

# EXHIBIT O

**CITY OF EL CENTRO**  
**IMPERIAL COUNTY OFFICE OF EDUCATION**  
**ADMINISTRATION BUILDING**  
**(ANNEXATION 2-17, COZ 17-03 & GPA 17-03)**  
**INITIAL STUDY/FINAL MITIGATED NEGATIVE DECLARATION**

---



**PREPARED BY:**

**CITY OF EL CENTRO  
COMMUNITY DEVELOPMENT DEPARTMENT  
1275 MAIN STREET  
EL CENTRO, CA 92243**

**JUNE 2019**

THIS PAGE INTENTIONALLY LEFT BLANK

---

**CITY OF EL CENTRO  
IMPERIAL COUNTY OFFICE OF EDUCATION  
ADMINISTRATION BUILDING  
ANNEXATION 2-17, COZ17-03 & GPA17-03  
INITIAL STUDY/FINAL MITIGATED NEGATIVE DECLARATION  
STATE CLEARINGHOUSE No. 2018061021**

---

*Prepared by:*

**CITY OF EL CENTRO  
COMMUNITY DEVELOPMENT DEPARTMENT  
1275 MAIN STREET  
EL CENTRO, CA 92243  
CONTACT: NORMA M. VILICAÑA, AICP**

**JUNE 2019**

## TABLE OF CONTENTS

### 1.0 INTRODUCTION

1.1	Introduction and Regulatory Guidance.....	1.0-1
1.2	Lead Agency.....	1.0-1
1.3	Purpose and Document Organization.....	1.0-2

### 2.0 PROJECT DESCRIPTION

2.1	Project Characteristics.....	2.0-1
2.2	Project Description.....	2.0-1
2.3	Required Project Approvals.....	2.0-3
2.4	Other Project Assumptions.....	2.0-3

### 3.0 ENVIRONMENTAL CHECKLIST

Environmental Factors Potentially Affected.....	3.0-1
Determination.....	3.0-2
Evaluation of Environmental Impacts.....	3.0-3
1. Aesthetics.....	3.0-4
2. Agriculture and Forestry Resources.....	3.0-6
3. Air Quality.....	3.0-8
4. Biological Resources.....	3.0-15
5. Cultural Resources.....	3.0-18
6. Geology and Soils.....	3.0-20
7. Greenhouse Gas Emissions.....	3.0-23
8. Hazards and Hazardous Materials.....	3.0-25
9. Hydrology and Water Quality.....	3.0-27
10. Land Use and Planning.....	3.0-29
11. Mineral Resources.....	3.0-30
12. Noise.....	3.0-31
13. Population and Housing.....	3.0-33
14. Public Services.....	3.0-34
15. Recreation.....	3.0-35
16. Transportation/Traffic.....	3.0-36
17. Tribal Cultural Resources.....	3.0-43
18. Utilities And Service Systems.....	3.0-44
19. Mandatory Findings of Significance.....	3.0-47

### 4.0 COMMENTS AND RESPONSES

4.1	List of Commenters.....	4.0-1
4.2	Comments and Responses.....	4.0-1

### 5.0 MITIGATION MONITORING AND REPORTING PROGRAM

5.1	Introduction.....	5.0-1
5.2	MMRP for the ICOE Administration Building Project.....	5.0-2

## TABLE OF CONTENTS

---

### APPENDICES

Appendix A - Air Quality Impact Analysis Report  
Appendix B - Biological Study  
Appendix C – Greenhouse Gas Analysis  
Appendix D – Traffic Study  
Appendix E – Pre-annexation Agreement  
Appendix F – Fire Protection Will Serve Letter  
Appendix G – Police Protection Will Serve Letter  
Appendix H - Sewer and Water Will Serve Letter

### LIST OF TABLES

Table 3.1-1	Zone Development Standards .....	3.0-4
Table 3.3-1	Maximum Short-Term Construction Emissions (Pounds per Day) .....	3.0-10
Table 3.3-2	Long-Term Operational Emissions (Pounds per Day) .....	3.0-11
Table 3.7-1	Annual Project Greenhouse Gas Emissions (Metric Tons per Year) .....	3.0-24
Table 3.12-1	City of El Centro Noise Standards .....	3.0-32
Table 3.16-1	Near-Term Intersection Operations .....	3.0-39
Table 3.16-2	Near-Term Street Segment Operations .....	3.0-40

### LIST OF FIGURES

Figure 1	Regional Vicinity .....	2.0-5
Figure 2	Project Location .....	2.0-7
Figure 3	Photographs .....	2.0-9
Figure 4	Existing and Proposed Zoning .....	2.0-11
Figure 5	Existing and Proposed Land Use .....	2.0-13
Figure 6	Site Plan .....	2.0-15
Figure 7	Floor Plan .....	2.0-16

---

# **1.0 INTRODUCTION**

---

### 1.1 INTRODUCTION AND REGULATORY GUIDANCE

This document is an Initial Study (IS) with supporting environmental studies, which provides justification for a Mitigated Negative Declaration (MND) pursuant to the California Environmental Quality Act (CEQA) for the Imperial County Office of Education Administration Building (project).

The IS/MND is a public document to be used by the City of El Centro (City), acting as the CEQA lead agency, to determine whether the project may have a significant effect on the environment pursuant to CEQA. If the lead agency finds substantial evidence that any aspect of the project, either individually or cumulatively, may have a significant effect on the environment that cannot be mitigated, regardless of whether the overall effect of the project is adverse or beneficial, the lead agency is required to prepare an environmental impact report (EIR), use a previously prepared EIR and supplement that EIR, or prepare a subsequent EIR to analyze the project at hand (Public Resources Code Sections 21080(d) and 21082.2(d)).

If the agency finds no substantial evidence that the project or any of its aspects may cause a significant impact on the environment with mitigation, an MND shall be prepared with a written statement describing the reasons why the proposed project, which is not exempt from CEQA, would not have a significant effect on the environment and therefore why it does not require the preparation of an EIR (CEQA Guidelines Section 15371).

According to CEQA Guidelines Section 15070, a Negative Declaration shall be prepared for a project subject to CEQA when either:

- 1) *The IS shows there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or*
- 2) *The initial study identifies potentially significant effects, but:*
  - a) *Revisions in the project plans or proposals made by, or agreed to by the applicant before the proposed MND and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and*
  - b) *There is no substantial evidence, in light of the whole record before the agency, that the proposed project as revised may have a significant effect on the environment.*

This IS/MND has been prepared in accordance with CEQA, Public Resources Code Section 21000 et seq., and the CEQA Guidelines Title 14 California Code of Regulations (CCR) Section 15000 et seq.

### 1.2 LEAD AGENCY

The lead agency is the public agency with primary responsibility over a proposed project. Where two or more public agencies will be involved with a project, CEQA Guidelines Section 15051 provides criteria for identifying the lead agency. In accordance with CEQA Guidelines Section 15051 (b)(1), "the lead agency will normally be the agency with general governmental powers." Therefore, based on the criteria described above, the lead agency for the proposed project is the City of El Centro.



## **1.0 INTRODUCTION**

---

### **1.3 PURPOSE AND DOCUMENT ORGANIZATION**

The purpose of this IS/MND is to evaluate the potential environmental impacts of the proposed Imperial County Office of Education Administration Building. Mitigation measures have also been established that reduce or eliminate any identified significant and/or potentially significant impacts. This document is divided into the following sections:

#### **1.0 INTRODUCTION**

This section provides an introduction and describes the purpose and organization of this document.

#### **2.0 PROJECT DESCRIPTION**

This section provides a detailed description of the proposed project and the environmental setting and lists the different agency approvals required.

#### **3.0 ENVIRONMENTAL CHECKLIST**

This section describes the environmental setting for each of the environmental subject areas; evaluates a range of impacts classified as "no impact," "less than significant impact," "less than significant impact with mitigation incorporated," or "potentially significant impact" in response to the environmental checklist; provides mitigation measures, where appropriate, to mitigate potentially significant impacts to a less than significant level; and provides an environmental determination of the project.

#### **4.0 COMMENT LETTERS AND RESPONSES TO COMMENTS**

This section includes photocopies of comment letters received during the public comment period. City of El Centro responses to the comment letters are also included in this section.

#### **5.0 MITIGATION MONITORING AND REPORTING PROGRAM**

This section contains the project's Mitigation Monitoring and Reporting Program (MMRP), prepared pursuant to Section 21081.6 of the California Public Resources Code, which requires public agencies to "adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." An MMRP is required for the proposed project because the Initial Study has identified potentially significant adverse impacts and measures to mitigate those impacts.

---

## **2.0 PROJECT DESCRIPTION**

---

**2.0 PROJECT DESCRIPTION**

**2.1 PROJECT CHARACTERISTICS**

**1. Project title:**

Imperial County Office of Education Administration Building

**2. Lead agency name and address:**

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

Imperial County LAFCO  
1122 W. State Street #D  
El Centro, CA 92243

**3. Contact person and phone number:**

Norma M. Villicaña, Director of Community Development  
Phone Number- 760.337.4545  
Email- nvillicana@cityofelcentro.org

**4. Project location and Size:**

Southwest corner of McCabe Road and Sperber Road, consisting of 80.0 acres within the unincorporated area of Imperial County, and further identified by Assessor's Parcel Number: 054-510-001.

**5. Project sponsor's name and address:**

Imperial County Office of Education  
c/o Wendy Rangel  
1398 Sperber Road  
El Centro, CA 92243

**6. General plan designation:**

**Current-** County Agriculture  
**Proposed-** City Public Use

**7. Zoning:**

**Current-** County A2 (General Agriculture)  
**Proposed-** City LU (Limited Use)

**2.2 PROJECT DESCRIPTION**

The project site is generally located at the southwest corner of McCabe Road and Sperber Road within the unincorporated area of Imperial County (**Figures 1** and **2**). The project site is approximately 80-acres. The site is bounded on the north, south, and west by agricultural land and on the east by Imperial County Office of Education offices, the Imperial County Sheriff's Office, as well as other administrative offices. For photographs of the project site, refer to **Figure 3**.

The proposed project evaluates the proposed 80-acre annexation, construction of a 20,700 square foot administration building as well as appurtenant facilities, and rezoning and general plan amendment of the subject property (APN 054-510-001) I. A sphere of influence change would be also be required to extend the sphere of influence boundary to accommodate the parcel of

## 2.0 PROJECT DESCRIPTION

---

land being annexed to the City. The existing zoning and proposed zone change is listed is identified above and shown in **Figure 4**. Additionally, the General Plan Land Use designation for Assessor's Parcel Number 054-510-001 would change from County Agriculture to City Public Use as shown on **Figure 5**.

Under the proposed 80-acre annexation, 5.9 acres will be developed for the construction of a 20,700 square foot administration office building for the use of the Imperial County Office of Education (ICOE). The administrative building would be constructed in a "campus-like" manner and would include offices, a staff lounge, conference rooms, restrooms, exercise room, storage spaces, a parking lot (97 spaces), an outdoor plaza, and other appurtenant facilities and shown in **Figure 6 and 7**. The project also includes construction onsite stormwater facilities and installation and modification of drainpipes connecting to the Date Drain west of the project site. No development is proposed for the remaining ~74 acres. When development plans for any of the parcels are submitted to the City in the future, the location, intensity, type, and size of the development will need to be assessed. Subsequent environmental review under CEQA will be required for proposed development within the 74 acres. As part of the project a Pre-Annexation agreement will be approved by the Imperial County Office of Education and the City of El Centro, a copy is attached hereto as **Attachment A**.

**2.3 REQUIRED PROJECT APPROVALS**

Listed below are all public agencies other than the City of El Centro that may have discretionary actions associated with the implementation of the proposed project, or may otherwise serve as a responsible or trustee agency under CEQA:

- Imperial County Local Agency Formation Commission (LAFCO)
- Imperial County Air Pollution Control District
- Imperial County Office of Education
- Regional Quality Control Board
- California Department of Fish and Wildlife
- Imperial Irrigation District

**2.4 OTHER PROJECT ASSUMPTIONS**

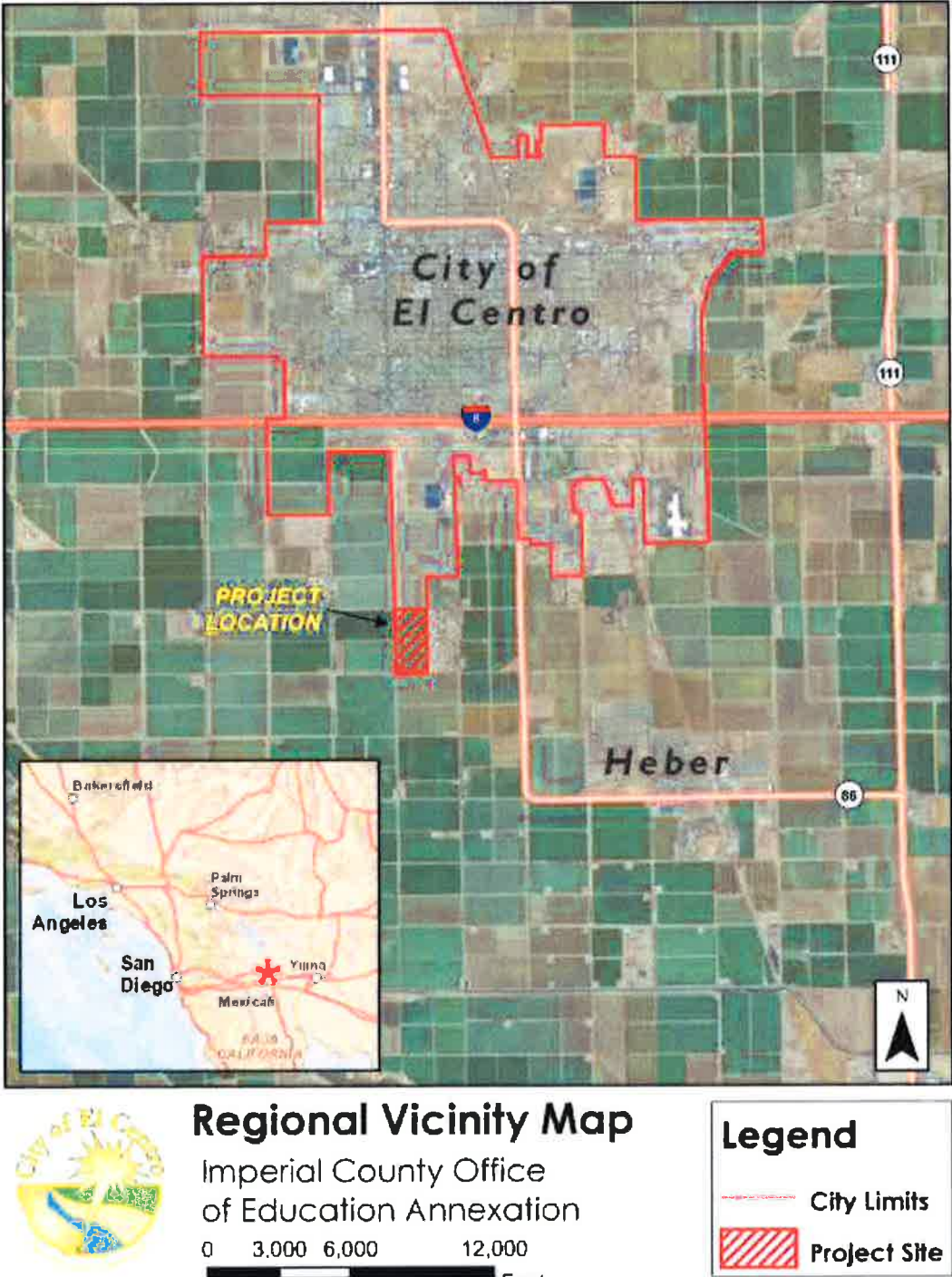
This IS/MND assumes compliance with all applicable state, federal, and local codes and regulations including, but not limited to, the California Health and Safety Code and the California Public Resources Code.

