

DATE SUBMITTED 06/12/15
 SUBMITTED BY PLANNING
 DATE ACTION REQUIRED 06/17/15

COUNCIL ACTION (x)
 PUBLIC HEARING REQUIRED (x)
 RESOLUTION (x)
 ORDINANCE 1ST READING (x)
 ORDINANCE 2ND READING ()
 CITY CLERK'S INITIALS ()

**IMPERIAL CITY COUNCIL
 AGENDA ITEM**

SUBJECT: PUBLIC HEARING/DISCUSSION/ACTION – IMPERIAL REGIONAL PARK AND EQUESTRIAN CENTER ANNEXATION

1. APPROVAL OF RES. NO. 2015-41, CERTIFYING A MITIGATED NEGATIVE DECLARATION, APPROVING A GENERAL PLAN AMENDMENT, APPROVING A TENTATIVE PARCEL MAP AND APPROVING AN ANNEXATION
2. INTRODUCTION/1ST READING OF ORD. NO. 785, APPROVING A PRE-ZONING DESIGNATION OF OS – OPEN SPACE
3. APPROVE TAX SHARING AGREEMENT BETWEEN THE CITY OF IMPERIAL AND THE COUNTY OF IMPERIAL

DEPARTMENT INVOLVED: PLANNING DEPARTMENT

BACKGROUND/SUMMARY:

The City of Imperial purchased a 143-acre agricultural field (APN 063-010-049) just outside its incorporated boundaries with the intent of annexation and developing it as a regional park and equestrian events center. The project will include approximately 40 acres of tournament-level sports fields; 51 acres for equestrian facility which includes a 160,000 square-foot covered arena, outdoor arena, stables, and an RV park; 20 acres of open space recreation; 6 acres of commercial for restaurants and equestrian related retail stores; and 8 acres for an olive mill. The goal of this project is to spur economic development through tourism that will draw visitors from outside the region. Actions to be taken by the City of Imperial include annexation, General Plan Amendment, pre-zone, subdivision of the existing parcel and approval of a Tax Sharing Agreement. The Initial Study and Mitigated Negative Declaration identified significant impacts in various environmental studies which would be mitigated to a level that is less than significant if mitigation measures were incorporated into the project (see attached).

FISCAL IMPACT: F.O. INITIALS _____

STAFF RECOMMENDATION:

MANAGER'S RECOMMENDATION: MANAGER'S INITIALS _____

MOTION:

SECONDED: APPROVED () REJECTED ()
 AYES: DISAPPROVED () DEFERRED ()
 NAYES:
 ABSENT: REFERRED TO:

ORDINANCE NO. 785

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF IMPERIAL, CALIFORNIA, APPROVING THE PRE-ZONING OF THE IMPERIAL REGIONAL PARK AND EQUESTRIAN CENTER PROJECT AREA IN CONFORMANCE WITH THE LAND USE POLICIES OF THE IMPERIAL GENERAL PLAN AND IN PREPARATION OF AN APPLICATION FOR AN ANNEXATION INTO THE CITY OF IMPERIAL

WHEREAS, the City Council of the City of Imperial, California considered all of the evidence, including, but not limited to, the City Planning Commission Resolution, staff report and attachments, and public testimony at a duly notified public hearing on June 17, 2015; and

WHEREAS, the City Council finds that the Pre-zoning is consistent with the goals, objectives and policies of the City of Imperial General Plan and will not conflict with the General Plan; and

WHEREAS, the City Council finds that the Pre-zoning will not be detrimental to the public interest, health, safety, convenience, or welfare of the City; and

WHEREAS, the proposed action complies with the provisions of the California Environmental Quality Act (CEQA) and a Mitigated Negative Declaration was adopted for the project.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF IMPERIAL DOES ORDAIN AS FOLLOWS:

Section 1. In view of all the evidence and based on the foregoing findings and conclusions, the City Council hereby approves the Pre-zoning of the Imperial Regional Park and Equestrian Center Project Area as shown on the attached map (Exhibit A), for the purpose of establishing applicable zoning districts in accordance with the land use policies of the Imperial General Plan, in preparation for submission of an application to the Imperial County Local Area Formation Commission seeking annexation of the project area into the City of Imperial.

Section 2. Chapter 24 of the City of Imperial Municipal Code (Zoning Code) is hereby amended as follows:

Section 24.20.100 - O-S OPEN SPACE ZONE

24.20.110 - Intent and purpose. It is the intent of this chapter to provide for the preservation, maintenance and enhancement of valuable natural, environmental and recreational resources while permitting reasonable and compatible uses of land. In order to properly manage these resources, criteria and regulations must be formulated to guide uses in the following open space capacities as defined in the open space element: productive, protective, structural, recreational and scenic preservation. The purpose and intent of this chapter shall be the advancement of the following objectives:

1. To protect and preserve land areas for the managed production of natural resources;
2. To protect, maintain and enhance air quality;
3. To assure the continued availability of open space lands for the enjoyment of outdoor recreation;

4. To preserve and enhance areas of significant scenic amenity, unique natural features, and areas of educational and scientific research;
5. To implement the conservation and open space elements of the general plan;

24.20.120 - Uses permitted. Uses permitted within the open space zone are as follows:

1. Agricultural uses as follows:
 - a. Trees for fruit, nut or timber;
 - b. Bushes or vines for berries and grapes;
 - c. Field, vegetable, and truck or row crops;
 - d. Orchards, vineyards, and bushes for fruit or nuts;
 - e. Drying of crops, hay, straw and seed;
 - f. Storage and wholesaling of crops grown on the property;
 - g. Animal breeding, pasturing or ranching;
 - h. The growing and harvesting of flowers, ornamentals and turf;
 - i. The keeping of farm animals and fowl for recreation, agricultural and school projects;
 - j. Agricultural stand on forty or more acres of land is permitted for the sale of agricultural, horticultural, floricultural or farming products, grown or produced on the premises.
2. Parks and Recreational facilities owned by public agencies;
3. Nurseries and greenhouses without retail sales;
4. Commercial or private stables and riding academies; boarding and care of horses, including living quarters for grooms and caretakers located within the same building;
5. Year-round roadside produce stands and Certified Farmers Market.
6. Seasonal stands (including Christmas trees and pumpkins).
7. Eating Establishments as an accessory use
8. Equestrian Facilities
9. Outdoor Recreation Facilities
10. RV Parks
11. Campsites

24.20.130 - Uses subject to a conditional use permit. The following uses may be permitted if a conditional use permit is obtained in the manner provided in the zoning ordinance and such use conforms to every term and condition of the permit. A permit for any of these uses may be granted by the planning commission if the applicant produces sufficient proof that the use will not be injurious or detrimental to the public health, safety or welfare, or to the property in the vicinity or zone in which the use will be situated; that the effects can be prevented with the imposition of conditions, and that the permit is necessary for the owner of the property to make reasonable use of the property:

1. Radio and television towers and related facilities excluding studios;
2. Hotels and Motels
3. Retail Facilities

4. Eating Establishments as a primary use
5. Residential Structures

24.20.140 - Development standards.

The following development standards shall apply to all developments within the O-S open space zone and all buildings or structures hereinafter erected shall conform to the following:

1. **Lot Area.** No minimum required
2. **Setbacks.** All buildings shall be setback a minimum of twenty feet.
3. **Building Height.** Buildings and structures located within 50' of any public right-of-way shall not exceed 25' in height. There are no height limits when the building or structure is located more than 50' away from any public right-of-way.
4. **Utilities.** All utilities shall be placed underground. This requirement may be waived where the utility agency will not allow the installation of their facilities underground.
5. **Signs.** Signs shall specifically relate to the use of the parcel and shall be approved by the Planning Commission.
6. **Animals and Fowl Maintenance.** The keeping of animals and fowl shall be maintained in accordance with the following:
 - a. The area where animals and fowl are maintained shall not create a nuisance in relation to adjoining property and shall be kept in a healthful manner.
 - b. The animals and fowl shall be contained in such a manner to restrict their movement onto the public right-of-way or adjoining property.
 - c. The area where animals or fowl are maintained shall be a minimum of fifty feet from any building used for human habitation excepting domestic pets such as dogs or cats.

Section 3. Effective Date: This Ordinance shall take effect 30 days after its passage and adoption pursuant to California Government Code Section 36937 and shall supersede any conflicting provision of any City of Imperial ordinance.

PASSED, APPROVED AND ADOPTED this _____ of _____ 2015.

Mayor

ATTEST:

City Clerk

**FINAL
INITIAL STUDY & MITIGATED NEGATIVE DECLARATION**

(State Clearinghouse No. 2015041012)

for

City of Imperial Regional Park & Equestrian Center



Prepared By:

CITY OF IMPERIAL
Planning & Development Department
420 South Imperial Avenue
Imperial, California 92251
(760) 355-3326
www.cityofimperial.org

(June 2015)

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SECTION 1.0 - INTRODUCTION

INTRODUCTION/OVERVIEW

The City of Imperial distributed the Initial Study/Mitigated Negative Declaration (IS/MND) for the City of Imperial Regional Park and Equestrian Center Project for public review on April 2, 2015, with the public review period ending on May 1, 2015. During this time, five comment letters were received.

This Final IS/MND has been prepared pursuant to the California Environmental Quality Act (CEQA, California Public Resources Code, Section 21000 et seq.), and in accordance with the Guidelines for Implementation of CEQA (14 CCR 15000 et seq.). This Final IS/MND will be used by the City (as the lead state agency), in conjunction with other information developed in the City's formal record, to act on the City's proposal for a Building Permit, Tentative Tract Map, Pre-zone, General Plan Amendment and Local Agency Formation Commission (LAFCO) Annexation of the Regional Park & Equestrian Center Project site. Under CEQA requirements, the City will adopt this Final MND if, based on the whole record, including the Initial Study and comments received, it determines that there is no substantial evidence that the Project will have a significant effect on the environment (CEQA Guidelines, Section 15074(b)).

CONTENTS OF THE FINAL IS/MND

The Final IS/MND contains all comments received on the IS/MND and responses thereto. In addition, errata changes that were made to the IS/MND based on comments received are also included. Revisions to clarify information presented in the IS/MND and minor technical changes or additions have been made and are included in Section 3.0, Errata of this Final EIR. These changes and additions to the IS/MND do not raise important new issues related to significant effects on the environment. Lastly, this Final IS/MND includes the Mitigation Monitoring and Reporting Program (MMRP).

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

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SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

INTRODUCTION

This chapter includes all comments received on the IS/MND during the 30-day public and agency review period. No new significant environmental impacts or issues, beyond those already identified in the IS/MND for the City of Imperial Regional Park & Equestrian Center were raised during the public review period. Acting as lead agency under CEQA, the City of Imperial directed responses to the comments received on the IS/MND.

LIST OF COMMENTERS

The following individuals and representatives of organizations and agencies submitted written comments on the IS/MND.

**TABLE 3.0-1
LIST OF COMMENTERS ON THE EIR**

COMMENTS RECEIVED BY IMPERIAL COUNTY			
Letter or E-mail	Individual or Signatory	Affiliation	Date
1	Donald Vargas, Environmental Regulatory Compliance Administrator	Imperial Irrigation District	April 22, 2015
2	Manuel Ortiz, Assistant County Engineer	Imperial County Department of Public Works	April 22, 2015
3	Alphonso Andrade, Environmental Health Compliance Specialist II	County of Imperial Public Health Department	April 15, 2015
4	Phyllis Cason for Connie L. Valenzuela Agricultural Commissioner	Imperial County Agricultural Commissioner	April 30, 2015
5	Robert Flores, Planner II for Jim Minnick, Director Imperial County Planning and Development Services Department	Imperial County Planning and Development Services Department	May 1, 2015
6	Monica Soucier, Division Manager, Planning and Monitoring Services Imperial County Air Pollution Control District	Imperial County Air Pollution Control District	May 1, 2015

REQUIREMENTS FOR RESPONDING TO COMMENTS ON AN IS/MND

CEQA Guidelines Section 15088 requires that lead agencies evaluate all comments on environmental issues received on the IS/MND and prepare a written response. CEQA Guidelines Section 15088 also recommends that where the response to comments results in revisions to the IS/MND, those revisions should be noted as a revision to the IS/MND or in a separate section of this Final IS/MND. Revisions are reflected in the Errata, Section 3.0 of this Final IS/MND.

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

COMMENTS AND RESPONSE TO COMMENTS

Written comments on the IS/MND are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the letters are coded using numbers (e.g., Comment Letter 1) and each issue raised in the comment letter is assigned a number that correlates with the letter (e.g. 1-1, 1-2, 1-3, etc.).

Where changes to the IS/MND text result from responding to comments, those changes are included in the response and demarcated with revision marks (underline for new text, ~~strike-out~~ for deleted text). Comment-initiated text revisions to the IS/MND and minor staff-initiated changes are compiled in their entirety and are demarcated with revision marks in Chapter 3.0, Errata, of this Final IS/MND.

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS



www.iid.com

LETTER 1

GS- RE&ERCS

April 22, 2015

Mr. Jorge Galvan
Director
Planning & Development Department
City of Imperial
420 South Imperial Avenue
Imperial, California 92251

SUBJECT: City of Imperial Regional Park & Equestrian Center IS & MND

Dear Mr. Galvan:

Pursuant to the City of Imperial's release for public review of the Initial Study (IS) and draft Mitigated Negative Declaration (MND) for the City of Imperial Regional Park & Equestrian Center Project; where the City proposes to develop on a 143-acre site, located adjacent to the northern boundary of Imperial, CA and 0.5 mile west of State Route 86; a Sportsplex regional park with tournament level sports fields, an equestrian facility, including arenas and stables; a recreational vehicle park, open space parks, a commercial center and an olive orchard and mill; the Imperial Irrigation District (IID) has reviewed the IS & draft MND and has the following comments:

1. The Electricity section on page 2-4 of the IS and draft MND states that "There is available capacity in the system to accommodate the proposed Project which is planned to establish connection during Phase 1A." This statement is incorrect. IID will need to perform a circuit study to evaluate the impact the Project will have on the IID Distribution system in the area. The Project proponent shall be required to provide IID with detailed phasing maps and include estimated time frames of development and electrical loads per phase. Furthermore, the Project proponent will be financially responsible for any system upgrades that the study deems necessary to serve the project. Project proponent should be advised to contact IID Energy Customer Operations and Planning Section at (760) 482-3402 or (760) 482-3300 for further information regarding electrical service for the project.
2. The Water Supply Assessment (WSA), contained in Appendix G, requires review by IID and IID will work directly with Ericsson-Grant Inc. on any required changes. Once IID has completed the technical review and the technical comments have been incorporated into the WSA in a manner acceptable for incorporation into the EIR, the IID Water Department will inform the City of Imperial.
3. IID facilities that may be impacted include the Newside Canal and the Newside Drain No. 1.

IMPERIAL IRRIGATION DISTRICT
OPERATING HEADQUARTERS • PO. BOX 937 • IMPERIAL, CA 92251

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

Mr. Jorge Galvan
April 22, 2015
Page 2

4. An IID planning review will be required for the project in accordance with IID Water Department developer guidelines. A copy of IID's Developer Project Guide is available at <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2328>. For additional information regarding planning reviews, Frank Fiorenza with IID Water Department Engineering Services should be contacted at (760) 339-9507. 1-5
5. IID drains will be impacted with drainage from project, site runoff flows and proposed storm water detention facilities. To mitigate impacts, a comprehensive IID hydraulic drainage system analysis will be required. IID's hydraulic drainage system analysis includes an associated drain impact fee. 1-6
6. Pursuant to the proposed on-site detention basin mentioned on page 2-4 of the IS and draft MND, the Project proponent should be advised to submit the project's Storm Water Pollution Prevention Plan to IID Water Department Engineering Services prior to final design. 1-7
7. Access to the project site on Larsen Road may require additional road improvements at Austin Road and Highway 86 intersections. 1-8
8. IID's canal or drain banks may not be used to access the project site. Any abandonment of easements or facilities shall be approved by IID based on systems' (Irrigation, Drainage, Power, etc.) needs. 1-9
9. Fencing should be installed at the boundary of IID's right-of-way for safety purposes and to allow access for IID operation and maintenance activities. Project proponent should consult with IID Water Department Engineering Services prior to finalization of the fencing plan to address this issue. 1-10
10. For IID construction water the proponent may contact IID South End Division at (760) 482-9800. 1-11
11. Any construction or operation on IID property or within its existing and proposed right of way or easements will require an encroachment permit, 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 (e.g. power lines). A copy of the encroachment permit application is included in the District's *Developer Project Guide 2008*, and can be accessed at the IID website: <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2328>. Instructions for the completion of an IID encroachment application can be found at the following website: <http://www.iid.com/Modules/ShowDocument.aspx?documentid=2335>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits. 1-12
12. 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 1-13

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

Mr. Jorge Galvan
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Page 3

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.

1-13 Con't.

13. 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, canals, drains, 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 mitigated. **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.**

1-14

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

1-15

Respectfully,



Donald Vargas
Environmental Regulatory
Compliance Administrator

Kevin Kelley – General Manager
Kristine Fontaine – Asst. General Manager
Tina Shields – Interim Planning and Water Conservation Manager, Water Dept.
Mike Pacheco – Interim Operations and Maintenance Manager, Water Dept.
Carl Stills – Manager, Energy Dept.
Vance Taylor – Asst. General Counsel
Tom King – Deputy Energy Manager, Engineering & Operations
Paul G. Peschel – Manager Planning & Engineering, Energy Dept.
Angela Evans – Manager Distribution Services & Maintenance Operations
Oscar Kebriti – Supt. Gen. Project Implementation, Energy Dept.
Michael P. Kemp – Superintendent, Real Estate & Environmental Compliance
Shayne Ferber – Supervisor, Real Estate
Bruce Wilcox – Manager Environmental and Salton Sea Programs

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

LETTER 1

**Donald Vargas, Imperial Irrigation District
Environmental Regulatory Compliance Administrator
April 22, 2015**

Response to Comment 1-1: The comment provides introductory remarks and summarizes the details of the Project. The comment does not address the adequacy of the environmental analysis. No response is necessary.

Comment 1-2: The comment states that there is an error in the text of the analysis with regard to the characterization of capacity in the electrical system. On page 2-4, the discussion of Electricity has been revised as follows to address the comment:

“**Electricity.** Electrical power is currently provided by IID and is accessible to the Project site from existing power lines located along Larsen Road, La Brucherie Road, and Ralph Road. ~~There is available capacity in the system to accommodate the proposed Project which is planned to establish connection during Phase IA. IID will need to perform a circuit study to evaluate the impact the Project will have on the IID Distribution system in the area. The City shall provide IID with detailed phasing maps and include estimated time frames of development and electrical loads per phase. The City will also be financially responsible for any system upgrades that the study deems necessary to serve the Project.~~”

Response to Comment 1-3: This comment states that a Water Supply Assessment (WSA) was included as an appendix to the IS/MND. The IID has reviewed the WSA and provided revisions that have been incorporated into the WSA. The revised WSA is attached to this Final IS/MND.

Response to Comment 1-4: The comment states that IID facilities may be impacted by the Project but does not provide specific impacts. The comment does not address the adequacy of the environmental analysis. No response is necessary.

Response to Comment 1-5: The comment states that IID planning review will be required for the Project in accordance with the IID Water Department developer guidelines. This comment is procedural in nature. The City will be required to undergo IID planning review as part of the development process. This comment is noted for the decision-makers’ consideration.

Response to Comment 1-6: The comment states a comprehensive IID hydraulic drainage system analysis will be required for the Project. The City will be required to have this analysis performed and pay the associated fee. This comment is noted for the decision-makers’ consideration.

Response to Comment 1-7: The comment states that prior to final design, the City will be required to submit the Project’s Storm Water Pollution Prevention Plan to the IID Water Department Engineering Services. This comment is procedural in nature and is noted for the decision-makers’ consideration.

Response to Comment 1-8: The comment states that access to the Project site on Larsen Road may require additional improvements at Austin Road and Highway 86 intersections. The Draft Traffic Impact Assessment (LOS 2015) prepared for the proposed Project did not identify any direct or cumulative impacts to the intersection of Larsen Road at Austin Road and Highway 86. Further, this comment does not identify specific improvements that may be required and thus cannot be analyzed. If in the future, specific improvements are identified to address cumulative impacts, additional environmental review may be required at that time.

