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- Be served by a landfill with insufficient permitted capacity;
 - Result in substantial adverse physical impacts associated with the provision or need for new or physically altered law enforcement facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios;
 - Result in substantial adverse physical impacts associated with the provision or need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable response;
 - Result in substantial adverse physical impacts associated with the provision or need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios; or
 - Result in substantial adverse physical impacts associated with the provision or need for new or physically altered parks facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios.

4.9.3 Impact Analysis

The following analysis is based on documentation and personal communication with public agencies providing services to the City, including: the Community Development Department, Engineering Division of Public Works, ECFD, ECPD, the IID, MUESD, CUHSD, and the City Department of Parks and Recreation. The individuals contacted are listed in the References section of this report.

Water Service

The project would replace agricultural operations existing on the site with 609 residences, one public park, and three storm water detention basins. This would permanently remove the on-site use of agricultural irrigation and increase demand for City water services. The project would connect to the existing City water main line located along Wake Avenue. Drought regulations require water consumption to be reduced by 25 percent statewide. To achieve this, the City has imposed temporary emergency measures, including a water budget of 9 units per residence. One unit is 1,000 gallons/month.

The water treatment plant's existing capacity is 21.0 mgd and was completed in 2010. The average daily demand is 8.6 mgd. On peak days (summer months) demand is approximately 12.5 mgd. Average single-family water consumption is approximately 721.3 gpd. The project proposes the development of approximately 609 single-family units, which amounts to an average demand of 445,042 gpd. Peak demand is approximately 1.5 times average demand, and thus the approximate peak demand from the proposed project is 667,563 gpd.

The completed filter upgrades and expansion of the City's water treatment plant increased capacity to handle future demand, including that presented by the project.

Water Supply

The Imperial Irrigation District provides wholesale water service. Demand for water in the Imperial Unit service area is divided into three basic categories: agricultural, municipal, and industrial. According to the 2010 Urban Water Management Plan (UWMP), the Imperial Irrigation District delivers approximately 97% of its annual flows to agricultural water users, 2% to municipalities, and 1% percent for industrial purposes. The UWMP states that projected water supplies exceed projected demand for municipal use for the next 25 years. The City of El Centro anticipates that increased water demand will be offset with increased water conservation measures and that it is unlikely that the urban water supply would ever be affected, even under shortage or drought conditions on the Colorado River. Future development within the IID water supply service area, including within the City and as represented by the project, will occur on land currently used for agriculture. Agricultural water demand ranges from 2,700 to 5,400 gallons per day (gpd)/acre. Residential and commercial land uses such as is planned for future development in the area use water at rates ranging from 100 to 2,500 gpd/acre. This will result in a net reduction in the raw water supply required for the area.

The City of El Centro has been supplying potable drinking water since the early years of the 1900's when water became available from the Colorado River. El Centro receives its drinking water from the Colorado River via the Imperial Irrigation District's (IID) All-American Canal and the Central Main Canal that run south of the city limits. The South Date Canal and the Dahlia Lateral Number 1 run north from the Central Main Canal and supply the El Centro water treatment facility. The raw water is stored in reservoirs until undergoing treatment.

The City of El Centro depends solely on the Colorado River for surface water inflows, supplied by the IID. The IID imports the raw Colorado River water and distributes it to the City and for agricultural purposes. Water from agricultural drains, the New and Alamo Rivers are high in total dissolved solids and other contaminants and are unsuitable for potable water use. The City treats the raw surface water to meet state and federal drinking water standards before distribution.

IID has a longstanding right to import Colorado River water, and holds legal title to all its water and water rights in trust for landowners and water users within the District (California Water Code §§20529 and 22437; *Bryant v. Yellen*, 447 U.S. 352, 371 (1980), fn.23). These date from as early as 1885, when a number of individuals, as well as the California Development Company, made a series of appropriations of Colorado River water, pursuant to stipulations of California law, for use in the Imperial Valley.

The right to water from the Colorado River is governed by numerous compacts, state and federal laws, court decisions and decrees, contracts, and regulatory guidelines collectively known as the "Law of the River". These documents apportion the water and regulate the use and management of the Colorado River among the seven basin states (Colorado, New Mexico, Utah, Wyoming, Arizona, California and Nevada) and Mexico.

It is unlikely that the urban water supply of Imperial Irrigation District would ever be affected, even under shortage or drought conditions on the Colorado River. Urban water use in the Imperial Unit makes up less than three percent of the total water delivered by the Imperial Irrigation District. Under a worst case water supply scenario, the Imperial Irrigation District could meet the demands of urban water users. Due to the high priority of the Imperial Irrigation District's water rights, Colorado River flows, and the storage facilities on the Colorado River it is highly unlikely that Imperial Irrigation District's water supply will be affected, even in dry years.

According to the 2010 census, there are 3.23 persons per household in the City of El Centro. With 609 units, this represents 1,993 persons. The City of El Centro water use goal per the 2010 UWMP for the year 2020 is 190 gallons per day per person, which represents the estimated per capita water use per person. The proposed project would total an additional 378,480 gallons per day, at 138 million gallons per year demand (424 acre feet per year). This represents 5.3% of the total current flows from the water treatment plant. The actual water demand required by the project may be lower due to the current drought conditions and low-flow plumbing fixtures, reduced landscaping and other demand management measures as required and implemented by the City.

The city is capable of treating and distributing 35,755 acre feet of water per year. Current demand is approximately 8,000 acre feet per year. Per the above estimates, the project will require 424 acre feet per year. The total water demand as described in the 2010 UWMP for the City by 2025 when the project is estimated to be fully completed is 13,540 acre feet per year.

The City of El Centro receives water from the Imperial Irrigation District that ultimately receives water from the Colorado River, a very reliable source. The city's raw water is a very small percentage of the total water allocated to the Imperial Irrigation District's allotment. Therefore, the city has the water supply and capability of delivering the total water required by the project, and the project will not have a significant impact on public service for water.

Sewer

The wastewater treatment plant capacity is 8 mgd and the current generation from City wastewater customers averages approximately 3.40 mgd. Trunk sewer mains within the site are required to serve additional development surrounding the proposed site in accordance with the Sewer Master Plan. Although the proposed project would increase demand for wastewater services, it is clear that there is sufficient capacity in the system. The developer would be required to pay standard sewer capacity fees to assure there are no significant impacts. Subsequently, with the payment of mandatory sewer capacity fees, the proposed project would not result in significant impacts to sewer services. Please note, however, that the collection system is the weak link and is nearing capacity.

Solid Waste

Current landfill capacity is sufficient to handle project-related solid waste. Therefore, the project would not result in significant direct impacts to solid waste services. Residents of the proposed

houses would be subject to regular fees as approved by the El Centro City Council in exchange for solid waste services. All single family homes within the City have source-separated carts for waste, recyclables, and green wastes. CR&R will be responsible and obligated to deliver the three waste carts to each house upon occupancy. Additionally, the County's Task Force encourages existing and new developments to participate in recycling programs.

Fire/Emergency

The proposed project would be annexed and incorporated into the City of El Centro and would be serviced by ECFD. On a project level, the proposed project is not anticipated to substantially alter the Fire Department's ability to provide fire protection services to the project site. Fire Station No. 1 is located nearest the site at 775 State Street. No new facilities would need to be constructed to service the proposed project. ECFD is not currently capable of effectively responding to calls from many outlying areas (including the project site) within the times set out in the NFPA standard. Although the proposed project would not substantially alter the Fire Departments' ability to provide fire protection services to the project site, constructing new residences on the site will increase the demand on ECFD services, which are already under strain. Considering the proposed project would increase demand for fire protection services, the developer would be required to pay development impact fees. Development impact fees are mandatory fees collected by the City for all developments and are standard mechanisms for cities to recover increased costs associated with providing services to new developments.