## **2.0 PROJECT DESCRIPTION**

---

This page intentionally left blank

FIGURE 1 REGIONAL VICINITY



**2.0 PROJECT DESCRIPTION**

---

This page intentionally left blank



FIGURE 2 PROJECT LOCATION



### Regional Vicinity Map

Imperial County Office of Education Annexation



### Legend

- Project Site
- City Limits

**2.0 PROJECT DESCRIPTION**

---

This page intentionally left blank

FIGURE 3 PHOTOGRAPHS

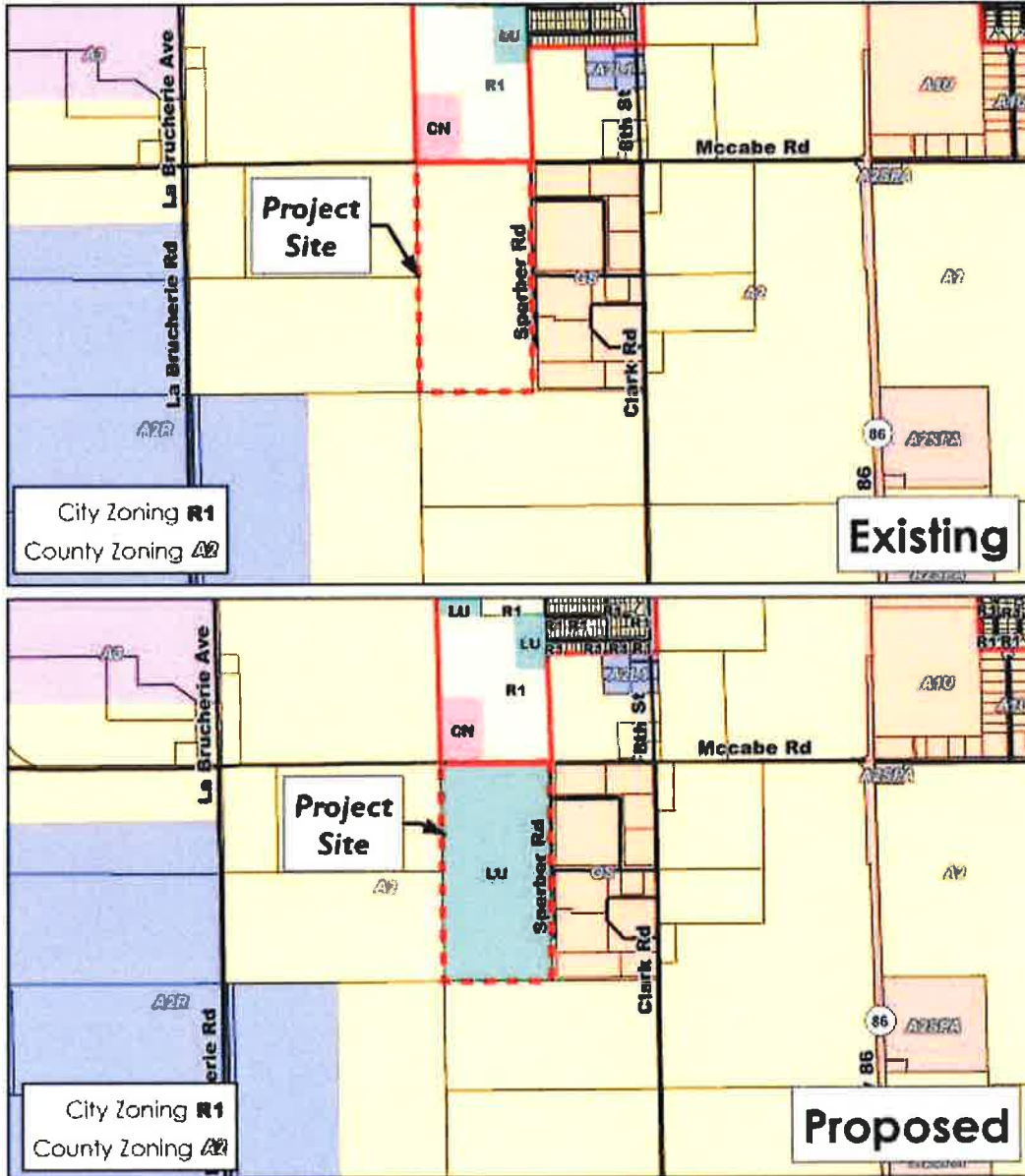


## **2.0 PROJECT DESCRIPTION**

---

This page intentionally left blank

FIGURE 4 EXISTING AND PROPOSED ZONING



### Zoning Map

Imperial County Office  
of Education Annexation

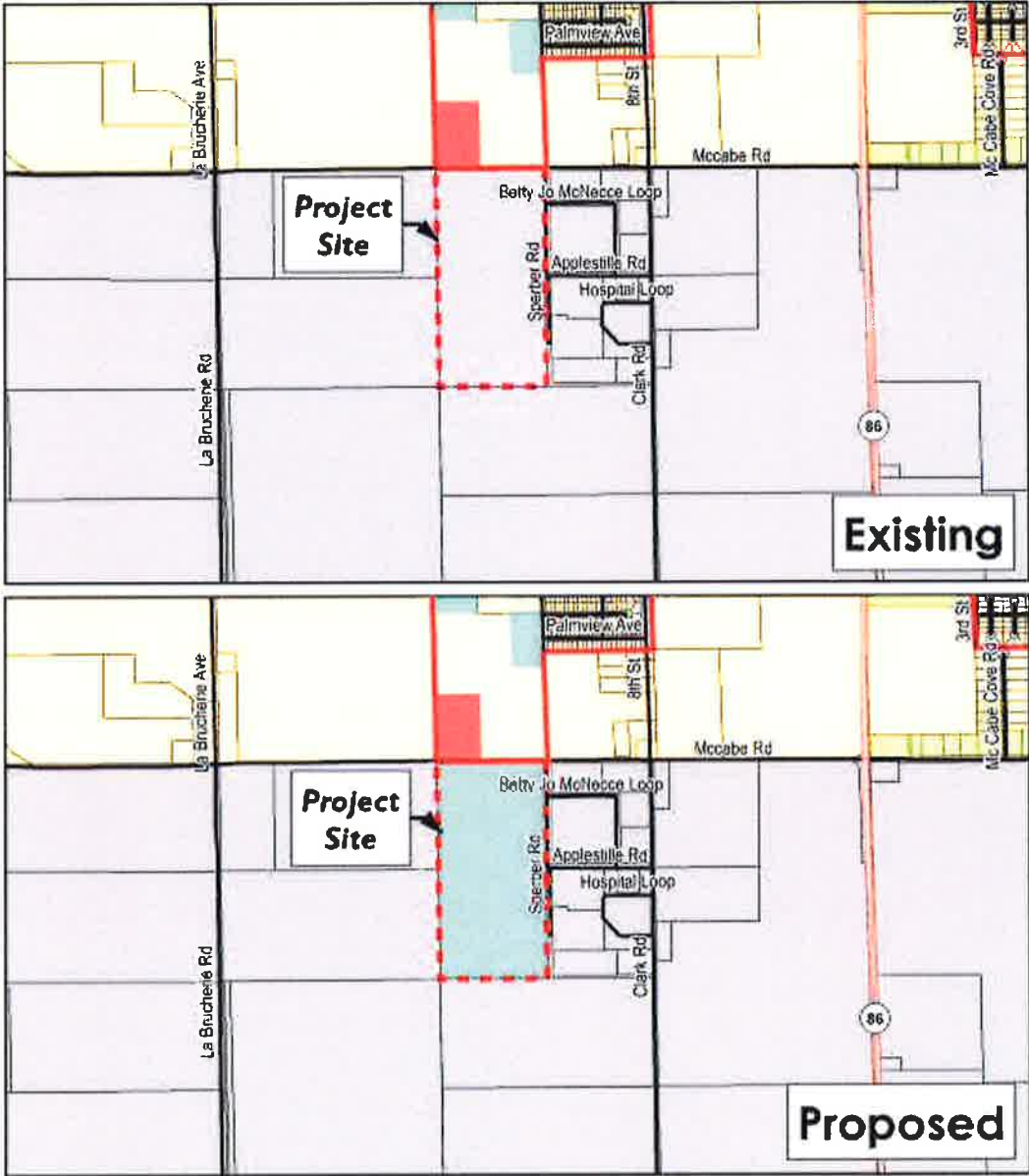


**2.0 PROJECT DESCRIPTION**

---

This page intentionally left blank

FIGURE 5 EXISTING AND PROPOSED LAND USE



**Land Use Map**  
Imperial County Office  
of Education Annexation



Legend	
	Project Site
	City Lines
Land Use Designation	
	Rural Residential
	Low Density Residential
	Medium Density Residential
	High/Medium Density Residential
	Tourist Commercial
	General Commercial
	Downtown Commercial
	General Industrial
	Planned Industrial
	Civic
	Public

## **2.0 PROJECT DESCRIPTION**

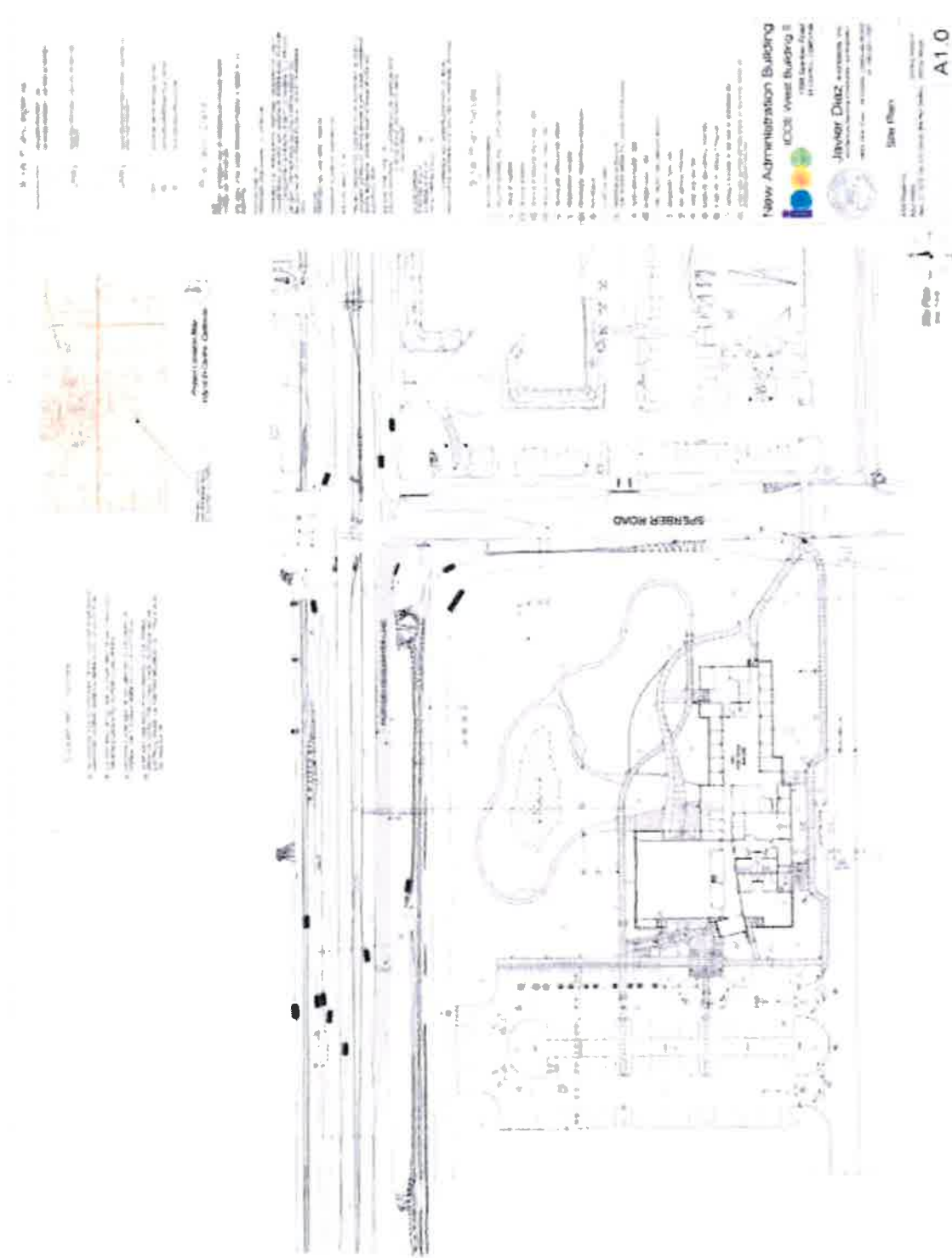
---

This page intentionally left blank



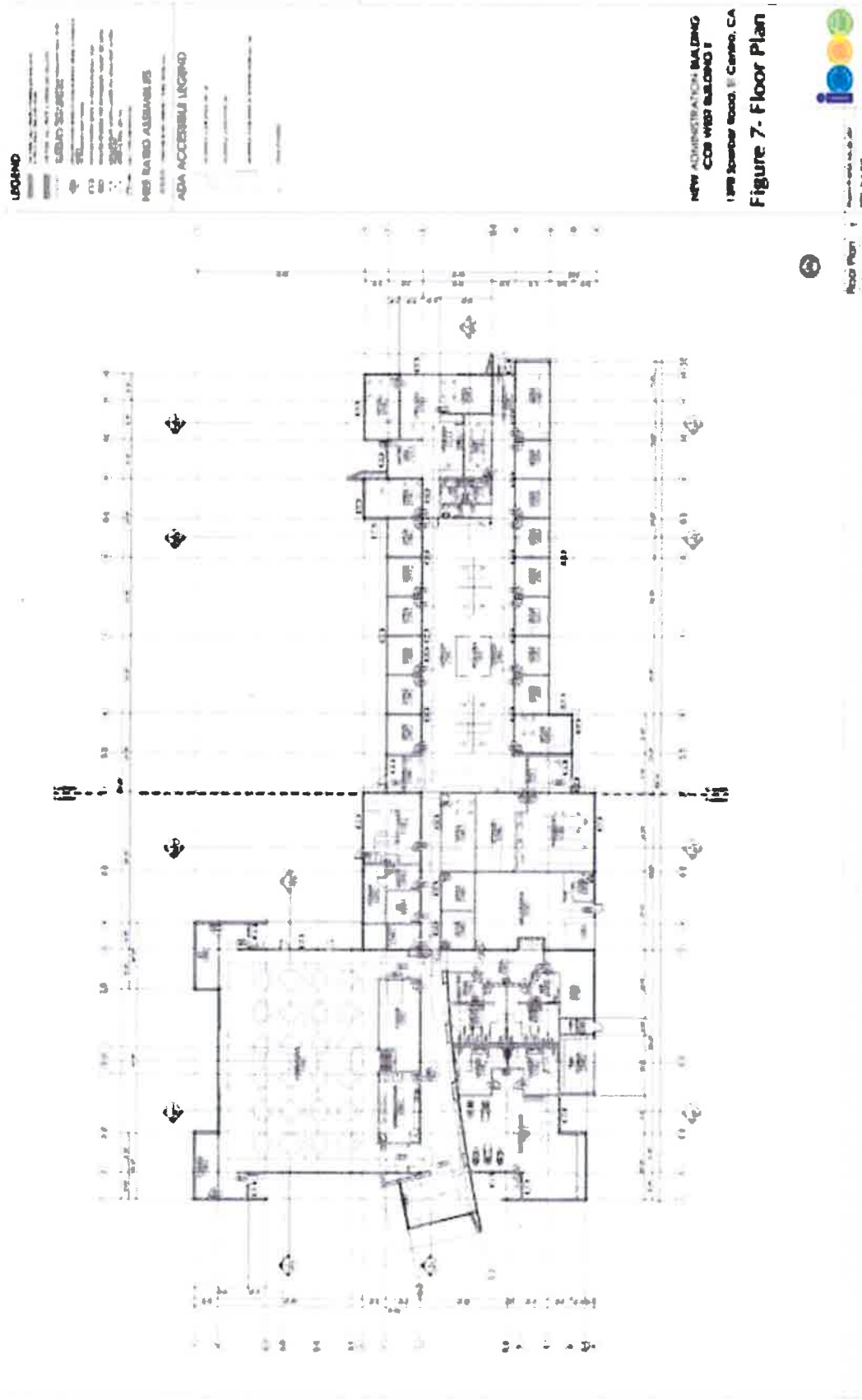
## 2.0 PROJECT DESCRIPTION

FIGURE 6 SITE PLAN



2.0 PROJECT DESCRIPTION

FIGURE 7 FLOOR PLAN



---

## **3.0 ENVIRONMENTAL CHECKLIST**

---

### 3.0 ENVIRONMENTAL CHECKLIST

#### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project involving at least one impact that is "Less Than Significant Impact With Mitigation Incorporated" as indicated by the checklist on the following pages.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                                    | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality               |
| <input checked="" type="checkbox"/> Biological Resources               | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Geology and Soils                    |
| <input type="checkbox"/> Greenhouse Gas Emissions                      | <input type="checkbox"/> Hazards/Hazardous Materials        | <input type="checkbox"/> Hydrology/Water Quality              |
| <input type="checkbox"/> Land Use/Planning                             | <input type="checkbox"/> Mineral Resources                  | <input type="checkbox"/> Noise                                |
| <input type="checkbox"/> Population/Housing                            | <input type="checkbox"/> Public Services                    | <input type="checkbox"/> Recreation                           |
| <input checked="" type="checkbox"/> Transportation/Traffic             | <input type="checkbox"/> Tribal Cultural Resources          | <input checked="" type="checkbox"/> Utilities/Service Systems |
| <input checked="" type="checkbox"/> Mandatory Findings of Significance |   |   |

