.</p> <p>C-T 4 The applicant shall provide dedicated northbound left-turn lanes and dedicated southbound right-turn lanes at the</p>	<p>Prior to issuance of certificate of occupancy</p> <p>Prior to issuance of certificate of occupancy</p> <p>Prior to issuance of certificate of occupancy</p> <p>Prior to issuance of certificate of</p>	<p>City of El Centro</p> <p>City of El Centro</p> <p>City of El Centro</p> <p>City of El Centro</p>

Impact	Mitigation Measure	Schedule for Implementation	Monitoring Responsibility
site access is not provided.	three proposed access points along La Brucherie Avenue and a dedicated eastbound left-turn lane and a dedicated eastbound right-turn lane on Danenburg Drive at La Brucherie Avenue.	occupancy	
Cumulative Noise			
<p>C-N 1 Cumulative traffic noise levels at the first row of homes facing I-8 would exceed the City's "Clearly Unacceptable" threshold of 75 dBA CNEL.</p>	<p>C-N 1 Mitigation measure N2, which addresses the direct noise impacts assessed for the project, would adequately reduce cumulative traffic noise impact C-N 1. No additional mitigation is required.</p>	Prior to issuance of certificate of occupancy	City of El Centro
<p>C-N 2 Cumulative traffic noise levels at the first row of homes facing La Brucherie Avenue would exceed the City's "Conditionally Acceptable" threshold of 60 dBA CNEL.</p>	<p>C-N 2 Mitigation measure N3, which addresses the direct noise impacts assessed for the project, would adequately reduce cumulative traffic noise impact C-N 2. No additional mitigation is required.</p>	Prior to issuance of certificate of occupancy	City of El Centro
Cumulative Public Services			
<p>C-PS 1 The City's Fire Department has insufficient resources to adequately service the combined demands of the proposed project and cumulative projects.</p>	<p>C-PS 1 In addition to the payment of development impact fees, developers of new projects south of I-8 shall be required to pay a fair share contribution towards the construction of fire facilities and services south of I-8.</p>	Prior to recordation of final map	City of El Centro
<p>C-PS 2 The project would result in significant public services impacts associated with the predicted increase in enrollment at the McCabe Union School District and the Central Union High School District.</p>	<p>C-PS 2 Mitigation measure C-PS 1, which addresses the direct public service impacts assessed for the project, would adequately reduce cumulative traffic noise impact C-PS 1. No additional mitigation is required.</p>	Prior to recordation of final map	City of El Centro

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**DRAFT
LOTUS RANCH
ENVIRONMENTAL IMPACT REPORT
FOR THE ANNEXATION TO
THE CITY OF EL CENTRO,
PRE ZONE (Change of Zone #05-07) AND
TENTATIVE SUBDIVISION MAP**

Prepared for:

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March 2016

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LIST OF ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ADD	average day demand (water)
ADT	average daily traffic
AFY	acre-feet per year
AQAP	Air Quality Attainment Plan
BAU	Business-as-Usual
BMP	Best Management Practices
CAA	Clean Air Act (federal)
CAFE	Corporate Average Fuel Economy
CARB	California Air Resources Board
CCAA	California Clean Air Act
CDFG	California Department of Fish and Game
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFD	Community Facilities District
City	City of El Centro
County	County of Imperial
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CUHSD	Central Union High School District
dba	decibels (for human scale)
DEIR	Draft Environmental Impact Report
ECFD	El Centro Fire Department
ECPD	El Centro Police Department
EIR	Environmental Impact Report
EO	Executive Order
EPA	Environmental Protection Agency
FMMP	Farmland Mapping and Monitoring Program
GHG	greenhouse gas emissions
gpd	gallons per day
gpm	gallons per minute
HCM	Highway Capacity Manual
I-8	Interstate 8
IID	Imperial Irrigation District
ICAPCD	Imperial County Air Pollution Control District
<u>ICTC</u>	<u>Imperial County Transportation Commission</u>
<u>IVT</u>	<u>Imperial Valley Transit</u>
LAFCO	Local Agency Formation Commission
LCFS	Low Carbon Fuel Standard
LEV	low-emission vehicle
LL&G	Linscott, Law & Greenspan Engineers
LOS	level of service
mg	million gallons

mgd	million gallons per day
MMTCO ₂ E	million metric tons of CO ₂ equivalent
MUESD	McCabe Union Elementary School District
NAAQS	national ambient air quality standards
NAT	No action taken
NFPA	National Fire Protection Association
NOI	Notice of Intent
NOP	Notice of Preparation
NPDES	National Pollution Discharge Elimination System
NRCS	Natural Resources Conservation Service
Project	Lotus Ranch subdivision
RCPG	Regional Comprehensive Plan and Guide
RECON	RECON Environmental, Inc.
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board (Colorado River Basin)
SAP	Service Area Plan
SB	Senate Bill
SSAB	Salton Sea Air Basin
SCAG	Southern California Association of Governments
SIP	State Implementation Plan
sf	square feet
SOI	Sphere of Influence
SWPPP	Storm Water Pollution Prevention Plan
TDS	total dissolved solids
TMDL	total maximum daily load
USDA	United States Department of Agriculture
WTP	water treatment plant

EXECUTIVE SUMMARY

S.1 PROJECT SYNOPSIS

Project Description

The proposed project consists of the development of 213 acres of agricultural land into 609 single-family residences, three storm water detention basins that would also serve as public open space, one (1) park consisting of ±10.8 acres, and offsite improvements to serve the project. The lot size of the 609-lot single-family development would average approximately 8,494 square feet. The smallest lot would be approximately 7,200 square feet, and the largest would be approximately 19,411 square feet. It is anticipated the development would occur in three (3) phases. The project would require an Annexation, Pre-Zone, ~~Vesting~~ Tentative Subdivision Map, and Development Agreement.

An Environmental Impact Report (EIR) was previously prepared for the proposed project and circulated to all agencies in 2007. The EIR was not formally adopted by the respective governing bodies and the project has been modified. The project modifications include a reduction in residential units, the addition of parkland space, and phasing of the project.