The El Toro Export hay storage operation immediately south of the project could pose fire hazards to future residences. However, since the project would entail construction of a new paved road (Manuel Ortiz Road) that would provide fire and emergency access to the hay storage yard. In addition, a barrier fence or wall south of the residences would reduce the potential for homes igniting from nearby fires.

Therefore, with the payment of mandatory development impact fees, the proposed project would not result in significant direct impacts to fire protection services.

Law Enforcement

The project would present an increase in demand to ECPD personnel and resources due to the increased intensity of use on the site. A greater number of homes and residents in the project area would be a potential source of additional calls for service. Other ECPD concerns related to future development and annexation include increases in traffic and the ability of the existing ECPD radio communication system to operate in outlying areas. The proposed project consists of 609 residential units, which is estimated to house a population of approximately 1,967.

To compensate for an increase in law enforcement service costs resulting from increased demand for resources generated by the proposed project, the developer will be required to pay development impact fees. Development impact fees are mandatory fees collected by the City and are standard mechanisms for cities to recover increased costs associated with service provision for all developments. The increased demand associated with the proposed project is not considered to be substantial. Therefore, with the payment of mandatory development impact

fees, the proposed project would not result in significant direct impacts to law enforcement services. Cumulative impacts are discussed in Section 7 of this EIR.

Schools

School-aged students residing within the homes constructed on the site would enroll in MUESD and CUHSD facilities. For facility planning purposes MUESD and CUHSD have each adopted yield rates for the estimated number of students generated by a residential development. MUESD maintains a yield rate of 0.659 students per dwelling unit and CUHSD maintains a yield rate of 0.211. Application of the districts' rates to the 609 planned project residences would yield approximately 402 MUESD students and 128 CUHSD students.

K through 8th grade students residing within the first phases of the project would immediately be served by McCabe Elementary School, an MUESD facility. The increase in student enrollment generated by the project is a significant public services impact. The project applicant would be required to pay State-mandated developer fees to MUESD to help offset the costs of the additional enrollment generated by the project.

According to the latest data available, the MUESD is at full capacity, with a pupil capacity of 1,270 and enrollment of 1,267 while the CUHSD has a pupil capacity of 2,970 and enrollment of 4,052. The project's increased demand on existing MUESD and CUHSD facilities would lead to overcrowded conditions at existing facilities and present a significant public services impact. The project applicant would be required to pay to MUESD and CUHSD development impact fees mandated by the State. MUESD requested a school site be incorporated into the project and a School Site Alternative has been prepared as part of this DEIR. The project's impact to CUHSD operations is a significant public services impact.

Parks

The project would construct 609 single-family homes whose residents would place demand on existing City park facilities. Design of the park has not yet been completed, but preliminary indications are that the park is to include grass play areas and children's play equipment. Restrooms, benches, and drinking fountains would be provided; lighting would be limited to low-level security lighting.

For planning purposes the City's General Plan maintains a 3.23 resident-per-household ratio. Applying this ratio, the project would yield approximately 1,993 residents. According to the City's parkland standard of five acres per 1,000 residents, the project would add a demand of approximately 10 acres of parkland. The project includes one public park totaling ±10.8 acres, which would exceed the parkland demand of the project's residential portion by 0.8 acres. This excess of acreage would contribute toward reducing the City's existing parkland deficit. The project would result in no adverse impact with respect to public parks service.

The project also proposes three lots (totaling 16.5 acres) surrounding the residential development that would serve chiefly as flood control basins. These lots would serve as open space available for residents' recreational use. These lots would need to be maintained by the City Department

of Parks and Recreation through a Landscape and Maintenance District Agreement (LLMD), for the parks and right of way areas. Such facilities would not necessarily conform to the City's park standards, and are thus not considered park facilities applicable to the City's parkland demand, but they would be beneficial to the recreational needs of the project's residents.

4.9.4 Significant Impacts

Water

PS 1 The project's 609 new residences would result in significant public services impacts on the City's water service since no existing water infrastructure ~~(pipes, etc.)~~ currently exists on site.

Sewer

PS 2 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.

Fire

PS ~~3~~ 4 The project's 609 new residences would result in a significant public services impact due to the increased demand on ECFD services.

Law Enforcement

PS ~~4~~ 2 The project's 609 new residences would result in a significant public services impact due to the increased demand on ECPD services.

Schools

PS ~~5~~ 3 The project would result in significant public services impacts associated with the predicted increase in enrollment at the McCabe Union Elementary School District and the Central Union High School District.

Parks

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.

4.9.5 Mitigation Measures

The following mitigation measures would be required to reduce the project impacts to a level below significance:

Water

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.

Sewer

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.

Fire

PS 3 In order to offset the costs and impacts to fire protection services, the developer will be required to pay development impact fees.

Law Enforcement

PS 4 In order to offset the costs and impacts to law enforcement service, ~~costs resulting from~~ the developer will be required to pay development impact fees.

Schools

PS 5 In order to offset the educational costs associated with increased enrollment in the McCabe Union Elementary School District and the Central Union High School District, the project applicant is required to pay state-mandated school impact fees. In addition, per the MUESD's request, the EIR includes analysis of an alternative project that includes ~~has requested that the project include~~ a school site. ~~alternative plan.~~

Parks

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.

4.9.6 Level of Significance after Mitigation

Implementation of mitigation measures PS 1 to PS 6 will reduce the impacts to fire, law enforcement, and school services to a level below significance.

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SECTION 5

ALTERNATIVES TO THE PROPOSED PROJECT

5.1 PURPOSE

In accordance with Section 15126.6 of the State CEQA Guidelines, EIRs must evaluate a "...range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project." The discussion of alternatives should focus on "...alternatives capable of eliminating any significant adverse impacts or reducing them to below a level of significance, even if these alternatives could impede to some degree the attainment of the project objectives or would be more costly." CEQA further directs that "...the significant effects of an alternative shall be discussed, but in less detail than the significant effects of the project as proposed." The factors that may be taken into account when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.

The decision to select alternative locations needs to be based on whether off-site locations would avoid or substantially lessen any of the significant effects of the project. The lead agency must also determine if no feasible alternative locations exist and disclose the reasons for this assessment. The inclusion of an alternative in an EIR does not constitute definitive evidence that the alternative is in fact "feasible." The final decision regarding the feasibility of alternatives lies with the decision-maker for a given project who must make the necessary findings addressing the potential feasibility of reducing the severity of significant environmental effects (Pub. Resources Code, §21081; see also CEQA Guidelines, §15091).

CEQA Guidelines define "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." When making the decision as to whether an alternative is feasible or infeasible, the decision-making body may consider the stated project objectives in an EIR in light of any relevant economic, environmental, social, and technological factors.

5.2 ALTERNATIVES

Two alternatives to the proposed project are described below: the School Site Alternative and the No Project Alternative. Additional alternatives were not identified during the scoping process or required to reduce significant adverse environmental impacts.

5.2.2 School Site Alternative

McCabe Union Elementary School District (MUESD), which serves kindergarten through 8th grade, and Central Union High School District (CUHSD), which serves 9th through 12th grades, both provide public school services to the project site and surrounding area. The project applicant would be required to pay to MUESD and CUHSD development impact fees mandated by the State.

In addition, according to the 2012 MUESD School Facility Fee Justification Report, the MUESD is at full capacity, with a pupil capacity of 1,270 and enrollment of 1,267. The project's increased demand on existing MUESD facilities would lead to overcrowded conditions at existing facilities and present a significant public services impact. During the Notice of Preparation phase of this DEIR, MUESD submitted comments requesting the Project Applicant include a school site alternative to mitigate the project's impacts to schools. A school site alternative is considered as part of this DEIR which would mitigate the significant cumulative impacts to a less than significant level.