### 3.0 ENVIRONMENTAL CHECKLIST

---

#### DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because of the incorporated mitigation measures and revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Norma M. Villicaña, AICP

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

\_\_\_\_\_  
Community Development Director

\_\_\_\_\_  
Title

**EVALUATION OF ENVIRONMENTAL IMPACTS**

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources cited. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards.
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect, and construction as well as operational impacts.
- 3) A "Less Than Significant Impact" applies when the proposed project would not result in a substantial and adverse change in the environment. This impact level does not require mitigation measures.
- 4) "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 5) "Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from a "Potentially Significant Impact" to a "Less Than Significant Impact." The initial study must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.

### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>1. AESTHETICS.</b> Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### DISCUSSION OF IMPACTS

- a) **No Impact.** Scenic vistas include natural features such as topography, watercourses, rock outcrops, natural vegetation, and man-made alterations to the landscape. The proposed construction of a 22-foot high building, consisting of 20,700 square feet will not obstruct the views of a scenic vista. Future development in the proposed zone LU, Limited Use Zone would follow the standards of the General Commercial (CG) zone as shown in **Table 3.1-1**. As such, implementation of the proposed project would have a less than significant impact on a scenic vista.

**TABLE 3.1-1  
ZONE DEVELOPMENT STANDARDS**

Proposed Zone	Maximum Building Height, in Feet	Maximum Lot Coverage, Percent
General Commercial (CG)	65	No Requirement <sup>1</sup>

1. Maximum floor area ratio is 0.50:1.

- b) **No Impact.** The project site is not located within a scenic corridor, nor are there any scenic highways in El Centro. Because the project site is not located in the vicinity of a designated scenic highway, implementation of the proposed project would have no impact to scenic resources within a state scenic highway.
- c) **Less Than Significant Impact.** The construction of 20,700-square foot administrative building will not be out of context within the project's vicinity. The land to the east is substantially developed and consists of administrative offices. The project will consist of similar urban uses in the immediate vicinity and would be of a design quality that does not substantially degrade the visual quality of the area. Moreover, future projects would be designed in accordance with design standards codified in the El Centro Municipal Code and be subject to design review. Therefore, the impact would be less than significant.
- d) **Less Than Significant Impact.** Future development may increase the amount of light and glare in the area. In addition, future development may introduce new light sources onto the currently undeveloped project site. However, all new development projects in El

---

### **3.0 ENVIRONMENTAL CHECKLIST**

Centro are required to meet the standards in the City's Lighting Regulations, which are contained in the Zoning Ordinance. These regulations require light fixtures to be shielded from above and designed and adjusted to reflect light away from streets and residences. Therefore, future development impacts associated with light and glare would be less than significant.



### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>2. AGRICULTURE AND FORESTRY RESOURCES.</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997), prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forestland or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### DISCUSSION OF IMPACTS

- a) **Less Than Significant Impact.** The proposed project site is currently zoned for general agriculture uses; zoning will be changed to Limited Use (LU). The project site is identified as Farmland of Statewide Importance pursuant to the California Important Farmland Finder. This type of farmland has a good combination of physical and chemical characteristics for the production of agricultural crops. Under Imperial County's Agricultural Element of the General Plan, the policy is that no agricultural land "shall be removed from the agriculture category except where needed for use by a public agency, for renewable energy purposes, where a mapping error may have occurred, or where a clear long term economic benefit to the County can be demonstrated..." In this vein, the removal of agricultural land by the Imperial County Office of Education is acceptable and consistent with the County's policy because the land is being used by a public agency to improve educational services to the general public.
- b) **Less Than Significant Impact.** The proposed project's zoning does not conflict with existing zoning for agricultural uses or a Williamson Act contract. A change of zone is being sought by the applicant from County A2 (General Agriculture) to City (Limited Use) to

### 3.0 ENVIRONMENTAL CHECKLIST

---

ensure consistency in zoning for the proposed administrative building. The construction of the administrative building will eliminate ~6 acres of farmland and would leave the remaining ~74 for agricultural purposes. The change of zone is consistent with Imperial County's Agriculture Element which allows for agricultural land to be removed from the agriculture category if the land is needed by a public agency such as the Imperial County Office of Education.

- c-d) **No impact.** The project site is not zoned for forestry uses, and is not actively utilized as a forestry operation. There would be no impact.
  
- e) **Less than significant impact.** The proposed project is adjacent to existing development, namely the Imperial County Jail and the Office Education Office, collectively known as County Center II. It is possible that the construction of a new 20,700-square foot administrative building could potentially lead to additional development that would convert farmland to nonagricultural use. In the event there is additional development proposed, conformance with CEQA would be required for future projects.

### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>3. AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project is nonattainment under applicable federal or state ambient air quality standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### DISCUSSION OF IMPACTS

This section summarizes findings of the Imperial County Office of Education Air Quality Impact Analysis Report prepared by Urban Crossroads (2018), which is contained in its entirety in **Appendix A**.

- a) **Less Than Significant Impact With Mitigation Incorporated.** The project site is located in Imperial County. The air quality in the County is under the jurisdiction of the Imperial County Air Pollution Control District (ICAPCD). The ICAPCD is the local air quality agency and shares responsibility with the California Air Resources Board (CARB) for ensuring that state and federal ambient air quality standards are achieved and maintained in Imperial County. ICAPCD responsibilities include monitoring ambient air quality, planning activities such as modeling and maintenance of the emission inventory, and preparing clean air plans.

Clean air plans, known as State Implementation Plans, must be prepared for areas designated as nonattainment areas to demonstrate how the area will come into attainment of the exceeded ambient air quality standard. Air basins with air quality that exceed adopted air quality standards are designated as nonattainment areas for the relevant air pollutants. Imperial County is classified a nonattainment area for particulate matter equal to or less than 10 microns in aerodynamic diameter (PM<sub>10</sub>) and ozone (O<sub>3</sub>) under both state and federal air quality standards (the pollutants described as reactive organic gases (ROG) and oxides of nitrogen (NO<sub>x</sub>) are ozone precursors).

Furthermore, the county is classified a nonattainment area for particulate matter equal to or less than 2.5 microns in aerodynamic diameter (PM<sub>2.5</sub>) under federal standards. Imperial County is an unclassified or attainment area for all other criteria air pollutants, including sulfur oxide, carbon monoxide, and lead (unclassified areas are those with insufficient air quality monitoring data to support a designation of attainment or

nonattainment, but are generally presumed to comply with the ambient air quality standard).

The region's State Implementation Plan (SIP) constitutes the ICAPCD air quality plans: Final 2013 State Implementation Plan for the 2006 24-hour PM<sub>2.5</sub> Moderate Nonattainment Area, Final 2009 1997 8-Hour Ozone Modified Air Quality Management Plan, Final PM<sub>10</sub> 2009 State Implementation Plan, and February 2008 Ozone Early Progress Plans. Generally, project compliance with all of the ICAPCD rules and regulations results in conformance with the ICAPCD air quality plans. Policy 6.1 in the City's General Plan Conservation/Open Space Element mandates that the City cooperate with the ICAPCD in the district's efforts to implement the regional SIP. In addition, Policy 6.2 requires that the City cooperate and participate in regional air quality management planning, programs, and enforcement measures. The proposed project is required to conform to the City's General Plan; therefore, the proposed project would also be required to adhere to all ICAPCD rules and regulations.

The project is considered a Tier II project as a result of its projected maximum daily pollutant emissions. The Imperial County Office of Education Air Quality Analysis Report (**Appendix A**) fulfills the ICAPCD requirement for Tier II projects to prepare an air quality analysis report for the proposed project. Additionally, mitigation measures **AQ-1** and **AQ-2** fulfill all other ICAPCD requirements for Tier II projects. Since projects are required to comply with all applicable ICAPCD rules and regulations, as well as with all Tier II project requirements for controlling emissions of the nonattainment air pollutants and their precursors, the project would not conflict with or obstruct implementation of any air quality plans. This impact is less than significant with mitigation incorporated.

- b) **Less Than Significant Impact With Mitigation Incorporated.** As previously stated, the project site is located in Imperial County, and state and federal air quality standards are often exceeded in many parts of the county. The project's potential short-term construction-period and long-term operational-period air quality impacts are discussed below.

#### **Short-Term Construction Emissions of Criteria Air Pollutants**

The ICAPCD has established methods to quantify air emissions associated with construction activities such as air pollutant emissions generated by operation of on-site construction equipment, fugitive dust emissions related to grading and site work activities, and mobile (tailpipe) emissions from construction worker vehicles and haul/delivery truck trips. Emissions would vary from day to day, depending on the level of activity, the specific type of construction activity occurring, and, for fugitive dust, prevailing weather conditions. The use of construction equipment on-site would result in localized exhaust emissions.

#### ***Fugitive Dust***

Fugitive dust emissions are generally associated with land clearing and exposure of soils to the air and wind and with cut-and-fill grading operations. Dust generated during construction varies substantially on a project-by-project basis, depending on the level of activity, the specific operations, and weather conditions at the time of construction.

### 3.0 ENVIRONMENTAL CHECKLIST

General Plan Conservation/Open Space Element Policy 6.1 mandates that the City cooperate with the ICAPCD in the district's efforts to implement the regional SIP, and Policy 6.2 requires that the City cooperate and participate in regional air quality management planning, programs, and enforcement measures. Therefore, project applicants must adhere to all ICAPCD rules and regulations since conformance with the City's General Plan is a requirement for any project in El Centro.

Since 5 or more acres of land would be disturbed by construction activity, project applicants are required to develop and implement a dust control plan consistent with the ICAPCD Rule 801 requirements for construction activities. The purpose of this rule is to reduce the amount of PM<sub>10</sub> entrained in the ambient air as a result of emissions generated from construction and other earthmoving activities by requiring actions to prevent, reduce, or mitigate PM<sub>10</sub> emissions. In addition, projects must adopt best available control measures to minimize emissions from surface-disturbing activities to comply with ICAPCD Regulation VIII (Fugitive Dust Rules).

The proposed Administration Building would generate short-term, temporary, construction-related air quality impacts. The estimated construction emissions are summarized in **Table 3.3-1** and compared with ICAPCD significance thresholds. The emissions from the project would not exceed ICAPCD significance thresholds.

**TABLE 3.3-1  
MAXIMUM SHORT-TERM CONSTRUCTION EMISSIONS (POUNDS PER DAY) WITHOUT MITIGATION**

Construction Year	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM10	PM <sub>2.5</sub>
2018	5.12	55.44	25.54	0.05	10.17	6.51
2019	16.18	24.10	19.67	0.03	1.60	1.36
Maximum Daily Emissions	16.18	55.44	25.54	0.05	10.17	6.51
ICAPCD Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: Urban Crossroads Air Quality Impact Analysis

As shown above, all criteria pollutant emissions would remain below their respective thresholds. Therefore, construction-related air quality impacts would be less than significant.

#### **Long-Term Operational Emissions of Criteria Air Pollutants**

The ICAPCD has established significance thresholds to evaluate the potential impacts associated with long-term project operations. Regional air pollutant emissions associated with project operations include area source emissions, energy-use emissions, and mobile source emissions. The quantified operational emission projections are summarized in **Table 3.3-2** and compared with ICAPCD significance thresholds. Project operational source emissions would not exceed the applicable ICAPCD regional thresholds of significance. Therefore, a less than significant impact would occur and not mitigation is required.

**TABLE 3.3-2  
LONG-TERM OPERATIONAL EMISSIONS (POUNDS PER DAY)**

<b>Emission Source</b>	<b>VOC</b>	<b>NOx</b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>PM10</b>	<b>PM<sub>2.5</sub></b>
Area Source Emissions	0.57	0	0.01	0	0	0
Energy Use Emissions	0	0.02	0.02	0	0	0
Mobile Emissions	3.04	17.85	24.98	0.05	2.34	0.66
<b>Maximum Daily</b>	<b>3.61</b>	<b>17.87</b>	<b>25.01</b>	<b>0.05</b>	<b>2.35</b>	<b>0.66</b>
ICAPCD Threshold	55	55	550	150	150	55
Exceed threshold?	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: Urban Crossroads Air Quality Impact Analysis

The project is considered a Tier II project. These types of projects are required to prepare an air quality analysis report demonstrating project implementation of all ICAPCD-identified Standard Mitigation Measures and all feasible Discretionary Mitigation Measures. These measures must be listed and incorporated into the air quality analysis report. In the case that these measures cannot be shown to reduce air pollutant emissions to levels below ICAPCD thresholds, Tier II projects are required to conform to ICAPCD Rule 310, Operational Development Fee, which is a rule adopted by the ICAPCD as a sound method for mitigating the emissions produced from the operations of new development projects throughout the Imperial County.

The ICOE Air Quality Analysis Report (**Appendix A**) fulfills the ICAPCD requirement to prepare an air quality analysis report for the proposed project. The following ICAPCD-identified Standard Mitigation Measures and Discretionary Mitigation Measures are also required.

**Mitigation Measures**

- AQ-1** The operator shall implement the following standard mitigation measures for fugitive dust PM<sub>10</sub> control:
- a. The operator shall insure that all disturbed areas, including bulk material storage which is not being actively utilized, will be effectively stabilized and visible emissions will be limited to no greater than 20% opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps, or other suitable material such as vegetative ground cover.
  - b. The operator shall insure that all on-site and off-site unpaved roads will be effectively stabilized and visible emissions be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering.
  - c. The operator shall insure that all unpaved traffic areas with 75 or more average vehicle trips per day will be effectively stabilized and visible emission be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering.
  - d. The operator shall insure that all transport (import or export) of borrow material used as cover material will be completely covered unless six inches of

### 3.0 ENVIRONMENTAL CHECKLIST

---

freeboard space from the top of the container is maintained with no spillage and loss of borrow material. In additions, the cargo compartment of all haul trucks is to be cleaned and/or washed at delivery site after removal of bulk material.