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

Response to Comment 1-9: The comment states that IID's canal or drain banks may not be used to access the Project site and that any abandonment, easements, or facilities must be approved by IID based on the systems' needs. This comment is procedural in nature and is noted for the decision-makers' consideration.

Response to Comment 1-10: The comment states that fencing should be installed at the boundary of IID's right-of-way for safety purposes and to allow access for IID operation and maintenance activities. Areas of the Project proposed to be fenced are depicted in Figure 8B of the IS/MND. The fencing, as proposed, does not completely surround IID facilities on the south and east of the site. However, the City is willing to extend fencing along the parks and olive mill for safety purposes. The fencing would be designed to allow access for IID operations and maintenance of its facilities.

Response to Comment 1-11: The comment provides contact information to obtain construction water. This comment is procedural in nature and is noted for the decision-makers' consideration.

Response to Comment 1-12: The comment addresses the need for an encroachment permit for any construction or operation on IID property or within IID's existing and/or proposed right-of-way. The City would be required to obtain an encroachment permit as described. This comment is procedural in nature and is noted for the decision-makers' consideration.

Response to Comment 1-13: The comment states that IID claims a prescriptive right-of-way to the toe of slope of all existing canals and drains. This comment is procedural in nature and is noted for the decision-makers' consideration.

Response to Comment 1-14: The comment states that any new, relocated, modified or reconstructed IID facilities required for and by the Project need to be included as part of the Project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. No IID improvements are proposed for the Project site and are therefore not included in the IS/MND.

Response to Comment 1-15: The comment provides closing remarks and contact information. This comment is noted.

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

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SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS



COUNTY OF
IMPERIAL

DEPARTMENT OF
PUBLIC WORKS

155 S. 11th Street
El Centro, CA
92243

Tel: (760) 482-4462
Fax: (760) 352-1272

Public Works works for the Public



April 22, 2015

LETTER 2

Mrs. Janet Redondo, Development Technician
City of Imperial
420 South Imperial Ave.
Imperial, CA 92251

SUBJECT: **City of Imperial Regional Park & Equestrian Center**; located immediately adjacent to the northern boundary of the City of Imperial and 0.5 mile west of State Route (SR) 86. APN 063-010-049.

Dear Mr. Galvan:

This letter is in response to your city of Imperial Regional Park and Equestrian Center package received on April 10, 2015 by this Department. The project proposes to develop the Project site with a variety of recreation uses including a Regional Park and Equestrian Center..

2-1

Our Department staff has reviewed the package and based on the information provided has the following comments:

1. Each parcel created or affected by this project shall abut a maintained road and/or have legal and physical access to a public road.
2. LaBrucherie Road is classified as Minor Collector- Local Collector, two (2) lanes, requiring seventy feet (70) of right of way, being thirty-five (35) feet from existing centerline. It is required that sufficient right of way be provided to meet this road classification. At completion of annexation into the City of Imperial, the applicant is requested to refer to the City of Imperial Planning Department for road right-of-way conditions. **As directed by Imperial County Board of Supervisors per Minute Order #6 dated 11/22/1994 per the Imperial County Circulation Element Plan of the General Plan).**
3. Larson Road is classified as Major Collector- Collector, four (4) lanes, requiring eighty four feet (84) of right of way, being forty two (42) feet from existing centerline. It is required that sufficient right of way be provided to meet this road classification. At completion of annexation into the City of Imperial, the applicant is requested to refer to the City of Imperial Planning Department for road right-of-way conditions. **As directed by Imperial County Board of Supervisors per Minute Order #6 dated 11/22/1994 per the Imperial County Circulation Element Plan of the General Plan).**
4. The applicant for Encroachment Permits in County Roads and Right of Way is responsible for researching, protecting, and preserving survey monuments per the Professional Land Surveyor's Act (8771 (b)). This shall include a copy of the referenced survey map and tie card(s) (if applicable) for all monuments that may be impacted.

2-2

2-3

2-4

2-5

An Equal Opportunity / Affirmative Action Employer

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SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

5. The applicant shall furnish a Drainage and Grading Plan/Study to provide for property grading and drainage control, which shall also include prevention of sedimentation of damage to off-site properties. The Study/Plan shall be submitted to the Department of Public Works for review and approval. The applicant shall implement the approved plan. Employment of the appropriate Best Management Practices (BMP's) shall be included. (Per Imperial County Code of Ordinances, Chapter 12.10.020 B). 2-6
6. The applicant for grading plans and/or improvement plans is responsible for researching, protecting, and preserving survey monuments per the Professional Land Surveyor's Act (8771 (b)). This shall include a copy of the referenced survey map and tie card(s) (if applicable) for all monuments that may be impacted by the project whether it be on-site or off-site. 2-7
7. The Developer shall consult with the Department concerning PM-10 mitigation. Early consultation with the Department is highly recommended. 2-8
8. The AM and PM Peak Hour Trips presented on Table 6: Project Daily Use Trip Generation of Section 4.0 Project Description of the Traffic Impact Analysis do not match the information presented on Figure 7b: Project Phase II & III Intersection Trip Assignment of the same section. 2-9
9. Section 13.0 Impacts and Mitigation Measures of the Traffic Impact Analysis does not include any comments on whether the installation turn lanes at site entrances for Phases IA, IB or Phases IA, IB, II & III will be required. 2-10
10. Section 13.0 Impacts and Mitigation Measures of the Traffic Impact Analysis does not **include any comments on construction traffic.**
 - a. The Developer shall prepare a mitigation monitoring program, including pictures, videos and/or other documents, to verify the existing conditions of the impacted roads before construction begins and after construction has been completed to evaluate the impacts to county roads due to construction and provide recommendations to bring the roads up to pre-construction conditions. The Developer will be required to repair any damages caused by construction traffic. 2-11
 - b. The Developer shall prepare and provide a construction traffic route plan to be maintained and enforced throughout the project construction period.
11. Appendix H of the Traffic Impact Analysis illustrates project description details for Phases IA, IB, II, and III. The details call for half-width paving of a road section of proposed Ralph Road as well as the road sections of La Brucherie Road and Larsen Road surrounding the site. No details on the installation of the remaining half-width paving for these roads are included in this appendix. No details on the paving of the extension of proposed Ralph Road connecting with Larsen Road are included in this appendix. 2-12

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SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

INFORMATIVE:

12. All solid and hazardous waste shall be disposed of in an approved solid waste disposal site in accordance with existing County, State and Federal regulations. (Per Imperial County Code of Ordinances, Chapter 8.72). 2-13
13. All on-site traffic area shall be hard surfaced to provide all weather access for fire protection vehicles. Fire/OES Standards as well as those of the Air Pollution Control District (ACPD). (Per Imperial County Code of Ordinances, Chapter 12.10.020 A). 2-14
14. The project will require a National Pollutant Discharge Elimination System (NPDES) permit and Notice of Intent (NOI) from the Regional Water Quality Control Board (RWQCB) prior to County approval of onsite grading plan. (40 CFR 122.28). 2-15
15. At time of development, if required, by Section 8762(b) of the Professional Land Surveyors Act, a record of shall be filed with County Recorder of Imperial County. 2-16
16. A Transportation Permit may be required from road agency(s) having jurisdiction over the haul route(s) for any hauls of heavy equipment and large vehicles which impose greater than legal loads on riding surfaces, including bridges. (Per Imperial County Code of Ordinances, Chapter 10.12.020). 2-17

Should you have any questions, please do not hesitate to contact this office. Thank you for the opportunity to review and comment on this project. 2-18

Respectfully,

William S. Brunet, PE
Director of Public Works

By: 

Manuel Ortiz
Assistant County Engineer

C:\Users\davemahaney\AppData\Local\Microsoft\Windows\Temporary Internet Files\Content.Outlook\0SDAW66A\City of Imperial Equestrian Center (draft).doc

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

LETTER 2

Manuel Ortiz, Assistant County Engineer
Imperial County Department of Public Works
April 22, 2015

Response to Comment 2-1: This comment provides introductory remarks regarding the Imperial County Department of Public Works' review of the Project. Specific comments follow.

Response to Comment 2-2: The comment states that each parcel created or affected by the Project will abut a maintained road and/or have legal and physical access to a public road. This comment does not address the adequacy of the environmental analysis but is noted for the decision-makers' consideration.

Response to Comment 2-3: The comment identifies the classification of LaBrucherie Road and states that sufficient right-of-way must be provided to meet this road classification. After annexation, the County states that the City must refer to the City of Imperial Planning Department for road right-of-way conditions as directed by the Imperial County Board of Supervisors according to Minute Order #6 dated 11/22/1994 per the Imperial County Circulation Element Plan of the General Plan. This comment is noted for the decision-makers' consideration.

Response to Comment 2-4: The comment identifies the classification of Larson Road and states that sufficient right-of-way must be provided to meet this road classification. After annexation, the County states that the City must refer to the City of Imperial Planning Department for road right-of-way conditions as directed by Imperial County Board of Supervisors according to Minute Order #6 dated 11/22/1994 per the Imperial County Circulation Element Plan of the General Plan. This comment is noted for the decision-makers' consideration.

Response to Comment 2-5: The comment states that the applicant (i.e. the City) will be responsible for researching protecting and preserving survey monuments per the Professional Land Surveyor's Act (8771(b)). The City will develop the Project site in accordance with all applicable regulations, including the Professional Land Surveyor's Act. This comment is noted.

Response to Comment 2-6: The comment states that the applicant (i.e. the City) shall furnish a Drainage and Grading Plan/Study to provide for property grading and drainage control to the Imperial County Department of Public Works for review and approval. The Plan/Study shall include prevention of sedimentation and damage to off-site properties. This comment is noted, however, the Project site will be within the jurisdictional authority of the City of Imperial following annexation. The Drainage and Grading Plan/Study will not be submitted to the Imperial County Department of Public Works, but the City will coordinate with the County to ensure that there will be no damage from sedimentation to neighboring properties.

Response to Comment 2-7: The comment states that the applicant (i.e. the City) for grading plans and/or improvement plans is responsible for researching and preserving survey monuments per the Professional Land Surveyor's Act. This comment is noted. Refer also to Response to Comment 2-5.

Response to Comment 2-8: The comment states that the developer (i.e. the City) shall consult with the Imperial County Department of Public Works concerning PM10 mitigation. Early consultation with the Department is recommended. This comment is noted.

Response to Comment 2-9: The comment states that the AM and PM Peak Hour trips presented in Table 6, Project Daily Use Trip Generation of the Traffic Impact Analysis do not match information

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

presented on Figure 7b – Project Phase II & III Intersection Trip Assignment of the same section. Several peak hour volumes are off by 1 trip due to rounding. The rounding has been corrected in Figure 7b and the revisions are included as Errata to this Final IS/MND. The report analyzed Phases IA and 1B, and then the Total (all phases); Phases II and III are interim phases of the Project and were incorporated in the LOS tables. Thus, none of the calculations have been affected by the revising the rounding error and no further corrections are required as errata.

Response to Comment 2-10: The comment states that Section 13, Impacts and Mitigation Measures of the Traffic Impact Analysis does not include any discussion as to whether the installation of turn lanes at site entrances for Phases IA, IB or Phases IA, IB, II and III will be required. Left-turn lanes into the Project site along LaBrucherie Road and Larsen Road will be add during Phase IB. These roads will be annexed into the City and will comply with City design standards.

Response to Comment 2-11: The comments states that Section 13, Impacts and Mitigation Measures of the Traffic Impact Analysis does not include any comments on construction traffic. The comment states that the Developer (i.e. the City) shall prepare a mitigation monitoring program including pictures, videos and/or other documents, to verify the existing conditions of the impacted roads before construction begins and after construction has been completed to evaluate the impacts to county roads due to construction and provide recommendations to bring the roads up to pre-construction conditions. The comment states that the Developer (i.e. the City) will be required to repair any damages caused by construction traffic. The comment goes on to state that the Developer (i.e. the City) shall prepare and provide a construction traffic route plan to be maintained and enforced throughout the construction period. While hauling of heavy construction equipment and high volumes of construction traffic compressed into a short time frame would not occur in association with this Project, City will require contractors to provide a traffic route plan as part of bid documents.

Response to Comment 2-12: The comment states that Appendix H of the Traffic Impact Analysis illustrates Project description details for Phases IA, IB, II and III. The details call for half-width paving of road section of the proposed Ralph Road extending through the Project site as well as the road sections of LaBrucherie Road and Larsen Road surrounding the site. The comment goes on to state that no details on the installation of the remaining half-width paving for these roads are included in Appendix H of the Traffic Impact Analysis. Likewise, no details on the paving of the extension of proposed Ralph Road connecting with Larsen Road are included in this appendix.

The comment does not provide rational as to why half-width improvement drawings or the paving drawings are needed at this time. The half-width improvements include adding additional left-turn lanes into the Project site along Larsen Road and La Brucherie Road during Phase IB.

Response to Comment 2-13: The comment states that all hazardous waste shall be disposed of at an approved solid waste disposal site in accordance with existing County, State and Federal regulations. This comment does not address the adequacy of the environmental analysis. This comment is noted for the decision-makers' consideration.

Response to Comment 2-14: The comment states that all on-site traffic areas shall be hard surfaced to provide all weather access for fire protection vehicles and that the Project shall adhere to all Fire Department, Office of Emergency Services, and Air Pollution Control District standards. The Project will be designed in conformance with all applicable standards to ensure safety and minimize air pollution. This comment is noted for the decision-makers' consideration.

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

Response to Comment 2-15: The comment states that the Project will require a National Pollutant Discharge Elimination System (NPDES) permit and Notice of Intent (NOI) from the Regional Water Quality Control Board (RWQCB) prior to County approval of an on-site grading plan. The City will obtain all necessary permits from the appropriate agencies prior to commencing construction. This comment is noted for the decision-makers' consideration.

Response to Comment 2-16: The comment states that a record of survey shall be filed with the County Recorder of Imperial County, if required by Section 8762(b) of the Professional Land Surveyors Act. This comment is noted for the decision-makers' consideration.

Response to Comment 2-17: The comment states that a Transportation Permit may be required from road agency(s) having jurisdiction over the haul route(s) for any hauls of heavy equipment and large vehicles which impose greater than legal loads on riding surfaces, including bridges. This comment is noted for the decision-makers' consideration.

Response to Comment 2-18: The comment provides closing remarks. No response is required.

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS



COUNTY OF IMPERIAL
PUBLIC HEALTH DEPARTMENT

LETTER 3

ROBIN HODGKIN, M.P.A.
Director

STEPHEN W. MUNDAY, M.D., M.P.H.
Health Officer

April 15, 2015

Mr. Roberto Flores, Planner II
Imperial County Planning & Development Services
801 Main Street
El Cento, CA 92243

Subject: Request for Review and Comments for the City of Imperial’s Equestrian Center’s MND

Dear Mr. Flores:

The Imperial County Division of Environmental Health (DEH) is providing the information below as a guide for land use requirements our office oversees and regulates. Proposed projects within Imperial County may be subject to the requirements listed below. Please review the information and contact DEH if further information is required. All applicants are encouraged to contact DEH early in the project planning stages in order to prevent any delays during the application process.

3-1

Wastewater

It is stated in the documents received by DEH, that the use of portable restrooms is proposed during phase IA of development of the equestrian and events center for up to 10,000 people each year. The use of rented portable receptacles for special events is not consistent with required minimum plumbing facilities for assembly occupancy in the California Plumbing Code, Chapter 4 (CPC 2013). Sanitary sewer infrastructure to support all phases of development should be constructed. Any separate on-site wastewater treatment system proposed for interim use must be permitted through the RWQCB.

3-2

Solid Waste

All proposed projects within Imperial County shall contract with a licensed waste hauler to provide collection bins and for waste hauling services during the construction and operational phase. All solid waste generated by the project must be taken to a permitted solid waste disposal and/or recycling facility.

3-3

Additionally, a waste management plan must be submitted to the Local Enforcement Agency (DEH) consistent with Title 14, California Code of Regulations, Sections 17801 et seq. (Agricultural Solid Waste Management Standards), which details the storage, handling, and disposal of manures such that vectors, odors, and dust are minimized. Manures removed from the stables or equestrian center shall be managed so as to prevent the creation of adverse public health/well-being conditions.

3-4

Water Supply

Based on the population that the project will serve, the project (including Phase I) is classified as a public water system under State law due to the project serving 25 or more people 60 days out of the year. As a result, the project is required to be serviced by a public water system for all phases of development.

3-5

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

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

The applicant currently proposes to haul water from the City of Imperial Water Treatment Plant (WTP) to two 5,000 gallon storage tanks located on-site for Phases IA and B of the project, with no guarantee of Phase II construction in 2023. While the City of Imperial WTP is an approved public water system that is permitted through the State Water Resources Control Board, Division of Drinking Water, the use of bulk hauled water, as a primary water supply to the site, is inconsistent with State law, as it cannot be ensured that the water distribution system will reliably supply treated water to the project or to meet the minimum Operational Requirements found in Section 116555 of the California Health and Safety Code. Therefore, the applicant shall either obtain a permit from DEH for the installation of a permitted small public water system to serve the initial phases of the project, or be connected to the City of Imperial WTP for all phases of development.

3-6

Basins

A Mosquito Abatement Plan is required by DEH/Vector Control District prior to approval of the storm water management plan for the project, both for the on-site detention basin and for excess nuisance waters that may collect in the self-contained Newside Drain that is proposed as an additional stormwater discharge point. Please contact DEH in order to obtain all necessary requirements for creating a plan.

3-7

Once again, DEH is providing this letter as a guide for the planning of your project. DEH reserves the right to provide specific comments concerning your project at anytime during the environmental review process. DEH encourages applicants to come into our office to discuss the project in detail.

3-8

If you have any questions or would like to meet with DEH staff, please do not hesitate to contact us at 442-265-1888.

Sincerely,



Alphonso Andrade
Environmental Health Compliance Specialist II

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

LETTER 3

Alphonso Andrade, Environmental Health Compliance Specialist II
County of Imperial Public Health Department

April 15, 2015

Response to Comment 3-1: The comment includes introductory remarks from the Department of Environmental Health. Specific comments regarding wastewater, solid waste, water supply and basins follow and are addressed in Response to Comments 3-2 thru 3-8.

Response to Comment 3-2: The comment states that the use of rented portable receptacles for special events is not consistent with required minimum plumbing facilities for assembly occupancy in the California Plumbing Code, Chapter 4. The comment goes on to state that sanitary sewer infrastructure should be constructed to support all phases of development. Page 2-49 of the IS/MND states “Portable toilets will be used during Phase IA & IB with some permanent bathroom facilities constructed as part of Phase II supplemented with portable toilets during large events.” The City of Imperial has historically used portable sanitary facilities for temporary, special events. The initial events hosted at the City of Imperial Regional Park and Equestrian Center will have a low enough attendance to be accommodated with portable toilets consistent with past practices. With implementation of Phase IB of the Project, the threshold attendance population of 10,000 would be reached and the associated permanent sanitary sewer infrastructure would be constructed to accommodate the number of visitors accordingly.

To eliminate any confusion, the description of “Proposed Operations” on page 2-3 of the IS/MND has been revised to place the discussion of “Phasing” before “Project Operations”. In addition, text has been added to the second paragraph under “Project Operations” to clarify the number of participants during Phase I as follows:

“Initially, Phase I of the Project is anticipated to accommodate several events totaling 10,000 visitors over the course of the year. The City projects that two to three major events with up to 10,000 people may occur each year upon build-out of all Phases (IA, IB, II and III) of the Project. Once a month, the Project could host activities generating between 200 to 3,000 attendees. Smaller events would draw visitors from the local area including Imperial County as well as the larger region (i.e. San Diego, Riverside and Yuma Counties). Larger events would draw from both the local and regional area as well as outside of the Country (i.e. Mexico).”

Response to Comment 3-3: The comment states that all proposed projects within Imperial County shall contract with a licensed waste hauler to remove trash during both construction and operation and disposed of at a permitted solid waste disposal and/or recycling facility. Page 2-93 of the IS/MND indicates that Republic Services would provide solid waste service with disposal at the Allied Imperial Landfill located at 104 East Robinson Road.

Response to Comment 3-4: The comment states that a Waste Management Plan must be submitted to the Local Enforcement Agency (DEH) detailing the storage, handling and disposal of manures such that vectors, odors, and dust are minimized. The requirement that a WMP be prepared has been added to Mitigation Measure AQ-4. Refer to Response to Comment 6-4.