A school site would need to accommodate 720 students that would include classroom buildings, a library/media center, administrative/support facilities, playground area, and asphalt play area. The hours of operation are expected to be 6:30 a.m. to 5:00 p.m., Monday through Friday, with occasional evening programs. Joint use of playground and/or park facilities could also be explored with the City.

Inclusion of the 8-acre school would reduce the number of dwelling units by 35 from 609 single-family units to 574 single-family units. As a result, some of the direct and cumulative impacts attributed to the project would be reduced or eliminated by implementing this alternative. Given constraints with State-mandated school siting requirements (including location away from roadways with high traffic volume, sewer or water lines, hazardous air emissions, etc.), the best location is determined to be the block bounded by Danenberg Drive to the north, Sophia Circle to the south, 23rd Street to the east, and 24th street to the west.

No other features of the proposed project would be changed under this alternative. In addition to the proposed homes north of Danenberg Drive, the park and the retention basins north of Danenberg Drive would remain as proposed, and the Lotus Drain would be placed underground as in the project.

Agriculture

The School Site Alternative would have no increased effect on the current loss of agricultural land given its non-agriculture use. However, due to its relative proximity to a cattle feed yard and hay storage operation (El Toro Exports, LLC) south of Manuel Ortiz Drive, the placement of a school could cause conflicts between the operation.

Air Quality

The School Site Alternative would reduce the number of dwelling units and would therefore result in reduced operational-related direct impacts to air quality compared to the proposed project and reduction in amount of vehicle trips. However, due to the proposed location south of the site close to the current cattle ranch and hay storage yard, odors from the site could affect the air quality of attending students and staff.

Biology

By developing the majority of the project site and removing potential habitat for the burrowing owl, the School Site Alternative would have a biological resources impact that is similar to that assessed for the project. Mitigation measures detailed in Section 4.2 of this EIR would be required.

Hydrology

The School Site Alternative would also be subject to the NPDES requirements including the preparation of a SWPPP and identification of BMPs. However, due to the amount of hardscape and required asphalt play area, the runoff potential would likely increase and therefore, the hydrology/water quality impacts for this alternative would need to be addressed.

Noise

The scale of project construction would likely increase construction noise when compared to the proposed project, due to the larger amount of work that goes into constructing school sites compared to residences. A construction timeline for the school site alternative has not been provided, and should construction of residences be completed before the school site is developed, an additional noise study will be needed to determine construction noise impacts to residents and required mitigation to reduce those impacts to a less-than-significant level.

Noise from school operations would include noise from school bells on the classroom buildings, heating/ventilation/air conditioning (HVAC) equipment, and students using the playground areas. Since intermittent noise from HVAC equipment, school bells, and students would occur in the daytime, it would not be expected to cause discomfort at residences located in close proximity to the site. In addition, the construction of new buildings with newer HVAC equipment is likely to reduce operational noise associated with HVAC equipment and building maintenance. These noise levels do not exceed the conditionally acceptable outdoor noise level for residential land uses of 70 CNEL identified by the Noise Element.

Hazards and Hazardous Materials

The School Site Alternative would require approvals from the California Department of Education and Department of Toxic Substances Control to ensure the site is clear of contaminants in the soil and groundwater, and that hazardous material handlers are not located within ¼ a mile.

Public Services

The School Site Alternative would reduce impacts to public services by reducing the number of homes built and number of residents needing public services. Demand on water, sewer, solid waste, police, fire, park, and school services would be less than under the proposed project.

Traffic

The impacts for the School Site Alternative project scenario are the same as those identified for the proposed project with the exception of the impact at the La Brucherie Avenue / McCabe Road. Under the alternative project scenario, a direct impact would occur at the La Brucherie Avenue / McCabe Road intersection, as opposed to the cumulative impact that occurs under the proposed project scenario.

To mitigate this impact, the applicant should install a traffic signal at the intersection of La Brucherie Avenue / McCabe Road and provide a dedicated left-turn lane at each approach. Further details on the analysis of traffic impacts from the school site alternative are discussed in Appendix E.

5.2.3 No Project Alternative

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 identified significant environmental impacts associated with the proposed project, and the School Site Alternative, this alternative would not meet any of the project objectives, as described in Section 2.2.

SECTION 6 GROWTH INDUCEMENT

Section 15126(d) of the CEQA Guidelines requires that an EIR address a project's growth-inducing impacts. Growth inducement refers to economic or population growth, the construction of additional housing, or removal of obstacles to population growth. Direct growth inducement may result from provision of public services, infrastructure (e.g., utility lines and roads) to a previously undeveloped area. Such provision can foster additional growth by reducing development constraints for nearby areas, thereby inducing other landowners in the area to convert their property to other uses. Direct impacts can also result from a development's population placing strain on existing public services, or a particular development increasing the pace of density of existing surrounding developments. Indirect growth-inducing impacts include the additional demand for housing, commodities, and services that new development causes or attracts by increasing population in an area.

The project would construct 609 new residences and extend City infrastructure (including roadways and utilities pipelines). The proposed project represents planned growth that is intended to accommodate a population increase foreseen by Imperial County through their multi-jurisdictional planning efforts. Through its general plan process and coordination with the Southern California Association of Governments (SCAG) and the County of Imperial, the City has planned for projected population and physical growth within its existing boundaries and surrounding areas planned for future annexation. The 213-acre project site and much of the surrounding land has been planned for residential development. The City's plan for infrastructure and service extension to accommodate this planned growth will be presented in the Service Area Plan. Growth associated with the project would accommodate projected population growth within the City and the region. The growth inducement associated with this project would not create adverse impacts to the community.

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SECTION 7 CUMULATIVE IMPACTS

7.1 CUMULATIVE PROJECTS

Section 15130 of the CEQA Guidelines allows for the preparation of a list of past, present, and reasonably anticipated future projects as a viable method of determining cumulative impacts. Section 15130 also states that a summary of projects contained in an adopted general plan or related planning document which is designed to evaluate regional or area wide conditions may be used in a cumulative impact analysis. This discussion primarily utilizes the first method for analyzing cumulative impacts with the exception of traffic, air quality, and noise, which utilize both the list method and adopted City and County General Plans. A list of all related present and reasonably foreseeable future projects known to the city was compiled; past project that have already been built were already included in the baseline. Additionally, an analysis is provided of the effects that the proposed project may have on each environmental category of concern when considered in conjunction of past, present, and reasonably foreseeable future projects including impacts related agricultural resources, air quality, biological resources, geology and soils, greenhouse gas emissions, hydrology and water quality, transportation and traffic, noise, and public services.

The basis for the analysis of cumulative impacts is dependent on the nature of the issue. According to Section 15130 of the CEQA Guidelines, the discussion of cumulative effects need not provide as great a detail as it provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness. Reasonable mitigation measures must be discussed; however, CEQA acknowledges that with some projects the only feasible mitigation measures for cumulative impacts may involve the adoption of ordinances or regulations rather than the imposition of conditions on a project-by-project basis.

Table 7-1 is a list of the surrounding projects that either have applications submitted, approved, recently constructed, or under construction, which are considered for this cumulative analysis. Also included are projects recently constructed or under construction. Following is a brief description of these projects. The projects that are included in the table below are included because they pose a potentially cumulative construction and operational impacts to agricultural resources, air quality, biological resources, hazardous materials, hydrology and water quality, land use, public facilities, noise, and traffic.

Note that table 7-1 provides a more extensive list than provided in the Traffic Impact Analysis which focused on potential and proposed projects.

Both the Air Quality and Noise technical reports depend on calculation from the traffic reports to identify impacts.