- e. The operator shall insure that all track-out or carryout will be cleaned at the end of each workday.
- f. The operator shall insure that all movement of borrow material handling or at points of transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line.

*Timing/Implementation: During Construction*

*Enforcement/Monitoring: Imperial County Air Pollution Control District*

#### AQ-2

The operator shall implement the following standard mitigation measures for construction combustion equipment:

- a. The operator shall insure the use of Tier 2 vehicles or the equivalent alternative fueled or catalyst equipped diesel construction equipment.
- b. The operator shall insure that idling time will be minimized by either shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum.
- c. The operator shall limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use.
- d. The operator shall, where practicable, replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set).

*Timing/Implementation: During construction*

*Enforcement/Monitoring: Imperial County Air Pollution Control District*

- c) **Less Than Significant Impact.** The following tiered approach is to assess cumulative air quality impacts, per ICAPCD guidance. Each of the criteria must be less than significant in order for the project to have a less than significant impact on cumulative air quality.

#### **Regional Analysis**

If an area is in nonattainment for a criteria pollutant, then the background concentration of that pollutant has historically been over the ambient air quality standard. It follows that if a project exceeds the regional threshold for that nonattainment pollutant, it will result in a cumulatively considerable net increase of that pollutant and result in a significant cumulative impact.

As previously stated, Imperial County is nonattainment for federal ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> standards as well as state ozone and PM<sub>10</sub> standards (CARB 2015). Therefore, if the

project exceeds the regional thresholds for PM<sub>10</sub> and/or PM<sub>2.5</sub>, it contributes to a cumulatively considerable impact for particulate matter. Additionally, if the project exceeds the regional threshold for NO<sub>x</sub> or ROG (ozone precursors), it follows that the project will contribute to a cumulatively considerable impact for O<sub>3</sub>.

Emissions generated from project construction would not exceed the regional significance thresholds for ROG, NO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. In addition, construction contractors would be required to implement all standard construction mitigation measures to reduce construction-related emissions per ICAPCD Rule 801.

The project is considered a Tier II project as a result of its projected maximum daily pollutant emissions. As previously described, the project's Air Quality Analysis Report (**Appendix A**) fulfills the ICAPCD requirement for Tier II projects to prepare an air quality analysis report. Additionally, mitigation measures **AQ-1** and **AQ-2** fulfill all other ICAPCD requirements for Tier II projects. Since project applicants are required to comply with all Tier II project requirements for controlling emissions of the nonattainment air pollutants and their precursors, the project would not exceed regional thresholds. Therefore, the project will not contribute to a cumulative air quality impact according to this criterion.

#### **Plan Approach**

As previously described, the ICAPCD is required to prepare and maintain attainment plans to document the strategies and measures to be undertaken in order to reach attainment of ambient air quality standards. While the ICAPCD does not have direct authority over land use decisions, it is recognized that changes in land use and circulation planning are necessary to maintain clean air. As a result, the ICAPCD evaluates the entirety of Imperial County when it develops the attainment plan. As discussed above, the project is consistent with the current air quality plans. Therefore, according to this criterion, the project has a less than significant cumulative impact.

#### **Cumulative Health Impacts**

Imperial County is in nonattainment for O<sub>3</sub> and PM<sub>10</sub> under both state and federal air quality standards and for PM<sub>2.5</sub> under federal standards, which means that the background levels of these pollutants are at times higher than the ambient air quality standards. The air quality standards were set to protect public health, including the health of sensitive individuals (i.e., the elderly, children, and the sick). Therefore, when the concentration of those pollutants exceeds the standard, it is likely that some sensitive individuals in the population will experience negative health effects. The regional significance analysis demonstrated that emissions during operation of the project at buildout of parcels would not exceed the regional significance thresholds; therefore, significant cumulative health impacts are not anticipated from project emissions.

- d) **Less Than Significant Impact.** Sensitive land uses are generally defined as locations where people reside or where the presence of air emissions could adversely affect the use of the land. Typical sensitive receptors include residents, schoolchildren, hospital patients, and the elderly. The nearest sensitive receptors to the project site is the Betty McNeece home, which is 800 feet. The proposed land use would negatively affect the nearby receptor given that it meets ICAPCD regional threshold and does not create a CO hot spot.
- e) **Less Than Significant Impact.** Substantial odor-generating sources include land uses such as agricultural activities, feedlots, wastewater treatment facilities, landfills or various



### **3.0 ENVIRONMENTAL CHECKLIST**

---

heavy industrial uses. The project does not propose any such uses or activities that would result in potentially significant operational-source odor impacts. Potential sources of operational odors generated by the project would include disposal of miscellaneous commercial refuse. Consistent with applicable requirements, all project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations. Potential operational-source odor impacts are therefore considered less-than-significant.

### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>4. BIOLOGICAL RESOURCES.</b> Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal wetlands, etc.), through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### DISCUSSION OF IMPACTS

- a) **Less Than Significant Impact With Mitigation Incorporated.** A biological resources report was prepared for the project in November 2017. The study included a query of the California Natural Diversity Database (CNDDDB) to identify known occurrences for special-status species within a 1-mile and a 5-mile radius of the project area. Additionally, the California Native Plant Society (CNPS) database was queried to identify special-status plant species with the potential to occur within the El Centro, California, US Geological Survey (USGS) 7.5-minute quadrangle. Field guides, personal contacts and other methods to ascertain potential for sensitive species on the site were used. A biologist also surveyed the property on October 29, 2017 and found no sensitive habitat or species. See **Appendix B** for the database search results and summary.

### 3.0 ENVIRONMENTAL CHECKLIST

---

#### **Special-Status Species**

The Imperial Valley has a majority of the Burrowing Owl population in southern California. Irrigation canals and drains are commonly used as nesting sites in the Imperial Valley region. The Burrowing Owl is a small, pale, buffy-brown owl that nests in borrowed burrows and is a California Department of Fish and Wildlife Species of Special Concern, and a Federal Species of Concern pursuant to the Migratory Bird Treaty Act. The biology study completed was conducted utilizing the California Department of Fish and Wildlife (CDFW) Staff Report (2012), which addresses survey mitigation guidelines for the owl and communication with the CDFW, Bermuda Dunes, CA office.

The project site was searched for Burrowing Owls and their sign (burrows, pellets, feathers, scat, litter, and animal dung). The entrances to burrows often have bits of animal dung, prey carcasses, feathers, and litter, among other objects. During the period of February through May, up to 12 eggs are laid by burrowing owls. During the site investigation, burrowing owls and their signs were searched for, and no burrowing owls or burrows were found. However, burrowing owls could be expected in the vicinity of the site. It is for this reason, a preconstruction survey should be completed. Implementation of mitigation measures BIO-1 and BIO-2 would reduce those impacts to a less than significant level.

#### **Mitigation Measures**

**BIO-1** Prior to the start of construction activities, the project applicant shall retain a qualified biologist to conduct mandatory contractor/worker awareness training for construction personnel. The awareness training shall be provided to all construction personnel to brief them on owl/nest birds, biology, regulations (CDWF/USFWS), wallet card with owl pictures/guidelines for protecting owl and wildlife, and notification procedures if avian species (dead, alive, injured) are found on or near the site.

*Timing/Implementation: Prior to construction activities*

*Enforcement/Monitoring: City of El Centro Community Development Department*

**BIO-2** A preconstruction survey of the project area shall be conducted and performed three (3) days prior to initiating ground disturbance to survey for nesting birds. If construction begins between January through the end of August, a report should be submitted to the appropriate agency.

*Timing/Implementation: Prior to construction activities*

*Enforcement/Monitoring: City of El Centro Community Development Department*

- b) **No Impact.** Sensitive habitats include those that are of special concern to resource agencies and those that are protected under CEQA, Section 1600 of the Fish and Game Code, and Section 404 of the Clean Water Act (CWA). No waters of the State or waters of the United States occur within the project site; therefore, no impact to riparian or other sensitive natural communities will occur as a result of the proposed project.
- c) **No Impact.** Implementation of the proposed project will not result in the loss of jurisdictional waters of the State and waters of the United States, because no such waters

### 3.0 ENVIRONMENTAL CHECKLIST

---

occur within the project site. As a result, no impact to federally protected wetlands would occur as a result of the proposed project.

- d) **Less Than Significant Impact.** Implementation of the proposed project would not interfere substantially with the movement of native resident or migratory fish or wildlife species. No established migratory routes were identified on or adjacent to the project site. Due to the urbanized land uses in the project vicinity, it is unlikely that any significant wildlife corridors exist in the project vicinity. Therefore, a less than significant impact would occur.
- e) **No Impact.** There are currently no adopted or proposed local policies or ordinances protecting biological resources that affect the proposed project site. Therefore, no impact would occur.
- f) **No Impact.** There are currently no adopted or proposed habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans that affect the proposed project site. Therefore, no impact would occur.

### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>5. CULTURAL RESOURCES.</b> Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5??	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### DISCUSSION OF IMPACTS

- a) **Less Than Significant Impact.** The proposed project site does not contain any known archaeological resources. The site has been historically been used for agricultural purposes.

Even though no archaeological resources have been identified in the project area, most areas of the southern basin of Lake Calhulla, where the project site is located, are typically considered to have a moderate to high sensitivity for buried resources. In the current project area, covered by deep layers of Quaternary alluvium and lake deposits, buried archaeological resources could be present, potentially at great depth.

Given the potential for buried resources, prior to the initiation of future development projects, construction, or ground-disturbing activities, all construction personnel are required to be alerted to the possibility of buried cultural materials (i.e., prehistoric or historic archaeological resources). Potential cultural materials include historic and prehistoric artifacts, features, and structural remains that may consist of but are not limited to:

- Historic artifacts, such as glass bottles and fragments, metal cans, nails, ceramic and pottery sherds, and other metal objects;
- Flaked-stone artifacts and debitage, consisting of obsidian, basalt, and/or chert;
- Groundstone artifacts, such as mortars, pestles, and grinding slabs;
- Faunal remains, including animal bone and shell; and
- Archaeological midden-type soil that may be associated with charcoal, ash, bone, shell, flaked stone, groundstone, and fire-affected rock.

In regard to the proposed project site, personnel would be instructed that upon discovery of buried cultural remains, work in the immediate vicinity of the find must cease and a qualified archaeologist contacted immediately. Once the find has been identified, plans for treatment and evaluation of the find will need to be developed. If

### 3.0 ENVIRONMENTAL CHECKLIST

---

- the find is determined eligible for the California Register of Historical Resources, plans for mitigating impacts to the resource will also need to be developed. Upon implementation of these standard requirements, impacts to historical resources would be less than significant.
- b) **Less Than Significant Impact.** No archaeological resources have been identified at the project site. However, ground-disturbing activities could encounter previously unrecorded resources. For this reason, the requirements for future development projects presented in Issue a) above must be followed. Compliance with these standard requirements would ensure impacts to archaeological resources are less than significant.
- c) **No Impact.** The proposed project would have no impacts on a unique paleontological resource or geologic feature.
- d) **No Impact.** In the unlikely event of the discovery of human remains during project construction, the California Health and Safety Code and State CEQA Guidelines Section 15064.5(e) require that work in the immediate area must halt, the remains must be protected, and the county coroner must be notified immediately. If the remains are determined to be Native American, then the Native American Heritage Commission (NAHC) must be notified (typically by the coroner) within 24 hours, as required by Public Resources Code Section 5097. The NAHC would identify and contact a most likely descendant, who would be given the opportunity to provide recommendations for the treatment of the remains within 48 hours of being granted access to the site. Compliance with these requirements would ensure a less than significant impact on human remains.

### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>6. GEOLOGY AND SOILS.</b> Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death, involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the projects, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2015), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### DISCUSSION OF IMPACTS

a)

- i) **Less Than Significant Impact.** There are no known faults traversing the project site, in the vicinity of the project site, or in El Centro. The site is not located in an Alquist-Priolo earthquake hazard zone. However, the project site is located in a seismically active area. The City requires proper development engineering and building construction of proposed development and enforces these requirements through the development and environmental review process. The proposed development would follow the California Building Code (CBC), as adopted in the City of El Centro Municipal Code.
- ii) **Less Than Significant Impact.** The project area is seismically active, and development will require implementation of project design measures and adherence to the California

Building Code, as adopted in the City of El Centro Municipal Code. These design and building techniques would be implemented for the proposed development.

- iii) **Less Than Significant Impact.** The Imperial Valley is a seismically active area. Future development of the project site will require implementation of design measures and conformance to the California Building Code.
- iv) **No Impact.** Because the project area is relatively flat, no potential for a landslide exists, thereby posing no impacts to the project site.
- b) **Less Than Significant Impact.** Future development will require the implementation of best management practices (BMPs) for project construction and on-site drainage, which will reduce the potential for erosion.
- c) **Less Than Significant Impact.** A geology and soils study shall be prepared with a clear identification of site-specific measures to ensure geotechnical stability and submitted as part of the building permit process.

#### **On-Site or Off-Site Landslide**

The project site is generally level and would not be susceptible to landslides. Development would be required to be in compliance with the structural standards set forth by both the City.

#### **Lateral Spreading**

The risk of lateral spreading can be reduced through appropriate land use planning, development engineering, and building construction practices. As such, the proposed development would comply with the most recent California Building Code, Uniform Mechanical Code, Uniform Fire Code, and National Electric Code, which contain structural requirements for existing and new buildings designed to ensure structural integrity during seismic events and to prevent injury, loss of life, and substantial property damage.

#### **Liquefaction**

The risk of liquefaction can be reduced through appropriate land use planning, development engineering, and building construction practices. As such, future development would comply with the most recent California Building Code, Uniform Mechanical Code, Uniform Fire Code, and National Electric Code, which contain structural requirements for existing and new buildings designed to ensure structural integrity during seismic events and to prevent injury, loss of life, and substantial property damage. All development is required to be in accordance with typical building construction practices that comply with the California Building Code.

#### **Collapse**

Neither natural nor man-made subsurface features that are known to encourage collapse, including mines, aggregate extraction operations, or karst topography, are known to underlay or occur adjacent to the project site.



### 3.0 ENVIRONMENTAL CHECKLIST

---

Therefore, mandatory compliance with applicable codes would ensure that future impacts related to unstable soil would be less than significant.

- d) **Less Than Significant Impact.** The project site is underlain by clays of moderate to high expansion potential. However, the proposed development would be required to be in accordance with the typical building construction practices that comply with the California Building Code. Measures could include compaction, over-excavating, and slab-on-grade foundations. Compliance with the California Building Code would result in less than significant impacts associated with expansive soils.
- e) **No Impact.** The proposed development would connect to the existing sewer system. Septic tanks and alternative wastewater disposal systems would not be installed on the project site. Therefore, implementation of the proposed project would not result in impacts to soils associated with the use of such wastewater treatment systems.

### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>7. GREENHOUSE GAS EMISSIONS.</b> Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### DISCUSSION OF IMPACTS

This section summarizes findings of the Imperial County Office of Education Greenhouse Gas Analysis Report prepared by Urban Crossroads (2018), which is contained in its entirety in **Appendix C**.

- a) **Less Than Significant Impact.** Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O). Human-caused emissions of these GHGs in excess of natural ambient concentrations are believed responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming. It is "extremely likely" that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic factors together (IPCC 2014).

The proposed project would result in direct and indirect emissions of GHGs. Direct project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation from the construction of the proposed administrative building.

Determining a threshold of significance for a project's climate change impacts poses a special difficulty for lead agencies. Much of the science in this area is new and is evolving constantly. At the same time, neither state nor local agencies are specialized in this area, and there are currently no local, regional, or state thresholds for determining whether the proposed project has a significant impact on climate change. The CEQA Amendments do not prescribe specific significance thresholds but instead leave considerable discretion to lead agencies to develop appropriate thresholds to apply to projects within their jurisdiction. Assembly Bill (AB) 32 sets statewide reduction mandates for emissions be reduced to 1990 levels by 2020, but to date neither the local air district nor the City of El Centro have adopted GHG significance thresholds applicable to potential development.