Project Setting

The proposed project site (Assessor's Parcel Numbers 052-280-012 and 052-380-030) is generally located at the southwest quadrant of Interstate 8 (I-8) and La Brucherie Avenue, adjacent to the southwestern City of El Centro city limits and within the County of Imperial. The surrounding properties consist of I-8, Southwest High School, and rural residences to the north; agricultural land, specifically hay storage yard/cattle feed yard to the south; the Farmer Estates Subdivision (which includes single-family homes) and agricultural land to the east; and agricultural land to the west. The Lotus Canal and Drain, facilities of the Imperial Irrigation District, run parallel to each other on the western boundary of the project site. La Brucherie Avenue marks the eastern boundary of the site.

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

S.2 SUMMARY OF SIGNIFICANT EFFECTS WITH MITIGATION MEASURES

Significant direct (i.e., not cumulative) environmental impacts are discussed and analyzed in detail in Section 4 of this Draft Environmental Impact Report (DEIR). Significant cumulative impacts are discussed in Section 7 of this DEIR. Technical reports were prepared to determine potential impacts to air quality, biological resources, greenhouse gas emissions, hydrology/water quality, transportation/traffic, and noise; their findings have been incorporated into this document, and copies of the reports are provided as Appendices A-H of this DEIR.

Project implementation would result in significant direct impacts to agriculture resources, air quality, biology, greenhouse gas emissions, hydrology/water quality, transportation/traffic, noise, and public services. The proposed project will also contribute considerably to significant cumulative impacts to agricultural resources, air quality, greenhouse gas emissions, public services, noise, and traffic. Table S-1 presents a matrix of potentially significant impacts associated with the proposed project along with mitigation measures that will reduce or avoid the significant impacts. All impacts can be mitigated by measures listed in this DEIR and reduced to less-than-significant levels.

S.3 ENVIRONMENTALLY PREFERRED PROJECT ALTERNATIVE

Two alternatives to the proposed project are considered in Section 5: the School Site Alternative and No Project Alternative.

Section 5 identifies the School Site Alternative as the environmentally superior alternative. Although both the proposed project and the School Site Alternative have similar impacts, the location of a K-6 school site in the future residential neighborhood will reduce impacts to traffic and could promote smart growth principals for walking and biking. These would be accomplished by having a school and park in close proximity to the residential neighborhoods.

Under the No Project Alternative, the site would not be developed and would remain agricultural land. The No Project Alternative would eliminate all potential environmental impacts associated with the implementation of the Proposed Project and the School Site Alternative.

Although the No Project Alternative would avoid the significant environmental impacts associated with both the Proposed Project and School Site Alternative, the No Project Alternative would not meet any of the project objectives identified in Section 2.2.

S.4 AREAS OF CONTROVERSY

As defined by Section 15123(b)(2) of the California Environmental Quality Act (CEQA) Guidelines, certain areas of controversy have been raised by agencies, organizations, and the public through Notice of Preparation (NOP) comment letters (Appendix I). Comments have been received regarding potential impacts to agriculture, traffic, air quality, fire, public services, schools, storm water pollution prevention, water supply, and biological resources.

Table S-1. Matrix of Significant Impacts and Mitigation Measures

Environmental Effect	Level of Significance	Proposed Mitigation	Level of Significance after Mitigation	Alternatives That May Reduce Impacts
Agricultural Resources				
<p>AGR 1 The proposed project could potentially create land use conflicts with the adjacent agricultural properties, particularly the cattle feedlot immediately south.</p>	<p>Potentially significant direct impact without mitigation incorporated.</p>	<p>AGR 1.1 The layout of the project site is designed to reduce potential land use conflicts between the proposed single-family homes and adjacent agricultural lands by creating a “buffer zone” between the homes and the farmland. This buffer zone consists of stormwater detention basins located on the west side of the site that also serve as open space for the residents. To the south, Manuel Ortiz Avenue buffers the residences from El Toro Export.</p> <p>AGR 1.2 The development shall include the construction of a <u>six (6) foot</u> barrier fence or wall to further separate the southern-most residences from Manuel Ortiz Avenue and the El Toro Export facilities located south.</p> <p>AGR 1.3 <u>To reduce the risk of fires on the hay storage facility immediately south, the City should enact an ordinance prohibiting the use of fireworks and open fires on the project site.</u></p> <p>AGR 1.4 <u>To reduce potential conflicts with future residents and existing agricultural operations, and to advise future residents of potential agricultural impacts (traffic, odor, noise, etc.), the Applicant will be required to comply with the “Right to Farm Ordinance” and include an advisory notice on the Title for future purchasers.</u></p>	<p>Less than significant.</p>	<p>No Project Alternative.</p>

Environmental Effect	Level of Significance	Proposed Mitigation	Level of Significance after Mitigation	Alternatives That May Reduce Impacts
Air Quality				
<p>AQ 1 Construction-related activities are temporary, short-term sources of air emissions that include fugitive dust from grading activities; construction equipment exhaust; and construction-related trips by workers, delivery trucks, and material-hauling trucks that will have a potentially significant impact on the environment.</p>	<p>Potentially significant direct impact without mitigation incorporated.</p>	<p>AQ 1.1 Standard mitigation measures for construction equipment.</p> <p>AQ 1.2 Standard mitigation measures for PM₁₀ control.</p> <p>AQ 1.3 Discretionary mitigation measures for PM₁₀ control.</p>	<p>Less than significant.</p>	<p>No Project Alternative, School Site Alternative.</p>
<p>AQ 2 Operational emissions are projected to be less than the applicable thresholds for all pollutants except ROG after construction of Phase 2 and total buildout. Emissions of ROG are due to mobile sources, the use of fireplaces, and the use of consumer products associated with the project. Impacts would be potentially significant.</p>	<p>Potentially significant direct impact without mitigation incorporated.</p>	<p>AQ 2.1 Standard Site Design Measures.</p> <p>AQ 2.2 Require all fireplaces to be natural gas.</p>	<p>Less than significant.</p>	<p>No Project Alternative.</p>
Biological Resources				
<p>BIO 1 The project would disturb land that contains active burrowing owl burrows.</p>	<p>Potentially significant direct impact without mitigation incorporated.</p>	<p>BIO 1.1 Pre-construction surveys will be required at least 14 days prior to ground disturbance to detect the presence of burrowing owls and inform avoidance actions. These surveys will include all areas where suitable habitat is present within the survey area.</p> <p>BIO 1.2 The burrow exclusion and closure technique will apply to culverts being used as burrows along the southern boundary of the southern parcel.</p>	<p>Less than Significant.</p>	<p>No Project Alternative.</p>