**Table 7-1 List of Past, Present, and Probable Activities
Producing Related or Cumulative Impacts**

Project Name	Use Type	Sq. Foot/Units/Rooms	Project Status	Expected Completion
McCabe Ranch	Residential	428 units	Approved	Completed
Wildflower/Santa Rosa Desert Country Estates	Residential	325 units	Approved	Completed
Countryside Subdivision North/South	Residential	330 total units South- 39 acres 152 single family lots	North/South approved	Completed
Imperial Valley Mall	Commercial	160 acres	Approved	Partially Completed
El Centro Town Center	Commercial	241,000 sf commercial 126,200 sf retail, 62,637 sf detention basin	Approved	Completed
Imperial Center	Commercial	722,000 sf	Approved	Partially Completed
Buena Vista	Residential	465 units	Approved	Completed
Linda Vista	Residential/ School/ Commercial	80 acres 173 single family lots park/ school site/ commercial	Approved	Approved Unknown
Wake Avenue Auto Park	Commercial	34.62 net acres	Approved	Completed
Farmer Estates	Residential	190	Approved	Completed
Heber Meadows	Residential	476 multifamily unit structure 222 single family units	Approved	Unknown
Dogwood Elementary School	Institutional (School)	600 students	Approved	Completed
Heberw-Wood	Residential	425 units	Approved	Completed
Imperial Plaza	Commercial	31.88 acres, 341,516 sf	Approved	Completed
8 th Street	Mixed-Use	2 multi-family lots (maximum 172 dwelling units) 14.82 acres General Manufacturing	Approved	Unknown
8th Street	General Manufacturing	14.82 acres General Manufacturing	Approved	Unknown
Citrus Grove	Residential	47 acres 120 single-family units	Proposed	Unknown
Courtyard Villas	Residential	54 single family units	Proposed	Unknown
Imperial Valley Commons	Commercial	780,000 sf commercial / retail	Approved	Partially Completed
The Plaza	Commercial	350,102 sf commercial / retail	Approved	Completed

Project Name	Use Type	Sq. Foot/Units/Rooms	Project Status	Expected Completion
Heber Family Apartments	Residential	West of Dogwood Road, north of Heber Road.	Approved	Completed
McCabe Elementary Expansion	Institutional (school)	Increase school capacity	Approved	Completed
Town Center Village Apartments	Residential	12.75 acres, approximately 256 multi-family dwelling units	Approved	Under Construction
Monterey Park	Residential	152 acres, 589 dwelling units	Approved	Partially Completed
sf = square feet				

McCabe Ranch has been completed and consists of 428 residential units that include of 301 single-family, 85 multi-family, and 42 units designated for senior residents. The site is located on the west side of Dogwood Road, south of McCabe Road in Imperial County. Site access is proposed via Correll Road and Dogwood Road. A total of four access points to the surrounding street system are planned, three to the proposed Correll Road and one (Black Hills Road) to Dogwood Road. The three residential access points to Correll Road will be at Lone Star Way, Palm Avenue, and Maple Avenue. Black Hills Road will provide access to Dogwood Road. The project would generate 3,550 ADTs, with 76 inbound and 206 outbound trips during the AM peak hour, and 243 inbound and 143 outbound trips during the PM peak hour.

The Wildflower/Santa Rosa/Desert Estates II Residential Development has been completed and consists of a 325-unit residential subdivision located north of Ross Avenue and South of Main Street. The project would generate about 3,110 ADTs, with 60 inbound trips and 180 outbound trips during the AM peak hour and 210 inbound/115 outbound trips during the PM peak hour.

Countryside Subdivision North/South has been completed and consists of 330-unit residential subdivision located south of I-8 and east of SR 86. The project would generate 3,300 ADTs, with 53 inbound trips and 211 outbound trips during the AM peak hour and 231 inbound trips and 99 outbound trips during the PM peak hour.

Imperial Valley Mall was completed in 2005 and consists of a regional indoor shopping center mall on a 160-acre site located within the City's adopted Sphere of Influence. The project site is along the east side of Dogwood Road and south of Chick Road/Danenberg Drive. The project has two separate and distinct phases. Phase I opened in March 2005 while Phase II establishes general land use categories for the parcels surrounding the retail mall. The regional indoor retail mall consists of four anchor tenants, a cinema, auto service facility, and supporting retail stores on approximately 80 acres. Phase II is programmed for commercial and residential uses.

El Centro Town Center is a completed commercial development to be located on the east side of SR 86 in the City of El Centro between Cruickshank Drive and Bradshaw Road. The development will consist of 235,200 square feet of discount retail stores, a 3,500 square foot fast food restaurant, and a six-pump gas station. The project was calculated to generate 14,789 ADT, with 307 inbound

and 124 outbound trips during the AM peak hour, and 802 inbound and 802 outbound trips during the PM Peak hour.

Imperial Center is a proposed project to be built in three phases, consisting of 722,000 square feet of commercial space including a gas station and convenience store, a hotel and a shopping center. It is located to the east of SR 111 just north of Heber Road. The project will generate 25,397 ADT, with 421 inbound and 302 outbound trips during the AM peak hour, and 1,131 inbound and 1,203 outbound trips during the PM peak hour. This project is partially completed.

Buena Vista is a completed 465-unit detached residential development located south of I-8, west of Clark Road, and east of the Imperial Avenue extension. The project is calculated to generate 4,450 ADT.

The Linda Vista Subdivision is a proposed 173-unit residential subdivision located south of I-8 and west of SR 86. The project also includes 4.6 acres of commercial land use and a school site. The project would generate 7,970 ADTs, with 270 inbound trips and 246 outbound trips during the AM peak hour and 411 inbound trips and 419 outbound trips during the PM peak hour. The project was approved by City Council.

Wake Avenue Auto Park has been completed and consists of a commercial development project covering 34.62 net acres consisting of an auto dealership, strip commercial, and an apartment complex. The site is located on the east side of 8th Street, just south of I-8, in Imperial County. It is calculated that this approved project will generate 11,040 ADT, with 215 inbound and 227 outbound trips during the AM peak hour, and 505 inbound and 435 outbound trips during the PM peak hour.

Farmer Estates is a completed 190-unit detached residential development located south of I-8 Freeway and east of La Brucherie Avenue. It was calculated to generate 934 ADT, with 18 inbound and 61 outbound trips during the AM peak hour, and 61 inbound and 36 outbound trips during the PM peak hour.

Heber Meadows is a project that proposes to construct a combination of single-family and multi-family residential units. The development would consist of 222 single-family homes residential and a 476-unit apartment complex directly north of the single-family residential subdivision. The site is located on the southwest corner of the future Correll Road/Pitzer Road intersection. It is calculated that the proposed project would generate 5,270 ADT, with 87 inbound and 304 outbound trips during the AM peak hour, and 325 inbound and 175 outbound trips during the PM peak hour.

Dogwood Elementary School is a completed 600-student elementary school project. The site is located on the north of Correll Road and east of Dogwood Road. It was calculated to generate 1,740 ADT, with 323 inbound and 216 outbound trips during the AM peak hour, and 132 inbound and 190 outbound trips during the PM peak hour.

Heber~~w~~-Wood Estates consists of 425 residential units. The project is located west of Dogwood Avenue and north of SR 86.

Imperial Plaza is completed and consists of 341,516 square feet of General Commercial development. The project site is located 330 feet east of Imperial Avenue (SR 86), between the Central Drain and North 12th Street (extended). It is estimated that the project generates a total of 15,088 ADT primary trips, with 677 inbound/733 outbound trips during the PM peak hour.

8th Street consists of a proposed General Plan Amendment from low-density residential to medium-density residential and general industrial. The project site is located east of SR 86 along the east side of 8th Street on the southwest corner of 8th Street and Bradshaw Road extension. The project proposes 6.9 acres of multi-family units, which would include a maximum 172 dwelling units and 14.82 acres of General Manufacturing. The project is expected to generate approximately 2,000 ADT with 240 PM peak hour trips.

Citrus Grove is a proposed project involving the residential development of approximately 50 acres of land east of SR 86 and north of McCabe Road. The project consists of 120 single family lots and a 2.23-acre park.