Response to Comment 3-5: The comment states that the Project is classified as a public water system under State law because it will serve 25 or more people 60 days out of the year. As a result, the Project is required to be serviced by a public water system for all phases of development. Page 2-59 of the IS/MND states: “No domestic water delivery infrastructure is currently available at the

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

Project site. Potable water will be provided from the City's Water Treatment Plant and stored in two 5,000 storage tanks for Phase IA and IB (Figure 9A). At full build-out the proposed Project would obtain water via a pipeline extending north from Neckel Road and east from La Brucherie Road to the Project site (Figure 9B)."

The City of Imperial has historically used water tanks or bottled water for temporary, special events. The initial events hosted at the City of Imperial Regional Park and Equestrian Center will have low enough attendance to be accommodated with portable toilets consistent with past practices. As stated in the IS/MND, water will be provided from the City's Water Treatment Plant and stored in two 5,000 storage tanks for Phase IA and IB. The City will ensure that the number and size of events hosted during Phase IA and IB, prior to development of a public water system, remain below the population threshold requiring a public water system under State law (i.e. 925 or more people 60 days out of the year). In addition, the City will work with the State Water Resource Control Board (SWRCB), Division of Drinking Water, to ensure that water delivered to the Project site meets SWRCB standards for drinking water.

Response to Comment 3-6: The comment states that the proposed use of bulk hauled water as a primary water supply to the site is inconsistent with State law. The comment goes on to state that the City will need to obtain either a permit from the DEH for the installation of a permitted small public water system to serve the initial phases of the project, or be connected to the City of Imperial Water Treatment Plant for all phases of development. The provision of drinking water during Phases IA and IB has been previously discussed. Refer to Response to Comment 3-5, above.

Response to Comment 3-7: The comment states that a Mosquito Abatement Plan is required by DEH/Vector Control District for both the on-site detention basin and excess nuisance waters that may collect in the self-contained Newside Drain.

On page 2-59 of the IS/MND, the last paragraph prior the heading "Mitigation Measure" has been revised to acknowledge preparation of a Mosquito Abatement Plan. In addition, an error in the number of Mitigation Measure GEO-3 has been corrected and Mitigation Measure WQ-1 has been revised to include the requirement of a Mosquito Abatement Plan. The text revisions are as follows:

"During construction and operational activities, the proposed Project has the potential to discharge pollutants from the Project site and result in a potentially significant impact. However, with the incorporation of construction and post-construction BMPs that would target pollutants of concern, as specified in Mitigation Measures GEO-~~32~~ (as identified in the analysis of Geology and Soils impacts) and WQ-1 identified below, the proposed Project would not violate any water quality standards or waste discharge requirements and impacts would be less than significant. In addition, the City would submit a Mosquito Abatement Plan for the on-site detention basin and excess nuisance waters that may collect in the self-contained Newside Drain.

Mitigation Measure

GEO-~~32~~ Refer to the Geology and Soils Section.

"WQ-1 During Project operation, the City of Imperial shall verify BMP implementation and maintenance through inspection, self-certification, survey, or other equally effective measure. The City of Imperial shall retain operations, inspections, and maintenance records of the BMPs for at least 5 years after the recorded inspection date for the life of the Project. In addition, the City of Imperial shall ensure that long-term funding for BMP maintenance is available.

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

The City of Imperial shall also prepare a Mosquito Abatement Plan (MAP) as required by the Imperial County Department of Environmental Health (DEH)/Vector Control District for both the on-site detention basin and excess nuisance waters that may collect in the self-contained Newside Drain.

Timing/Implementation: BMPs and MAP prepared and submitted for approval prior to construction/BMPs and MAP implemented During Project construction and operation.

Enforcement/Monitoring: City of Imperial Planning and Development Department.”

Response to Comment 3-8: The comment provides closing remarks and contact information. No response is required.

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

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SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

Connie L. Valenzuela
Agricultural Commissioner
Sealer of Weights and Measures

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

IMPERIAL COUNTY
AGRICULTURAL COMMISSIONER
SEALER OF WEIGHTS AND MEASURES
CALIFORNIA

852 Broadway
El Centro, CA 92243-2850

(442) 265-1500
Fax: (442) 265-5708

E-mail: agcom@co.imperial.ca.us

LETTER 4

April 30, 2015

Mr. Robert Flores, Planner II
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

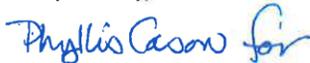
Dear Mr. Flores:

We have reviewed the City of Imperial for an Equestrian Center environmental assessment. This project for an equestrian center will allow a zone change from A-2-U, General Agriculture Urban to Public Facilities allowing large and small animals to reside adjacent to agricultural farm land. The Equestrian Center should not permit animals or water runoff from the Center to the agricultural fields nearby because of property and food safety issues. Imperial Valley is a diverse crop production area and crops are rotated frequently. Contamination from animals or water runoff could damage or destroy the crop and cause economic hardship.

4-1

Should you have any questions, please do not hesitate to contact me.

Respectfully,



Connie L. Valenzuela
Agricultural Commission

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

LETTER 4

Phyllis Cason for Connie L. Valenzuela
Agricultural Commissioner
April 30, 2015

Response to Comment 4-1: The comment notes that the proposed zone change will allow large and small animals to reside adjacent to agricultural farmland. The comment also states that the Equestrian Center should not permit animals or water runoff from the facility on to nearby agricultural fields and properties to avoid hazards and food safety issues. The comment closes by stating that contamination from animals or water runoff could damage or destroy crops and result in economic hardships.

Page 2-59 of the IS/MND acknowledges that during operational activities, the proposed Project has the potential to discharge pollutants from the Project site and result in a potentially significant impact. However, with the incorporation of construction and post-construction BMPs that would target pollutants of concern through implementation of an erosion and dust control plan, in combination with inspections, self-certification and surveys to confirm effectiveness of measures, the proposed Project would not violate any water quality standards or waste discharge requirements. All animals, animal waste and runoff from the site would be contained within the site thereby avoiding impacts to surrounding agricultural properties and crops.

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

**IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES**
Planning / Building & Safety / Parks & Recreation



May 1, 2015

LETTER 5

Jorge Galvan, Director
City of Imperial,
Planning & Development Department
420 South Imperial Avenue
Imperial, CA 92251

**RE: RESPONSE TO NOTICE OF INTENT TO ADOPT MND
"CITY OF IMPERIAL REGIONAL PARK & EQUESTRIAN CENTER"**

Dear Mr. Galvan,

The Imperial County Planning & Development Services Department (ICPDS) has reviewed the Mitigated Negative Declaration (MND), Initial Study (IS), and appendices for the proposed "City of Imperial Regional Park & Equestrian Center" prepared by your department, and our staff has provided the following comments on your assessment of the environmental impacts of this project:

5-1

GENERAL COMMENTS

1. The project is proposed to undergo a change in zoning and land use, after annexation; however, there is a discrepancy on the proposed zone and land use designation in the project description (pg. 2-1), General Plan analysis (section E on pg. 2-4), and the discussion section (pg. 2-64) of Category X. (Land Use and Planning).
 - a. What is the proposed zoning: "Public Facilities," "Open Space," or "Public Use?"
 - i. According to the City's Zoning Ordinance (§24.01.140), neither of the aforementioned zones currently exist. Will the City be adopting a new zone for this project?
 - b. What is the proposed General Plan land use designation: "Open Space" or "Public Use?"

5-2

5-3

5-4

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

- i. According to the City's Land Use Element (pg. 28-32), the Public Use land use designation exists, but the Open Space land use designation does not. If the land use designation will be Open Space, will the City be creating a new land designation for this project? 5-5
2. It this department's understanding that an application for annexation has been submitted to LAFCO; however, if the site does not gets approved for annexation and incorporation into the City of Imperial, the project will have to be reevaluated by the County's Planning & Development Services Department for land use impacts and permitting. 5-6
- CATEGORY SPECIFIC COMMENTS**
- Biological Resources (IV. a. and b.):
3. Subsection a. and b. are marked as "PSI;" however, the subsequent discussion section identifies both subcategory as "PSUMI." What is the City's determination with regards to these sections? 5-7
- Hazards and Hazardous Materials (VI. e.)
4. Although the site is outside of the compatibility zones for the Imperial County Airport, the site is still close in proximity to the airport (less than 2 miles) and just outside of the "B2" (Extended Approach/Departure Zone) and "C" (Common Traffic) compatibility zones (less than a quarter-mile from zones). Therefore, the project should be taken in front of the Airport Land Use Commission. 5-8
- Transportation/Traffic (XVI. f.)
5. Subsection f. is marked as "NI;" however, the subsequent discussion section identifies the subcategory as "LTSI." What is the City's determination with regards to this section? 5-9
- COMMENTS FROM OTHER COUNTY DEPARTMENTS**
6. The **Public Health Department**, Division of Environmental Health (DEH), has comments on the following topics; please see the attached letter for details: 5-10
- a. Wastewater
 - b. Solid Waste
 - c. Water Supply
 - d. Detention Basin
7. The **Department of Public Works** has comments on the following topics; please see the attached letter for details: 5-11
- a. Legal and physical access
 - b. Right-of-way
 - c. Drainage and Grading Plan/Study
 - d. PM-10 mitigation

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

- e. Trip generation data discrepancy
 - f. Turning lanes
 - g. Construction traffic
 - h. Half-width paving
 - i. And additional informative data.
8. The **Agricultural Commissioner** has comments on the following topics; please see the attached letter for details:
- a. Impacts to nearby agriculture fields from animals or water runoff.
9. The **Air Pollution Control District** has comments on the following topics; please see the attached letter for details:
- a. New thresholds for PM₁₀ and PM_{2.5}
 - b. Regulation VIII best available control measures
 - c. Ammonia Emissions from animals related to PM_{2.5}
 - d. Clarification on mitigation measures AQ1 through AQ4
 - e. Rule 310 Operational Development Fees

5-11 Cont

5-12

5-13

In closing, the Imperial County Planning & Development Services Department requests that any future environmental documents be sent to our office located at 801 Main Street, El Centro, CA 92243, **Attn. Jim Minnick, Director**.

5-14

Should you have any questions regarding this letter, please contact Robert Flores, Planner II, by phone at (442) 265-1736 ext. 1751 or by email at RobertoFlores@co.imperial.ca.us.

Thank you,

JIM MINNICK, Director
Planning & Development Services Department

By: 
Robert Flores, Planner II

Attachments:

Comment Letter from the Imperial County Public Health Department dated April 15, 2015
Comment Letter from the Imperial County Department of Public Works dated April 22, 2015
Comment Letter from the Imperial County Agricultural Commissioner dated April 30, 2015
Comment Letter from Imperial County Air Pollution Control District dated May 1, 2015

CC: Jim Minnick, ICPDS Director
Michael Abraham, AICP, ICPDS Assistant Director
Patricia Valenzuela, ICPDS Planner IV
Robert Flores, ICPDS Planner II
John Gay, Assistant Director of ICDPW
Monica Soucier, APCD
Jeff Lamour, DEH
Connie Valenzuela, Ag. Commission
Jurg Heuberger, LAFCO
APN: 10.125; 10.104

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SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

LETTER 5

**Robert Flores, Planner II for Jim Minnick, Director
Imperial County Planning and Development Services Department
May 1, 2015**

Response to Comment 5-1: The comment provides introductory remarks. No response is necessary.

Response to Comment 5-2: The comment states that there is a discrepancy in the proposed zone and land use designation on page 2-1 of the project description; page 2-4 under the General Plan Analysis; and page 2-64. The correct proposed land use and zoning are addressed in Response to Comments 5-3, 5-4 and 5-5, below.

Response to Comment 5-3: The comment requests clarification of the proposed zoning whether Public Facilities, Open Space, or Public Use. The proposed zoning is Public Facilities. Incorrect references to the proposed land use has been revised on page 2-1 as follows

“8. General Plan Designation: Existing: Agriculture (County) **Proposed:** ~~Open Space~~ Public Use

9. Zoning: Existing: A-2-U, General Agriculture Urban (County) **Proposed:** ~~Public Facilities~~ Open Space”

Incorrect references to the proposed zoning have been revised on page 2-4 as follows

“E. General Plan Consistency: The proposed 143-acre Project site consists of one parcel (APN 063-010-049) currently zoned A-2-U (General Agriculture Urban). The Project requires annexation, a pre-zone and general plan amendment. The Project site is currently within the City’s Sphere of Influence (SOI) and immediately adjacent to the northern City limit boundary. The site would be pre-zoned to its proposed zoning designation of Open Space and the existing ~~A-2-U zoning~~ land use designation would be changed to PU (Public Use) through a general plan amendment.”

Response to Comment 5-4: The comment requests clarification of the proposed zoning whether Open Space or Public Use. As noted in Response to Comment 5-3, above, the proposed zoning is “Open Space.”

Response to Comment 5-5: The comment asks if a new land use designation will be created to accommodate the proposed “Public Use” designation. The Draft Land Use Element of the City of Imperial General Plan Update contains a definition for the “Public Facility” designation which is considered synonymous with the Public Use designation depicted on the Exhibit 1-1, City of Imperial Proposed Land Use.

Response to Comment 5-6: The comment asks if the Project will have to be re-evaluated if the site is not approved for annexation and incorporation. If annexation is denied, the City may attempt to re-conceptualize the Project or abandoned the Project entirely.

Response to Comment 5-7: The comment notes a discrepancy in the Biological Resources section (IV) for items “a)” and “b).” On page 2-35 of the IS/MND, the boxes under the heading “Potentially Significant Unless Mitigation Incorporated” have been checked to be consistent with the text discussion and mitigation measures.

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

	Potentially Significant Impact (PSI)	"Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
IV. BIOLOGICAL RESOURCES				
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" 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, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?"	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Response to Comment 5-8: The comment states that the Project should be taken before the Airport Land Use Commission based on its proximity to the Imperial County Airport. The City intends to present the Project before the ALUC sometime during the month of July 2015.

Response to Comment 5-9: The comment identifies a discrepancy in the Transportation/Traffic section (XVI) of the IS/MND with regard to item "f)." The box is marked as "No Impact" but the text discussion identifies this item as "Less than Significant Impact." On page 2-86 of the IS/MND, the box under the heading "Less than Significant Impact" has been checked to be consistent with the text discussion for item "f)."

	Potentially Significant Impact (PSI)	"Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
f) Conflicts with adopted policies, plans, programs, regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?"	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Response to Comment 5-10: The comment notes that the Imperial County Department of Environmental Health provided comments on the IS/MDN. These comments are included in Letter 3. Refer to Response to Comments 3-2 thru 3-7.

Response to Comment 5-11: The comment notes that the Imperial County Department of Public Works provided comments. These comments are included in Letter 2. Refer to Response to Comments 2-2 thru 2-17.

Response to Comment 5-12: The comment notes that the Imperial County Agricultural Commissioner provided comments. These comments are included in Letter 4. Refer to Response to Comment 4-1.

Response to Comment 5-13: The comment notes that the Imperial County Air Pollution Control District provided comments. These comments are included in Letter 3. Refer to Response to Comments 2-2 thru 2-17.

Response to Comment 5-14: The comment provides closing remarks. No response is required.

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

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



AIR POLLUTION CONTROL DISTRICT

LETTER 6

May 1, 2015

CITY OF IMPERIAL
Redevelopment Agency
420 South Imperial Avenue
Imperial, California 92251
(760) 355-3326
www.cityofimperial.org

SUBJECT: Notice of Intent to Adopt a Mitigated Negative Declaration (MND) City of Imperial Regional Park & Equestrian Center

To Whom It May Concern:

The review of the Initial Study (IS), to adopt a Mitigated Negative Declaration (MND) for the City of Imperial Regional Park & Equestrian Center (Project) has been finalized by the Imperial County Air Pollution Control District (Air District). The Project headed by the City of Imperial Redevelopment Agency proposes to develop approximately 143 acres (proposed for annexation) into a site with a variety of recreational uses including a Regional Park and Equestrian Center. Once fully built the Project is expected to serve residents from the following cities; Imperial, Brawley and El Centro as well as incorporated and unincorporated areas of the County. However the overall goal is to spur economic development through tourism by attracting visitors from outside the region. Envisioned facilities include a 22.98 acre Sportsplex Regional Park with tournament-level sports fields; 56.5 acres for an equestrian facility which includes a 160,000 sq ft covered area, outdoor area, stables and a recreational vehicle park with 200 parking spaces; two open space parks totaling 14.77 acres; a 4.4 acre Commercial Center with 15,000 sq ft for restaurants and equestrian-related retail stores; and 6.25 acres for an olive orchard and mill.

6-1

The comments that follow are based on the information provided by the IS, MND and appendices, the Imperial County CEQA Air Quality Handbook (Handbook)¹ and the Rules and Regulations as adopted by the Imperial County Air Pollution Control Board of Directors.

6-2

¹ Since the adoption of the Imperial County CEQA Air Quality Handbook changes to significance criteria for tier I projects and expected standard and discretionary measures have changed primarily because of advances in engine manufacturing technologies. In addition, the use of URBEMIS has been replaced with CalEEMod as a preferred modeling urban tool. Finally, consultation with the Air District is vitally important to any application of stated measures.

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

Our non-attainment status for ozone, our "serious" non-attainment status for Particulate Matter of less than 10 microns (PM₁₀) and our non-attainment status for Particulate Matter of less than 2.5 microns (PM_{2.5}) for the 24 hr and annual are the driving criteria in establishing, new thresholds for NOx, ROG, PM₁₀, Sox, CO and PM_{2.5}. Except for the PM_{2.5} threshold these thresholds and the significance related to them can be found in the Handbook. In addition, since the adoption of best available control measures (BACM), Regulation VIII, full enforcement of fugitive dust generating activities will affect your project.

6-3

With that said, the following comments are intended to clarify updated procedures and expectations that will allow the Project to maintain the "Potentially Significant Unless Mitigation Incorporated" finding. Throughout the IS MND beginning with page 35 (2-28 of the document) and ending with page 60 (2-53 of the document) and Appendix A; Air Quality & Greenhouse Gas Impact Analysis the project correctly identifies the potentially significant impacts associated with Nitrogen Oxide (NOx) and Particulate Matter of Less than 10 microns (PM₁₀). However, because of the storage of animal waste the IS MND is not properly addressing potential ammonia emissions as they relate to the formation of PM_{2.5}. It is the opinion of the Air District that simply notifying the Project within this letter that a dedicated effort at mitigation of the animal waste and the housing of animals will need to be coordinated with the Air District so as to assure that emissions do not contribute significantly to the formation of PM_{2.5}.

6-4

The mitigation measures listed in the IS MND and appendix and identified as AQ1 through AQ4 require the following clarification.

AQ1 – the implementation of the standard mitigation measures can only be assured when the project commits via the submittal of a Dust Control Plan (DCP). The Dust Control Plan **MUST** expressly commit the project to the standard mitigation measures that will be implemented and those measures **MUST** be verified by the Air District. Such verification is released after the review of a submitted DCP by the Air District and will contain the requirement of the submittal of Records of Implementation. Finally, at a minimum of 10 days prior to any earthmoving activity the Project must submit a notification of such earthmoving activity to the Air District.

6-5

AQ2 – the implementation of the standard mitigation measures for the reduction of combustion equipment emissions, specifically NOx the project **MUST** submit prior to any earthmoving activity a complete list of intended equipment to be utilized on the site during construction. The list must be detailed such that a NOx evaluation can be performed to assure that emissions of NOx remain less than significant. The list must contain at a minimum the Model, Make, Year, Horsepower (*not* to be substituted by the load factor), estimated daily hours of operation and the total number of those pieces of equipment. Once construction commences, updated equipment list will be required. Failure to submit updated lists will trigger verification by compliance personnel.

6-6

AQ3 – Verification of the minimum 50% of tier 3 engines is insufficient to assure that the levels of NOx emissions will remain below the threshold and support the finding of less

6-7

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

than significant. Therefore, please refer to the AQ2 requirement for the submittal of equipment list to verify the emissions of NOx during the construction phases. The second portion of this mitigation suggesting that as an alternative an amended air quality emissions assessment could demonstrate construction generated emission would not exceed ICAPCD's thresholds is impractical and does nothing to assure that NOx emissions remain below the emissions threshold. However, an accepted and proven feasible mitigation measure is the application of Policy 5 which involves the reduction of like emissions off-site should the project exceed NOx emission thresholds. Therefore, the Project is required to submit the equipment list for a NOx evaluation should the NOx emissions exceed the threshold of significance for Imperial County then the Project will be required to implement Policy 5 to assure off-site like emissions are reduced to the extend the Project exceeded emissions.