Neither Imperial County nor the City of El Centro have adopted a Climate Action Plan. Therefore, a 900 MTCO<sub>2</sub>e screening criterion for determining when a detailed GHG analysis shall be prepared, following guidance from the CAPCOA report, "CEQA &

### 3.0 ENVIRONMENTAL CHECKLIST

Climate Change." The CAPCOA report references the 900-metric-ton guideline as a conservative threshold for requiring further analysis and mitigation. This emission level is based on the amount of vehicle trips, typical energy and water use, and other factors associated with projects. CAPCOA identifies project types that are estimated to emit approximately 900 MTCO<sub>2</sub>e of GHGs annually. Projects that meet the criterion are not required by the City to prepare a detailed GHG report. If a project would emit GHGs less than 900 MTCO<sub>2</sub>e per year, the project is not considered a substantial GHG emitter and the GHG impact is less than significant, requiring no additional analysis and no mitigation. Project-related GHG emissions were quantified with CalEEMod. **Table 3.7-1** shows the estimated GHG emissions that would result annually with project implementation. Total construction-generated GHG emissions were amortized over the estimated life of the project. A project life of 30 years is assumed for the proposed project.

**TABLE 3.7-1  
ANNUAL PROJECT GREENHOUSE GAS EMISSIONS (METRIC TONS PER YEAR)**

Emission Type	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total CO <sub>2</sub> E
Construction Amortized Over 30 Years	15.26	0.00	0.00	15.35
Area Source (landscaping, hearth)	0.00	0.00	0.00	0.00
Energy Consumption	138.85	0.00	0.00	131.13
Mobile Source (vehicles)	595.71	0.06	0.00	597.28
Waste Generation	4.09	0.24	0.00	10.14
Water Demand	50.60	0.14	0.00	55.20
<b>Total</b>	<b>793.75</b>			
Screening Threshold	<b>900</b>			
Exceeds Threshold?	<b>NO</b>			

Source: CalEEMod 2018. Mobile emissions derived from the traffic study prepared for the project (Urban Crossroads, 2018).

The annual GHG emissions associated with the operation of the proposed project are estimated to be 793.75 MTCO<sub>2</sub>e per year as summarized in Table 3-7-1. The project total GHG emissions would not exceed the City's screening threshold of 900 MTCO<sub>2</sub>e per year. As shown, the proposed project would result in a less than significant impact with respect to GHG emissions.

- b) **Less Than Significant Impact.** The project's net total GHG emissions would result in approximately 793.75 MTCO<sub>2</sub>e per year; thus, the proposed project would not exceed the City's screening threshold of 900 MTCO<sub>2</sub>e per year. Project-related emissions would not have a significant direct or indirect impact on GHG and climate change and no mitigation or further analysis is required.

### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>8. HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### DISCUSSION OF IMPACTS

a, b) **Less Than Significant Impact.** The proposed administrative building would not involve the routine transport, use, or disposal of hazardous materials. Any use of hazardous materials would be in compliance with all applicable federal, state, and local standards associated with the handling of hazardous materials. As such, the project would not create a hazard to the public or to the environment; therefore, the impact is considered less than significant.

### 3.0 ENVIRONMENTAL CHECKLIST

---

- c) **No Impact.** The proposed administrative building would not emit hazardous emissions or handle hazardous acute chemicals that would affect any school or proposed school.
- d) **No Impact.** The project site is not located on a hazardous materials site per the State Water Resources Control Board Website Geotracker website. The nearest LUST cleanup site is immediately east of the site at the Youth Juvenile Center. The site was cleaned and the case was closed on March 10, 1997.
- e) **No Impact.** The project site is not within 2 miles of an airport. The location of the administrative building would not be a hazard to those working within it due to proximity to an airport.
- f) **No Impact.** The proposed project site is not located within 2 miles of any private airstrip. Therefore, the proposed project would have no impact associated with hazards near private airstrips.
- g) **Less Than Significant Impact.** The proposed administration building would not interfere with the implementation of an emergency response plan or emergency evacuation plan. Future development of the annexation area would be subject to site plan review by City emergency services personnel to ensure that it would not interfere with an emergency response plan. Future buildout of the rezoned parcels would require associated improvements to the surrounding circulation system to ensure emergency access standards are maintained or improved. Therefore, the impact is less than significant.
- h) **No Impact.** The project site is not located on or contiguous to a designated high fire area associated with any designated wildland area. Future development would not expose people or structures to an increased risk of wildland fires. Therefore, there is no impact.

### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>9. HYDROLOGY AND WATER QUALITY.</b> Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of a failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### DISCUSSION OF IMPACTS

- a) **Less Than Significant Impact.** The Regional Water Quality Control Board (RWQCB) Colorado River Region administers the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program for construction activities. Construction activities disturbing 1 acre or more of land are subject to the permitting requirements of the NPDES General Permit for Discharges of Storm Water Runoff Associated with Construction Activity. Since the project site is more than 1 acre in size, the City, as the lead agency, will

### 3.0 ENVIRONMENTAL CHECKLIST

---

be required to submit a Notice of Intent to the RWQCB that covers the General Construction Permit (GCP) prior to the beginning of construction of the administrative building.

The GCP requires the preparation and implementation of a water quality management plan (WQMP) and a stormwater pollution prevention plan (SWPPP), both of which must be prepared before construction can begin. The SWPPP outlines all activities to prevent stormwater contamination, to control sedimentation and erosion, and to comply with Clean Water Act (CWA) requirements during construction. Implementation of the SWPPP starts with the commencement of construction and continues through to the completion of the project. The WQMP outlines the project site design, source control, and treatment control of BMPs utilized throughout the life of the project. Upon completion of future construction, the City, as the lead agency, must submit a Notice of Termination to the RWQCB to indicate that construction is complete. Therefore, with implementation of the NPDES and the SWPPP in compliance with the Regional Water Quality Control Board, impacts to water quality and discharge requirements will be less than significant.

- b) **Less Than Significant Impact.** The City of El Centro does not use its groundwater supply for consumption, because the groundwater is too brackish in quality for human consumption and agricultural uses. Instead, the future development will be supplied from the City's water supply system rather than groundwater, which will not result in a net deficit of aquifer volume or lowering of the groundwater table. Therefore, the level of impact is less than significant.
- c, d) **Less Than Significant Impact.** Stormwater runoff on the project site would be routed to an onsite bioretention detention basin, located north of the administration building. BMPs for pre- and post-construction activities on-site would also be implemented to ensure that less than significant impacts occur from erosion or siltation. Any projects associated with the annexation area must be designed to be consistent with the RWQCB requirements as detailed in item a) above. As such, impacts from future development of the parcels would be less than significant.
- e) **Less Than Significant Impact.** (See items a, c, and d, above.)
- f) **Less Than Significant Impact.** (See items a, c, and d, above.)
- g) **No Impact.** The project does not include housing and is not located within a 100-year flood hazard area (FEMA 2017).
- h) **No Impact.** The project is not located within a 100-year flood hazard area (FEMA 2017), thereby posing no impact to the project site.
- i) **No Impact.** The project is not located in an area identified to be at risk of flooding from dam or levee failure, thereby posing no impact to the project site.
- j) **No Impact.** The project site is located 114 miles from the Pacific Ocean, 31 miles from the Salton Sea, and 55 miles from the Colorado River. Therefore, it is not near a large water body that would be capable of creating seiches or tsunamis. The project site is characterized by generally flat terrain, as is the surrounding area; therefore, there would also be no mudflows on or near the project site.

**3.0 ENVIRONMENTAL CHECKLIST**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>10. LAND USE AND PLANNING.</b> Would the project:				
a) Physically divide an existing community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**DISCUSSION OF IMPACTS**

a) **No Impact.** The proposed project will not physically divide the community. The project area is located adjacent to land that is substantially developed with County administrative offices, the County jail, and an emergency shelter for children. To the north, south, and west of site land is presently use for farming. The proposed administrative building would be a continuation of the offices to east and would in no way physically divide the existing community. Therefore, there will be no impact.

b) **Less Than Significant Impact.** The project site is located in an area that is designated as "Agriculture" by Imperial County's General Plan. The project site is proposed to be rezoned from general agriculture (A2) to City limited use (LU). However, under Imperial County's Agricultural Element of the General Plan, the policy is that no agricultural land "shall be removed from the agriculture category except where needed for use by a public agency, for renewable energy purposes, where a mapping error may have occurred, or where a clear long term economic benefit to the County can be demonstrated..." In this vein, the removal of agricultural land by the Imperial County Office of Education is acceptable and consistent with the County's policy because the land is being used by a public agency.

The proposed LU zoning designation will be consistent with the surrounding zoning. The County facilities to the east are currently zoned G/S (Government Special Public Zone) per the County of Imperial Zoning Ordinance. The zone is intended for government owned facilities, including public office buildings and is consistent with the proposed City LU (Limited Use) zoning. The project also includes the annexation of 80 acres of land into the City of El Centro and a sphere of influence change to accommodate the parcel to be annexed into the City of El Centro.

c) **No Impact.** Currently, there is no adopted habitat conservation plan or natural community conservation plan in El Centro. Therefore, there is no impact.



### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>11. MINERAL RESOURCES.</b> Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### DISCUSSION OF IMPACTS

- a) **No Impact.** No mineral resources that are be of value to the region or residents of the state have been identified on the project site. Additionally, no locally important mineral resource recovery sites in the vicinity of the proposed project have been delineated on a local plan, specific plan, or in the City or County General Plan. Therefore, the project will have no impact on mineral resources.
- b) **No Impact.** See Issue a) above.

### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>12. NOISE.</b> Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or of applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, exposure of people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, exposure of people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### DISCUSSION OF IMPACTS

a-c) **No Impact.** The Noise Element of the General Plan discusses sound levels in terms of Community Noise Equivalent Level (CNEL) and equivalent noise level ( $L_{eq}$ ). CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale that accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 p.m. and 10:00 p.m. is as if the sound were actually 5 dBA higher than if it occurred from 7:00 a.m. to 7:00 p.m. From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were 10 dBA higher due to the lower background noise level. The CNEL is obtained by adding an additional 5 dBA to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels at night from 10:00 p.m. to 7:00 a.m. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour average.  $L_{eq}$  is the average noise level on an energy basis for any specific time period. The  $L_{eq}$  for 1 hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound.  $L_{eq}$  can be thought of as the level of a continuous noise that has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of A-weighted decibels (dBA).

The City of El Centro has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise-sensitive land uses. Noise sensitive land uses include hospitals, schools, daycares, elderly housing, and convalescent facilities. Table 3.12-1 identifies noise standards for these types of facilities.

### 3.0 ENVIRONMENTAL CHECKLIST

Betty Jo McNeece, an emergency shelter for children and a private residence are the nearest sensitive receptors, located 850 feet and 550 feet, respectively. Because of the distance between the proposed administrative office and the sensitive receptors, construction or operational-facility noise will not adversely affect individuals at these facilities.

**TABLE 3.12-1  
CITY OF EL CENTRO NOISE STANDARDS**

Land Use Types	One-Hour Average Sound Level (dBA)	
	Outdoor	Indoor <sup>(a)</sup>
Rural and Single-Family Residential	60	45
Multi-Family Residential	65	45
Schools, Libraries, Churches, Hospitals, Nursing Homes, and Parks and Recreation Areas	70	45

Source: El Centro 2004

a. In the event that outdoor acceptable noise exposure levels cannot be mitigated by various attenuation mitigation measures, indoor noise levels shall not exceed 45 dBA CNEL.

- d) **Less Than Significant Impact.** During project construction, construction activities will result in temporary increase in noise levels in the area. Section 17.1-8 of the City of El Centro Municipal Code states that during construction, no equipment shall be operated that cause noise at a level in excess of 75 dBA for more than 8 hours during a twenty-four hour period measured at the property line used for residential purposes. The nearest continuously occupied use in the vicinity is the Imperial County Office of Education administrative buildings located 130 feet to the east. Construction equipment typically produce noise levels up to 83 dBA  $L_{eq}$  approximately 50 feet from the source. Since construction noise levels drop off at a rate of about 6 dBA per doubling of distance between the noise source and receptor, existing offices will experience noise levels of 71 dBA, which meets the City's construction standards. Sensitive receptors are located approximately 550 feet and 850 feet away from the construction site. Because of the significant distance, construction noise will not negatively affect the well-being of individuals. Due to the operational nature of office-related work, there will not be a substantial noise increase in ambient noise levels.
- e) **No Impact.** The project site is located 5.5 miles south of the Imperial County Airport. Since this facility is more than 2 miles away, the project is not considered to be in the vicinity of the airstrip.
- f) **No Impact.** The project site is located 5.5 miles south of the Imperial County Airport and there are no private airstrips within 2 miles. Thus, there will no impacts to individuals working within the proposed building.

### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>13. POPULATION AND HOUSING.</b> Would the project:				
a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### DISCUSSION OF IMPACTS

- a) **Less Than Significant Impact.** The proposed project will not induce substantial population growth in the area, either directly or indirectly. The project's footprint is negligible and is not a substantial job generator inducing the construction of additional housing. Therefore, this impact would be less than significant.
- b) **No Impact.** The project site is underdeveloped. The proposed project involves the construction of a 20,700 square foot administrative office building for the use of the Imperial County Office of Education. Therefore, implementation of the proposed project would not displace any housing, and no impact would occur.
- c) **No Impact.** See Issue b) above.

### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>14. PUBLIC SERVICES.</b> Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### DISCUSSION OF IMPACTS

- a) **Less Than Significant Impact.** Development on the proposed project site would be serviced by the El Centro Fire Department (ECFD) after annexation. Fire Station No. 1 is located nearest the site at 775 W. State Street. Because the size of the administrative office is negligible at 20,700 square feet, the project will not pose a significant fire impact. The project proponent will be required to pay fire impact fees in proportion to the development proposed to offset any impacts. A will-serve letter from the El Centro Fire Department for the Administration Building is included in the appendices of this document.
- b) **Less Than Significant Impact.** The El Centro Police Department (ECPD) would provide police protection to the project site after annexation. Because of the type of development project the administrative office constitutes, it will not pose a significant police demand. The project proponent will be required to pay police impact fees in proportion to the development proposed to offset any impacts. A will-serve letter from the El Centro Police Department for the Administration Building is included in the appendices of this document.
- c) **No Impact.** The proposed project involves the construction of an administrative office for the Imperial County Office of Education and does not involve the construction of any housing that would impact demand for schools. Therefore, the project will not impact schools.
- d) **No Impact.** The proposed project does not involve the construction of homes that would lead to construction of parks and does not employ a vast number of individuals that would lead to a substantial demand in housing. Therefore, the proposed project would not result in impacts to park services.
- e) **No Impact.** The proposed project would not increase the demand of other public facilities.

**3.0 ENVIRONMENTAL CHECKLIST**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>15. RECREATION</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**DISCUSSION OF IMPACTS**

- a) **No Impact.** The proposed project involves the construction of a 20,700 square foot administrative office building and would not result in substantial population growth that could impact recreational facilities. Thus, there will be no increase in the use of existing neighborhood and regional parks or other recreational facilities.
- b) **No Impact.** The proposed project would not result in substantial population growth that could impact recreational facilities. Any increased demand would be minimal and is expected to be offset by development impact fees.

### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>16. TRANSPORTATION/TRAFFIC.</b> Would the project:				
a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### DISCUSSION OF IMPACTS

- a) **Less Than Significant Impact With Mitigation Incorporated.** This analysis is based on the traffic impact analysis performed for the proposed project by Linscott Law & Greenspan Engineers (**Appendix D**).