Courtyard Villas is a proposed project involving 54 single-family units and a park on 21.5 acres, east of Austin Road and South of Orange Avenue.

Imperial Valley Commons is a partially completed commercial/retail center. The project is located in the southeastern portion of the City south of I-8, north of Danenberg Drive, and east of Dogwood Avenue. The project site consists of approximately 780,000 square feet of commercial / retail space divided into individual retail stores varying in size.

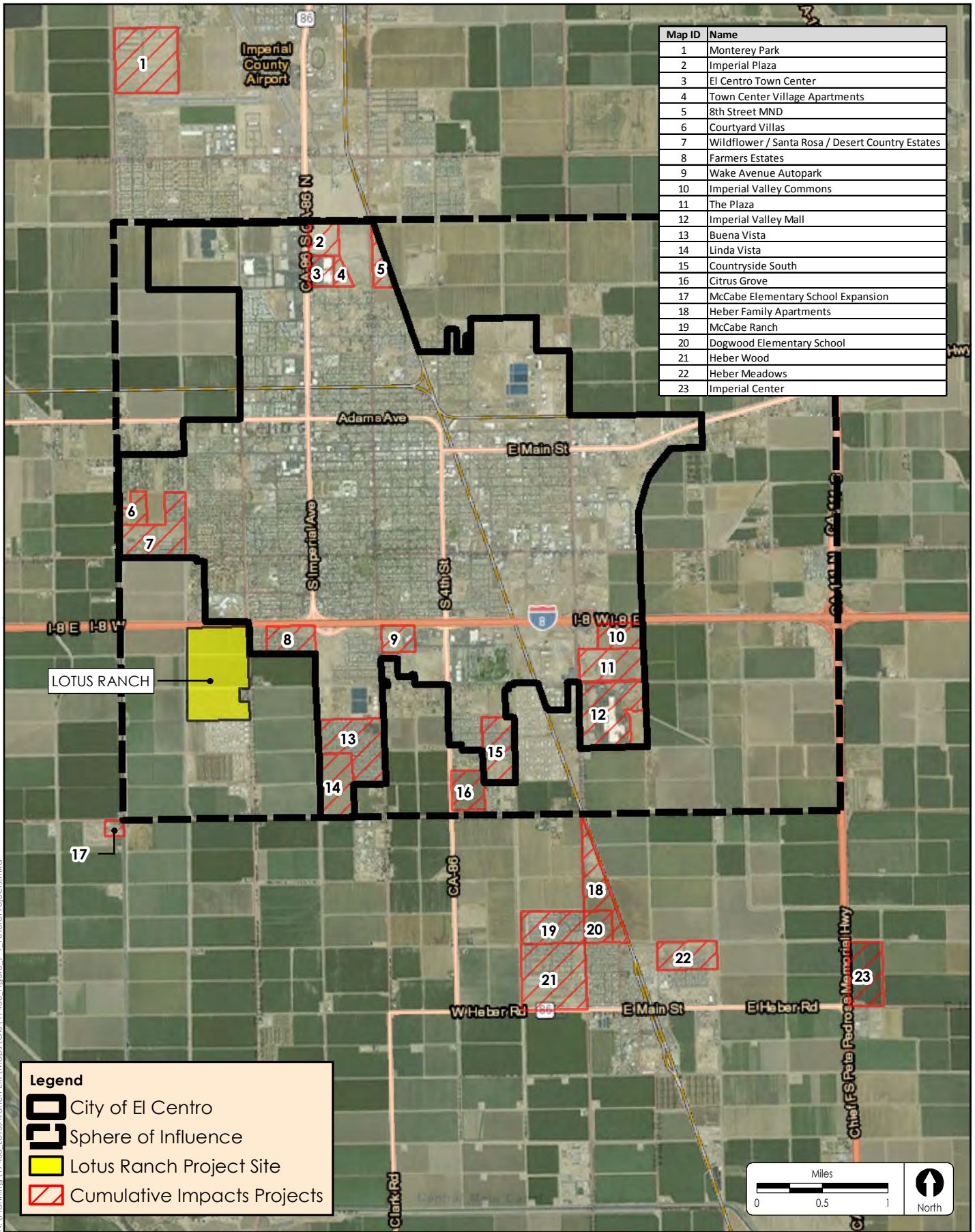
Plaza at Imperial is a completed commercial/retail center. The project is located in the southeastern portion of the City south of I-8, north of Danenberg Drive, and east of Dogwood Avenue. The project site consists of approximately 350,102 square feet of commercial/retail space divided into individual retail stores varying in size.

Heber Family Apartments is a residential project located west of Dogwood Road and north of Heber Road. The project was estimated to generate 269 ADT, with 4 inbound and 16 outbound trips during the AM peak hour, and 16 inbound and 9 outbound trips during the PM peak hour.

McCabe Elementary Expansion is a completed project that increased capacity of the existing McCabe Elementary School located on the southwest corner of the McCabe Road/Austin Road intersection.

Town Center Village Apartments is a project currently under construction and located approximately 1,000 feet east of North Imperial Avenue situated between Cruickshank drive and Bradshaw Drive. The project consists of 256 multi-family residential units on 12.75 acres of land.

Monterey Park is a partially completed 152-acre residential subdivision including 589 units. The proposed project is located on the southeast corner of Austin Road and Brewer Road in the City of Imperial.



Map ID	Name
1	Monterey Park
2	Imperial Plaza
3	El Centro Town Center
4	Town Center Village Apartments
5	8th Street MND
6	Courtyard Villas
7	Wildflower / Santa Rosa / Desert Country Estates
8	Farmers Estates
9	Wake Avenue Autopark
10	Imperial Valley Commons
11	The Plaza
12	Imperial Valley Mall
13	Buena Vista
14	Linda Vista
15	Countryside South
16	Citrus Grove
17	McCabe Elementary School Expansion
18	Heber Family Apartments
19	McCabe Ranch
20	Dogwood Elementary School
21	Heber Wood
22	Heber Meadows
23	Imperial Center

Legend

- City of El Centro
- Sphere of Influence
- Lotus Ranch Project Site
- Cumulative Impacts Projects

Date of Exhibit: 3/8/2016
 Source: ESRI Aerial Basemap (Microsoft 5/29/2011)
 City of El Centro Cumulative Projects: 01/2016



Cumulative Impact Activities
 Figure 7-1

7.2 CUMULATIVE IMPACTS ANALYSIS

7.2.1 Agricultural Resources

Similar to Lotus Ranch, many of the cumulative housing projects in the City of El Centro would result in conversion of farmland to non-agricultural uses. This cumulative impact is anticipated by the City and County General Plans. To offset the expected net loss of Prime Farmland or Farmland of Statewide Importance and provide necessary housing and support facilities, both the City and County General Plans designate areas where growth should be directed. All properties within the urban limit line are anticipated for development. Urban uses outside this boundary are not currently anticipated and/or planned for urban development.

The proposed project site is located along the southern boundary of the county urban limit line. The project is situated east and north of Prime Farmland and west of Farmland of Statewide Importance according to the California Department of Conservation Farmland Mapping and Monitoring Program. Land to the west of the project site is currently agricultural use. The project will indirectly place pressures to convert prime farmland outside of the designated urban area to non-agricultural uses south of the project. While the project will not have direct impacts to these properties, the cumulative impact of the development of the proposed project may place additional pressure to remove agricultural land from production.

Significant Impacts

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.

Mitigation Measures

The following mitigation for farmland conversion impacts would minimize potential land use conflicts and cumulative conversion of agricultural land to non-agricultural use.

C-AG 1.1 Minimize indirect impacts on adjacent agricultural lands by creating and maintaining on-site buffer zones in the form of barrier walls, detention basins, recreational or vacant land that protect adjacent agricultural properties from new commercial and non-agricultural uses. The widths of the created buffer zones would vary depending upon the existence of existing features such as roads and canals, and the types of agricultural commodities produced on adjacent lands.