6-7 Con't

AQ4 – the Project assessed long term emissions and correctly asses PM₁₀ as exceeding the Air District thresholds. Like AQ1, in order for the long term emissions to remain less than significant the Project must submit an Operational Dust Control Plan that will assure that PM₁₀ emissions are controlled for the life of the project. In addition, because part of the Project includes the storage and housing of animals emissions of ammonia must be controlled via the Operational Dust Control Plan. Last but not least because the Project proposes to build an olive orchard and mill and because it is unknown at this time exactly what equipment the mill will require the Project will be required to meet and confer with the Air District to see if there are any potential permit requirements.

6-8

6-9

6-10

Finally, Rule 310 Operational Development Fees will need to be assessed as the structures (not just buildings) are permitted for building.

6-11

In closing, the above mentioned clarifications are necessary to assure the Project emissions remain less than significant. Should you have any questions regarding the aforementioned information please do not hesitate to call our office at (442) 265-1800.

6-12

Respectfully Submitted,



Monica N. Soucier
Division Manager
Planning and Monitoring Sections

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

LETTER 6

Monica Soucier, Division Manager, Planning and Monitoring Services
Imperial County Air Pollution Control District
May 1, 2015

Response to Comment 6-1: The comment provides introductory remarks including a description of the Project. The comment does not address the adequacy of the environmental analysis. No response is required.

Response to Comment 6-2: The comment identifies the documents which provide the basis for comments 6-3 thru 6-11. The documents include the IS/MND and appendices as well as the Imperial County CEQA Air Quality Handbook and the Rules and Regulations as adopted by the Imperial County Air Pollution Control Board of Directors. No response is required.

Response to Comment 6-3: The comment identifies non-attainment thresholds for various pollutants noting that all thresholds, except for PM_{2.5} can be found in the Imperial County CEQA Air Quality Handbook. The comment also notes that Regulation VIII will apply to the Project. This comment is noted for the decision-maker's consideration.

Response to Comment 6-4: The comment states that the IS/MND correctly identifies the potentially significant impacts associated with NO_x and PM₁₀. However, because the Project will store animal waste, the comment states that the Project did not properly address potential ammonia emissions as they related to the formation of PM_{2.5}. The text of Mitigation Measure AQ-4 on page 2-31 of the IS/MND has been revised to identify removal and covering of animal waste as follows:

“AQ-4: A Waste Management Plan (WMP) shall be submitted to the Imperial County Department of Environmental Health (DEH) detailing the storage, handling and disposal of manures such that vectors, odors, and dust are minimized. In addition, an Operational Dust Control Plan (ODCP) shall be prepared for the proposed Project. The ODCP shall be endorsed by the Imperial County Air Pollution Control District (ICAPCD) prior to Project operations. At a minimum, the ODCP shall include the following measures:

- During Project operations, all on-site unpaved vehicle travel surfaces, including roadways and vehicle parking areas, shall be stabilized with an approved chemical dust stabilizer or shall be paved.
- Animal waste shall be promptly removed from the site (i.e., within 72 hours) in accordance with the provisions of the WMP.
- Animal waste piles should be covered, or other measures employed, as recommended by the ICAPCD.

Timing/Implementation: WMP submitted to DEH and approved prior to construction/ODCP and WMP implemented during Project operation.

Enforcement/Monitoring: City of Imperial Planning and Development Department, ~~DEH~~ and ICAPCD.”

Response to Comment 6-5: The comment states that Mitigation Measure AQ-1 requires clarification regarding standard mitigation and verification by the APCD. The comment also states that the Project must submit a notification of earthmoving activity to the APCD a minimum of 10 days prior to the activity. The first paragraph of Mitigation Measure AQ-1 on page 2-30 of the IS/MND has

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

been revised to identify preparation of a Construction Dust Control Plan as follows:

“AQ-1: A Construction Dust Control Plan (CDCP) shall be prepared for the Project. The CDCP shall be endorsed by ICAPCD prior to beginning construction. At a minimum, the CDCP shall include the following During construction, the proposed Project shall implement ICAPCD’s standard mitigation measures to reduce fugitive dust control, as noted below:

- All disturbed areas, including Bulk Material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall 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.
- All on site and off site unpaved roads will be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.
- All unpaved traffic areas one (1) acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emission shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.
- The transport of Bulk Materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of Bulk Material. In addition, the cargo compartment of all Haul Trucks is to be cleaned and/or washed at delivery site after removal of Bulk Material.
- All Track-Out or Carry-Out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.
- Movement of Bulk Material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers or by sheltering or enclosing the operation and transfer line.
- The construction of any new Unpaved Road is prohibited within any area with a population of 500 or more unless the road meets the definition of a Temporary Unpaved Road. Any temporary unpaved road shall be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emission by paving, chemical stabilizers, dust suppressants and/or watering.

Timing/Implementation: During construction activities.

Enforcement/Monitoring: City of Imperial Planning and Development Department/ICAPCD.”

Response to Comment 6-6: The comment states that Mitigation Measure AQ-2 requires clarification regarding submission of a complete list of intended equipment to be used on site during construction in order to implement standard mitigation measures for the reduction of NOx. Mitigation Measure AQ-2 on page 2-31 of the IS/MND has been revised to add and clarify submission of a complete equipment list prior to commencing construction as follows:

“AQ-2: Prior to commencing construction, a complete list of equipment shall be submitted to the ICAPCD for evaluation. The list shall include, at minimum, the Model, Make, Year, Horsepower (not to be substituted by the load factor), estimated daily hours of operation, and the total number of pieces of equipment. Updated equipment lists shall be submitted to the ICAPCD once construction begins.

During construction, the proposed Project shall implement the following ICAPCD Standard

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

Mitigation Measures to reduce heavy-duty construction combustion equipment emissions:

- Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel powered equipment.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum.
- Limit, to the extent feasible, the hours of operation of heavy duty equipment and/or the amount of equipment in use
- Replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set)

Timing/Implementation: A complete list of equipment shall be submitted to the ICAPCD Prior to construction/Updated equipment lists shall be submitted, and ICAPCD Standard Mitigation Measures implemented During construction activities.

Enforcement/Monitoring: City of Imperial Planning and Development Department/ICAPCD.”

Response to Comment 6-7: The comment states that Mitigation Measure AQ-3 requires clarification to indicate that the Project is required to submit the equipment list for a NO_x evaluation if the NO_x emissions exceed the threshold of significance for Imperial County. If an exceedance occurs, the Project will be required to implement Policy 5 to assure off-site like emissions are reduce to the extent the Project exceeds demands. Mitigation Measure AQ-3 on page 2-31 of the IS/MND has been revised to clarify submission of a complete equipment list prior to commencing with construction as follows:

“AQ-3: Prior to any earthmoving activity, a complete list of intended construction equipment to be utilized on the site shall be provided to the ICAPCD. The list must be detailed such that a NO_x evaluation can be performed to assure that emissions of NO_x Alternatively, this requirement can be amended if a supplemental air quality emissions assessment, to be based on the actual construction equipment fleet, demonstrates that construction-generated emissions would not exceed ICAPCD’s applicable emission threshold of 100 lbs/day of NO_x; would not exceed ICAPCD’s applicable emission threshold of 100 lbs/day of NO_x. At a minimum, the list shall identify the equipment model, make, year, horsepower, estimated daily hours of operation, and the total number of pieces of equipment. Once construction commences, an updated equipment list shall be provided to the ICAPCD. To the extent deemed necessary by the ICAPCD, emission reduction measures shall be incorporated to ensure that project-generated construction emissions would not exceed applicable thresholds. Such measures may include, but are not limited to, the use of heavy-duty off-road equipment meeting Tier 3 emissions standards.

Timing/Implementation: Prior to and During construction activities.

Enforcement/Monitoring: City of Imperial Planning and Development Department/ICAPCD.”

Response to Comment 6-8: The comment states that the Project must submit an Operational Dust Control Plan that will assure that PM₁₀ emissions are controlled for the life of the Project. This issue has been previously addressed. Refer to Response to Comment 6-5 above.

SECTION 2.0 – COMMENTS AND RESPONSE TO COMMENTS

Response to Comment 6-9: The comment states that ammonia emissions from the storage and housing of animals must be controlled via an Operational Dust Control Plan. Mitigation Measure AQ-4 on Page 2-31 of the IS/MND has been revised to require that an Operational Dust Control Plan be prepared and endorsed by the ICAPCD. Refer to Response to Comment 6-4, above.

Response to Comment 6-10: The comment indicates that prior to construction of the Project, the City will be required to discuss with the ICAPCD the equipment needed to operate the olive orchard and mill to determine if there are any permit requirements. This comment is noted for the decision-makers' consideration.

Response to Comment 6-11: The comment states that Rule 310 Operational Development Fees will need to be assessed as the structures (not just the buildings) are permitted. This comment is noted for the decision-makers' consideration.

Response to Comment 6-12: The comment provides closing remarks and contact information. This comment is noted.

SECTION 3.0 – ERRATA

INTRODUCTION

This Errata has been prepared to address minor errors or revisions which came about as a result of comments received during the 30-day public review period (April 2, 2015 thru May 1, 2015) in compliance with CEQA Guidelines 15073. The minor modifications to the text of the IS/MND detailed in the Errata reflect corrections and/or clarifications that do not constitute significant new information and do not change any of the impact conclusions of the IS/MND. In addition, these minor revisions to the text, as described below, would not cause a substantial increase in the severity of any environmental impacts. Rather, these changes merely clarify or correct portions of the text. Amended text is identified by page number. Revisions adding new text to the IS/MND are shown with underline and deleted portions of text are shown with ~~striketrough~~.

CHANGES AND EDITS TO THE IS/MND

The following changes and edits represent revisions to information included in the IS/MND based upon: (1) additional or revised information required to prepare a response to a specific comment; (2) updated information required due to the passage of time; and/or (3) typographical errors.

A brief description of the change or edit is provided as well as a reference to where the change or edit occurs in the document (page number, paragraph, sentence, table, etc.). Changes to the portion of text are included in quotes (“”).

SECTION 3.0 – ERRATA

SECTION II. ENVIRONMENTAL CHECKLIST

Page 2-1, items “8” and “9” have been revised as follows to reflect the correct proposed Zoning and General Plan Designation.

- “8. **General Plan Designation:** Existing: Agriculture (County) **Proposed:** ~~Open Space~~ Public Use
9. **Zoning:** Existing: A-2-U, General Agriculture Urban (County) **Proposed:** ~~Public Facilities~~ Open Space”

Page 2-3, has been revised to place the discussion of “Phasing” before “Project Operations”. In addition, text has been added to the second paragraph under “Project Operations” to clarify the number of participants during Phase I as follows:

“Phasing. The Project is proposed to be developed in three phases. Phase I includes two portions: Phase IA would construct the equestrian and events center with associated parking (Figure 7A); Phase IB would include the road improvements necessary for Phase IA along Larsen Road, La Brucherie Road, and Ralph Road (Figure 7B). Phase II is proposed to include the RV Park and City Park #1 (Figure 7C). Phase III would consist of the remaining components including the commercial center, Olive Orchard and Mill, Sportsplex, and City Park #2 (Figure 7D). Areas planted with turf and fencing for the Project are depicted in Figures 8A and 8B.

Proposed Operations. On a year-round basis, the proposed Project would support local residents’ needs for recreational facilities through providing parks and sportsplex areas for team sports and general recreational use. The RV Park area would be used for the storage of recreational vehicles and would be located next to the commercial area which would support a variety small- to medium-sized businesses such as retail stores and restaurants. The Olive Orchard and Mill would be a combined commercial and tourist destination with the availability of visitors to sample olive oils and take tours of the facilities. The equestrian and event center would be utilized for a variety of equestrian focused events with the potential for musical and sporting events as well as for conventions.

“Initially, Phase I of the Project is anticipated to accommodate several events totaling 10,000 visitors over the course of the year. The City projects that two to three major events with up to 10,000 people may occur each year upon build-out of all Phases (IA, IB, II and III) of the Project. Once a month, the Project could host activities generating between 200 to 3,000 attendees. Smaller events would draw visitors from the local area including Imperial County as well as the larger region (i.e. San Diego, Riverside and Yuma Counties). Larger events would draw from both the local and regional area as well as outside of the Country (i.e. Mexico).”

Phasing. The Project is proposed to be developed in three phases. Phase I includes two portions: Phase IA would construct the equestrian and events center with associated parking (Figure 7A); Phase IB would include the road improvements necessary for Phase IA along Larsen Road, La Brucherie Road, and Ralph Road (Figure 7B). Phase II is proposed to include the RV Park and City Park #1 (Figure 7C). Phase III would consist of the remaining components including the commercial center, Olive Orchard and Mill, Sportsplex, and City Park #2 (Figure 7D). Areas planted with turf and fencing for the Project are depicted in Figures 8A and 8B.

Page 2-4, the discussion of Electricity has been revised as follows to reflect the need for a circuit study and potential upgrades to IID facilities as follows:

“Electricity. Electrical power is currently provided by IID and is accessible to the Project site from existing power lines located along Larsen Road, La Brucherie Road, and Ralph Road. ~~There is available capacity in the system to accommodate the proposed Project which is planned to~~

SECTION 3.0 – ERRATA

establish connection during Phase IA. IID will need to perform a circuit study to evaluate the impact the Project will have on the IID Distribution system in the area. The City shall provide IID with detailed phasing maps and include estimated time frames of development and electrical loads per phase. The City will also be financially responsible for any system upgrades that the study deems necessary to serve the Project.”

Page 2-4, item “E.” of the Project Summary has been revised to reflect the correct zoning and land use designations:

“E. General Plan Consistency: The proposed 143-acre Project site consists of one parcel (APN 063-010-049) currently zoned A-2-U (General Agriculture Urban). The Project requires annexation, a pre-zone and general plan amendment. The Project site is currently within the City’s Sphere of Influence (SOI) and immediately adjacent to the northern City limit boundary. The site would be pre-zoned to its proposed zoning designation of Open Space and the existing ~~A-2-U zoning~~ land use designation would be changed to PU (Public Use) through a general plan amendment.”

Page 2-8, Figure 4 has been revised to reflect current City Boundaries (included below))

Page 2-18, Figure 9B has been revised to clarify the location of the future water pipeline and future sewer pipeline (included below).

SECTION I. AESTHETICS

Page 2-22, the first paragraph under the heading “Aesthetics Discussion” has been revised as follows:

“The Project site is currently in agricultural use with no on-site sources of light or glare. Existing light sources in the area ~~include~~ a few residences and vehicle headlights on area roadways. The visual quality of the Project site will be affected as the existing character will change from agriculture to a regional park and equestrian center and include nighttime events and activities. In addition, two large scale residential developments, the Morningstar Subdivision to the south and Barioni Lakes Specific Plan Subdivision to the north, east and west, are proposed to be developed surrounding the Project site (refer to Figure 5).”

Page 2-23, the second sentence first paragraph has been revised as follows:

“However, the proposed regional park and equestrian center would be located adjacent to areas proposed for development (Figure 5) with subdivision uses to the north, west, east and south.”

Page 2-23, Mitigation Measure AEST-2, the last sentence has been revised as follows:

“The landscape plan must include perimeter landscaping around the Project site that would adequately provide shielding of the on-site lighting to the existing surrounding residences and the proposed future developments of the Morningstar Star and Barioni Lakes Specific Plan areas.”

SECTION IV. AGRICULTURE & FOREST RESOURCES

Page 2-24, the last sentence of the second paragraph under the heading “Agriculture and Forest Resources Discussion” has been revised as follows:

“The site has been pre-zoned to its proposed zoning designation of Open Space.”

Page 2-24, item “a),” the last sentence at the bottom of the page and the first sentence at the top of page 2-27 have been revised to insert missing text as follows:

“However, because the City of Imperial is almost entirely surrounded by agricultural land, annexation and conversion of agricultural lands to urban uses is necessary in order for the City to grow. Given the county-wide importance and local abundance of agricultural land, the City recognizes the importance and preservation of this resource within its SOI.”

SECTION 3.0 – ERRATA

Page 2-27, the second sentence in the discussion of item “b)” has been revised to add the proposed zoning designation:

“The Project proposes a General Plan Amendment to designate the site as Public Use and a pre-zone to change the existing zoning to its proposed zoning designation of Open Space.”

SECTION III. AIR QUALITY

Page 2-28, the last sentence of the first paragraph under the heading “Long-term Operations” has been revised to include the missing closed parenthesis:

“Vehicle trip generation rates were derived from the traffic analysis prepared for this Project by LOS Engineering (Appendix F).”

Page 2-30, the text of Mitigation Measure AQ-1 of the IS/MND has been revised to identify preparation of a Construction Dust Control Plan as follows:

“AQ-1: A Construction Dust Control Plan (CDCP) shall be prepared for the Project. The CDCP shall be endorsed by ICAPCD prior to beginning construction. At a minimum, the CDCP shall include the following During construction, the proposed Project shall implement ICAPCD’s standard mitigation measures to reduce fugitive dust control, as noted below:”

- All disturbed areas, including Bulk Material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall 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.
- All on site and off site unpaved roads will be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.
- All unpaved traffic areas one (1) acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emission shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.
- The transport of Bulk Materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of Bulk Material. In addition, the cargo compartment of all Haul Trucks is to be cleaned and/or washed at delivery site after removal of Bulk Material.
- All Track-Out or Carry-Out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.
- Movement of Bulk Material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers or by sheltering or enclosing the operation and transfer line.
- The construction of any new Unpaved Road is prohibited within any area with a population of 500 or more unless the road meets the definition of a Temporary Unpaved Road. Any temporary unpaved road shall be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emission by paving, chemical stabilizers, dust suppressants and/or watering

Timing/Implementation: During construction activities.

Enforcement/Monitoring: City of Imperial Planning and Development Department/ICAPCD.”

SECTION 3.0 – ERRATA

Page 2-31, the Timing/Implementation of Mitigation Measure AQ-2 of the IS/MND has been revised to add and clarify submission of a complete equipment list prior to commencing with construction as follows:

“AQ-2: Prior to commencing construction, a complete list of equipment shall be submitted to the ICAPCD for evaluation. The list shall include, at minimum, the Model, Make, Year, Horsepower (not to be substituted by the load factor), estimated daily hours of operation, and the total number of pieces of equipment. Updated equipment lists shall be submitted to the ICAPCD once construction begins.

During construction, the proposed Project shall implement the following ICAPCD Standard Mitigation Measures to reduce heavy-duty construction combustion equipment emissions:

- Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel powered equipment.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum.
- Limit, to the extent feasible, the hours of operation of heavy duty equipment and/or the amount of equipment in use
- Replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set)

Timing/Implementation: A complete list of equipment shall be submitted to the ICAPCD Prior to construction/Updated equipment lists shall be submitted, and ICAPCD Standard Mitigation Measures implemented During construction activities.

Enforcement/Monitoring: City of Imperial Planning and Development Department/ICAPCD.”

Page 2-31, the text of Mitigation Measure AQ-3 of the IS/MND has been revised to add and clarify submission of a complete equipment list prior to commencing with construction as follows:

“AQ-3: Prior to any earthmoving activity, a complete list of intended construction equipment to be utilized on the site shall be provided to the ICAPCD. The list must be detailed such that a NO_x evaluation can be performed to assure that emissions of NO_x Alternatively, this requirement can be amended if a supplemental air quality emissions assessment, to be based on the actual construction equipment fleet, demonstrates that construction-generated emissions would not exceed ICAPCD’s applicable emission threshold of 100 lbs/day of NO_x. would not exceed ICAPCD’s applicable emission threshold of 100 lbs/day of NO_x. At a minimum, the list shall identify the equipment model, make, year, horsepower, estimated daily hours of operation, and the total number of pieces of equipment. Once construction commences, an updated equipment list shall be provided to the ICAPCD. To the extent deemed necessary by the ICAPCD, emission reduction measures shall be incorporated to ensure that project-generated construction emissions would not exceed applicable thresholds. Such measures may include, but are not limited to, the use of heavy-duty off-road equipment meeting Tier 3 emissions standards.