Environmental Effect	Level of Significance	Proposed Mitigation	Level of Significance after Mitigation	Alternatives That May Reduce Impacts
		BIO 1.3 Formal consultation with CDFW will be required to develop the appropriate mitigation plans which could include actions such as translocation of burrowing owls, artificial burrow construction, and/or habitat preservation.		
Geology and Soils				
GEO 1 Soil underlying the site may be subject to seismically induced liquefaction, which could present hazardous conditions.	Potentially significant direct impacts without mitigation incorporated.	GEO 1 A site-specific geotechnical investigation shall be prepared to locate and evaluate on-site soils with the potential for liquefaction. Such investigation would detail the design requirements to account for any potential liquefaction conditions.	Less than Significant.	No Project Alternative.
GEO 2 Soil underlying the site may be subject to seismically induced subsidence, which could present hazardous conditions.	Potentially significant direct impacts without mitigation incorporated.	GEO 2 A site-specific geotechnical investigation shall be prepared to locate and evaluate on-site soils with the potential for subsidence. Such investigation would detail the design requirements to account for any potential subsidence conditions.	Less than Significant.	No Project Alternative.
GEO 3 Soil underlying the site may possess expansive qualities, which could present hazardous conditions on the site.	Potentially significant direct impacts without mitigation incorporated.	GEO 3 A site-specific geotechnical investigation shall be prepared to locate and evaluate on-site expansive soils. Such investigation would detail the design requirements to account for any potential expansive conditions.	Less than Significant.	No Project Alternative.
Greenhouse Gas Emissions				
GHG 1 The Greenhouse Gas Technical Analysis concluded the project would generate greenhouse gas emissions at levels that would not have a significant impact on the environment.	Less than significant.	No mitigation required.	Less than significant.	No Project Alternative, School Site Alternative

Environmental Effect	Level of Significance	Proposed Mitigation	Level of Significance after Mitigation	Alternatives That May Reduce Impacts
Hydrology/Water Quality				
HYD 1 Impacts to Surface Water Quality and Groundwater Quality Due to Construction Related Earth Disturbing Activities and Construction-Related Hazardous Substances.	Potentially significant direct impacts without mitigation incorporated.	HYD 1.1 Comply with NPDES General Construction Permit and City's Stormwater Program. HYD 1.2 Implement a Spill Prevention and Control Program HYD 1.3 Implement Measures to maintain groundwater and surface water quality.	Less than significant.	No Project Alternative
HYD 2 Water quality impacts from construction below the water table.	Potentially significant direct impacts without mitigation incorporated.	HYD 2.1 Comply with NPDES General Construction Permit and City's Stormwater Program. HYD 2.2 Implement a Spill Prevention and Control Program HYD 2.3 Implement Measures to Maintain Groundwater or Surface Water Quality HYD 2.4 Provisions for Dewatering	Less than significant.	No Project Alternative.
HYD 3 Increased amount of surface runoff and associated impacts to drainage facilities.	Potentially significant direct impacts without mitigation incorporated.	HYD 3.1 Implement Best Management Practices to Maximize Storm Water Quality. <u>Comply with City of El Centro storm water ordinance and MS4 requirements as specified by state law.</u>	Less than significant.	No Project Alternative.
Noise				
N 1 Temporary, localized noise would be received by on-site residences in excess of the acceptable 75-dBA CNEL threshold when project construction occurs within 150 feet of occupied project structures.	Potentially significant direct impacts without mitigation incorporated.	N 1.1 Construction contracts shall specify that all construction equipment shall be equipped with mufflers and other suitable noise attenuation devices. N 1.2 All existing residential units located within 200 feet of the construction site shall be sent a notice regarding the	Less than significant.	No Project Alternative.

Environmental Effect	Level of Significance	Proposed Mitigation	Level of Significance after Mitigation	Alternatives That May Reduce Impacts
		<p>construction schedule of the proposed project. Signs, legible at a distance of 50 feet shall also be posted at the construction site. All notices and signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.</p>		
<p>N 2 Traffic noise levels at the first row of homes nearest to Interstate-8 would be 78 dBA CNEL, which exceeds the City's "Clearly Unacceptable" threshold of 75 dBA CNEL.</p>	<p>Potentially significant direct impacts without mitigation incorporated.</p>	<p>N 2 Prior to completion of the homes nearest to Interstate-8, the developer shall construct a permanent noise barrier to shield the homes and park from freeway noise. The noise wall should be designed to provide at least 8 dBA of noise reduction at the first row of homes. That noise barrier would reduce freeway noise levels at the homes nearest Interstate-8 to the "Conditionally Acceptable" noise compatibility category. The Citywide requirement to meet the Title 24 construction standards for indoor noise would then be adequate to provide a suitable noise environment inside the homes. Further analysis to determine the final height of the wall will be conducted.</p>	<p>Less than significant.</p>	<p>No Project Alternative</p>

Environmental Effect	Level of Significance	Proposed Mitigation	Level of Significance after Mitigation	Alternatives That May Reduce Impacts
<p>N 3 Traffic noise levels at the first row of homes facing La Brucherie Avenue would be 65 dBA CNEL approximately 50 feet from the centerline, which is within the limits of the City's "Conditionally Acceptable" threshold of 70 dBA CNEL.</p>	<p>Potentially significant direct impacts without mitigation incorporated.</p>	<p>N 3 The applicant shall be required to install a noise wall to reduce acoustical impacts to outdoor uses on residences along La Brucherie Avenue. The noise barrier shall be designed to reduce the noise impacts to an acceptable level (60 CNEL) in accordance with the City of El Centro Noise Element of the General Plan.</p>	<p>Less than significant.</p>	<p>No Project Alternative</p>
<p>Public Services</p>				
<p>PS 1 <u>The project's 609 new residences would result in significant public services impacts due to the lack of existing water infrastructure.</u></p> <p>PS 2 <u>The project's 609 new residences would result in significant public services impacts on the City's Sewer service since no existing sewer infrastructure currently exists on site.</u></p> <p>PS 3.1 The project's 609 new residences would result in significant public service impacts due to the increased demand on ECFD services.</p> <p>PS 4.2 The project's 609 new</p>	<p>Potentially significant direct impacts without mitigation incorporated.</p>	<p>PS 1 <u>In order to offset the costs and impacts to water service, including maintenance of infrastructure, the developer will be required to pay development impact fees.</u></p> <p>PS 2 <u>In order to offset the costs and impacts to sewer service, including maintenance of infrastructure, the developer will be required to pay development impact fees.</u></p> <p>PS 3.1 In order to offset the costs and impacts to fire protection services, the developer will be required to pay development impact fees.</p> <p>PS 4.2 In order to offset the costs and impacts to law enforcement services, the</p>	<p>Less than significant.</p>	<p>No Project Alternative.</p>