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.

C-AG 1.3 Design implementing projects to increase transportation benefits for the agricultural sector to maximize the efficient transport of products and machinery.

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.

Level of Significance after Mitigation

With mitigation, impacts would be less than significant.

7.2.2 Air Quality

The project is located within the Salton Sea Air Basin (SSAB), one of 15 air basins that geographically divide the state of California. The SSAB is currently designated a non-attainment area for the state and federal ozone standards, the state and federal PM₁₀ (particulate matter with an aerodynamic diameter of 10 microns or less) standards, and the federal PM_{2.5} (particulate matter with an aerodynamic diameters of 2.5 microns or less) standard. Ozone is not emitted directly, but is a result of atmospheric activity on precursors, i.e. NO_x (nitrogen oxides) and ROG (reactive organic gases). These compounds react in the presence of sunlight to produce ozone.

As shown in Table 8 of the Air Quality Technical Report, operational emissions are projected to be less than the applicable thresholds for all pollutants except ROG after construction of Phase 2 and total buildout. Impacts would be potentially significant, and discretionary measures shall be implemented. Implementation of these measures would reduce impacts to a level less than significant.

Table 7-2 Summary of Maximum Daily Emissions (pounds per day)

Pollutant Source	Phase 1 Only					Phase 1 + Phase 2					Total Buildout				
	ROG	NO _x	CO	SO _x	PM ₁₀	ROG	NO _x	CO	SO _x	PM ₁₀	ROG	NO _x	CO	SO _x	PM ₁₀
SUMMER															
Mobile Sources	7.1	11.3	61.9	0.1	5.5	16.8	24.9	147.2	0.2	13.7	24.3	34.3	216.4	0.3	21.4
Area Sources	26.8	0.4	34.1	0.0	3.1	67.4	0.9	85.8	0.0	7.9	104.4	1.4	132.9	0.0	12.2
Total	33.9	11.6	96.0	0.1	8.6	84.1	25.9	233.0	0.2	21.6	128.8	35.8	349.3	0.3	33.6
Significance Threshold	55	55	550	150	150	55	55	550	150	150	55	55	550	150	150
Exceed Threshold?	No	No	No	No	No	Yes	No	No	No	No	Yes	No	No	No	No
WINTER															
Mobile Sources	5.8	12.3	63.6	0.1	5.5	13.7	27.2	152.0	0.2	13.7	20.0	37.4	223.9	0.3	21.4
Area Sources	26.8	0.4	34.1	0.0	3.1	67.4	0.9	85.8	0.0	7.9	104.4	1.4	132.9	0.0	12.2
Total	32.5	12.7	97.7	0.1	8.6	81.1	28.1	237.8	0.2	21.6	124.4	38.8	356.8	0.3	33.6
Significance Threshold	55	55	550	150	150	55	55	550	150	150	55	55	550	150	150
Exceed Threshold?	No	No	No	No	No	Yes	No	No	No	No	Yes	No	No	No	No

Source: RECON, 2015

However, the proposed project incremental motor vehicle emissions to the cumulative effect are cumulatively considerable for the County of Imperial.

Significant Impacts

C-AQ 1 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.

Mitigation Measures

C-AQ 1 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.

Level of Significance after Mitigation

With implementation of the discretionary measure and standard mitigation measures, operational related air quality impacts would be less than significant.

7.2.3 Biological Resources

The project site is covered with agricultural lands. Because of the active agricultural character of the area there are a limited variety of sensitive biological habitat areas. None of the cumulative projects identified are considered to have potentially significant impacts to biological resources. However, one species, the burrowing owl, has adapted to the agricultural coverage and is commonly found on agricultural sites in the Imperial Valley.

Significant Impacts

C-BIO 1 The project would have a substantial adverse effect through habitat modifications on the burrowing owl.

Mitigation Measures

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).

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.

- 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.

Level of Significance after Mitigation

With mitigation measures, cumulative impacts would be less than significant.

7.2.4 Greenhouse Gas Emissions

As discussed in detail in Section 4.5 of this DEIR, the Greenhouse Gas Analysis and Technical Report assesses the significance of the project's greenhouse gas (GHG) emissions based on consistency with Assembly Bill 32 by comparing the project's GHG emissions, as proposed, to the project's GHG emissions if it were built using a Business-as-Usual (BAU) approach in terms of design, methodology, and technology. The BAU project without GHG-reducing design features would generate a net total of 11,396 MTCO₂E (million metric tons of CO₂ equivalent) annually. The project with GHG-reducing design features and implementation of state laws and regulations would generate a net total of 8,087 MTCO₂E annually. This represents a 29.0 percent reduction in BAU GHG emissions, thereby exceeding the 28.3 percent reduction target.

Significant Impacts

The project would not cause a significant impact to GHG emissions.

Mitigation Measures

This reduction in GHG emissions would be due to a reduction in vehicle emissions through implementation of vehicle regulations including Pavley I, LCFS, and LEV III; a reduction in energy use through implementation of 2013 Title 24 energy code requirements and the installation of energy efficient appliances; and a reduction in water use through implementation of CalGreen.

Level of Significance after Mitigation

The level of impacts associated with the project's contribution of GHGs to cumulative statewide emissions would be less than significant.

7.2.5 Hydrology and Water Quality

The Final Environmental Impact Report (FEIR) for Lotus Ranch in 2007 reviewed Hydrology and Water Quality with a hydrology, water quality, and drainage study prepared in November 2005. Due to the fact that the site's hydrology and water conditions have remained unchanged since 2005, this current DEIR utilizes the previous FEIR data. Contributions of these constituents originate from cumulative agricultural or naturally occurring sources. Agricultural runoff is collected in a system of earthen drains also owned and operated by the IID. The Lotus Canal, located adjacent to the site's western boundary, and the Lotus Drain, which runs parallel to the canal on the eastern side, are part of this system. The existing cumulative agricultural activities in the vicinity of the project site presently contribute to the impaired status of these waters.

Significant Impacts

The Salton Sea has been listed under Section 303(d) of the CWA as impaired by the following 303(d) listed constituents:

- Nutrients
- Salt
- Selenium

Both the Alamo River and Central Main Canal, an Imperial Valley Agricultural Drain, discharge to the Salton Sea and are each listed under Section 303(d) of the CWA as impaired by the following constituents:

- Pesticides
- Sedimentation/Siltation
- Selenium

Contributions of these constituents originate from agricultural or naturally occurring sources. As implied by inclusion on the 303(d) list, the beneficial uses of waters of the Alamo River, Imperial Valley Agricultural Drains, and Salton Sea are impaired such that they have no remaining assimilative capacity or ability to accommodate additional quantities of these contaminants, irrespective of concentration.

The existing agricultural activities at the project site presently contribute to the impaired status of these waters. After construction, the project would cease contributions of agricultural-related constituents, such as sediment, from the site through conversion of the land to residential use. However, some level of pollutants, such as nutrients from fertilizers, may be discharged from residential uses as a result of landscaping and urban runoff. Contributions of residential related contaminants from the project is anticipated to be relatively low compared to existing conditions, and is considered less than significant at the project-level. Additionally, the project would incorporate detention basins and other water quality treatment BMPs, as required by adopted TMDLs and the City municipal stormwater discharge permit, to ensure that runoff from the project would not further impair the Alamo River, Imperial Valley Agricultural Drains, or the Salton Sea as identified by CWA Section 303(d). Overall, the project would reduce agricultural

sources of impairment to the Alamo River, Imperial Valley Agricultural Drains, and the Salton Sea. Thus, the project would have a **less than significant** impact on CWA Section 303(d) listed water bodies.