Page 2-31, the text of Mitigation Measure AQ-4 of the IS/MND has been revised to require that an Operational Dust Control Plan be prepared and endorsed by the ICAPCD as well as identify removal and covering of animal waste as follows:

SECTION 3.0 – ERRATA

“AQ-4: A Waste Management Plan (WMP) shall be submitted to the Imperial County Department of Environmental Health (DEH) detailing the storage, handling and disposal of manures such that vectors, odors, and dust are minimized. In addition, an Operational Dust Control Plan (ODCP) shall be prepared for the proposed Project. The ODCP shall be endorsed by the Imperial County Air Pollution Control District (ICAPCD) prior to Project operations. At a minimum, the ODCP shall include the following measures:

- During Project operations, all on-site unpaved vehicle travel surfaces, including roadways and vehicle parking areas, shall be stabilized with an approved chemical dust stabilizer or shall be paved.
- Animal waste shall be promptly removed from the site (i.e., within 72 hours) in accordance with the provisions of the WMP.
- Animal waste piles should be covered, or other measures employed, as recommended by the ICAPCD.

Timing/Implementation: WMP submitted to DEH and approved prior to construction/ODCP and WMP implemented during Project operation.

Enforcement/Monitoring: City of Imperial Planning and Development Department, ~~DEH~~ and ICAPCD.”

Page 2-33, the acronym has been added immediately following the heading Toxic Air Contaminants:

“Toxic Air Contaminants (TACs)”

Page 2-33, the first full sentence of the first paragraph has been revised as follows:

“As such, the calculation of cancer risk associated with exposure of to TACs are typically calculated based on a long-term (e.g., 70-year) period of exposure.”

Page 2-33, the first sentence of the first paragraph following the “Valley Fever” heading has been revised as follows:

“Valley Fever. ~~As noted earlier in this report,~~ Valley Fever is an infection caused by the fungus *Coccidioides*. *Coccidioides* spores can become airborne after contaminated soil and dust are disturbed.”

Page 2-34, the fifth sentence of the paragraph following the “Fugitive Dust” heading has been revised as follows:

“However, implementation of Mitigation Measures AQ-1 through AQ-4 would require the control of fugitive dust emitted during long-term operation of the Project.”

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SECTION IV. BIOLOGICAL RESOURCES

Page 2-35, the boxes under the heading “Potentially Significant Unless Mitigation Incorporated” have checked to be consistent with the text discussion and mitigation measures.

	“Significant Potentially Significant Impact (PSI)”	Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
I. BIOLOGICAL RESOURCES				
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" 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, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?”	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION V. CULTURAL RESOURCES

Page 2-40, the fifth and sixth sentences of the last paragraph have been revised as follows:

“Also, because these materials are not imported in farming material, top soil, or fertilization, it is more than likely these materials are an original deposit indicating that original material still exists within the disturbed soil. Additionally, lithic material covered in patina was located within the Project site and survey area, which according to the cultural resources report, indicates that surface deposits are present in the agricultural soil and could be an indication as to what is buried or as to what may be mixed in the soil (Loveless & Linton 2014, p. 6).”

Page 2-42, the first paragraph under the discussion of item “c)” has been revised to add clarifications and correct the page number citations:

“Paleontological resources are typically impacted when earthwork activities such as mass excavation cut into geological deposits (formations) with buried fossils. The entire Project site, as well the entire Imperial Valley, is located within the former lakebed of Ancient Lake Cahuilla. The Ancient Lake Cahuilla lakebed sediments lie below the surface soils. Lakebed sediments have been proven to contain fossils or fossil remains such as invertebrates, small vertebrates, and extinct larger mammals (EGI 2014, p. 474.7-19). No paleontological resources were observed during the field survey. In addition, the soils are unlikely to contain intact paleontological remains due to the disturbed nature of the surface soils from farming practices on the Project site and its surroundings. However, the absence of fossils on the surface does not preclude the possibility of fossil presence within subsurface deposits (EGI 2014, p. 474.7-19). Therefore, although the potential of the proposed Project to impact paleontological resources is low in the disturbed surface sediments, there is a potential for resources to be impacted if grading or excavations were to occur in the subsurface of the undisturbed Ancient Lake Cahuilla sediments and underneath the older alluvium.”

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Page 2-43, the last sentence of the first full paragraph has been revised to correct a reference to the Imperial County Planning and Development Services Department as follows:

“Submittal of the report and inventory to the ~~Imperial County Planning and Development Services Department~~, City of Imperial Planning and Development Department along with confirmation of the curation of recovered specimens into an established, accredited museum repository, shall signify completion of the program to mitigate impacts to paleontological resources.”

Page 2-45, “Significance Level After Mitigation” has been moved to the end of Mitigation Measure GEO-1 as follows:

~~“Significance Level After Mitigation: Less than Significant.”~~

Mitigation Measure

GEO-1: Prior to approval of final building plans, structures on the Project site shall be designed and constructed to resist the effects of seismic ground motions as provided in Section 1613 of the 2013 California Building Code. The Project shall be engineered using the 2013 California Building Code, Section 1613 Design Coefficients for the proposed structures.

Timing/Implementation: Prior to approval of final building plans/As part of Project design.

Enforcement/Monitoring: City of Imperial Planning and Development Department, and Public Services Department.

Significance Level After Mitigation: Less than Significant.”

SECTION VII. GREENHOUSE GAS EMISSION

Page 2-50, the fourth sentence under the first paragraph has been revised to define the acronym ARB and remove a duplication of previously defined acronym:

“This reduction is also reflected in the Air Resources Board’s (ARB’s) AB 32 Scoping Plan (2008), which estimated that GHG emissions in the state need to be reduced by approximately 29 percent, in comparison to ~~business-as-usual (BAU)~~ conditions.”

“SECTION ~~VI~~ VIII. HAZARDS AND HAZARDOUS MATERIALS”

Page 2-54, the first sentence of the discussion of item “a” has been revised to spell out the entire name of the Project as follows:

“The operation of the City of Imperial Regional Park and Equestrian Center will involve the transport, use and storage of a limited amount of hazardous materials both during construction and operation.”

“SECTION ~~VIII~~ IX. HYDROLOGY AND WATER QUALITY”

Page 2-58, the first sentence of the fourth paragraph has been revised to insert a missing word as follows:

“The *Drainage Report for Imperial Equestrian and Events Center Project* was prepared by Alfred Civil Engineering (Alfred 2015) and summarizes the hydrological analysis for the proposed Project.”

Page 2-58, the first sentence of the fifth paragraph has been revised to insert missing words as follows:

“Under existing conditions, rainfall is detained on the Project site by the berms and roadways along the perimeter. These features prevent runoff except through two small PVC pipes

SECTION 3.0 – ERRATA

discharging to Newside Drain. Similarly, because of the perimeter barriers, there are no direct off-site flows to the site.”

Page 2-59, the first and fourth paragraph includes incorrect references to Mitigation Measure GEO-3. The text has been revised to reflect the correct Mitigation Measure GEO-2:

“Activities (Order No. 2012-0006-DWQ, as amended by Order No. 2010-0014-DWQ, NPDES No. CA000002) (Construction General Permit [CGP]). Permittees must verify compliance with permit requirements by monitoring effluent, maintaining records, and filing periodic reports. An NPDES permit would generally specify an acceptable level of a pollutant or pollutant parameter in a discharge (for example, a certain level of bacteria). Compliance with the NPDES permit requirement is specified in Mitigation Measure ~~GEO-3~~ GEO-2. Short-term potentially significant stormwater pollutant discharges from the Project site would be mitigated through compliance with the applicable NPDES permitting process, resulting in a less than significant impact.”

“During construction and operational activities, the proposed Project has the potential to discharge pollutants from the Project site and result in a potentially significant impact. However, with the incorporation of construction and post-construction BMPs that would target pollutants of concern, as specified in Mitigation Measures ~~GEO-3~~ GEO-2 (as identified in the analysis of Geology and Soils impacts) and WQ-1 identified below, the proposed Project would not violate any water quality standards or waste discharge requirements and impacts would be less than significant.”

Mitigation Measure

“~~GEO-3~~ GEO-2 Refer to the Geology and Soils Section.”

Page 2-59, the last paragraph prior the heading “Mitigation Measure” has been revised to acknowledge preparation of a Mosquito Abatement Plan. In addition, Mitigation Measure WQ-1 has been revised to include the requirement of a Mosquito Abatement Plan. The text revisions are as follows:

“During construction and operational activities, the proposed Project has the potential to discharge pollutants from the Project site and result in a potentially significant impact. However, with the incorporation of construction and post-construction BMPs that would target pollutants of concern, as specified in Mitigation Measures ~~GEO-3~~ GEO-2 (as identified in the analysis of Geology and Soils impacts) and WQ-1 identified below, the proposed Project would not violate any water quality standards or waste discharge requirements and impacts would be less than significant. In addition, the City would submit a Mosquito Abatement Plan for the on-site detention basin and excess nuisance waters that may collect in the self-contained Newside Drain.”

Mitigation Measure

~~GEO-3~~ GEO-2 Refer to the Geology and Soils Section.

“**WQ-1** During Project operation, the City of Imperial shall verify BMP implementation and maintenance through inspection, self-certification, survey, or other equally effective measure. The City of Imperial shall retain operations, inspections, and maintenance records of the BMPs for at least 5 years after the recorded inspection date for the life of the Project. In addition, the City of Imperial shall ensure that long-term funding for BMP maintenance is available.

The City of Imperial shall also prepare a Mosquito Abatement Plan (MAP) as required by Imperial County Department of Environmental Health (DEH)/Vector Control District for both the on-site detention basin and excess nuisance waters that may collect in the self-contained Newside Drain.”

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Timing/Implementation: BMPs and MAP prepared and submitted for approval prior to construction/BMPs and MAP implemented and during Project construction and operation.

Enforcement/Monitoring: City of Imperial Planning and Development Department.”

SECTION X. LAND USE

Page 2-64, the third sentence of the third paragraph under the heading “Land Use and Planning Discussion” has been revised to identify the proposed zoning designation as follows:

“The Project seeks to annex the 143-acre parcel into the City of Imperial and amend the General Plan to change the land use designation from Agriculture to Public Use (Figure 20) and a pre-zone to change the existing zoning to the proposed zoning designation of Open Space (Figure 21) to be consistent with City land use and zoning standards.”

SECTION XI. MINERAL RESOURCES

Page 2-69, the fifth sentence of the first paragraph under the heading “Mineral Resources Discussion” has been revised to correct the General Plan citation as follows:

“Figure 5 of the Imperial County General Plan Conservation and Open Space Element depicts mining areas within the County (~~IC GP Conservation element~~ Imperial County 2008, p. 26).”

Page 2-69, the last sentence of the paragraph for items “a,b)” has been revised to eliminate the incorrect reference to an EIR as follows:

“Thus, no impact is identified for these issue areas and mineral resources ~~will not be discussed in the EIR.~~”

SECTION XII. NOISE

Page 2-72, the second sentence of the paragraph following the heading “Ambient Noise Levels” has been revised to correct the singular reference to roadway segments as follows:

“Existing traffic noise levels along roadway segments primarily affected by the proposed Project as well as, distances to projected traffic noise contours, are summarized in **Table 9.**”

Page 2-73, the last sentence of the paragraph for item “a)” has been revised to correct an incorrect reference to NOI-2 and add new construction Mitigation Measure as follows:

“Implementation of Mitigation Measures NOI-1 and ~~NOI-2~~ NOI-2, NOI-3 and NOI-4 would reduce this impact to a less-than-significant level.”

Mitigation Measures

NOI-1 Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday. Construction activities shall be prohibited on Sundays and federally-recognized holidays.

Timing/Implementation: During Project construction.

Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Level After Mitigation: Less than Significant.

NOI-2 Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers’ recommendations. Equipment engine shrouds shall be closed during equipment operation.

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Timing/Implementation: During Project construction.

Enforcement/Monitoring: City of Imperial Planning and Development Department.”

Significance Level After Mitigation: Less than Significant.

NOI-13 During operation, the Project’s use of off-road equipment associated with the routine maintenance and operation of on-site land uses shall be limited to between the hours of 7:00 a.m. and 10:00 p.m.

Timing/Implementation: During Project operation.

Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Level After Mitigation: Less than Significant.

NOI-24 During operation, on-site recreational and equestrian events shall be limited to between the hours of 7:00 a.m. and 10:00 p.m.

Timing/Implementation: During Project operation.

Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Level After Mitigation: Less than Significant.”

Page 2-74, the first sentence of the first paragraph following the heading “On-site Equestrian & Event Center” has been revised to insert a missing word as follows:

“Although the specific hours of operation for the proposed equestrian and event center have not yet been identified, it is anticipated that the event center would be used primarily during the daytime hours, though some event activities could extend into the evening hours.”

Page 2-80, the following text has been inserted following the discussion of item “c)” to identify Mitigation Measures to address the potentially significant impacts as follows:

Mitigation Measures

Implement NOI-3 to address Off-Road Equipment Operations noise and NOI-4 to address on-site Equestrian & Event Center noise and On-Site Recreational Use noise levels.

Significance Level After Mitigation: Less than Significant.”

Page 2-80, the last paragraph at the bottom of the page and page 2-81, the first paragraph at the top of the page has been revised to include references to Mitigation Measures NOI-1 and NOI-2 as follows:

“As noted earlier in this report, noise-sensitive land uses in the Project area include residential dwellings, the nearest of which are generally located along the northern and eastern boundaries of the Project site, adjacent to Larsen Road and La Brucherie Road (Figure 22). However, in keeping with the provisions of Mitigation Measure NOI-1, construction activities (excluding activities that would result in a safety concern to the public or construction workers) will be limited to between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday with no construction occurring on Sundays and federally-recognized holidays. In addition, implementation of NOI-2, which requires noise-reduction intake and exhaust mufflers and engine shrouds on equipment, would serve to reduce construction noise levels. As a result, construction noise ~~this impact~~ would be considered to have a less than significant short-term noise impact to occupants of nearby residential land uses.”

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SECTION XIII. POPULATION AND HOUSING

Page 2-82, the last sentence of the first full paragraph has been revised as follows:

“Assuming a modest development of recently ~~annexed~~ ~~annexation~~ areas of only 20 percent, the City could potentially see an additional increase in population of 1,082 by 2021.”

Page 2-86, the last sentence of the first full paragraph has been revised as follows:

SECTION XVI. TRANSPORTATION/TRAFFIC

On page 2-86, the box under the heading “Less than Significant Impact” has checked to be consistent with the text discussion for item “f”).

	Potentially Significant Impact (PSI)	“Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
f) Conflicts with adopted policies, plans, programs, regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?”	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

SECTION XVII. UTILITIES AND SERVICES SYSTEMS

Page 2-91, the second paragraph under the heading “City of Imperial Distribution System” has been revised as follows:

“Water treatment and distribution facilities have an existing capacity of 7 million gallons per day (mgd) and an estimated daily demand of 2.6 mgd, based on 2014 residential population and assuming a 150 mgd per day per ~~capita~~ ~~capita~~ usage. Water treatment and distribution facilities are estimated to be at 37% capacity (City of Imperial 2014c, p. 37).”

Page 3-1, the following revisions have been made to the numbering of Section 3 to insert headings and revise the mitigation measures in item “c)”

SECTION 3 - III. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact (PSI)	“Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.				

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

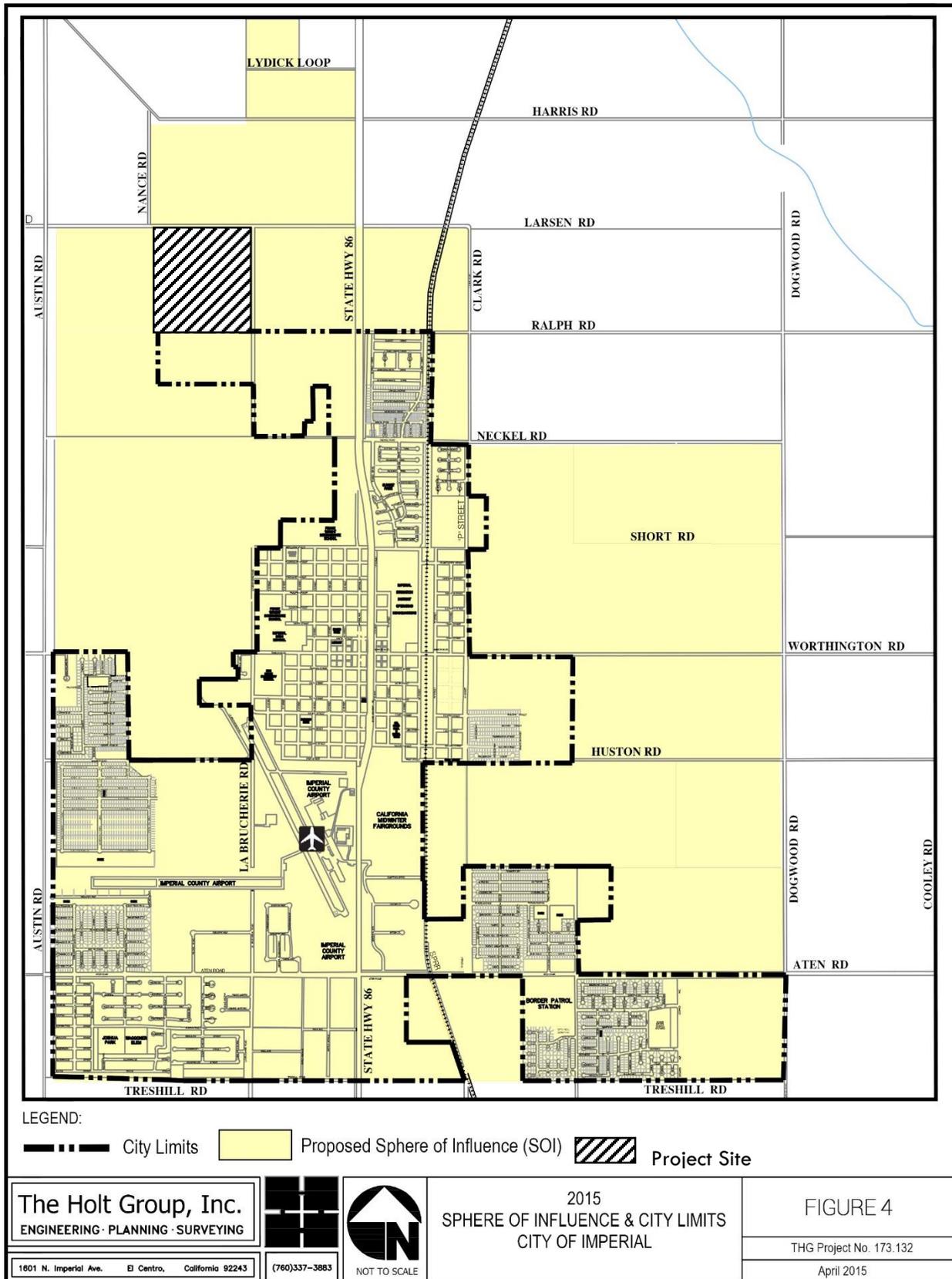
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limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

- c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

- a) **Potentially Significant Impact.** Implementation of the proposed Project has the potential to impact biological resources and cultural resources. However, implementation of mitigation measures BIO-1 through BIO-3 as well as CULT-1 and CULT-2 were determined to reduce those impacts to levels considered to be less than significant.
- b) **Potentially Significant Impact.** The proposed Project has the potential to result in environmental impacts that cumulatively could be considerable. However, through the implementation of mitigation measures provided in the mitigation, monitoring, and reporting program (MMRP) the cumulative contribution of the Project's impacts are considered to be less than significant.
- c) **Potentially Significant Impact.** The proposed Project has the potential to result in significant environmental effects, which could directly or indirectly cause adverse effects on human beings. As demonstrated in this Initial Study, the proposed Project has the potential to result in significant environmental impacts to air quality, greenhouse gases, geology/soils, noise and water quality. However, through the implementation of mitigation measures provided in the MMRP, the cumulative contribution of the Project's impacts are considered to be less than significant with implementation of AQ-1 thru AQ-4; GHG-1; GEO-1 and GEO-2; WQ-1; NOI-1, and NOI-2, NOI-3 and NOI-4; and TRAF-1 and TRAF-2.