Environmental Effect	Level of Significance	Proposed Mitigation	Level of Significance after Mitigation	Alternatives That May Reduce Impacts
<p>residences would result in a significant public service impacts due to the increased demand on ECPD services.</p> <p>PS 5.3 The project would result in significant public services impacts associated with the predicted increase in enrollment at the McCabe Union School District and the Central Union High School District.</p> <p><u>PS 6 The project would result in significant public services impacts to park space due to the addition of approximately 1,993 residents and the additional demand of an additional 10 acres of park space.</u></p>		<p>developer will be required to pay development impact fees.</p> <p>PS 5.4 In order to offset the educational costs associated with increased enrollment in the McCabe Union School District and the Central Union High School District, the project applicant is required to pay State-mandated school impact fees.</p> <p><u>PS 6 In order to offset the impacts to the availability of park space and maintenance of parks, the developer will construct a 10.8-acre park and will be required to pay development impact fees.</u></p>		
Transportation and Traffic				
<p>T 1 The project traffic would cause a significant increase in delay at the La Brucherie Avenue / Wake Avenue intersection.</p>	<p>Potentially significant direct impacts without mitigation incorporated.</p>	<p>T 1 The project applicant shall signalize the intersection and provide the lane configurations specified in the Traffic Analysis.</p>	<p>Less than significant.</p>	<p>No Project Alternative, School Site Alternative.</p>
<p><u>T2 The project would cause a significant increase the need for public transit services.</u></p>	<p><u>Potentially significant direct impacts without mitigation incorporated.</u></p>	<p><u>T2 The project applicant shall coordinate with the ICTC to establish a bus stop curb pullout and location within and/or surrounding the site.</u></p>	<p><u>Less than significant</u></p>	<p><u>No Project Alternative</u></p>

CUMULATIVE IMPACTS				
Agricultural Resources				
<p>C-AG 1 There are significant indirect cumulative impacts to adjacent agricultural land surrounding the project site. The development of the proposed Lotus Ranch project in combination with the other cumulative projects may create additional pressure to remove agricultural land from production.</p>	<p>Potentially significant cumulative impacts without mitigation incorporated.</p>	<p>C-AG 1.1 Minimize indirect impacts on adjacent agricultural lands by creating and maintaining on-site buffer zones in the form of agricultural land, greenbelts, detention basins, recreational or vacant land that protect adjacent agricultural properties from new commercial and non-agricultural uses.</p> <p>C-AG 1.2 For the conversion of agricultural land to urban uses within Urban Areas, require that at least one entire property line of the new uses adjoin an area of existing urban uses.</p> <p>C-AG 1.3 Design implementing projects to increase transportation benefits for the agricultural sector to maximize the efficient transport of products and machinery.</p> <p>C-AG 1.4 Provide adequate buffers in all future development projects in accordance with City of El Centro Zoning Ordinance setback requirements between existing farm operations and property owners.</p>	<p>Less than significant.</p>	<p>No Project Alternative and School Site Alternative.</p>

Air Quality				
<p>C-AQ 1 <u>Emissions of ROG are due to mobile sources, the use of fireplaces, and the use of consumer products associated with the project. Based on the estimates of the emissions associated with cumulative projects, forecast emissions are expected to contribute to regional air quality background.</u></p>	<p>Potentially significant cumulative impacts without mitigation incorporated.</p>	<p>C-AQ 1 <u>The project would be required to implement all standard mitigation measures as well as discretionary mitigation measures. The discretionary mitigation measure would require that all fireplaces be natural gas as opposed to wood-burning.</u></p>	<p>Less than significant.</p>	<p>No Project Alternative.</p>
Biological Resources				
<p>C-BIO 1 The project would have a substantial adverse effect through habitat modifications on the burrowing owl.</p>	<p>Potentially significant cumulative impacts without mitigation incorporated.</p>	<p>C-BIO 1.1 Take-Avoidance (Pre-Construction) Surveys. Pre-construction surveys will be required at least 14 days prior to ground disturbance to detect the presence of burrowing owls and inform necessary take avoidance actions. These surveys will include all areas where suitable habitat is present within the survey area (CDFW 2012).</p> <p>C-BIO 1.2 Burrow Exclusion and Closure. The CDFW 2012 guidelines state "Burrow exclusion is a technique of</p>	<p>Less Than Significant.</p>	<p>No Project Alternative.</p>

		<p>installing one-way doors in burrowing openings during the non-breeding season to temporarily exclude burrowing owls, or permanently exclude burrowing owls and close burrows after verifying burrows are empty by site monitoring and scoping.” Although there were no formal burrows being used by the burrowing owls detected on-site, the culverts are being used as burrows. The burrow exclusion and closure technique will apply to these culverts along the southern boundary of the southern parcel.</p> <p>C-BIO 1.3 Formal consultation with CDFW will be required in order to develop the appropriate mitigation plans for the Lotus Ranch project. Other mitigation measures such as translocation of burrowing owls, artificial burrow construction, and/or habitat preservation may be required.</p>		
Traffic/Intersections/Driveways				
<i>Intersections / Project Driveways</i>		<i>Intersections / Project Driveways</i>		
<u>C-T 1 Project traffic would cause a significant increase in delay at the Imperial Avenue / Ocotillo Drive intersection.</u>	Potentially significant cumulative impacts without mitigation incorporated.	<u>C-T 1 The project applicant shall contribute a fair share (2.5%) towards the provision of an eastbound right-turn overlap phase (RTOL) at the intersection of Imperial Avenue / Ocotillo Drive.</u>	Less than significant.	No Project Alternative.
<u>C-T 2 Project traffic would cause a significant increase in delay at the La Brucherie Avenue / McCabe Road intersection.</u>		<u>C-T 2 The project applicant shall contribute a fair share (4.8%) towards signalizing the intersection of La Brucherie Avenue / McCabe Road and providing a dedicated left-turn lane at each approach.</u>		
<i>Street Segments</i>		<i>Street Segments</i>		