The City of El Centro and the County of Imperial have goals for intersections and roadway segments to operate at level of service (LOS) C or better. In general, a level of service of C or better that degrades to LOS D or worse is considered a significant direct impact. A cumulative impact can occur if the intersection or segment level of service is already operating below City/County standards and the project increases the delay by more than 2 seconds or the volume-to-capacity (v/c) ratio by more than 0.02.

### 3.0 ENVIRONMENTAL CHECKLIST

---

The total project is calculated to generate approximately 870 ADT with 110 inbound/12 outbound trips during the AM peak hour and 23 inbound/90 outbound trips during the PM peak hour. **Table 3.16-1** summarizes the Existing, with Project, and with Cumulative Projects peak-hour intersection operations. As shown in **Table 3.16-1**, with the addition of Project and Cumulative Projects traffic, the following intersections are calculated to operate at LOS D or worse:

- La Brucherie Road / McCabe Road – LOS E during the AM peak hour
- McCabe Road / Clark Road – LOS E during the AM peak hours

Therefore, the implementation of mitigation measure **TRA-1** is necessary to reduce intersection operation impacts to less than significant. **TRA-2**, a deceleration vehicle lane is also required to avoid the potential of rear-ending along McCabe Road.



### **3.0 ENVIRONMENTAL CHECKLIST**

---

This page intentionally left blank

3.0 ENVIRONMENTAL CHECKLIST

TABLE 3.16-1  
NEAR-TERM INTERSECTION OPERATIONS

Intersection	Control Type	Peak Hour	Existing		Existing + Project		Δ <sup>c</sup>	Existing + Project + Cumulative Projects		Δ <sup>d</sup>	Sig? <sup>f</sup>
			Delay <sup>a</sup>	LOS <sup>b</sup>	Delay	LOS		Delay	LOS		
McCabe Road / La Brucherie Road	AWSC <sup>e</sup>	AM	25.6	D	27.2	D	1.6	49.0	F	21.6	Yes
		PM	9.4	A	9.6	A	0.2	14.2	B	19.6	No
McCabe Road / Sperber Road	OWSC <sup>f</sup>	AM	13.9	B	18.0	C	4.1	20.8	C	2.8	No
		PM	11.2	B	13.0	B	1.8	17.9	C	4.9	No
McCabe Road / Clark Road	AWSC <sup>e</sup>	AM	19.3	C	25.0	C	5.7	48.1	E	23.1	Yes
		PM	11.3	B	12.0	B	0.7	22.6	C	10.6	No

Source: LLG Engineers 2018

Notes:

- a. Average delay expressed in seconds per vehicle.
- b. LOS = level of service.
- c. Δ denotes an increase in delay due to Project traffic.
- d. Δ denotes an increase in delay due to Project and Cumulative Projects traffic.
- e. AWSC = All-Way Stop Controlled intersection.
- f. OWSC = One-Way Stop Controlled intersection. Minor street left turn delay is reported.

**Bold** indicates potential significant impact.

SIGNALIZED		UNSIGNALIZED	
Delay	LOS	Delay	LOS
0.0 to ≤ 10.0	A	0.0 to ≤ 10.0	A
10.1 to 20.0	B	10.1 to 15.0	B
20.1 to 35.0	C	15.1 to 25.0	C
35.1 to 55.0	D	25.1 to 35.0	D
55.1 to 80.0	E	35.1 to 50.0	E
≥ 80.1	F	≥ 50.1	F

### 3.0 ENVIRONMENTAL CHECKLIST

TABLE 3.16-2  
NEAR-TERM STREET SEGMENT OPERATIONS

Street Segment	Capacity (LOSE) <sup>a</sup>	Existing			Existing + Project			Δ <sup>e</sup>	Existing + Project + Cumulative Projects			Δ <sup>f</sup>	Impact Type
		ADT <sup>b</sup>	LOS <sup>c</sup>	V/C <sup>d</sup>	ADT	LOS	V/C		ADT	LOS	V/C		
<b>La Brucherie Road</b>	16,200	4,620	C	0.285	4,690	C	0.290	0.005	7,490	D	0.462	0.172	None
<b>McCabe Road</b>	16,200	5,030	C	0.310	5,2090	C	0.327	0.017	9,290	D	0.573	0.246	None
<b>Clark Road</b>	16,200	5,700	C	0.352	6,005	C	0.371	0.119	10,005	D	0.618	0.247	None
<b>North of McCabe Road</b>	16,200	6,180	C	0.381	6,440	C	0.398	0.017	10,740	D	0.663	0.265	None

a. Capacities based on City of El Centro Roadway Classification & LOS table

b. Average Daily Traffic

c. Level of Service

d. Volume to Capacity Ratio

e. Δ Denotes an increase in delay due to project traffic

f. Δ Denotes an increase in delay due to cumulative project traffic

**Mitigation Measures**

**TRA-1** The project, at buildout, is calculated to have significant direct impacts at two study intersections. The following summarizes the mitigation measures required to reduce the intersection operation impacts:

- **La Brucherie Road / McCabe Road**– Contribute a fair share towards the installation of a traffic signal and dedicated left-turn lanes on all approaches.
- **McCabe Road / Clark Road**– Contribute a fair share towards the installation of a traffic signal and a dedicated left-turn lane on the westbound approach.

*Timing/Implementation:* The fair shares shall be paid in full prior to issuance of the Certificate of Occupancy.

*Enforcement/Monitoring:* City of El Centro Community Development Department and Engineering Division.

- b) **Less Than Significant Impact With Mitigation Incorporated.** See item a) above.
- c) **No Impact.** The proposed project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. Therefore, there is no impact.
- d) **Less Than Significant Impact With Mitigation Incorporated.** Required mitigation measure **TRA-2** would ensure that no traffic hazards would result from design of future projects. Furthermore, the City Engineer will require a detailed Street Improvement Plan to be submitted for review in compliance with the City's standards and requirements. Therefore, impacts related to the project's design features would be less than significant with mitigation incorporated.

**TRA-2** The project shall provide a deceleration lane, consisting of ~483-feet in length, and 12-feet in width consistent with Figure 5 – Site Plan.

*Timing/Implementation:* The deceleration vehicle lane shall be completed prior to issuance of Certificate of Occupancy.

*Enforcement/Monitoring:* City of El Centro Community Development Department and Engineering Division.

- e) **Less Than Significant Impact.** Implementation of the project will not result in adequate or emergency access. The project has been designed to meet City of El Centro standards and include an improved circulation network. Therefore, impacts to emergency access would be less than significant.
- f) **Less Than Significant Impact With Mitigation Incorporated.** **TRA-3** ensures right of way is dedicated to the City of El Centro for the widening of McCabe Road and Sperber Road. The existing alignment of Sperber Road adjacent to the project site does not match the planned extension north of McCabe Road. **TRA-4** will require that development within the 80 acre project area contribute to the costs of realignment and construction of

### 3.0 ENVIRONMENTAL CHECKLIST

---

Sperber Road to City standards and the widening of the southern half of McCabe Road fronting the project site. Therefore, the impact is less than significant with mitigation incorporated.

**TRA-3** The Imperial County Office of Education shall dedicate right of way to the City of El Centro for the future widening of McCabe Road and Sperber Road.

*Timing/Implementation: The land dedication shall be completed prior to the issuance of a certificate of occupancy.*

*Enforcement/Monitoring: City of El Centro Engineering Division.*

**TRA-4** The Imperial County Office of Education and the City of El Centro shall enter into an agreement for the Imperial County Office of Education to contribute to the realignment of Sperber Road to align with the extension of Sperber Road north of McCabe Road per the Linda Vista Subdivision Map and the widening of the southern half of McCabe Road fronting the project site. Such agreement shall be require that all development within the 80-acre project site pay a contribution fee for these improvements proportional to the size of the proposed development.

*Timing/Implementation: An agreement between the Imperial County Office of Education and the City of El Centro shall be executed relating to the financial contribution for roadway improvements on the southern half of McCabe Road and the full width of Sperber Road.*

*Enforcement/Monitoring: City of El Centro Community Development Department and Engineering Division.*

### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>17. TRIBAL CULTURAL RESOURCES.</b> Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### DISCUSSION OF IMPACTS

- a) **No Impact.** The proposed project site is not listed on a historical register. The site does not contain any structures.
- b) **Less Than Significant Impact.** ASM Affiliates, Inc. prepared a Cultural Resource Survey for the County Center II Expansion Project in 2009. The study area includes the project site as well as the County of Imperial facilities located east of the project site. A field survey completed as part of this report concluded that no cultural resources were identified within the project area.

State law requires that cities and counties consult with Native American tribes prior to the adoption or amending a general plan for the purpose of protecting Native American cultural resources. On August 2, 2018 the City of El Centro sent notification letters to tribes that are culturally affiliated with the El Centro area. The letter contained a project description and contact information if the tribe would like to request consultation as per Senate Bill 18 regarding the General Plan amendment. As of the date of this document, representatives from the Viejas Tribal Government, Twenty-Nine Palms Band of Mission Indians and the Campo Band of Mission Indians have responded. No known cultural resources were identified as a result of this communication with locally affiliated tribal representatives.

As a result of existing agriculture operations within the project site that included the regular tilling of soil and the installation and maintenance of underground drainage the soil at the project site has been significantly disturbed. Although there is a possibility that construction activities may unearth previously unidentified cultural resources, the potential for encountering resources during construction activities is rare and would result in a less than significant impact.

### 3.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>17. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### DISCUSSION OF IMPACTS

- a) **Less Than Significant Impact.** According to the City's 2016 Service Area Plan, the capacity of the wastewater treatment plant (WWTP) is 8.0 million gallons per day (mgd). Current generation from City wastewater averages approximately 3.4 mgd, and existing peak flow is approximately 6.0 mgd. The WWTP and delivery system will meet demand of growth for the next ten years. A will-serve letter from the El Centro Public Works Department for the Administration Building is included in the appendices of this document. Given the WWTP has available capacity for an additional 2.0 million gallons per day, adequate capacity exists to serve the project's wastewater demands and less than significant impacts would result.
- b) **Less Than Significant Impact With Mitigation Incorporated.** According to the City's 2016 Service Area Plan, the capacity of the wastewater treatment plant (WWTP) is 8.0 million gallons per day (mgd). Current generation from City wastewater averages approximately 3.4 mgd, and existing peak flow is approximately 6.0 mgd. The WWTP and delivery system will meet demand of growth for the next ten years. Given the WWTP has available capacity for an additional 2.0 million gallons per day, adequate capacity exists to serve the project's wastewater demands. The ICOE Administration Building and

### 3.0 ENVIRONMENTAL CHECKLIST

future uses within the 80 acre project area are subject to an additional sewer system connection fee in accordance to the reimbursement agreement between the City of El Centro and County of Imperial for the construction and installation of wastewater system to serve County Center II.

However, as mentioned, the project will be required to dedicate land for the future widening of McCabe Road. El Centro Sewer Pump Station #1 is currently located immediately adjacent to McCabe Road and the pump station will be displaced as a result of the widening. Mitigation measure **UTL -1** will ensure land is dedicated within the project site in order to accommodate the future pump station.

**UTL-1** The Imperial County Office of Education shall dedicate land to the City of El Centro for the relocation of Pump Station #1.

*Timing/Implementation: The land dedication shall be prior to the issuance of a certificate of occupancy for the ICOE Administration Building.*

*Enforcement/Monitoring: City of El Centro Engineering Division.*

- c) **Less Than Significant Impact.** Stormwater runoff on the project site would be contained onsite through the construction of a bioretention basin, located north of the administrative building. BMPs for pre- and post-construction activities on-site would also be implemented to ensure that less than significant impacts occur from erosion or siltation.
- d) **Less Than Significant Impact.** The current capacity of the City's water system is approximately 21 mgd. The City serves water to 9,537 connections with an average day demand (ADD) of approximately 8.6 mgd. The maximum daily demand is approximately 13.8 mgd. The existing storage and conveyance capacity of 21 million gallons per day is sufficient for existing daily water demand and peak flow requirements. The system also has adequate capacity to accommodate anticipated near term development (Service Area Plan, 2016). The ICOE Administration Building and future uses within the 80 acre project area are subject to an additional water system connection fee in accordance to the reimbursement agreement between the City of El Centro and County of Imperial for the extension of a waterline to serve County Center II for which the project area will connect. The water demand associated with the proposed building is negligible and sufficient water is available to accommodate the development.
- e) **Less Than Significant Impact.** The City of El Centro is the wastewater provider for the project site and has adequate wastewater capacity for a less than significant impact.
- f) **Less Than Significant Impact.** The City of El Centro will continue to contract with Allied Imperial Landfill to service its existing and future solid waste needs. The maximum capacity of the Allied Imperial Landfill is 19,514,700 cubic yards of solid waste and as of December 31, 2010, the facility had a remaining capacity for 15,485,200 cubic yards of solid waste. In addition, the Imperial Landfill is permitted to receive 1,700 tons of solid waste per day (CalRecycle 2011).
- g) **Less Than Significant Impact.** The current solid waste service provider is CR&R Waste Services, who has sufficient landfill capacity to serve the project site. The City of El Centro has renewed its contract with CR&R through 2027. Any future development at the



### **3.0 ENVIRONMENTAL CHECKLIST**

---

site must comply with all applicable federal, state and local statutes and regulations pertaining to solid waste.

**3.0 ENVIRONMENTAL CHECKLIST**

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>18. MANDATORY FINDINGS OF SIGNIFICANCE</b>				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**DISCUSSION OF IMPACTS**

- a) **Less Than Significant Impact With Mitigation Incorporated.** Based on the evaluation and discussion contained in this IS/MND, the proposed project would not significantly degrade the quality of the environment. As discussed in subsection 3, Air Quality, the implementation of ICAPCD-identified Standard Mitigation Measures and all feasible Discretionary Mitigation Measures (see mitigation measures **AQ-1** and **AQ-2**, the project would have a less than significant impact on air quality. As discussed in subsection 4, Biological Resources, with implementation of mitigation measures **BIO-1** and **BIO-2**, the proposed project would have a less than significant impact on biological resources. As included, in subsection 16, Transportation/Traffic, the implementation of **TRA-1** and **TRA-2** would reduce transportation and traffic impacts to less than significant. Lastly, as discussed in subsection 17, **UTL-1** would reduce Utilities and Service System impacts to a less than significant level. Therefore, the proposed project would not significantly affect the environment with implementation of the mitigation measures contained in this IS/MND.
- b) **Less Than Significant Impact With Mitigation Incorporated.** Implementation of the proposed project, in conjunction with other approved or pending projects in the region, has the potential to result in potentially cumulatively impacts to the physical environment for analysis areas, which include air quality, biological resources, construction noise, traffic, and utilities and service system. However, with implementation of mitigation measures proposed in the relevant subsections of this Initial Study, these potential impacts would be reduced to a level that is considered less than significant.

### 3.0 ENVIRONMENTAL CHECKLIST

---

- c) **Less Than Significant Impact With Mitigation Incorporated.** As demonstrated in responses to items 1 through 18 of the environmental checklist, the proposed project does not have the potential to significantly adversely affect humans, either directly or indirectly. While a number of the impacts, specifically regarding air quality, biological resources, construction noise, traffic, and utilities were identified as having a potential to significantly impact humans, with implementation of the identified mitigation measures and standard requirements, these impacts are expected to be less than significant.