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**FIGURE 4
 SPHERE OF INFLUENCE MAP**

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FIGURE 9B
LOCATION OF WATER PIPELINE EXTENSION TO SERVE CITY OF IMPERIAL REGIONAL PARK & EQUESTRIAN CENTER

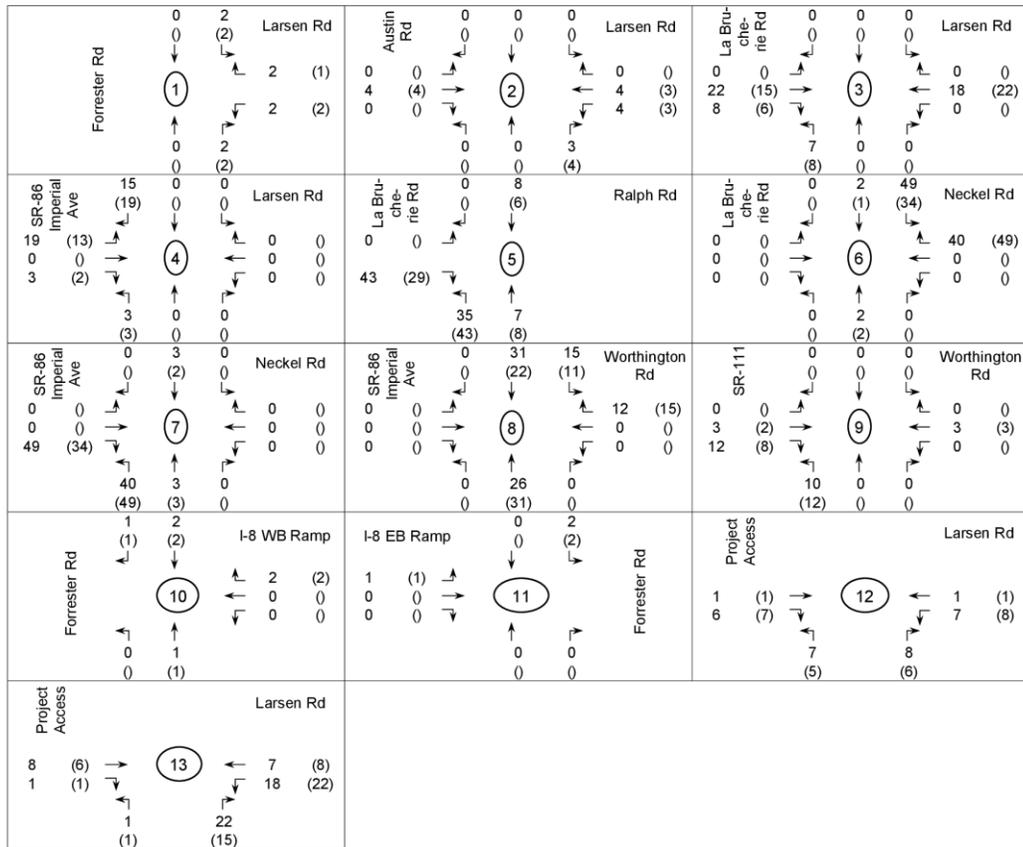
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APPENDIX F – TRAFFIC IMPACT ASSESSMENT

Page 24, Figure 7b, Project Phase II & III Intersection Trip Assignment of the Traffic Impact Analysis has been revised to correct rounding errors. Page 24 is included on the following page.

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Figure 7b: Project Phase II & III Intersection Trip Assignment



LEGEND

- XX AM Peak Hour volumes at intersections
- (YY) PM Peak Hour volumes at intersections
- 0 Represents 0 PM volume
- # Intersection Reference Number to LOS Tables



No Scale

SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

INTRODUCTION

This document is the Mitigation Monitoring and Reporting Program (MMRP) for the City of Imperial Regional Park & Equestrian Center Project. This MMRP has been prepared pursuant to California Public Resources Code §21081.6, 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 Mitigated Negative Declaration (MND) identified significant adverse impacts and mitigation measures have been identified to address these impacts. The numbering of the individual mitigation measures follows the numbering sequence as found in the MND. All revisions to mitigation measures that were necessary, as a result of responding to public comments and incorporating staff-initiated revisions have been incorporated into this MMRP.

MITIGATION MONITORING AND REPORTING PROGRAM

The MMRP, as outlined in the following table, describes mitigation timing, monitoring responsibilities, and compliance verification responsibility for all mitigation measures identified in the MND. The City of Imperial will be the primary agency, but not the only agency responsible for implementing the mitigation measures. In some cases, other public agencies will implement measures. The City may choose to require the construction contractor to implement specific mitigation measures prior to and/or during construction. The City will continue to monitor mitigation measures that are required to be implemented during the operation of the project.

The MMRP is presented in tabular form on the following pages. The components of the MMRP are described briefly below:

Mitigation Measures: The mitigation measures are taken from the MND, in the same order that they appear in the MND.

Mitigation Timing: Identifies at which stage of the project mitigation must be completed.

Monitoring Responsibility: Identifies the department within the City or other entity responsible for mitigation monitoring.

Compliance Verification Responsibility: Identifies the department of the City or other State agency responsible for verifying compliance with the mitigation. In some cases, verification will include contact with responsible state and federal agencies.

SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

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SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

MM #	Mitigation Measure	Monitoring Responsibility	Timing	Verification (Date and Initials)
AESTHETICS				
AEST-1	Prior to issuance of building permits, a lighting plan shall be developed. All lighting installed shall be shielded and directed so as to minimize significant off-site glare or adverse light intrusion into neighboring properties. The lighting plan shall be reviewed and approved by the City of Imperial Planning Department.	City of Imperial Planning and Development Department	Prior to issuance of building permit.	
AEST-2	Prior to issuance of building permits, a landscaping plan shall be submitted and approved by the City of Imperial Planning Department. The landscape plan must include perimeter landscaping around the Project site that would adequately provide shielding of the on-site lighting to the existing surrounding residences and the proposed future developments of the Morning Star and Barioni Lakes Specific Plan areas.	City of Imperial Planning and Development Department	Prior to issuance of building permit.	
AIR QUALITY				
AQ-1	<p>A Construction Dust Control Plan (CDCP) shall be prepared for the Project. The CDCP shall be endorsed by ICAPCD prior to beginning construction. During construction, the proposed Project shall implement ICAPCD's standard mitigation measures to reduce fugitive dust control, as noted below:</p> <ul style="list-style-type: none"> • All disturbed areas, including Bulk Material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall 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. • All on site and off site unpaved roads will be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering. • All unpaved traffic areas one (1) acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emission shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering. • The transport of Bulk Materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of Bulk Material. In addition, the cargo compartment of all Haul Trucks is to be 	City of Imperial Planning and Development Department / Imperial County Air Pollution Control District (ICAPCD)	During construction activities.	

SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

MM #	Mitigation Measure	Monitoring Responsibility	Timing	Verification (Date and Initials)
	<p>cleaned and/or washed at delivery site after removal of Bulk Material.</p> <ul style="list-style-type: none"> • All Track-Out or Carry-Out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area. • Movement of Bulk Material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers or by sheltering or enclosing the operation and transfer line. • The construction of any new Unpaved Road is prohibited within any area with a population of 500 or more unless the road meets the definition of a Temporary Unpaved Road. Any temporary unpaved road shall be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emission by paving, chemical stabilizers, dust suppressants and/or watering. 			
AQ-2	<p>Prior to commencing construction, a complete list of equipment shall be submitted to the ICAPCD for evaluation. The list shall include, at minimum, the Model, Make, Year, Horsepower (not to be substituted by the load factor), estimated daily hours of operation, and the total number of pieces of equipment. Updated equipment lists shall be submitted to the ICAPCD once construction begins.</p> <p>During construction, the proposed Project shall implement the following ICAPCD Standard Mitigation Measures to reduce heavy-duty construction combustion equipment emissions:</p> <ul style="list-style-type: none"> • Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel powered equipment. • Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum. • Limit, to the extent feasible, the hours of operation of heavy duty equipment and/or the amount of equipment in use • Replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set) 	<p>City of Imperial Planning and Development Department / Imperial County Air Pollution Control District (ICAPCD)</p>	<p>A complete list of equipment shall be submitted to the ICAPCD Prior to construction/ Updated equipment lists shall be submitted, and ICAPCD Standard Mitigation Measures implemented during construction.</p>	

SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

MM #	Mitigation Measure	Monitoring Responsibility	Timing	Verification (Date and Initials)
AQ-3	<p>Prior to any earthmoving activity, a complete list of intended construction equipment to be utilized on the site shall be provided to the ICAPCD. The list must be detailed such that a NO_x evaluation can be performed to assure that emissions of NO_x would not exceed ICAPCD's applicable emission threshold of 100 lbs/day. At a minimum, the list shall identify the equipment model, make, year, horsepower, estimated daily hours of operation, and the total number of pieces of equipment. Once construction commences, an updated equipment list shall be provided to the ICAPCD. To the extent deemed necessary by the ICAPCD, emission reduction measures shall be incorporated to ensure that project-generated construction emissions would not exceed applicable thresholds. Such measures may include, but are not limited to, the use of heavy-duty off-road equipment meeting Tier 3 emissions standards.</p>	City of Imperial Planning and Development Department/ ICAPCD	During construction activities.	
AQ-4	<p>A Waste Management Plan (WMP) shall be submitted to the Imperial County Department of Environmental Health (DEH) detailing the storage, handling and disposal of manures such that vectors, odors, and dust are minimized. In addition, an Operational Dust Control Plan (ODCP) shall be prepared for the proposed Project. The ODCP shall be endorsed by the Imperial County Air Pollution Control District (ICAPCD) prior to Project operations. At a minimum, the ODCP shall include the following measures:</p> <ul style="list-style-type: none"> • During Project operations, all on-site unpaved vehicle travel surfaces, including roadways and vehicle parking areas, shall be stabilized with an approved chemical dust stabilizer or shall be paved. • Animal waste shall be promptly removed from the site (i.e., within 72 hours) in accordance with the provisions of the WMP. • Animal waste piles should be covered, or other measures employed, as recommended by the ICAPCD. 	City of Imperial Planning and Development Department, DEH-and ICAPCD	WMP submitted to DEH and approved prior to construction/ ODCP and WMP implemented during Project operation	
BIOLOGICAL RESOURCES				
BIO-1	Prior to the start of construction, a pre-construction survey for the BUOW will be conducted in accordance with the CDFW 2012 Burrowing Owl Staff Report on Burrowing	Imperial City of Imperial Planning and	Management Plan prepared prior to issuance	

SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

MM #	Mitigation Measure	Monitoring Responsibility	Timing	Verification (Date and Initials)
	<p>Owl Mitigation. The pre-construction surveys shall identify active BUOW burrows and provide estimates of the number of BUOWs, as well as include information to determine whether BUOW are considered breeding pairs or migrants. If it is discovered that there is an occupied BUOW burrow, then a Burrowing Owl Mitigation and Management Plan will be developed in accordance with the CDFW Staff Report, which outlines the methods of removal (if necessary) and the methods and placement of replacement burrows. At a minimum, occupied burrows will be replaced at a 2:1 ratio. The Management Plan shall include the following information:</p> <ul style="list-style-type: none"> • Descriptions of setbacks; • A description of shelter in place and its purpose to minimize impacts to BUOW while allowing existing burrows to remain intact; • A plan for excavation of inactive BUOW burrows, as appropriate; • A passive relocation plan; • Additional measures to ensure protection of BUOW through construction and during operation and maintenance phases of the Project; and • On-site and off-site mitigation plans for impacts to BUOW (if present). 	Development Department	of building permit/Management plan implemented during construction.	
BIO-2	<p>If disturbances to suitable nesting habitat are proposed during the breeding season (January 15 through August 31), a pre-construction survey for nesting birds should be conducted by a qualified biologist not more than 72 hours prior to the disturbance. If any active nests are detected, the specific area would be flagged and mapped on the construction plans, an appropriate avoidance buffer may be necessary, and the nest would be avoided until the nesting cycle is complete or it is determined by the Project biologist that the nest has failed.</p>	City of Imperial Planning and Development Department	72 hours prior to ground disturbance (if conducted from January 15 through August 31).	

SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

MM #	Mitigation Measure	Monitoring Responsibility	Timing	Verification (Date and Initials)
BIO-3	Prior to issuance of grading permits, the City shall conduct a survey to determine the presence of mature trees that would require protection or replacement in accordance with Goal 2, Policy 2.1, Action 2.1.2 of the Conservation Element. Any required replacement trees would be incorporated and recorded within the landscape plans and be indicated in the plan notes.	City of Imperial Planning and Development Department	Prior to issuance of grading permits.	
CULTURAL RESOURCES				
CULT-1	<p>Cultural Resources Monitoring. During initial ground disturbance and vegetation removal, a qualified archaeological monitor and a Native American monitor shall be present.</p> <ul style="list-style-type: none"> The Monitoring Archaeologist shall have the authority to temporarily halt construction operations within a reasonable distance from a find or resource exposure to determine if significant cultural resources are present and if they will be adversely affected by continuing construction operations. If a discovery proves to be significant, a preservation or data recovery excavation may be warranted, as deemed necessary by the Monitoring Archaeologist or Native American Monitor. If the initial disturbance does not yield any cultural resources then full-time monitoring shall subside and the monitors shall coordinate with the construction schedule to make site visits weekly or when significant disturbances will take place to ensure no soil changes or buried resources are unearthed. If resources are located during any phase of development, the frequency and intensity of monitoring activities shall occur at the discretion of the monitors. Monitoring methods shall be discussed with the project manager and the construction managers. If the monitors are confident that the area is unlikely to yield any resources, monitoring shall be terminated. 	City of Imperial Planning and Development Department	During initial ground disturbance.	
CULT-2	Cultural Discovery Plan. Prior to issuance of grading permits, a detailed Discovery Plan for cultural/historical resources and human remains shall be developed in consultation with interested Native American groups and individuals in compliance with section 21083.2(i) of the CEQA Statutes, Section 15064.5(f) of the State CEQA Guidelines,	City of Imperial Planning and Development	Prior to issuance of grading permits and during project	

SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

MM #	Mitigation Measure	Monitoring Responsibility	Timing	Verification (Date and Initials)
	California Health and Safety Code 7050.5, and Public Resource Code 5097.98. The Discovery Plan shall identify procedures to follow in the event that subsurface archaeological and Native American resources or human remains are discovered during construction. If subsurface archaeological or Native American resources are encountered during construction, the procedures identified in the Discovery Plan shall be followed.	Department	construction.	
CULT-3	<p>Paleontological Discovery Plan. Prior to issuance of grading permits, a detailed Discovery Plan for paleontological resources shall be prepared. The Paleontological Discovery Plan shall be consistent with the guidelines of the Society of Vertebrate Paleontologists (SVP) (SVP, 1995 and 2010). The plan shall include and implement procedures similar to the following:</p> <p>Earth-moving operations impacting the soils five feet and deeper within the Project area shall be "spot-checked" up to two days per week by a Registered Professional Archaeologist (RPA) to determine whether undisturbed lakebed sediments have been encountered. During construction on the initial ten percent of total site grading, disturbance below 5 feet shall be monitored through "spot-checking" two days per week. If within that period no paleontological findings meeting the San Bernardino County Museum significance criteria are found, the Principal Paleontologist may review the procedures and, if warranted, reduce the rate of "spot-checking" to one day per week. If paleontologically sensitive soils, as defined by the SVP (1995), are being impacted, or if paleontological resources meeting the San Bernardino County Museum significance criteria are encountered, they would be reported to the Principal Paleontologist and monitoring would be increased to full-time within a radius of 100 meters of the find. Full time monitoring may become necessary if the earth-moving operations continuously impact paleontological sensitive soils. A program to mitigate Project impacts on paleontological resources that are exposed shall be developed and implemented.</p> <p>Paleontological monitors shall be equipped to salvage fossils as they are unearthed (to help avoid construction delays) and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. Monitors shall be empowered to temporarily halt or divert equipment to allow removal of abundant or</p>	City of Imperial Planning and Development Department	Prior to issuance of grading permits and during Project construction.	

SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

MM #	Mitigation Measure	Monitoring Responsibility	Timing	Verification (Date and Initials)
	<p>large specimens. Recovered specimens shall be prepared to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates. Fossil specimens shall be curated by accessioning into an established, accredited museum repository with permanent retrievable paleontological storage. A report of findings with an appended itemized inventory of specimens shall be prepared. Submittal of the report and inventory to the Imperial County Planning and Development Services Department, along with confirmation of the curation of recovered specimens into an established, accredited museum repository, shall signify completion of the program to mitigate impacts to paleontological resources.</p>			
CULT-4	<p>Human Remains Discovery. In the event that human remains are encountered during Project construction, the Project Contractor shall immediately halt all construction activities. Upon discovery of osteological material (bone) that cannot be immediately and confidently identified as non-human, it is recommended that California Health and Safety Code 7050.5C and California Public Resources Code 5097.98 be followed.</p>	City of Imperial Planning and Development Department	During project grading and construction.	
GEOLOGY & SOILS				
GEO-1	<p>Prior to approval of final building plans, structures on the Project site shall be designed and constructed to resist the effects of seismic ground motions as provided in Section 1613 of the 2013 California Building Code. The Project shall be engineered using the 2013 California Building Code, Section 1613 Design Coefficients for the proposed structures.</p>	City of Imperial Planning and Development Department, and Public Services Department	Prior to approval of final building plans/As part of Project design.	
GEO-2	<p>The City shall implement water erosion control plans in accordance with National Pollutant Discharge Elimination System (NPDES) requirements and dust control plans in accordance with Imperial County Air Pollution Control District (ICAPCD) requirements (City of Imperial 2014a, p. 7).</p> <p>Standard erosion control methods/best management practices such as straw wattles, check dams, fabric blankets, and silt fencing will be required in accordance with City</p>	City of Imperial Planning and Development Department, and Public	Prior to issuance of grading permits/During construction.	

SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

MM #	Mitigation Measure	Monitoring Responsibility	Timing	Verification (Date and Initials)
	standards including preparation, review and approval of a grading plan by the City Engineer.	Services Department		
GREENHOUSE GAS EMISSIONS				
GHG-1	<p>The following measures shall be implemented:</p> <p>a) Energy-efficient lighting (e.g., light emitting diodes (LEDs), metal halide, high-pressure sodium cutoff) shall be installed in exterior areas.</p> <p>b) Water-reducing features shall be incorporated into building and landscape design. Such measures shall include, at a minimum, the following:</p> <ul style="list-style-type: none"> • Installation of drought-tolerant and water-efficient landscaping, where practical. • Installation of water-efficient irrigation systems and building fixtures. <p>c) To the extent available and where possible, GHG-reducing building practices and site design elements shall be incorporated. Examples of such practices and elements include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Design buildings to take advantage of sunlight. Use passive solar design (e.g., orient buildings and incorporate landscaping to maximize passive solar heating during cool seasons, minimize solar heat gain during hot seasons, and enhance natural ventilation). • Light colored “cool” roofs and cool pavements. • Design buildings to accommodate solar, wind, and/or geothermal power systems, where feasible. • Provide on-site connections to adjacent existing and/or planned off-site transit, bicycle, and pedestrian facilities. 	City of Imperial Planning and Development Department	Prior to approval of final building design.	
WATER QUALITY				
WQ-1	During Project operation, the City of Imperial shall verify BMP implementation and maintenance through inspection, self-certification, survey, or other equally effective measure. The City of Imperial shall retain operations, inspections, and maintenance records of the BMPs for at least 5 years after the recorded inspection date for the life	City of Imperial Planning and Development	BMPs and MAP prepared and submitted for approval prior	

SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

MM #	Mitigation Measure	Monitoring Responsibility	Timing	Verification (Date and Initials)
	<p>of the Project. In addition, the City of Imperial shall ensure that long-term funding for BMP maintenance is available.</p> <p>The City of Imperial shall also prepare a Mosquito Abatement Plan (MAP) as required by the Imperial County Department of Environmental Health (DEH)/Vector Control District for both the on-site detention basin and excess nuisance waters that may collect in the self-contained Newside Drain.</p>	Department	to construction/BMPs and MAP implemented during Project construction and operation.	
NOISE				
NOI-1	Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday. Construction activities shall be prohibited on Sundays and federally-recognized holidays.	City of Imperial Planning and Development Department.	During Project construction.	
NOI-2	Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.	City of Imperial Planning and Development Department."	During Project construction.	
NOI-3	During operation, the Project's use of off-road equipment associated with the routine maintenance and operation of on-site land uses shall be limited to between the hours of 7:00 a.m. and 10:00 p.m.	City of Imperial Planning and Development Department	During Project operation.	
NOI-4	During operation, on-site recreational and equestrian events shall be limited to between the hours of 7:00 a.m. and 10:00 p.m.	City of Imperial Planning and Development Department	During Project operation.	

SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

MM #	Mitigation Measure	Monitoring Responsibility	Timing	Verification (Date and Initials)
TRAFFIC AND TRANSPORTATION				
TRAF-1	To reduce cumulative impacts related to the Year 2015 + Phase IA & IB Conditions and the Year 2015 + Phase IA & IB + Cumulative Conditions, prior to the approval of final building plans, the City shall develop and make financial provisions to contribute to a "Fair Share Program" for the signalization of the intersection of SR-86 and Neckel Road.	City of Imperial Planning and Development Department	Prior to approval of final building plans.	
TRAF-2	To reduce direct impacts related to Year 2019 + Total Project (Phase IA & IB, II, & III) Conditions and Year 2019 + Total Project (Phase IA, IB, II & III) + Cumulative conditions, prior to the approval of final building plans, the City shall develop and incorporate as a condition of approval the requirement that only Phase II and Phase III proceed until the intersection of SR 86 and Neckel Road is fully signalized.	City of Imperial Planning and Development Department	Prior to approval of final building plans.	

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INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

for

City of Imperial Regional Park & Equestrian Center



Prepared By:

CITY OF IMPERIAL
Planning & Development Department
420 South Imperial Avenue
Imperial, California 92251
(760) 355-3326
www.cityofimperial.org

(March 2015)

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SECTION 1 - I. INTRODUCTION

A. PURPOSE

This document is a policy-level/ project level Initial Study for evaluation of potential environmental impacts resulting with the proposed City of Imperial Regional Park & Equestrian Center (Refer to Exhibits “A,” “B,” and “C”). For purposes of this document, the Conditional Use Permit application, General Plan Amendment, Annexation, and Parcel Map will be called the “proposed applications”.

B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS AND THE IMPERIAL COUNTY'S GUIDELINES FOR IMPLEMENTING CEQA

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's Guidelines for Implementing CEQA, an **Initial Study** is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration would be appropriate for providing the necessary environmental documentation and clearance for any proposed project.

According to Section 15065, an EIR is deemed appropriate for a particular proposal if the following conditions occur:

- The proposal has the potential to substantially degrade quality of the environment.
- The proposal has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
- The proposal has possible environmental effects that are individually limited but cumulatively considerable.
- The proposal could cause direct or indirect adverse effects on human beings.

According to Section 15070(a), a **Negative Declaration** is deemed appropriate if the proposal would not result in any significant effect on the environment.

According to Section 15070(b), a **Mitigated Negative Declaration** is deemed appropriate if it is determined that though a proposal could result in a significant effect, mitigation measures are available to reduce these significant effects to insignificant levels.

This Initial Study has determined that the proposed applications may result in potentially significant environmental impacts and therefore, a Mitigated Negative Declaration (MND) is deemed as the appropriate document to provide necessary environmental evaluations and clearance. Although potentially significant impacts related to aesthetics, agricultural and forestry resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use, noise, public services, transportation/traffic and utilities and service systems may occur as a result of project implementation, it has been determined that, through the implementation of mitigation measures, all impacts can be reduced to levels considered to be less than significant.

This Initial Study is prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

C. INTENDED USES OF INITIAL STUDY

This Initial Study is an informational document which is intended to inform City of Imperial decision-makers, other responsible or interested agencies, and the general public, of potential environmental effects of the proposed applications. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals.

The Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the Project will be circulated for a period of 30-days for public and agency review and comments. At the conclusion of the review period, if comments are received by the City Planning Department, these comments will be made part of the record and considered during preparation of the IS/MND.

D. CONTENTS OF INITIAL STUDY

This Initial Study is organized to facilitate an understanding of the existing setting and environmental implications of the proposed applications.

SECTION I. INTRODUCTION presents an introduction to the entire report. This section discusses the environmental process, scope of environmental review, and incorporation by reference documents.

SECTION II. ENVIRONMENTAL CHECKLIST FORM contains the Environmental Checklist Form from the CEQA Guidelines Appendix G. The checklist form presents results of the environmental evaluation for the proposed applications and those issue areas that would have either a significant impact, potentially significant impact, or no impact.

SECTION III. PROJECT SUMMARY, LOCATION AND ENVIRONMENTAL SETTINGS describes the proposed project entitlements and required applications. A description of discretionary approvals and permits required for project implementation is also included. It also identifies the location of the project and a general description of the surrounding environmental settings.

SECTION IV. ENVIRONMENTAL ANALYSIS evaluates each response provided in the environmental checklist form. Each response checked in the checklist form is discussed and supported with sufficient data and analysis as necessary. As appropriate, each response discussion describes and identifies specific impacts anticipated with project implementation.

SECTION V. MANDATORY FINDINGS presents Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

SECTION VI. PERSONS AND ORGANIZATIONS CONSULTED identifies those persons consulted and involved in preparation of this IS/MND.

SECTION VII. REFERENCES lists bibliographical materials and persons consulted in preparation of this document.

E. SCOPE OF ENVIRONMENTAL ANALYSIS

For evaluation of environmental impacts, each question from the Environmental Checklist Form is summarized and responses are provided according to the analysis undertaken as part of the Initial Study. Impacts and effects will be evaluated and quantified, when appropriate. To each question, there are four possible responses, including:

1. **No Impact:** A “No Impact” response is adequately supported if the impact simply does not apply to the proposed applications.

-
2. **Less Than Significant Impact:** The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.
 3. **Less Than Significant With Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact”.
 4. **Potentially Significant Impact:** The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

[Note: This section is not applicable to this project].

This Initial Study will be conducted under a policy-level, project level analysis.

Regarding mitigation measures, it is not the intent of this document to “overlap” or restate conditions of approval that are commonly established for future known projects or the proposed applications. Additionally, those other standard requirements and regulations that any development must comply with, that are outside the County’s jurisdiction, are also not considered mitigation measures and therefore, will not be identified in this document.

SECTION 2 - II. ENVIRONMENTAL CHECKLIST

1. **Project Title:** City of Imperial Regional Park and Equestrian Center
2. **Lead Agency:** City of Imperial Development Department
3. **Contact Person:** Jorge Galvan, Planning & Development Director
4. **Address:** 420 South Imperial Avenue, Imperial, California 92251
5. **Phone Number:** (760) 355-3326 **Fax Number:** (760) 355-4718
6. **Project Location:** The Project site a 143-acre parcel located approximately 17 miles southeast of the Salton Sea, approximately 9 miles northwest of the City of Holtville and approximately one-quarter mile north of the northern limit of the City of El Centro (Figure 1). The Project site is immediately adjacent to the northern boundary of the City of Imperial and 0.5 mile west of State Route (SR) 86 (Figure 2). The Project site is bounded by Larsen Road on the north, La Brucherie Road on the east, Ralph Road on the south, and the Newside Canal on the west (Figure 3). The Project site consists of one parcel (Assessor's Parcel Number [APN] 063-010-049) and is currently within the City's Sphere of Influence (SOI) in unincorporated Imperial County (Figure 4) and surrounded by several proposed subdivisions (Figure 5).
7. **Project Sponsor:** City of Imperial Redevelopment Agency
420 South Imperial Avenue
Imperial, California 92251
8. **General Plan Designation:** Existing: Agriculture (County) **Proposed:** Open Space
9. **Zoning:** Existing: A-2-U, General Agriculture Urban (County) **Proposed:** Public Facilities
10. **Description of Project:** The City of Imperial Redevelopment Agency (Redevelopment Agency) proposes to develop the Project site with a variety of recreation uses including a Regional Park and Equestrian Center (Figures 6 thru 7D). The proposed Project includes a 22.98 acre Sportsplex Regional Park with tournament-level sports fields; 56.5 acres for an equestrian facility which includes a 160,000 square-foot covered arena (refer to Figure 11), outdoor arena, stables, and a Recreational Vehicle Park with 200 parking spaces; two open space parks (Park #1 = 9.5 acres, Park #2 = 5.27 acres) totaling 14.77 acres; 4.4 acres of Commercial Center with 15,000 square feet for restaurants and equestrian-related retail stores; and 6.25 acres for an olive orchard and mill. As a regional park, this facility would serve residents from the City of Imperial, City of Brawley, City of El Centro and the incorporated and unincorporated areas of the County. The park would provide "recreation tourism" in attracting visitors to the park from outside the Imperial Valley into the incorporated City boundaries. The overall goal of this Project is to spur economic development through tourism by attracting visitors from outside the region.
11. **Surrounding land uses and setting:** The area surrounding the Project site and surrounding lands are agricultural land currently in active production (i.e. alfalfa). Five residential structures are located opposite the Project site: three residences are on the north side of Larsen Road (including two across Larsen Road at the northwestern corner of the Project site and one at the northeast corner of the intersection of La Brucherie Road and Larsen Road); one residence is located on the east side of La Brucherie Road; and one is on the south side of Ralph Road. The Barioni Lakes Specific Plan is planned for development to the north and east of the Project site; the Morningstar Subdivision is proposed on the south side of Ralph Road opposite the Project site (Figure 5).
12. **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement.): Imperial Irrigation District (IID), Imperial County Air Pollution Control District (ICAPCD), Union Pacific Railroad (UPRR), and State Water Resources Control Board (SWRCB)/Regional Water Quality Control Board (RWQCB); City of Imperial (Building Permit, Tentative Tract Map, Pre-zone, General Plan Amendment); LAFCO (Annexation).

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION

The City of Imperial:

- Found that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- Found 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.
- Found 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.

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE DE MINIMIS IMPACT FINDING: Yes No

Jorge Galvan, Director of Planning and Development

Date:

PROJECT SUMMARY

- A. Project Location:** The Project site a 143-acre parcel located approximately 17 miles southeast of the Salton Sea, approximately 9 miles northwest of the City of Holtville and approximately one-quarter mile north of the northern limit of the City of El Centro (Figure 1). The Project site is immediately adjacent to the northern limit of the City of Imperial and 0.5 mile west of State Route (SR) 86 (Figure 2). The Project site is bounded by Larsen Road on the north, La Brucherie Road on the east, Ralph Road on the south, and the Newside Canal on the west (Figure 3). The Project includes one parcel (APN 063-010-049) and is currently within the City's Sphere of Influence (SOI) in unincorporated Imperial County (Figure 4) and surrounded by several proposed subdivisions (Figure 5).
- B. Project Summary:** The City of Imperial proposes to develop the Project site as a Regional Park and Equestrian Center, as depicted in Figures 6 thru 7D, which would contain recreational and commercial uses including the following:
- Equestrian Center (56.5 acres) with Recreational Vehicle Park (200 spaces)
 - Olive Orchard and Mill (6.25 acres)
 - Sportsplex Regional Park (22.98 acres)
 - Open Space Parks (Park #1 = 9.5 acres, Park #2 = 5.27 acres, total = 14.77 acres)
 - Commercial Center (15,000 square feet retail space on 4.4 acres)

As a regional park, this facility would serve residents from the City of Imperial, City of Brawley, City of El Centro and the incorporated and unincorporated areas of the County. The park would provide "recreation tourism" in attracting visitors to the park from outside the Imperial Valley into the incorporated City boundaries. The overall goal of this Project is to spur economic development through tourism by attracting visitors from outside the region.

Proposed Operations. On a year-round basis, the proposed Project would support local residents' needs for recreational facilities through providing parks and sportsplex areas for team sports and general recreational use. The RV Park area would be used for the storage of recreational vehicles and would be located next to the commercial area which would support a variety small- to medium-sized businesses such as retail stores and restaurants. The Olive Orchard and Mill would be a combined commercial and tourist destination with the availability of visitors to sample olive oils and take tours of the facilities. The equestrian and event center would be utilized for a variety of equestrian focused events with the potential for musical and sporting events as well as for conventions.

The City projects that two to three major events with up to 10,000 people may occur each year. Once a month, the Project could host activities generating between 200 to 3,000 attendees. Smaller events would draw visitors from the local area including Imperial County as well as the larger region (i.e. San Diego, Riverside and Yuma Counties). Larger events would draw from both the local and regional area as well as outside of the Country (i.e. Mexico).

Phasing. The Project is proposed to be developed in three phases. Phase I includes two portions: Phase IA would construct the equestrian and events center with associated parking (Figure 7A); Phase IB would include the road improvements necessary for Phase IA along Larsen Road, La Brucherie Road, and Ralph Road (Figure 7B). Phase II is proposed to include the RV Park and City Park #1 (Figure 7C). Phase III would consist of the remaining components including the commercial center, Olive Orchard and Mill, Sportsplex, and City Park #2 (Figure 7D). Areas planted with turf and fencing for the Project are depicted in Figures 8A and 8B.

Access and Circulation. The Project site is bounded by Larsen Road on the north, La Brucherie Road on the east, and Ralph Road on the south. Access to the site would occur at three entrances. Ralph Road would be extended through the site diagonally and be used for one access point at the southeast corner and the

northwest corner of the site. The main entrance to the commercial area and equestrian center would be from Larsen at the center of the site along the northern border. This access road would extend south through the middle of the site and connect with Ralph Road where it bisects the site diagonally. Secondary access drives that extend from the proposed Ralph Road extension would provide access to the Olive Orchard and Mill as well as the parking areas as depicted in Figure 6.

Drainage. Based on hydrologic flow analysis provided in the Project drainage report (Alfred Civil Engineering 2015), one on-site detention basin is proposed to detain approximately half of a 100-year storm flow with excess runoff draining to the Newside Drain. According to the drainage report prepared for the Project, the Newside Drain is self-contained and functions as a retention basin. Runoff from the proposed Project would continue to discharge to the Newside Drain (Alfred Civil Engineering 2015, p. 4)

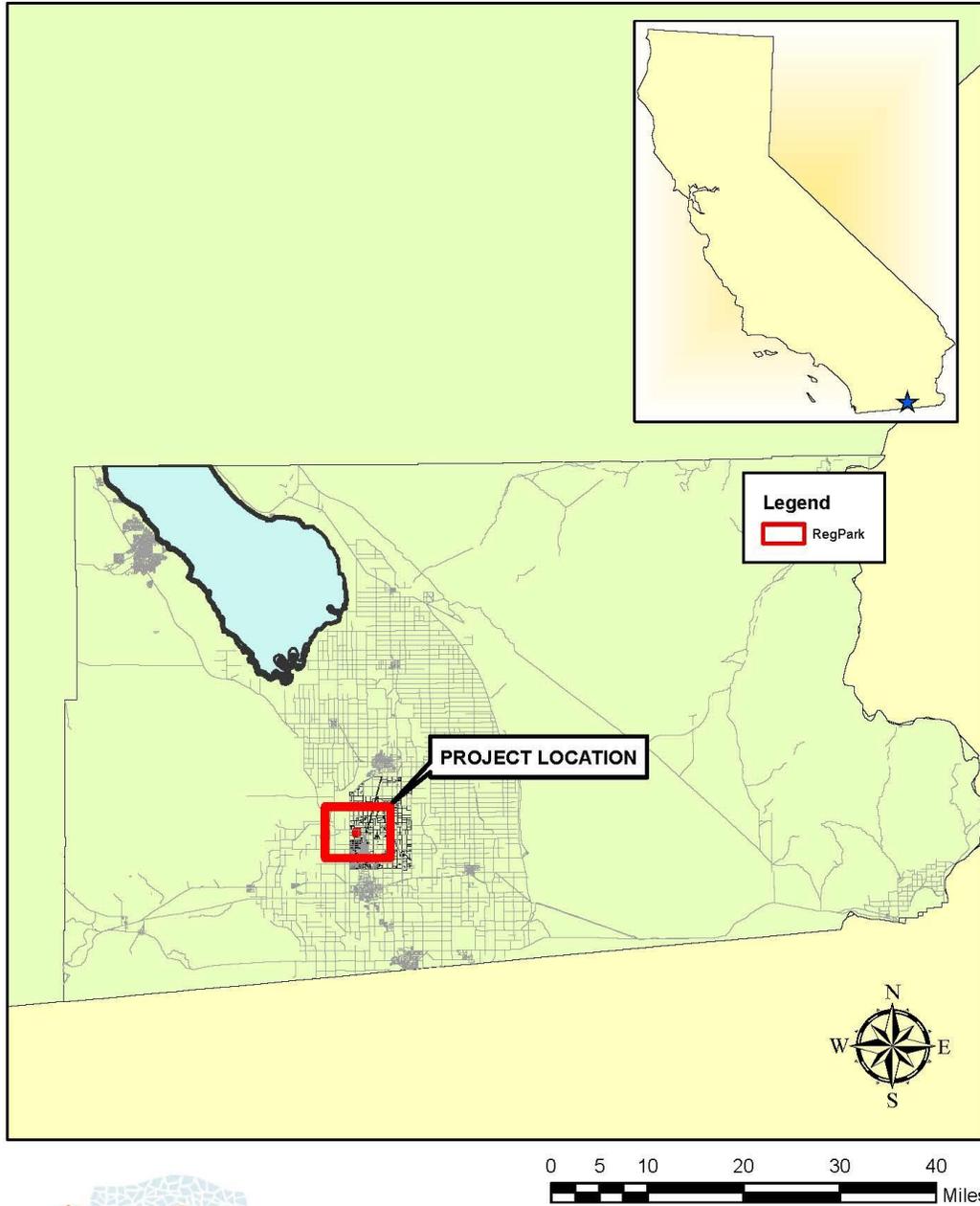
Electricity. Electrical power is currently provided by IID and is accessible to the Project site from existing power lines located along Larsen Road, La Brucherie Road, and Ralph Road. There is available capacity in the system to accommodate the proposed Project which is planned to establish connection during Phase IA.

Water Supply. No domestic water delivery infrastructure is currently available at the Project site. Potable water will be provided from the City's Water Treatment Plant and stored in two 5,000 storage tanks for Phase IA and IB (Figure 9A). At full build-out the proposed Project would obtain water via a pipeline extending north from Neckel Road and east from La Brucherie Road to the Project site (Figure 9B). (Galvan 2014). The total annual water needed for the Project is estimated to be 39 million gallons for irrigation and 98,500 gallons per year for potable water.

Sewer. Currently, no sanitary sewer infrastructure is available at the Project site. The Project proposes to collect waste generated during special events with rented portable receptacles. Waste would be picked-up, hauled, and disposed of by an independent company. It is anticipated that connection to the City's main sewer line located at the intersection of 15th Street and Imperial Avenue would occur in conjunction with construction of Project roadway improvements (Phase IB) and would extend north from Neckel Road along La Brucherie within the right-of-way.

- C. Environmental Setting:** The site has been, and currently is, used for agricultural operations (i.e. alfalfa). The topography of the site is flat and void of any structures. Agriculture irrigation to the site is available through the system maintained by the IID. The Newside Canal (a concrete structure) abuts the western border of the site and the Newside Drain No. 1 (a dirt canal) is adjacent to the eastern border.
- D. Analysis:** Refer the attached Evaluation of Environmental Impacts for an analysis of each environmental issue area.
- E. General Plan Consistency:** The proposed 143-acre Project site consists of one parcel (APN 063-010-049) currently zoned A-2-U (General Agriculture Urban). The Project requires annexation, a pre-zone and general plan amendment. The Project site is currently within the City's Sphere of Influence (SOI) and immediately adjacent to the northern City limit boundary. The site would be pre-zoned to Open Space and the existing A-2-U zoning designation would be changed to PU (Public Use) through a general plan amendment.
- F. Discretionary and Other approving Actions:** City of Imperial: Construction Traffic Management Plan, Grading Permits, Building Permits, Occupancy Permits; Imperial Irrigation District: Water Supply Agreement, Electric Service Agreement; Local Area Formation Commission: Annexation Application.