<u>C-T 3</u> Project traffic would cause a significant increase in volume/capacity ratio at the segment of Wake Avenue from La Brucherie Avenue to 8th Street.		<u>C-T 3</u> The applicant shall contribute a fair share (57.5%) towards improving the currently constructed portion of Wake Avenue between La Brucherie Avenue and the future extension of Imperial Avenue to City two-lane collector standards and towards the eastbound extension of Wake Avenue and the construction of Imperial Avenue between I-8 and Wake Avenue.	Less than significant.	No Project Alternative, School Site Alternative.
<u>Access-Related Impacts</u>		<u>Access-Related Impacts</u>		
<u>C-T 4</u> The project could result in significant operational impacts if proper site access is not provided.		<u>C-T 4</u> The applicant shall provide dedicated northbound left-turn lanes and dedicated southbound right-turn lanes at the three proposed access points along La Brucherie Avenue and a dedicated eastbound left-turn lane and a dedicated eastbound right-turn lane on Danenburg Drive at La Brucherie Avenue.	Less than significant. Less than significant.	No Project Alternative.
Noise				
<u>C-N 1</u> Cumulative traffic noise levels at the first row of homes facing I-8 would exceed the City's "Clearly Unacceptable" threshold of 75 dBA CNEL.	Potentially significant cumulative impacts without mitigation incorporated.	<u>C-N 1</u> Mitigation measure N2, which addresses the direct noise impacts assessed for the project, would adequately reduce cumulative traffic noise impact C-N 1. No additional mitigation is required.	Less than significant	No Project Alternative
<u>C-N 2</u> Cumulative traffic noise levels at the first row of homes facing La Brucherie Avenue would exceed the City's "Conditionally Acceptable" threshold of 60 dBA CNEL.		<u>C-N 2</u> Mitigation measure N3, which addresses the direct noise impacts assessed for the project, would adequately reduce cumulative traffic noise impact C-N 2. No additional mitigation is required.	Less than significant	No Project Alternative
Public Services				

<p>C-PS 1 The City's Fire Department has insufficient resources to adequately service the combined demands of the proposed project and cumulative projects.</p>	<p>Potentially significant cumulative impacts without mitigation incorporated.</p>	<p>C-PS 1 In addition to the payment of development impact fees, developers of new projects south of I-8 shall be required to pay a fair share contribution towards the construction of fire facilities and services south of I-8.</p>	<p>Less than significant.</p>	<p>No Project Alternative.</p>
<p>C-PS 2 The project would result in significant public services impacts associated with the predicted increase in enrollment at the McCabe Union School District and the Central Union High School District.</p>		<p>C-PS 2 Mitigation measure C-PS 1, which addresses the direct public service impacts assessed for the project, would adequately reduce cumulative traffic noise impact C-PS 1. No additional mitigation is required.</p>	<p>Less than significant.</p>	<p>No Project Alternative.</p>

SECTION 1 INTRODUCTION

An Environmental Impact Report (EIR) is an informational document prepared pursuant to the California Environmental Quality Act (CEQA) to inform decision-makers, responsible or interested agencies, and the general public of the environmental effects of a proposed project. This EIR presents environmental analysis conducted to determine the effects of the Lotus Ranch subdivision (referred to throughout this DEIR as “the project” or “the proposed project”), which would develop single-family residences and one public park on a 213-acre site adjacent to the incorporated boundaries of the City of El Centro (City). The project entails annexation of the land to the City from the County of Imperial (County); pre-zone designation in accordance with the City of El Centro Zoning Ordinance (City Zoning Ordinance); subdivision of two existing legal parcels into 609 residential lots, one lot for the park, three detention basins located along the northern and western perimeter; and construction and operation of associated infrastructure.

The City will serve as lead agency pursuant to Section 15051 of the State CEQA Guidelines to maximize the efficiency of a single document for the various actions necessary to approve the project. In accordance with CEQA requirements, the City’s Community Development Department has circulated a Notice of Preparation (NOP) to interested agencies, organizations, and individuals and solicited comments regarding the scope of environmental review for the project. All comments received were considered during EIR preparation. The NOP and comments have been included as Appendix I of the Draft EIR. In accordance with CEQA guidelines, a public scoping meeting was held on January 21, 2015 at El Centro City Hall. A list of attendees and summary of public comments is also included in Appendix I.

This EIR has been prepared in conformance with the requirements 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 adopted by the CEQA. The City’s Community Development Department will review and consider all comments to the Draft EIR prior to the completion of the Final EIR. The Draft EIR is made available for review by individuals, public, and private agencies for 45 days. Written comments are due to the Community Development Department within the 45-day review period. Responses to comments will be prepared and included as a part of the Final EIR, which the El Centro City Council will review and consider prior to making a decision to approve, revise, or deny the proposed project.

This EIR is further intended to serve as the primary environmental document for all future entitlements associated with the proposed project, including all discretionary approvals requested or required to implement the project. In addition, this DEIR is the primary reference document in the assessment and implementation of mitigation measures and the Mitigation Monitoring and Reporting Program (MMRP) for the proposed project.

1.1 REGULATORY DOCUMENTS

In addition to State guidelines, ~~four~~ five regulatory land use plans are referenced in this report and are relevant to the future development of the proposed project. These include:

- County of Imperial General Plan (2004);
- County of Imperial Land Use Ordinance (1998);
- City of El Centro General Plan (2004);
- City of El Centro General Plan EIR (2003); and
- City of El Centro Zoning Ordinance (2015).

Reference is also made to the Policies, Standards, and Procedures Manual for the Imperial County LAFCO (1993) with regard to the proposed annexation.

1.2 REQUESTED ACTIONS

Annexation from the County to the City, pre-zone under the City Zoning Ordinance, and approval of a ~~Vesting~~ Tentative Subdivision Map are requested for the proposed project. This EIR provides a project-level analysis of the environmental impacts associated with:

- Annexation from County of Imperial to City of El Centro, subject to LAFCO approval;
- Pre-zone of R1, Single-Family Residential pursuant to the City of El Centro Zoning Ordinance;
- ~~Vesting~~ Tentative Subdivision Map approval;
- Site Plan Review; and
- Construction of residences and one public park on the site, as well as the requisite infrastructure improvements.