This page intentionally left blank

---

## **4.0 COMMENT LETTERS AND RESPONSES TO COMMENTS**

---

## 4.0 COMMENT LETTERS AND RESPONSES TO COMMENTS

### 4.1 LIST OF COMMENTERS

The Initial Study/Mitigated Negative Declaration was circulated for agency and public comment beginning June 8, 2018, and ending July 8, 2018. The following agencies submitted written comments on the IS/MND:

Letter	Commenting Agency	Date
A	Native American Heritage Commission	June 22, 2018
B	Imperial County Air Pollution Control District	July 5, 2018
C	Imperial Irrigation District	July 5, 2018
D	Imperial County Planning and Development Services	July 6, 2018
E	Imperial County Public Works	July 11, 2018

### 4.2 COMMENTS AND RESPONSES

#### REQUIREMENTS FOR RESPONDING TO COMMENTS ON AN INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

CEQA Guidelines Section 15074 requires that lead agencies "consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process." The guidelines further state that the City can only adopt this MND "if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have significant effect on the environment..."

While the CEQA Guidelines do not explicitly require the lead agency to provide written responses to comment letters received, the City of El Centro has elected to provide written responses to all commenters and to carefully consider the comments received as part of its CEQA compliance duties and its deliberations on the proposed project.

#### RESPONSES TO COMMENT LETTERS

Written comments on the Draft IS/MND are reproduced on the following pages, along with the City of El Centro's corresponding responses to those comments.

## 4.0 COMMENT LETTERS AND RESPONSES TO COMMENTS

### Comment Letter A: Gayle Totton, Associate Government Project Analyst, Native American Heritage Commission

STATE OF CALIFORNIA  
NATIVE AMERICAN HERITAGE COMMISSION  
Environmental and Cultural Department  
1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691  
Phone (916) 373-3710  
Fax (916) 373-5471

Edmund G. Brown Jr., Governor



June 22, 2018

Norma Villicana  
City of El Centro  
1275 W. Main Street  
El Centro, CA 92243

Also sent via e-mail: [nvillicana@cityofelcentro.org](mailto:nvillicana@cityofelcentro.org)

Re: SCH# 2018061021, Imperial County Office of Education Administration Building (Annex 2-17, COZ 17-03 & GPA 17-03)  
Project, City of El Centro; Imperial County, California

Dear Ms. Villicana:

The Native American Heritage Commission (NAHC) has reviewed the Mitigated Negative Declaration (MND) prepared for the project referenced above. The review included the Introduction and Project Description; and the Environmental Checklist, section 5, Cultural Resources prepared by the City of El Centro. We have the following concerns:

- A-1 1. This MND was issued prior to tribal outreach for early consultation under SB-18. The contacts list request was processed on 6-8-2018 and the public comment period for the MLD began on 6-11-2018. Tribal consultation under SB-18 and AB-52 should be completed prior to the completion and release of any environmental document as tribes should have input on the type of document required and project design can incorporate plans to avoid areas of potential resources.
- A-2 2. Lack of contact with Tribes does not mean there may not be impacts to Tribal Cultural Resources. Mitigation for inadvertent finds of Tribal Cultural Resources is missing or incomplete. Sample mitigation measures for Tribal Cultural Resources can be found in the CEQA guidelines at [http://opr.ca.gov/docs/Revised\\_AB\\_52\\_Technical\\_Advisory\\_March\\_2017.pdf](http://opr.ca.gov/docs/Revised_AB_52_Technical_Advisory_March_2017.pdf)
- A-3 3. Tribal Cultural Resources assessments are not documented. These should adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources. The lack of documented resources does not preclude inadvertent finds, which should be addressed in the mitigation measures.

Please contact me at [gayle.totton@nahc.ca.gov](mailto:gayle.totton@nahc.ca.gov) or call (916) 373-3714 if you have any questions.

Sincerely,

*Gayle Totton*

Gayle Totton, B.S., M.A., Ph.D.  
Associate Governmental Project Analyst

Attachment

cc: State Clearinghouse

RECEIVED  
City of El Centro

JUN 27 2018

Community Development  
Department

## 4.0 COMMENT LETTERS AND RESPONSES TO COMMENTS

---

### **Responses to Comment Letter A: Gayle Totton, Associate Government Project Analyst, Native American Heritage Commission**

- Response A-1:** On August 8, 2018, The City of El Centro mailed notices to 23 Native American contacts affiliated with Native American tribes that have historical ties to the Imperial Valley. As of the date of this publication and consideration of adoption of this MND the City of El Centro has received responses from three tribes: Viejas Tribal Government, Twenty-nine Palms Band of Mission Indians, and Campo Band of Mission Indians. None has identified any known tribal culture resources within the project area.
- Response A-2:** Please refer to Response A-1 above.
- Response A-3:** A section discussion potential impacts to tribal cultural resources has been added to the Initial Study referencing a cultural resources survey prepared that included the project site. No known tribal cultural resources were documented.



**4.0 COMMENT LETTERS AND RESPONSES TO COMMENTS**

**Comment Letter B: Axel Salas, Air Pollution Control Environmental Coordinator, Imperial County Air Pollution Control District**

150 SOUTH NINTH STREET  
EL CENTRO, CA 92243-2850



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

**AIR POLLUTION CONTROL DISTRICT**

July 5, 2018

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

SUBJECT: MND 17-03 Imperial County Office of Education Admin. Building & Annexation

Dear Mr. Minnick,

The Air District has reviewed the Request for Review and Comments for the Mitigated Negative Declaration for the construction of the Imperial County Office of Education Building and its annexation into the city of El Centro.

The new Imperial County Office of Education Building will be a 21,685 square foot administration building, which will be constructed in a "campus-like" manner and would include offices, a staff lounge, conference rooms, restrooms, exercise room, storage spaces, a parking lot (~97 spaces), an outdoor plaza, and other appurtenant facilities. The project would also require a rezoning from County Agriculture to City Public Use, a general plan amendment, a lot line adjustment, and a sphere of influence change to accommodate the parcel of land annexed into the City of El Centro. The complete 80-acre project site is proposed for annexation into the City of El Centro, but only 6 acres are to be developed. The project is located on the Southwest corner of McCabe Road and Sperber Road; APN 054-510-001.

B-1 After reviewing, the Air District would like to remind the applicant that any construction and/or earthmoving activities are required to comply with the Air District's Fugitive Dust Rules (Regulation VIII) in order to maintain fugitive dust emissions below the required 20% opacity limit. The applicant is also required to develop a Construction Dust Control plan and should submit the plan for review by Air District Staff, along with a Construction Notification Form 10 days prior to beginning any construction activities. In addition, any temporary or permanent generators above 50 bhp will have to submit a permit application with our Engineering Department. Our rules and regulations can be found on our website at [www.co.imperial.ca.us/AirPollution](http://www.co.imperial.ca.us/AirPollution) under the planning tab. Should the applicant have any additional questions, please contact our office at (442) 265-1800.

Sincerely,

  
Axel Salas, EIT  
APC Environmental Coordinator

RECEIVED  
City of El Centro

JUL - 9 2018

Community Development  
Department

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

---

## 4.0 COMMENT LETTERS AND RESPONSES TO COMMENTS

### **Responses to Comment Letter B: Axel Salas, Air Pollution Control Environmental Coordinator, Imperial County Air Pollution Control District**

Response B-1: The commenter is stating the standard construction mitigation measures applicable to the project and the applicant understands that construction activities within the project site is subject to these standards and requirements.

## 4.0 COMMENT LETTERS AND RESPONSES TO COMMENTS

Comment Letter C: Donald Vargas, Compliance Administrator II, Imperial Irrigation District



# IID

*A century of service.*

www.iid.com

Since 1911

July 5, 2018

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

SUBJECT: IS and Draft MND, Imperial County Office of Education Administration Building & Annexation in El Centro, CA

Dear Ms. Villicana:

Pursuant to the City of El Centro's request for agency comments on the Initial Study and Draft Mitigated Negative Declaration, for the Imperial County Office of Education Administration Building & Annexation project, where the applicant, Imperial County Office of Education Administration, proposes the annexation of 80 acres, construction of a 21,685 sq. ft. administration building and appurtenant facilities, rezoning and general plan amendment of the subject property, and lot line adjustment to reconfigure the parcel located on the southwest corner of McCabe Road and Sperber Road, within the unincorporated area of Imperial County, CA; the Imperial Irrigation District has assessed the information and, in addition to the comments provided in IID letters dated January 10, 2018 and April 24, 2018 (see attached letters), has the following observations:

- C-1 1. Currently Joel Lopez, IID Customer Project Development Planner, is interacting with the City and overseeing the project from an electrical service perspective. Mr. Lopez can be reached at (760) 482-3444 or by e-mail at [Jflopez@iid.com](mailto:Jflopez@iid.com) for additional assistance on this matter. It is important to remember that in addition to submitting a formal application for electrical service (see <http://www.iid.com/home/showdocument?id=12923>), the applicant will be required to submit the applicable fees, permits, easements, electrical loads, panel size, voltage, project CAD files (electronic and hard copy), project schedule, estimated in-service date and environmental compliance documentation pertaining to the provision of electrical service to the project. The applicant shall be responsible for any and all costs related to providing electrical service to the project.
- C-2 2. The proposed project may impact agricultural land production for parcel APN 054-510-001-000. Dahlia Lateral 4 is located along this parcel's western boundary. Dahlia Lateral 4 Delivery 14 and Delivery 14A provide irrigation water for this agricultural parcel. When these water deliveries are abandoned, an "IID Request for Abandonment of Water Facility" form, included in IID's Developer Project Guide and available at the website <http://www.iid.com/home/showdocument?id=2328>, should be submitted to the IID Real Estate Section. Additional information regarding abandonment procedures, can be provided by the IID Real Estate Section.

IMPERIAL IRRIGATION DISTRICT • P.O. BOX 937 • IMPERIAL, CA 92251

**Comment Letter C: Donald Vargas, Compliance Administrator II, Imperial Irrigation District**

Norma Villicana  
 July 5, 2018  
 Page 2

- C-3 3. 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 are available at <http://www.iid.com/departments/real-estate>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements. No foundations or buildings will be allowed within IID's right of way.
- C-4 4. An IID encroachment permit is required to utilize existing surface-water drainpipe connections to drains and receive drainage service from IID. Surface-water drainpipe connections are to be modified in accordance with IID standards. A construction storm-water permit from the California Regional Water Quality Control Board is required before commencing construction. Copies of this permit and the project's Storm Water Pollution Prevention Plan should be submitted to IID. The IID Water Department Engineering Services section can be contacted at (760) 339-9265 for further information.
- C-5 5. In addition to IID's recorded easements, IID claims, at a minimum, a prescriptive right of way to the toe of slope of all existing canals and drains. Where space is limited and depending upon the specifics of adjacent modifications, the IID may claim additional secondary easements/prescriptive rights of ways to ensure operation and maintenance of IID's facilities can be maintained and are not impacted and if impacted mitigated. Thus, IID should be consulted prior to the installation of any facilities adjacent to IID's facilities. Certain conditions may be placed on adjacent facilities to mitigate or avoid impacts to IID's facilities.
- C-6 6. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully analyzed. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**
- C-6 7. Dividing a project into two or more pieces and evaluating each piece in a separate environmental document (Piecemealing or Segmenting), rather than evaluating the whole of the project in one environmental document, is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies. In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. The State CEQA

## 4.0 COMMENT LETTERS AND RESPONSES TO COMMENTS

### Comment Letter C: Donald Vargas, Compliance Administrator II, Imperial Irrigation District

Norma Villicana  
July 5, 2018  
Page 3

Guidelines define a project under CEQA as "the whole of the action" that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment. CEQA case law has established general principles on project segmentation for different project types. For a project requiring construction of offsite infrastructure, the offsite infrastructure must be included in the project description. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App. 4th 713.

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

Respectfully,



Donald Vargas  
Compliance Administrator II

Kevin Kelley – General Manager  
Mike Pacheco – Manager, Water Dept.  
Enrique B. Martinez – Manager, Energy Dept.  
Charles Alleganza – Manager, Energy Dept., Operations  
Jamie Aebury – Deputy Manager, Energy Dept., Operations  
Carlos Vasquez – Deputy Manager, Energy Dept. Planning & Engineering  
Enrique Da Leon – Asst. Mgr., Energy Dept., Distr., Planning, Eng. & Customer Service  
Vance Taylor – Asst. General Counsel  
Robert Laurie – Asst. General Counsel  
Michael P. Kamp – Superintendent, Regulatory & Environmental Compliance  
Harold Walk Jr. – Supervisor, Real Estate  
Randy Gray – ROW Agent, Real Estate  
Jessica Lovecchio – Environmental Project Mgr. Sr., Water Dept.

## 4.0 COMMENT LETTERS AND RESPONSES TO COMMENTS

### **Response to Comment Letter C: Donald Vargas, Compliance Administrator II, Imperial Irrigation District**

- Response C-1: When the applicant proceeds with the proposed project to established electrical service for the site and off-site improvements, they will submit an application, applicable fees, easements and environmental compliance documentation pertaining to the provision of electrical service for the project.
- Response C-2: No development that will affect Dahlia Lateral 4 is planned at this time. Construction of the ICOE Administration Building is located at the northeast corner of the project site, approximately 700 feet west of the project site. It is the intention of the applicant and property owner to continue to lease agriculture land production on the remainder portion of the project site and continue use of the Dahlia Lateral 4 canal.
- Future development within the project may impact the facility requiring the undergrounding and pipelining the facility but is unlikely to result in its abandonment.
- Response C-3: The applicant understands that any construction or operation within IID property or easements will require an encroachment permit or encroachment agreement.
- Response C-4: The applicant understands that utilizing existing surface-water drainpipe connections to drains and receive drainage service from the IID will require an encroachment permit. Furthermore, that surface water drainpipe connections shall conform to IID standards. The applicant will submit copies of a construction storm-water permit and storm water pollution prevention plan to the IID.
- Response C-5: The project applicant will consult and obtain the required encroachment permits with the IID prior to the installation of any facilities adjacent to IID facilities.
- Response C-6: The project applicant and the City of El Centro understands that any new, relocated, or modified IID facilities not contemplated as part of the project described in this MND may require additional review for CEQA compliance. As of the date of publication and consideration of adoption of this MND by the City of El Centro, IID has not indicated any such facilities will be needed beyond the extension of electrical service to the project site, construction of a new storm drain discharge pipe to the Date Drain, relocation of the tile and tailwater discharge for the existing agricultural land.
- Response C-8: The project consist of the annexation, change of zone, and general plan amendment affecting the entire 80-acre site. At this time there are no plans for future development excluding the northeast six-acres on which the ICOE administration building will be located. No development is proposed for the remaining ~74 acres. When development plans for any of the parcels are submitted to the City in the future, the location, intensity, type, and size of the development will need to be assessed. Subsequent environmental

#### **4.0 COMMENT LETTERS AND RESPONSES TO COMMENTS**

---

review under CEQA will be required for proposed development within the ~74 acres.

Comment Letter D: Isabel Patten, Planner I, Imperial County Planning and Development Services



Jim Minnick  
DIRECTOR

**Imperial County Planning & Development Services  
Planning / Building / Parks & Recreation**

July, 6, 2018

City of El Centro  
Norma M. Villacaña, AICP  
1275 Main Street  
El Centro, CA 92243

**Attention: Norma Villicaña, Community Development Director**

**Subject: Response to City of El Centro's MND 17-03 for ICOE Admin./Building & Annexation (APN 054-510-001-000)**

Dear Ms. Villicaña:

The Planning & Development Services Department received the City of El Centro's Draft Environmental Checklist - Initial Study for the above ICOE Admin. Building & Annexation.

The following are comments on the City's CEQA Environmental Checklist:

- 1) Aesthetics: The proposed project administration building does not appear to create any significant impacts; therefore, there are no comments.
- D-1 2) Agriculture and Forest Resources: The proposed project is located within the within disturbed commercial land and does not appear to have any impacts. Therefore there are no comments.
- 3) Air Quality: The project is subject to Imperial County Air Pollution Control District requirements. Therefore, there are no comments.
- D-2 4) Biological Resources: The proposed project site is located on disturbed land, which does not appear to have any impacts on sensitive species and/or habitats. However, with Mitigation BIO-1 and BIO-2 would address any potential impacts. Therefore there are no Comments.