~~After construction, the project would cease contributions of agricultural-related constituents, such as sediment, from the site through conversion of the land to residential use. However, some level of pollutants, such as nutrients from fertilizers, may be discharged from residential uses as a result of landscaping and urban runoff. Contributions of residential-related contaminants from the project are anticipated to be relatively low compared to existing conditions.~~

~~**C-HYD 1** — Impacts to surface water quality and groundwater quality due to construction related earth disturbing activities and construction related hazardous substances.~~

~~**C-HYD 2** — Water quality impacts from construction activity occurring below the water table.~~

~~**C-HYD 3** — Increased amount of surface runoff and associated impacts to drainage facilities.~~

Mitigation Measures

~~**C-HYD 1.1** — Comply with NPDES General Construction Permit and City's Stormwater Program.~~

~~**C-HYD 1.2** — Implement a Spill Prevention and Control Program~~

~~**C-HYD 1.3** — Implement measures to maintain groundwater or surface water quality~~

~~**C-HYD 2.1** — Comply with NPDES General Construction Permit and City's Stormwater Program~~

~~**C-HYD 2.4** — Incorporate provisions for dewatering~~

~~**C-HYD 2.3** — Implement measures to maintain groundwater or surface water quality~~

~~**C-HYD 2.2** — Implement a Spill Prevention and Control Program~~

Level of Significance after Mitigation

~~Implementation of the mitigation measures listed above will reduce all of the significant cumulative impacts to a less than significant level.~~

7.2.6 Transportation/Traffic

As part of their technical analysis, LLG reviewed the surrounding area and the list of cumulative projects which could potentially add traffic to the roadways and intersections. Based on a review of other potential projects within the area, and discussions with the City of El Centro and County

of Imperial staff, it was determined that the nine future cumulative development projects should be included in the traffic analysis.

Significant cumulative impacts were identified for several intersections and roadway segments where the Lotus Ranch project would contribute a substantial amount of traffic to facilities anticipated to operate with poor future conditions. The project would result in the following cumulative traffic impacts:

Intersections

~~C-T 1~~ Project traffic would cause a significant increase in delay at the La Brucherie Avenue / Wake Avenue intersection.

C-T 12 Project traffic would cause a significant increase in delay at the Imperial Avenue / Ocotillo Drive intersection.

C-T 23 Project traffic would cause a significant increase in delay at the La Brucherie Avenue / McCabe Road intersection.

Roadway Segments

C-T 34 Project traffic would cause a significant increase in volume/capacity ratio at the segment of Wake Avenue from La Brucherie Avenue to 8th Street.

Access-Related Impacts

C-T 45 The project could result in significant operational impacts if proper site access is not provided.

Mitigation Measures

C-T 12 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.

C-T 23 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.

C-T 34 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.

C-T 4 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.

~~The applicant shall provide dedicated northbound left-turn lanes at the three proposed access points along La Brucherie Avenue and a dedicated southbound right turn lane at the Wake Avenue access point.~~

Level of Significance after Mitigation

With the above mitigation measures, the project's cumulative impacts would be less than significant.

7.2.7.8 Noise

The Final Environmental Impact Report (FEIR) for Lotus Ranch in 2007 reviewed Noise impacts with a noise assessment technical study prepared in November 2005 (Appendix F). Due to the fact that the site's potential noise impacts from project construction and operation have remained unchanged since 2005, this current DEIR utilizes the previous FEIR data and an Addendum to Noise Report. The Addendum to the Noise Report (Noise Addendum) was completed by RECON in July 2015 that measured noise impacts from traffic and machinery from the adjacent El Toro Export Company which is included as Appendix G to this DEIR.

The project would result in temporary construction noise that would be received by off-site residences in the vicinity of project activity and by new project residences that would receive noise from later phases of project construction. Due to its temporary nature, project-related construction noise would not combine with other noise sources and cause a permanent increase in ambient noise conditions in the area.

Traffic is the largest contributor to the project's cumulative noise impacts. Project traffic would combine with cumulative project traffic to increased noise levels received at residential areas along the local circulation system routes, including La Brucherie Avenue, Wake Avenue, Ross Avenue, Ocotillo Avenue, McCabe Road, and SR-86. The project's 2005 Noise Report, as well as the Noise Addendum considered the combined noise impacts of cumulative traffic and determined locations where future traffic noise would present significant impacts to either the project site or off-site locations. Traffic trips were estimated by Linscott Law & Greenspan to analyze cumulative noise impacts related to the project.

Regional traffic presented by cumulative development far outweighs traffic related to the Lotus Ranch project. Cumulative traffic (regardless of project contribution) is expected to result in significant noise increases along Wake Avenue (between Clark Road and SR-86), McCabe Road (between Clark Road and SR-86), all three studied segments of La Brucherie Avenue, and SR-86 (between Wake Avenue and I-8). The project would not substantially contribute to the impacts along Wake Avenue, McCabe Road, and SR-86. However, the project would contribute substantially to cumulative impacts assessed to La Brucherie Avenue. Furthermore, the project

fronts an impacted segment of La Brucherie Avenue, and cumulative noise impacts at this location would affect project residents. Traffic noise levels along La Brucherie Avenue in the vicinity of the project site are forecast to be 67 dBA CNEL. That cumulative noise level is 7 dBA higher than the 60 dBA CNEL level forecast based solely on traffic directly related to Lotus Ranch (Table 4.8-6).

Significant Impacts

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.

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.

Mitigation Measures

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.

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.

Level of Significance after Mitigation

The mitigation measures would adequately reduce the cumulative traffic noise impacts from C-N 1 and C-N 2 to a less than significant level. No additional mitigation is required.

7.2.8 Public Services

Water

The City is the agency responsible for providing water services to the proposed project and the majority of the identified cumulative projects. The maximum daily demand on the Water Treatment Plant is approximately 13.8 million gallons per day (mgd), while the existing capacity is 21 mgd. The system has adequate capacity to accommodate anticipated near-term development. Therefore, the Project would not result in a significant contribution to cumulative impacts.

Sewer

The City wastewater facilities include a collection of over 125 miles of sewer lines and pipelines that carry wastewater from residences and businesses to the Wastewater Treatment Plant

(WWTP). Current generation from City wastewater customers averages approximately 3.40 mgd, and existing peak flow is approximately 6.0 mgd. The WWTP consistently meets Secondary Treatment standards and has adequate capacity to handle existing flows, and because the facility is operating at approximately 50 percent capacity, no expansions to accommodate additional capacity are planned. The WWTP and delivery system will meet demand of growth for the next ten years. Planning must begin for the next expansion when the monthly flow reaches 6.4 mgd, or 80 percent of the plant's capacity of the 8.0 mgd. Planned improvements to expand the WWTP and delivery system will be considered during the anticipated 2018 update of the Sewer Master Plan. Therefore, the project's cumulative impacts would be less than significant.

Solid Waste

The project site is currently served by CR&R Incorporated, a privately owned company that collects and transports solid waste from residences and businesses under a County permit system. Under the Agreement between the City of El Centro and CR&R, several landfill disposal sites are available for waste generated from within the City limits. CR&R has the ability to utilize the following sites: Imperial County Regional landfill east of the City of Imperial, South Yuma County Landfill south of the City of Yuma, Arizona, and the Salton Sea Landfill north of the City of Westmorland off of Highway 86. All three sites have excess capacity and will be available for disposal for over 50 years. Therefore, the project's cumulative impacts would be less than significant.

Schools

McCabe Union School District (MUSD), which serves kindergarten through 8th grade, and Central Union High School District (CUHSD), which serves 9th through 12th grades, provide public school services to the project site and surrounding area. Similar to the impacts associated with the proposed project (see Sections 4.9.3 and 4.9.4 of this DEIR), the cumulative projects identified in Table 7-1 that include a residential component each present potentially significant direct impacts to these two school districts, for which impact fees are required. The project applicant would be required to pay to MUHSD and CUHSD development impact fees mandated by the State. In addition, according to the 2012 MUSD School Facility Fee Justification Report, the MUSD is at full capacity, with a pupil capacity of 1,270 and enrollment of 1,267. The project's increased demand on existing MUSD facilities would lead to overcrowded conditions at existing facilities and present a significant public services impact. In the MUSD's submitted comments during the Notice of Preparation phase of this DEIR, MUSD requested the Project Applicant include a school site alternative to mitigate the project's impacts to schools. A school site alternative is considered as part of this DEIR which would mitigate the significant cumulative impacts to a less than significant level.