1.3 ENVIRONMENTAL IMPACT REPORT ORGANIZATION

This EIR is organized into sections presenting information required by CEQA. In addition to this Introduction section, the following sections are provided:

- Section 2, Project Description, contains a description of the project, which entails a pre-zone under the City Zoning Ordinance, annexation to the City, and approval of a ~~Vesting~~ Tentative Subdivision Map. The project description includes the project location,

objectives, characteristics, and discretionary actions/required approvals to implement the project.

- Section 3, Environmental Setting, describes the existing environmental setting of the project site and surrounding area.
- Section 4, Environmental Analysis, addresses in detail each of the issues identified during the project's NOP scoping process. This section discusses the existing conditions at the project site as they relate to each issue and discusses the various direct, indirect, short-term, long-term, and any unavoidable consequences of the action that would occur with development. The issues addressed include agricultural resources, air quality, biological resources, geology/soils, greenhouse gas emissions, hydrology/water quality, transportation/traffic, noise, and public services. Mitigation measures are also identified to reduce or avoid significant impacts where required and if feasible.
- Section 5, Alternatives to the Proposed Project, describes the two alternatives to the Proposed Project considered, including the School Site Alternative, and No Project Alternative. Additionally, the environmentally superior alternative is identified in this section.
- Section 6, Growth Inducement, addresses the potential for the project to spur additional growth in the City or the region.
- Section 7, Cumulative Impacts, provides an overview of other development projects in the vicinity of the proposed project, considers their cumulative impact on the environment, and analyzes whether the project would contribute to any such impacts.
- Section 8, Significant Irreversible Environmental Changes, addresses any significant environmental effects which cannot be avoided, and any irreversible changes to the environment that may result from implementation of the proposed project.
- Section 9, Effects Found Not to Be Significant, presents a brief discussion of the environmental impact categories that were found to not be significant as a result of the NOP scoping process or during the preparation of the DEIR.
- Section 10, References, Persons, and Agencies Consulted, contains the sources and references used in preparation of this document.
- Section 11, Certification, provides certification of the document's independent analysis and a list of the contributing preparers.

A list of acronyms and abbreviations is provided for the reader's reference immediately following the list of tables in the Table of Contents.

The preceding Summary section is a requirement of the State Guidelines to provide a synopsis of the information and conclusions presented in this document. It includes a matrix of project impacts and mitigation for easy reference.

This document conforms to the requirements of CEQA (Public Resources Code § 21000 *et seq.*) and the State CEQA Guidelines (Title 14 § 15000 *et seq.*) for the implementation of CEQA.

SECTION 2 PROJECT DESCRIPTION

2.1 LOCATION

The site of the proposed project is located in the southeastern portion of the State of California approximately 13 miles from the United States/Mexico international border. The site is currently within unincorporated land in the south-central portion of the County of Imperial. The site abuts the southern incorporated boundary of the City and is within the City's adopted Sphere of Influence boundaries.

The project site is bounded by Interstate 8 (I-8) in the north, the Lotus Canal and Drain to the west, La Brucherie Avenue and the Dahlia Canal to the east, and active hay storage yard/cattle feed yard in the south. La Brucherie Avenue and Wake Avenue provide access to the site. The site comprises of two existing legal lots: County Assessor Parcel Numbers 052-280-012 and 052-380-030. These lots make up a portion of tracts 58 and 61, Township 16 South, Range 13 East, San Bernardino Base and Meridian.

2.2 PROJECT PURPOSE AND OBJECTIVES

The project provides single-family housing and public parkland for the increasing population of the City. The site is currently fallowed agriculture land. The surrounding properties consist of I-8, Southwest High School, and rural residences to the north; agricultural land, specifically the El Toro Export hay storage yard/cattle feed yard to the south; the Farmer Estates Subdivision, which includes single-family homes to the east; and agricultural land to the west.

The project objectives include: 1) providing a range of housing that allows residents to live in close proximity to employment opportunities in the City; 2) providing increased recreational opportunities for local residents; and 3) allowing capitalization on economic growth opportunities and providing an expanded tax base for the City.

2.3 PROJECT DESCRIPTION

The project proposes annexation of an approximately 213-acre area from the County to the City, subdivision of the existing lots, and construction and occupation on those lots of a 609-unit single-family residential development and one park consisting of ±10.8 acres. G-MAC Development has prepared a ~~vesting~~-tentative subdivision map. Detailed descriptions of these aspects of the project are provided below.

Project implementation requires the following agency approvals: 1) approval by LAFCO for annexation of the site from the County of Imperial to the City; 2) establishment of a pre-zone of R1 Residential under the City Zoning Ordinance; and 3) City approval of a ~~vesting~~-tentative subdivision map to allow the construction of 609 single-family residential lots and public park on

the approximately 213-acre site. Annexation and pre-zone to R1 residential of the two “out parcels” adjacent to La Brucherie Avenue is included as part of the project.

To prepare the site for development, all structures existent within the site’s boundaries would be demolished. Structures to be demolished include a single-family residence and several accessory buildings located along the site’s eastern boundary and north of an existing east-west dirt road (future alignment of Wake Avenue). There are two additional single-family residences and accessory structures located along the site’s eastern boundary and south of an existing east-west dirt road (future alignment of Danenberg Drive). The residences are not within the project boundaries and would not be demolished as part of the project; however, two structures accessory to the northern of these two residences are within the project boundaries and would be demolished. Grading would be conducted to create building pads for the residential lots and the park; however, grading is anticipated to be minimal due to the site’s flat topography.

2.3.1 Residential

The residential component of the proposed project would entail construction and occupation of 609 single-family detached residential units on approximately 174 acres of the 213-acre site. Lot sizes would range from approximately 7,200 square feet (sf) to approximately 19,411 sf, with an average lot size of 8,494 sf. Residences would vary between one and two levels and would be consistent in size and appearance with existing and planned residences in the vicinity of the site. Each lot would feature a garage and landscaped yards. According to the phasing map, the proposed residences would be constructed in three (3) phases.

2.3.2 Public Parks

One park consisting of ±10.8 acres would be constructed on the site. The park would consist of public-use facilities consisting of grass play areas and play equipment for children, with restrooms, drinking fountains, and security lighting provided. The project applicant will construct the park, but be owned, operated, and maintained by the City of El Centro.