RECEIVED  
City of El Centro

JUL - 6 2018

Community Development  
Department

Page 1 of 3

801 Main St. El Centro, CA. 92243 (442) 265-1736 Fax (442) 265-1735 [planninginfo@co.imperial.ca.us](mailto:planninginfo@co.imperial.ca.us) [www.icpds.com](http://www.icpds.com)



## 4.0 COMMENT LETTERS AND RESPONSES TO COMMENTS

Comment Letter D: Isabel Patten, Planner I, Imperial County Planning and Development Services

Norma Villicaña  
MND 17-03  
June 6, 2018

- D-3
- 5) Cultural Resources: The proposed project is located within disturbed land, it would appear to have no impacts. Therefore there are no comments.
- 6) Geology & Soils: The project site is not located within an earthquake hazard zone and would be subject to the California Building Codes. Therefore there are no comments.
- 7) Greenhouse gas Emissions: The proposed project does not appear to contribute greatly to greenhouse gas emissions. Therefore there are no comments.
- 8) Hazard and Hazardous Materials: The proposed project does not appear to create a hazard to the public or the public; therefore there are no comments.
- 9) Hydrology and Water Quality: The proposed project will be connecting to City Water and will not impact County water quality. Therefore there are no comments.
- D-4
- 10) Land Use: Per the documents provided the proposed project is not located within a County Urban Area or near any County properties, however, with the remaining 74 acres (to be rezoned Limited Use), it is unclear if future development would impact the surrounding area. Please address the consistency of the LU zone to the surrounding area.
- D-5
- 11) Mineral Resources: The proposed project is not located within any mining resource areas as identified in the Imperial County General Plan, therefore no impact is expected. There are no comments.
- D-6
- 12) Noise: The existing Imperial County Office of Education facility is located just east of the proposed Administrative Building and is not part of the noise evaluation. This facility should be evaluated (see Table N-3 –Noise/Land Use Compatibility Matrix).
- D-7
- 13) Population and Housing: The proposed project will not create the need for housing in the nearby vicinity based on the project description. The proposed project does not appear to have an impact to County Population and Housing. There are no comments.
- 14) Public Services: The proposed project will be serviced by City of El Centro and will not necessitate County Public Services. Therefore there are no comments.
- 15) Recreation: The proposed project does not propose any development that may trigger the need for recreational facilities. There are no comments.

## 4.0 COMMENT LETTERS AND RESPONSES TO COMMENTS

### Comment Letter D: Isabel Patten, Planner I, Imperial County Planning and Development Services

Norma Villicaña  
MND 17-03  
June 6, 2018


- D-8 16) Transportation/ Traffic: The intersections of La Brucherie Road/McCabe Road and Clark Road (8<sup>th</sup> Street)/McCabe Road are within County jurisdiction. Coordination with Imperial County Public Works Department should be made.
- D-9 17) Utilities and Service Systems: The City of El Centro provides water and wastewater services to the County Center II facilities. This is not included in within the document.

Thank you for the opportunity to comment on this project. For any questions on the above comments, feel free to contact Isabel Patten, Planner I, at (442) 265-1736, extension 1750 or via e-mail at [isabelpatten@co.imperial.ca.us](mailto:isabelpatten@co.imperial.ca.us).

Sincerely,

JIM MINNICK, Director  
Planning & Development Services

By:

  
Isabel Patten, Planner I

cc: Jim Minnick, ICPDS Director  
Michael Abraham, AICP, Asst. Director of ICP&DS  
Jung Heuberger, AICP, LAFCO Executive Director  
File : City of El Centro Correspondence

S:\CITY OF EL CENTRO\COE Admin Building & Annexation\response letter for MND for ICOE Admin Building & Annexation.doc



## **4.0 COMMENT LETTERS AND RESPONSES TO COMMENTS**

---

### **Response to Comment Letter D: Isabel Patten, Planner I, Imperial County Planning and Development Service**

- Response D-1: The commenter assesses the conclusions of the Aesthetics, Agriculture and Forest Resources and Air Quality sections of the Initial Study stating that there are no comments regarding these sections. The response for Agricultural and Forest Resources incorrectly states that the site is within disturbed commercial land, however, the project site mainly consists of agricultural land in active production.
- Response D-2: The commenter states that mitigation measures BIO 1 and BIO 2 would address any potential impacts to biological resources.
- Response D-3: The commenter assesses the conclusions of the Cultural Resources, Geology & Soils, Greenhouse Gas Emissions, Hazard and Hazardous Materials, and Hydrology and Water Quality sections of the Initial Study stating that there are no comments regarding these sections.
- Response D-4: The commenter requests that the Land Use section address the consistency of the proposed LU-Zoning to the surrounding area. As a result, the subject section has been amended to include discussion.
- Response D-5: The commenter states that the project is not within any mining resource areas and that no impact is expected.
- Response D-6: The commenter states that the discussion regarding noise impacts does not include the existing Imperial County Office of Education Administration office just east of the project site. This building was not included in the discussion because it is not considered a noise sensitive land use. Noise sensitive land uses include hospitals, schools, daycares, elderly housing and convalescent facilities. Nonetheless, because the existing building is in the immediate vicinity of the project site a discussion has been added to the noise section of the initial study.
- Response D-7: The commenter assesses the conclusions of the Population and Housing, Public Services, and Recreation sections of the Initial Study stating that there are no comments regarding these sections.
- Response D-8: The commenter identifies that the La Brucherie/McCabe and Clark/McCabe road intersections are within the County jurisdiction and coordination with the Imperial County Public Works Department should be made. The applicant the City of El Centro have communicated with the Imperial County Public Works Department regarding potential roadway impacts as a result of the project.
- Response D-9: The commenter states that the document does not mentioned that the City of El Centro provides water and wastewater facilities to the County Center II facilities near the project site. Water and wastewater lines that will serve the project were installed in the 1970s for the purpose of serving the County Center II facilities. A brief discussion regarding this has been added to the Utilities and Service Systems section of the Initial Study.

Comment Letter E: John Gay, Public Works Director, Imperial County Public Works Department

Public Works works for the Public

COUNTY OF IMPERIAL  
DEPARTMENT OF PUBLIC WORKS  
155 S. 11th Street  
El Centro, CA 92243  
Tel: (442) 265-1818  
Fax: (442) 265-1858  
Follow Us:  
[www.facebook.com/ImperialCountyDPW/](https://www.facebook.com/ImperialCountyDPW/)  
<https://twitter.com/CountyDpw>

July 13, 2018

Norma Villicana, AICP  
Community Development Director  
City of El Centro  
1275 Main Street  
El Centro, CA 92243


Re: Additional Response to City of El Centro MND 17-03 for the ICOE Admin./ Building & Annexation (APN 054-510-001-000)

Dear Ms. Villicana,

In review of the proposed annexation and development of the ICOE Administration Center proposed at the southwest corner of Sperber Rd. and McCabe Rd. intersection the following should be considered:

- E-1 1. The new development should participate in the reimbursement for the 12" waterline that was installed for the benefit of ICOE's 80 acre parcel immediately west of County Center 2.
- E-2 2. The 10" sewer located in Sperber Rd. may be at capacity according to the Holt Group's study for the AB900 project (see attached). The development should study possible tie in locations on McCabe Rd. where the sewer may have more capacity to serve. Site investigations and calculations should be provided to the City of El Centro to confirm.
- E-3 3. The future dedication and improvements along the development's McCabe Rd. frontage should be consistent with Linda Vista Subdivision and conform to the two agencies circulation elements. The Public Works Department requests a review of the offsite plans to verify the width and alignment of McCabe Rd. as a 6 lane roadway. (The Public Works Department is not opposed to phasing the offsite work as long as the City of El Centro receives adequate monetary securities/ sureties for future improvements if the development proposes to delay the offsite work until adjacent development occurs.)

If you have any questions please feel free to call anytime.

Respectfully  
  
John A. Gay, P.E.  
Public Works Director

An Equal Opportunity / Affirmative Action Employer

#### **4.0 COMMENT LETTERS AND RESPONSES TO COMMENTS**

---

**Response to Comment Letter E: John Gay, Public Works Director, Imperial County Public Works Department**

Response E-1: The commenter is referring to a waterline that serves the County Center II facilities constructed by the County of Imperial. The project site proposes to connect to said waterline and is subject to compensate the County of Imperial for a proportion of the cost of the waterline per an agreement between the City of El Centro and the County of Imperial.

Response E-2: The project will require the submission of a local sewer capacity study to the City Engineer to determine if the existing sewer line between Pump Station No. 1 and the propose point of connection can accommodate the additional flow from ICOE Administration Building.

Response E-3 Mitigation Measure **TRA 3** will require the Imperial County Office of Education to dedicate right of way to the City of El Centro for the future widening of McCabe Road and Sperber Road. The applicant will be subject to fair share costs for the future realignment of Sperber Road per Mitigation Measure **TRA 4**.

---

## **5.0 MITIGATION MONITORING AND REPORTING PROGRAM**

---

## 5.0 MITIGATION MONITORING AND REPORTING PROGRAM

---

### 5.1 INTRODUCTION

This document is the Mitigation Monitoring and Reporting Program (MMRP) for the Imperial County Office of Education Administration Building Project. This MMRP has been prepared pursuant to Section 21081.6 of the California Public Resources Code, which requires public agencies to "adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." An MMRP is required for the proposed project because the Initial Study/Mitigated Negative Declaration has identified potentially significant adverse impacts, and measures have been identified to mitigate those impacts to less-than-significant levels.

### 5.2 MITIGATION MONITORING AND REPORTING PROGRAM

As the lead agency, the City of El Centro will be responsible for monitoring compliance with all mitigation measures. The MMRP is presented in tabular form on the following pages. The components of the MMRP are described briefly below.

- **Mitigation Measure:** The mitigation measures are taken from the Initial Study/Mitigated Negative Declaration (IS/MND).
- **Timing:** Identifies at which stage of the project the mitigation must be completed.
- **Monitoring Responsibility:** Identifies the department within the City with responsibility for mitigation monitoring.
- **Verification (Date and Initials):** Provides a contact who reviewed the mitigation measure and the date the measure was determined complete.

**5.0 MITIGATION MONITORING AND REPORTING PROGRAM**

**MITIGATION MONITORING AND REPORTING PROGRAM FOR THE IMPERIAL COUNTY OFFICE OF EDUCATION ADMINISTRATION BUILDING PROJECT**

Mitigation Measure	Timing	Monitoring Responsibility	Verification (Date and Initials)
<p><b>AIR QUALITY</b></p> <p><b>AQ-1</b> The operator shall implement the following standard mitigation measures for fugitive dust PM10 control:</p> <ul style="list-style-type: none"> <li>a. The operator shall insure that all disturbed areas, including bulk material storage which is not being actively utilized, will be effectively stabilized and visible emissions will be limited to no greater than 20% opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps, or other suitable material such as vegetative ground cover.</li> <li>b. The operator shall insure that all on-site and off-site unpaved roads will be effectively stabilized and visible emissions be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering.</li> <li>c. The operator shall insure that all unpaved traffic areas with 75 or more average vehicle trips per day will be effectively stabilized and visible emission be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering.</li> <li>d. The operator shall insure that all transport (import or export) of borrow material used as cover material will be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss</li> </ul>	<p>During Construction</p>	<p>City of El Centro Engineering Division</p>	



5.0 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Timing	Monitoring Responsibility	Verification (Date and Initials)
<p>of borrow material. In additions, the cargo compartment of all haul trucks is to be cleaned and/or washed at delivery site after removal of bulk material.</p> <p>e. The operator shall insure that all track-out or carryout will be cleaned at the end of each workday.</p> <p>f. The operator shall insure that all movement of borrow material handling or at points of transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line.</p>			
<p><b>AQ-2</b> The operator shall implement the following standard mitigation measures for construction combustion equipment:</p> <p>a. The operator shall insure the use of Tier 2 vehicles or the equivalent alternative fueled or catalyzed equipped diesel construction equipment.</p> <p>b. The operator shall insure that idling time will be minimized by either shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum.</p> <p>c. The operator shall limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use.</p> <p>d. The operator shall, where practicable, replace</p>	<p>During construction</p>	<p>Imperial County Air Pollution Control District</p>	

**5.0 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Timing	Monitoring Responsibility	Verification (Date and Initials)
<p>fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set).</p>			
<p><b>BIOLOGICAL RESOURCES</b></p>			
<p><b>BIO-1</b> Prior to the start of construction activities, the project applicant shall retain a qualified biologist to conduct mandatory contractor/worker awareness training for construction personnel. The awareness training shall be provided to all construction personnel to brief them on owl/nest birds, biology, regulations (CDWF/USFWS), wallet card with owl pictures/guidelines for protecting owl and wildlife, and notification procedures if avian species (dead, alive, injured) are found on or near the site.</p>	<p>Prior to construction activities</p>	<p>City of El Centro Community Development Department</p>	
<p><b>BIO-2</b> A preconstruction survey of the project area shall be conducted and performed three (3) days prior to initiating ground disturbance to survey for nesting birds. If construction begins between January through the end of August, a report should be submitted to the appropriate agency.</p>	<p>Prior to construction activities</p>	<p>City of El Centro Community Development Department</p>	

5.0 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Timing	Monitoring Responsibility	Verification (Date and Initials)
<b>TRAFFIC</b>			
<p><b>TRA-1</b> The project, at buildout, is calculated to have significant direct impacts at two study intersections. The following summarizes the mitigation measures required to reduce the intersection operation impacts:</p> <p><b>La Brucherie Road / McCabe Road</b>– Contribute a fair share towards the installation of a traffic signal and dedicated left-turn lanes on all approaches.</p> <p><b>McCabe Road / Clark Road</b>– Contribute a fair share towards the installation of a traffic signal and a dedicated left-turn lane on the westbound approach.</p>	<p>The fair shares shall be paid in full prior to issuance of the Certificate of Occupancy.</p>	<p>City of El Centro Community Development and Engineering Division</p>	
<p><b>TRA-2</b> The project shall provide a deceleration lane, consisting of ~483-feet in length, and 12-feet in width consistent with Figure 5 – Site Plan.</p>	<p>The deceleration vehicle lane shall be completed prior to issuance of Certificate of Occupancy.</p>	<p>City of El Centro Community Development and Engineering Division.</p>	
<p><b>TRA-3</b> The Imperial County Office of Education shall dedicate right of way to the City of El Centro for the future widening of McCabe Road and Sperber Road.</p>	<p>The land dedication shall be completed prior to the issuance of a certificate of occupancy.</p>	<p>City of El Centro Engineering Division</p>	

**5.0 MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Timing	Monitoring Responsibility	Verification (Date and Initials)
<p><b>TRA-4</b> The Imperial County Office of Education and the City of El Centro shall enter into an agreement for the Imperial County Office of Education to contribute to the realignment of Sperber Road to align with the extension of Sperber Road north of McCabe Road per the Linda Vista Subdivision Map and the widening of the southern half of McCabe Road fronting the project site. Such agreement shall be require that all development within the 80-acre project site pay a contribution fee for these improvements proportional to the size of the proposed development.</p>	<p>An agreement between the Imperial County Office of Education and the City of El Centro shall be executed relating to the financial contribution for roadway improvements on the southern half of McCabe Road and the full width of Sperber Road.</p>	<p>City of El Centro Community Development and Engineering Division.</p>	
<p><b>Utilities and Service Systems</b></p>			
<p><b>UTL-1</b> The Imperial County Office of Education shall dedicate land to the City of El Centro for the relocation of Pump Station #1.</p>	<p>The land dedication shall be prior to the issuance of a certificate of occupancy for the ICOE Administration Building.</p>	<p>City of El Centro Engineering Division.</p>	

This page intentionally left blank