Parks

As discussed in Section 4.9.1 of this DEIR, the City is currently in deficit of parkland acreage requirement by approximately 116.17 acres. Cumulative projects that include a residential component will present increased demand for public parkland, but each will be required to install

parkland to address this demand. The proposed project is providing a public park that exceeds the City-required acreage by approximately 0.8 acres. Therefore, the project would improve the City's parkland deficit and reduce the cumulative impacts to a less than significant level.

Fire

The proposed project would be annexed and incorporated into the City of El Centro and would be serviced by ECFD. Fire Station No. 1 is located nearest the site at 775 State Street. No new facilities would need to be constructed to service the proposed project. ECFD is not currently capable of effectively responding to calls from many outlying areas (including the project site) within the times set out in the National Fire Protection Association (NFPA) standard. Although the proposed project would not substantially alter the Fire Departments' ability to provide fire protection services to the project site, constructing new residences on the site will increase the demand on ECFD services. Considering the Project would increase demand for fire protection services, the developer would be required to pay development impact fees. Therefore, with the payment of mandatory development impact fees, the proposed project's cumulative impact to fire protection services would be less than significant.

Law Enforcement

The project would present an increase in demand to ECPD personnel and resources due to the increased intensity of use on the site. A greater number of homes and residents in the project area would be a potential source of additional calls for service. Other ECPD concerns related to future development and annexation include increases in traffic and the ability of the existing ECPD radio communication system to operate in outlying areas.

To compensate for an increase in law enforcement service costs resulting from increased demand for resources generated by the proposed project, the developer will be required to pay development impact fees. Therefore, with the payment of mandatory development impact fees, the proposed project's cumulative impact to fire protection services would be less than significant.

Significant Impacts

C-PS 1 The City's Fire Department has insufficient resources to adequately service the combined demands of the proposed project and cumulative projects.

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.

Mitigation Measures

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.

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.

Level of Significance after Mitigation

With the above mitigation measures, cumulative impacts to public services would be less than significant.

SECTION 8 IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126(b) and (c) of the CEQA Guidelines requires that an EIR address any significant environmental effects which cannot be avoided, and any irreversible changes to the environment that may result from implementation of the proposed project.

Approval of the proposed project would commit agricultural lands currently in production to urban uses, including lands that are recognized by the State as important agricultural resources, due to the quality of the soil and the irrigational system. It is unlikely that these lands would revert to agricultural production after development and occupation have occurred. This permanent conversion is discussed in depth in Section 4.1. The County and City recognize that growth projected for the region could not occur without such agricultural conversion, and the long-term land use plans for the City and County have accounted for this loss of farmland. The project would contribute to the cumulative loss of agricultural land in the region (an irreversible environmental change), as discussed in Section 4.1.

The project would result in the irreversible consumption of nonrenewable resources in several ways. Construction activity associated with the project would consume petroleum products used to power many construction-related vehicles and pieces of machinery. Many of the materials used for on-site structures and infrastructure on the project would also be non-renewable. Once the project is completed and operational, it would contribute to resources consumption by means of the fossil fuel-burning vehicular traffic related to residents and, to a lesser extent, to non-residential visitors to the park, as well as the maintenance of the park and on-site infrastructure. These are impacts common to any development project, and the project's relatively small scale precludes identification of a significant irreversible environmental change.

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SECTION 9

EFFECTS FOUND NOT TO BE SIGNIFICANT

9.1 INTRODUCTION

In accordance with Section 15128 of the State CEQA Guidelines, this section discusses environmental issue areas for which the project's direct impacts were identified as less than significant during the Initial Study scoping process or during focused DEIR analysis. Issue areas for which direct significant impacts were identified are discussed above in Section 4, and cumulative impacts are discussed in Section 7.

The proposed project would not result in significant direct impacts to the following environmental issue areas and, therefore, are not subject to further consideration in the DEIR.

9.2 EFFECTS FOUND NOT TO BE SIGNIFICANT AS PART OF THE INITIAL STUDY

9.2.1 Aesthetics

The project site and surrounding land is flat and devoid of notable scenic vistas. The project site does not contain any scenic resources and is not visible from any designated scenic highways. There are no scenic vistas that would be affected by project implementation. Constructing residences, a public park, detention basins, and roadways on the site would alter the aesthetic setting of the site from its existing state of undeveloped agricultural fields, but this is not considered a significant environmental effect. The project would become aesthetically compatible with the residential development in the vicinity of the site. Examples of similar visual environment include development to the north and east.

9.2.2 Cultural Resources

The proposed project site is currently used for agriculture production. A cultural resource constraints review for the project site was conducted by synthesizing archaeological records from the California Historical Resources Information System, feedback from the various concerned Native American tribes, and historical data available for the area. No potential cultural resources were identified, including archaeological resources, unique paleontological site, unique geologic feature, or human remains. Therefore, there will be no impact.

9.2.3 Hazards & Hazardous Materials

The project site is currently used for agricultural production that does not utilize or contain hazardous materials. The proposed use as a residential development would not create any significant hazard to the public during construction or upon occupation, either by transport, use, disposal, or emissions of hazardous materials. Therefore, there will be no impact.

9.2.4 Land Use / Planning

To accommodate population growth, both the City and the County have determined that it will likely be necessary to convert existing “Important Farmland” to non-agricultural, urban uses. The City of El Centro has designated the project site as Low Density Residential on their General Plan and the County has designated it as an Urban Area. The project is consistent with these designations, and would therefore not conflict with any applicable land use plan, conservation plan, policy, or regulation of an agency with jurisdiction over the project. Therefore, there will be no impact.

9.2.5 Mineral Resources

The project site is not known to possess mineral resources valuable to the State or region. Therefore, there will be no impact to mineral resources.

9.2.6 Recreation

The proposed project provides a public park that exceeds the City-required acreage by approximately 0.8 acres. In addition, the project includes three grass-lined lots surrounding the residential development that will serve primarily as flood control basins, but also space for resident recreational use. Therefore, there will be no impact to recreation.

9.2.7 Utilities / Service Systems

Although the project would increase the demand for water, wastewater, solid waste, and storm water facilities and services, the developer is required to pay the standard development impact fees and the facility and service capacity would exceed the demand from the project. With regards to an increase in demand and need for electricity associated with the project, the applicant has contacted the IID Energy Customer Operations & Planning Section to assess the project’s energy requirements in relation to existing infrastructure. It has been determined that no new or upgraded facilities are required to service the project.

SECTION 10 REFERENCES, PERSONS, AND AGENCIES CONTACTED

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SECTION 11 CERTIFICATION

This report presents a full disclosure and independent analysis of all the identified environmental resources as required by the California Environmental Quality Act. Mooney Planning Collaborative of San Diego, California prepared this report. Members of the Mooney Planning Collaborative staff contributing to this report are listed below.

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Appendix A: Air Quality Technical Appendices

Appendix B: Biological Resources Report

Appendix C: Greenhouse Gas Emissions Analysis

**Appendix D: Hydrology, Water Quality, and Drainage
Report**

Appendix E: Transportation/Traffic Analysis

Appendix F: Noise Assessment Technical Report (2005)

Appendix G: Addendum to the Noise Report (2015)

Appendix H: Water Supply Assessment

Appendix I: Notice of Preparation and Comment Letters

Appendix J: List of Development Impact Fees