2.3.3 Infrastructure

Infrastructure improvements, including roadways, sewer and water lines, and gas/electric connections, will be installed as part of the project. A grid of roads and cul de sacs to be constructed as part of the project and maintained by the City would serve the project. The street system would be connected to the existing and planned City street system. Access will be provided by the north/south route of La Brucherie Avenue and the east/west routes of Wake Avenue, Danenberg Drive, and Manuel Ortiz Avenue.

The project entails widening a segment of La Brucherie Avenue, which is currently paved within the project area. The existing pavement between I-8 and Wake Avenue would be ~~retained in its existing width~~ widened to align with the proposed expanded intersection at Wake Avenue and La Brucherie Avenue. The existing pavement between Wake Avenue and the future alignment of Manuel Ortiz Avenue (the project’s southern boundary) would be replaced to a width of approximately 60 feet. Concrete sidewalks and storm water gutters would be constructed along

the western side of the roadway, and streetlights installed at regular intervals. Wake Avenue, Danenberg Drive, and Manuel Ortiz Avenue would be paved throughout the project limits and connected with existing and planned alignments extending to adjacent parcels, with sidewalk and utility improvements incorporated. Eighteen additional roads would be constructed with cul de sac terminations and would only serve the project residences.

Sewer, water, and storm drain pipes would be installed beneath the project roadways for service of the project residences. Infrastructure will include a sewage lift station in the northeast portion of the site and stormwater pump stations in the north-central and northeastern portions of the site.

The Lotus Canal and Drain, facilities of the Imperial Irrigation District (IID), run parallel to each other on the western boundary of the project site. These features are part of the large-scale agricultural irrigation and drainage system serving the region. The project will entail undergrounding of the Lotus Drain and the installation of a series of storm drains and stormwater treatment systems to manage stormwater flow from the project site and integrate the project with the larger IID drainage system. Undergrounding of the Lotus Drain would require grading work in this portion of the site.

2.3.4 Storm Water Detention Basins

The proposed subdivision would create three detention basins along the site's western and northern boundary. These lots would encompass 16.5 total acres. Drainage flow from the site would be directed toward these lots, which would slow storm flows during heavy rain events. The lots would also be available to the public for recreational use, and would be operated or maintained by the City Parks and Recreation Department. The basins would also buffer the project's residential uses from the Lotus Canal to the west and I-8 to the north. These storm water treatment systems may be used to comply with the City's Storm Water Ordinance and MS4 requirements.

2.4 LAND USES

The project is proposed on currently inactive agricultural land that has been ~~followed~~ followed for a year. The site is within unincorporated land of the County and designated Urban Area in the County General Plan. The project site is currently assigned Low Density Residential by the El Centro General Plan.

2.4.1 Low Density Residential

The Low Density Residential land use designation would allow the single-family residential development proposed for the majority of the site. According to the Land Use Element of the El Centro General Plan, the Low Density Residential designation allows for single-family detached units, modular homes, accessory dwelling units, mobile home parks, and other compatible uses to serve the needs of single-family residential neighborhoods. The minimum lot size under this designation is 7,200 square feet. The project proposes 609 single-family dwelling units with lots sizes ranging from 7,200 square feet to 19,411 square feet are proposed. The overall average lot size proposed is approximately 8,494 square feet.

2.5 ZONING

The project site is currently designated A2U (General Agriculture – Urban) by the County Zoning Ordinance, which would be negated by the proposed annexation from the County to the City. The project proposes a City pre-zone designation of R1 Residential (Single-Family Residential), in accordance with the City’s Zoning Ordinance.

2.6 REQUIRED APPROVALS

The following actions are required by LAFCO and the El Centro City Council:

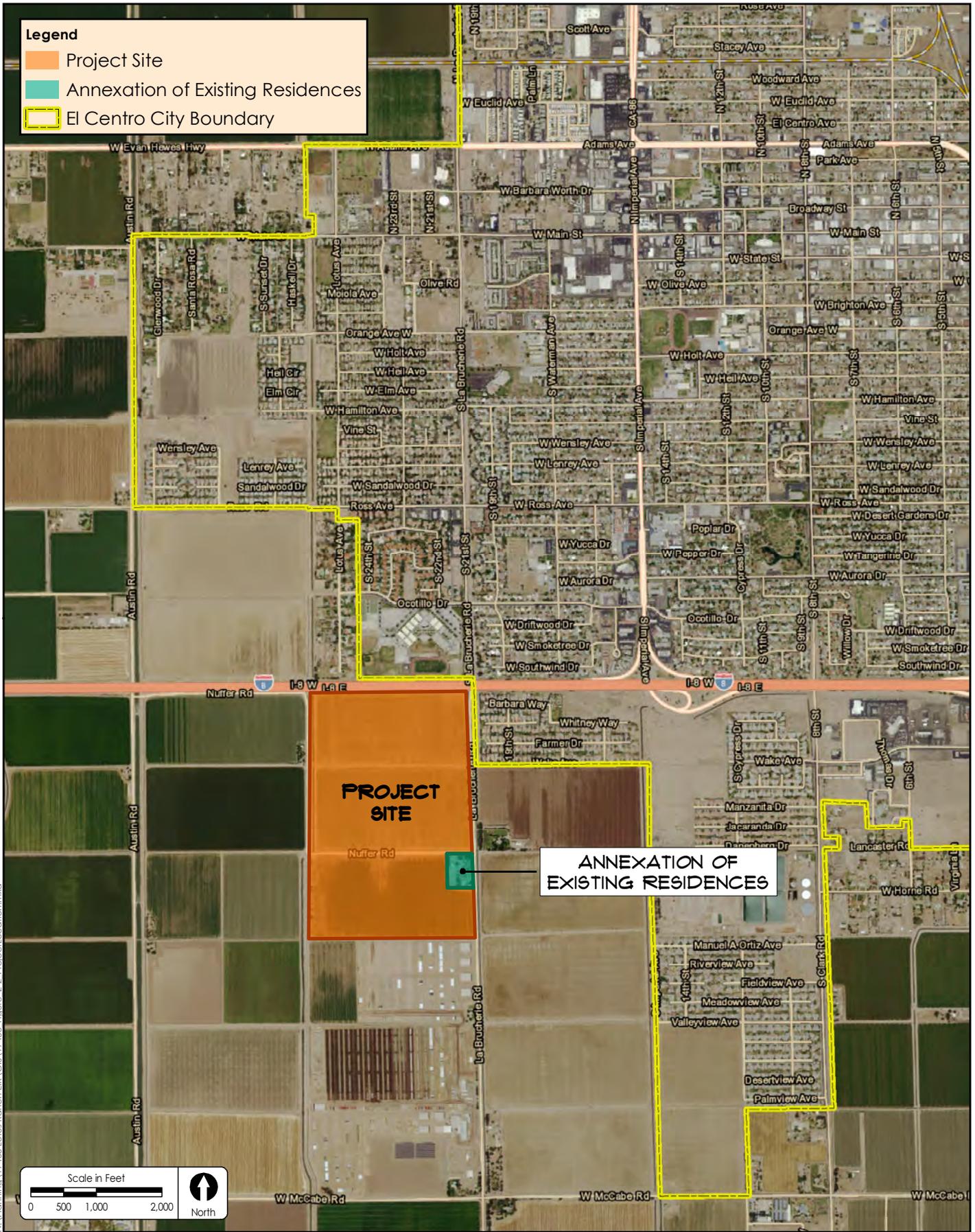
- Approval by LAFCO of the Annexation of the project site and adjacent two “out parcels” to the City;
- Approval by the City of El Centro for pre-zone classification;
- Approval by the City of El Centro of the ~~Vesting~~ Tentative Subdivision Map;
- Approval by the County of El Centro of the Development Agreement;
- Review of flood control and holding basin by the IID and the City of El Centro Department of Public Works; and
- Review of storm water quality components by City of El Centro Department of Public Works
- Review of water, sewer, and storm facilities for compliance with City Master Plans by the City of El Centro Department of Public Works
- National Pollution Discharge Elimination System (NPDES) permit from the Regional Water Quality Control Board (RWQCB).



Date of Exhibit: 4/16/2015
 Source: ESRI Aerial Basemap (Microsoft 5/29/2011)

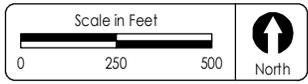
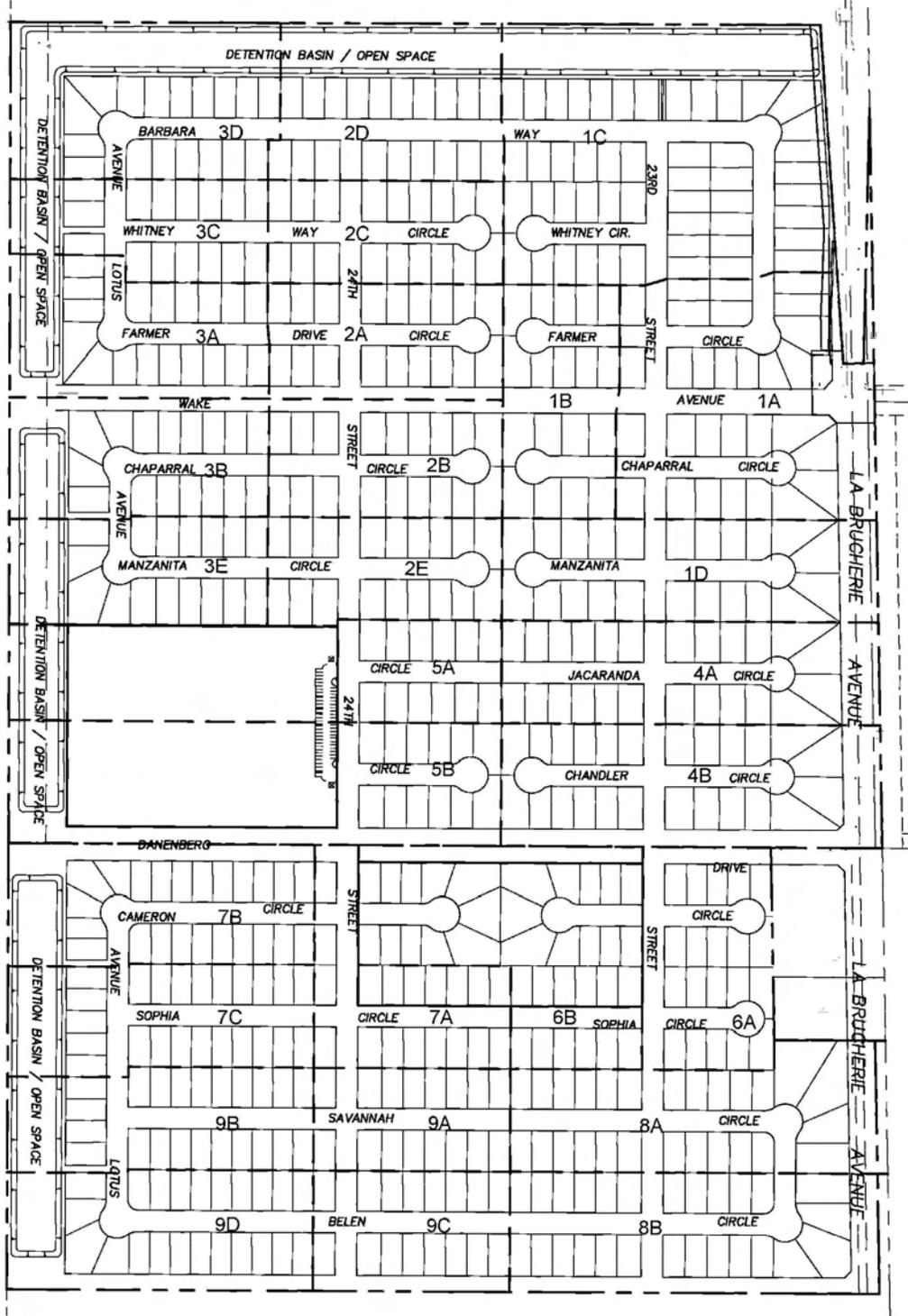


Regional Location Map
 Figure 2-1



Date of Exhibit: 10/8/2015
Source: ESRI Aerial Basemap (Microsoft 5/29/2011)

INTERSTATE 8 FREEWAY



N:\Planning\17463 Lotus Ranch EIR\GIS\17463_Figure_2-3_SitePlan.mxd

Source: G-MAC Development



Site Plan
Figure 2-3