CITY OF IMPERIAL REGIONAL LOCATION MAP



**FIGURE 1
REGIONAL LOCATION MAP**

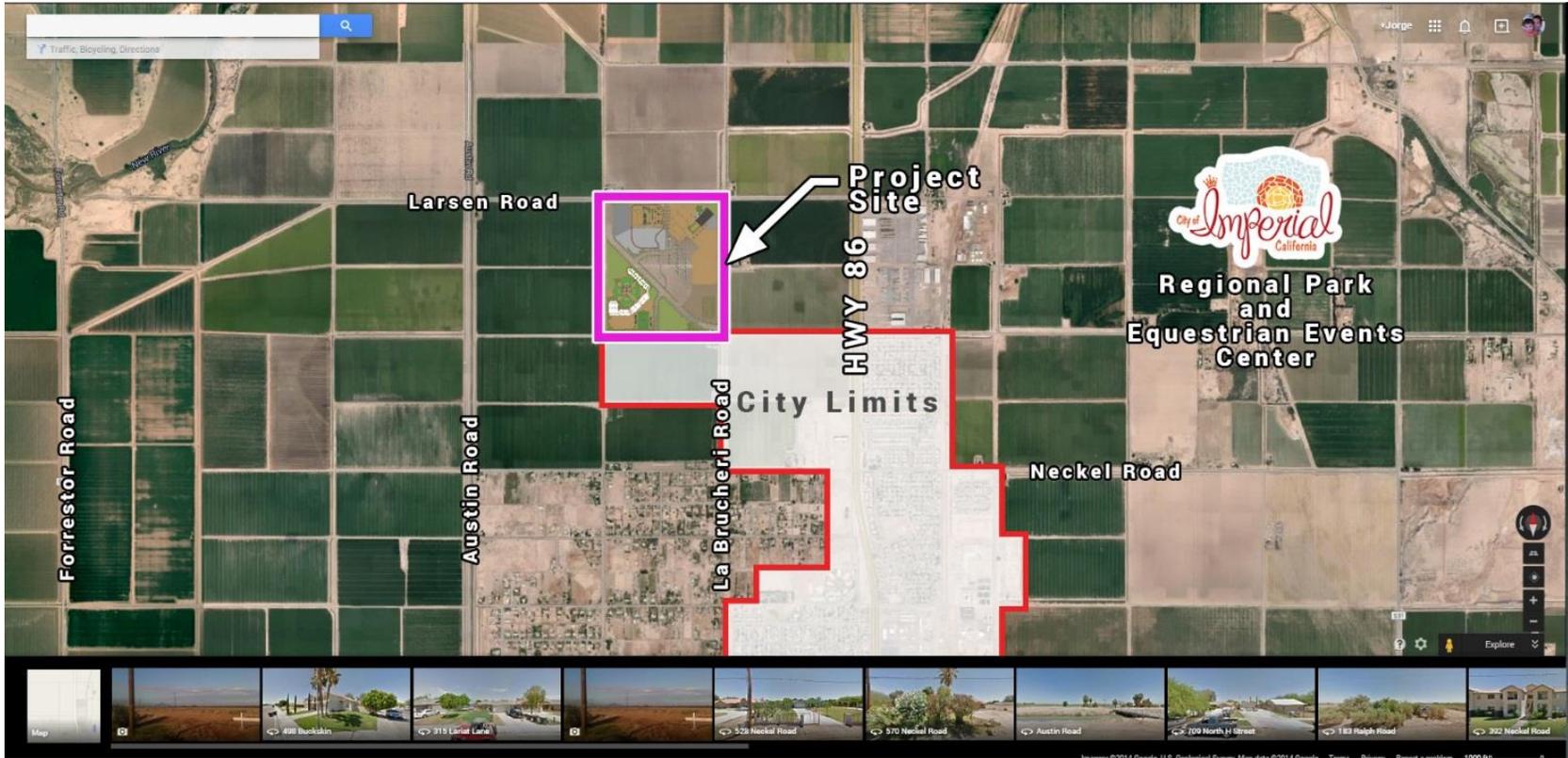


FIGURE 2
AERIAL LOCATION MAP

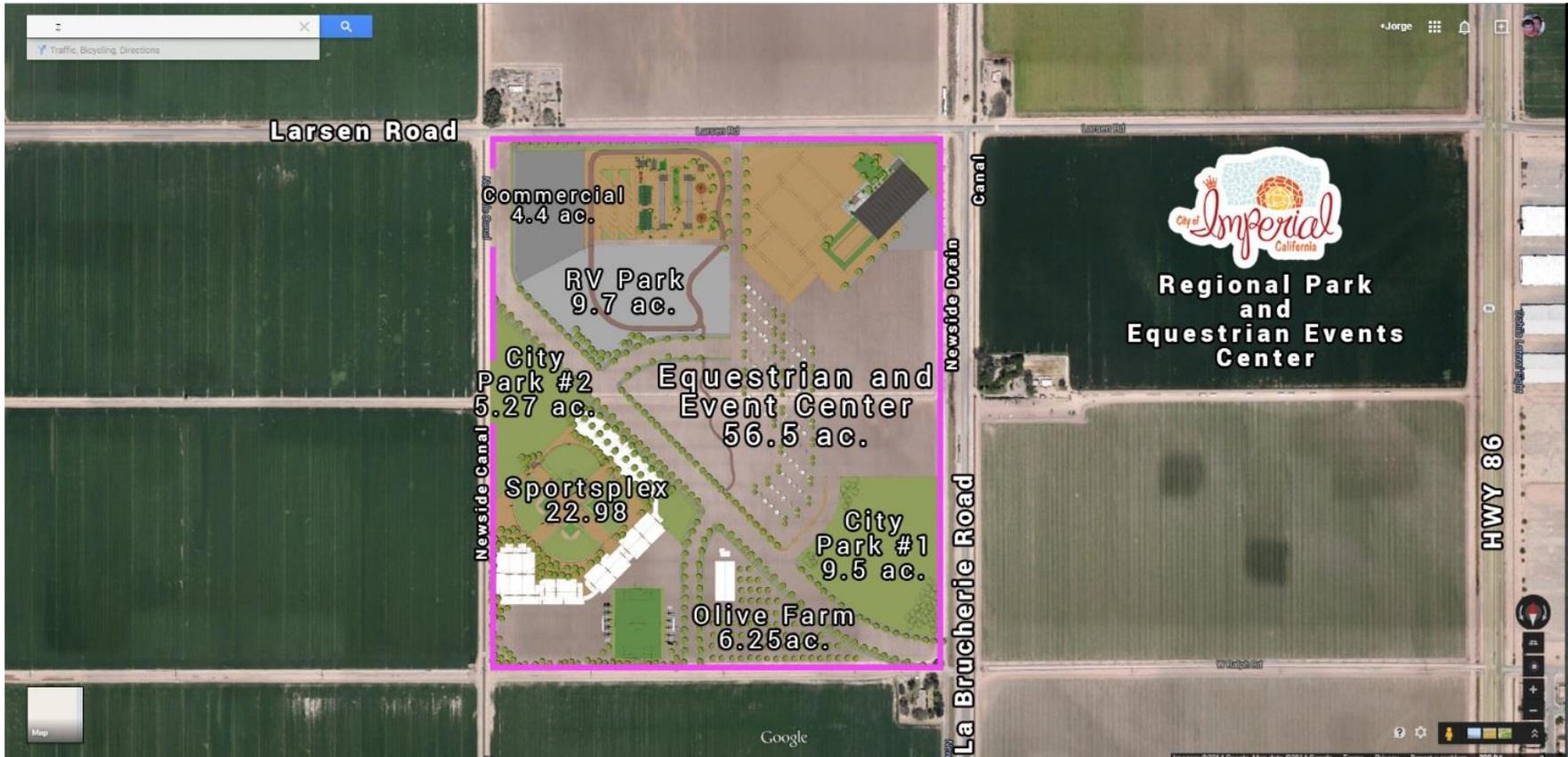


FIGURE 3
AERIAL VICINITY MAP

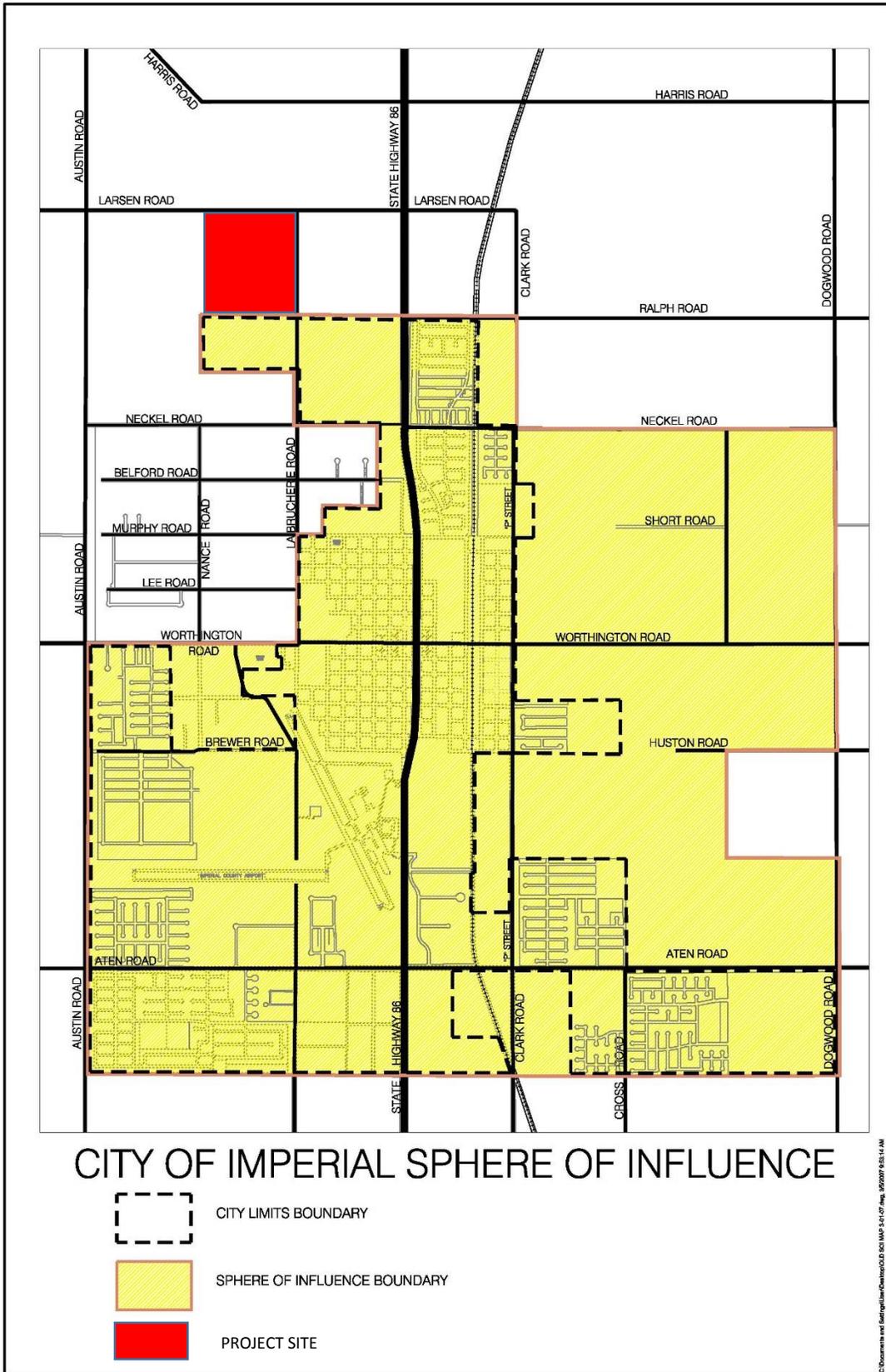


FIGURE 4
SPHERE OF INFLUENCE MAP

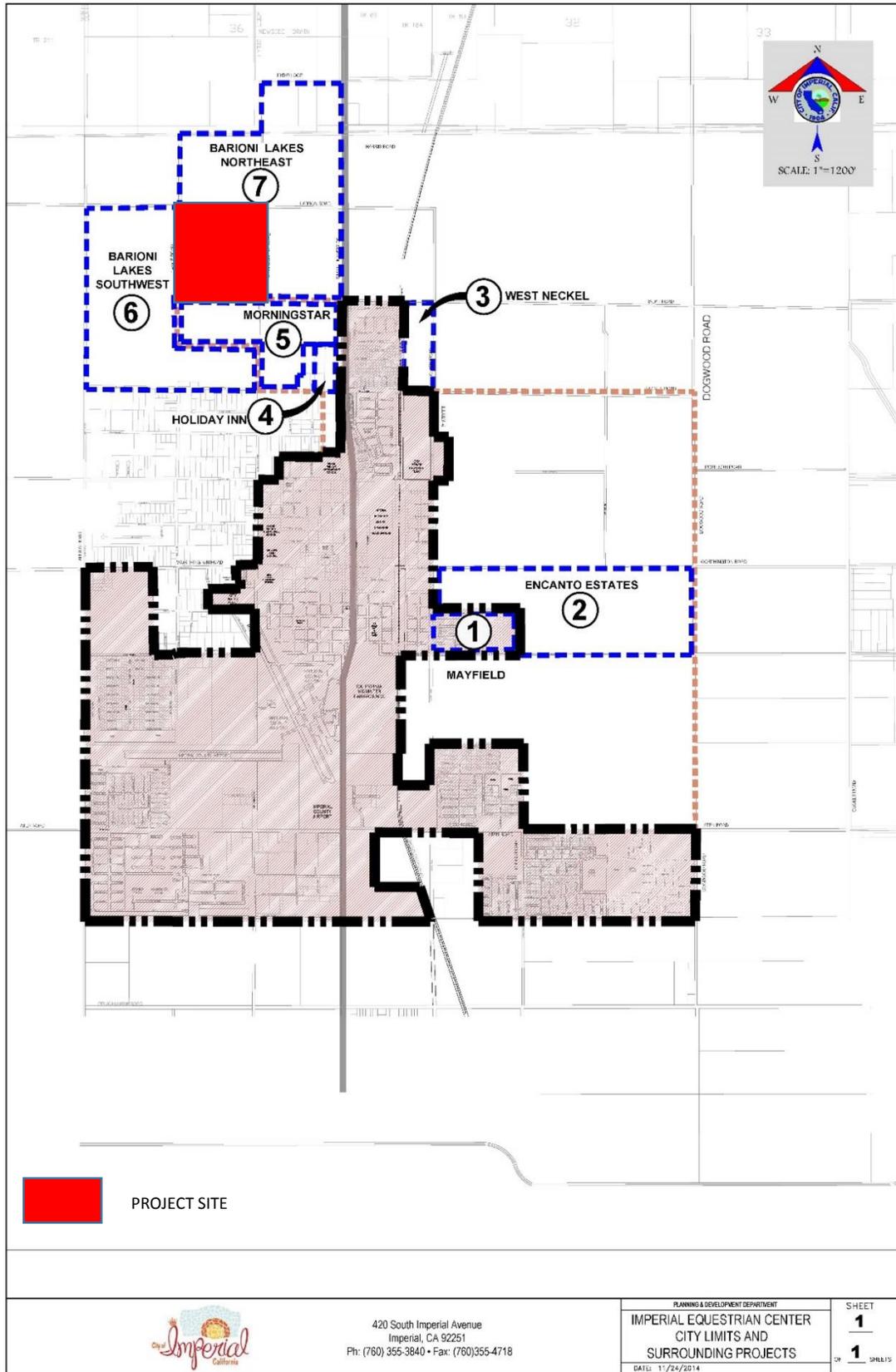


FIGURE 5
PROJECT SITE AND PROPOSED SURROUNDING SUBDIVISIONS




**Regional Park
and Equestrian Events
Center**

Land Uses:

Equestrian and Events Center	56.5 ac.
Commercial	4.5 ac.
RV Park	9.7 ac.
Olive Orchards & Mill	6.25 ac.
Sportsplex	22.98 ac.
Park #1	9.5 ac.
Park #2	5.27 ac.
Easements and Roadways	28.9 ac.
Total	143.5 ac.



FIGURE 6
CONCEPTUAL LAYOUT – CITY OF IMPERIAL REGIONAL PARK & EQUESTRIAN CENTER



FIGURE 7A

CONCEPTUAL LAYOUT – PHASE 1A CITY OF IMPERIAL REGIONAL PARK & EQUESTRIAN CENTER

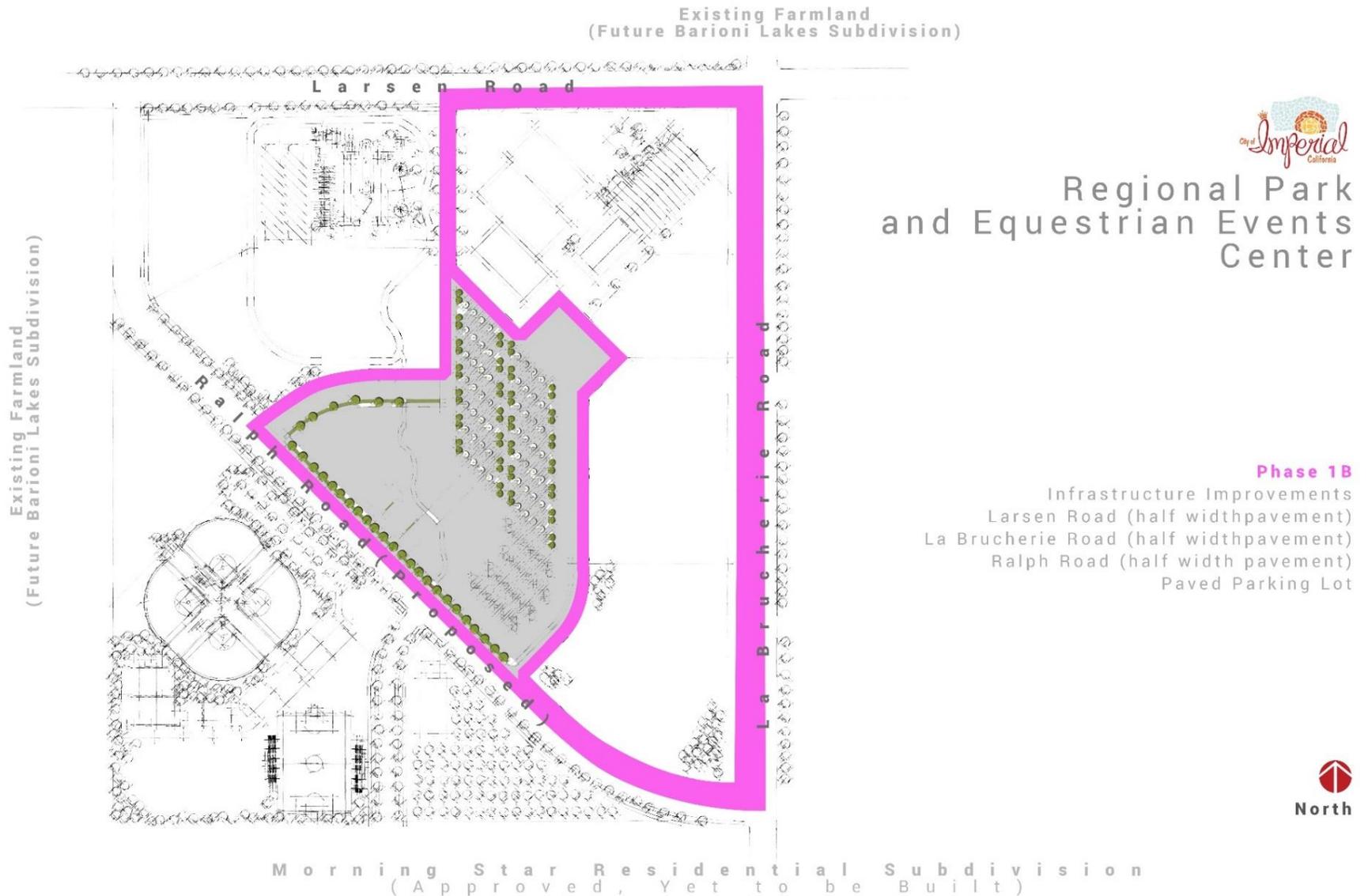


FIGURE 7B

CONCEPTUAL LAYOUT – PHASE 1B CITY OF IMPERIAL REGIONAL PARK & EQUESTRIAN CENTER



Regional Park and Equestrian Events Center

Phase 2
RV Park
City Park #1



FIGURE 7C
CONCEPTUAL LAYOUT – PHASE II CITY OF IMPERIAL REGIONAL PARK & EQUESTRIAN CENTER

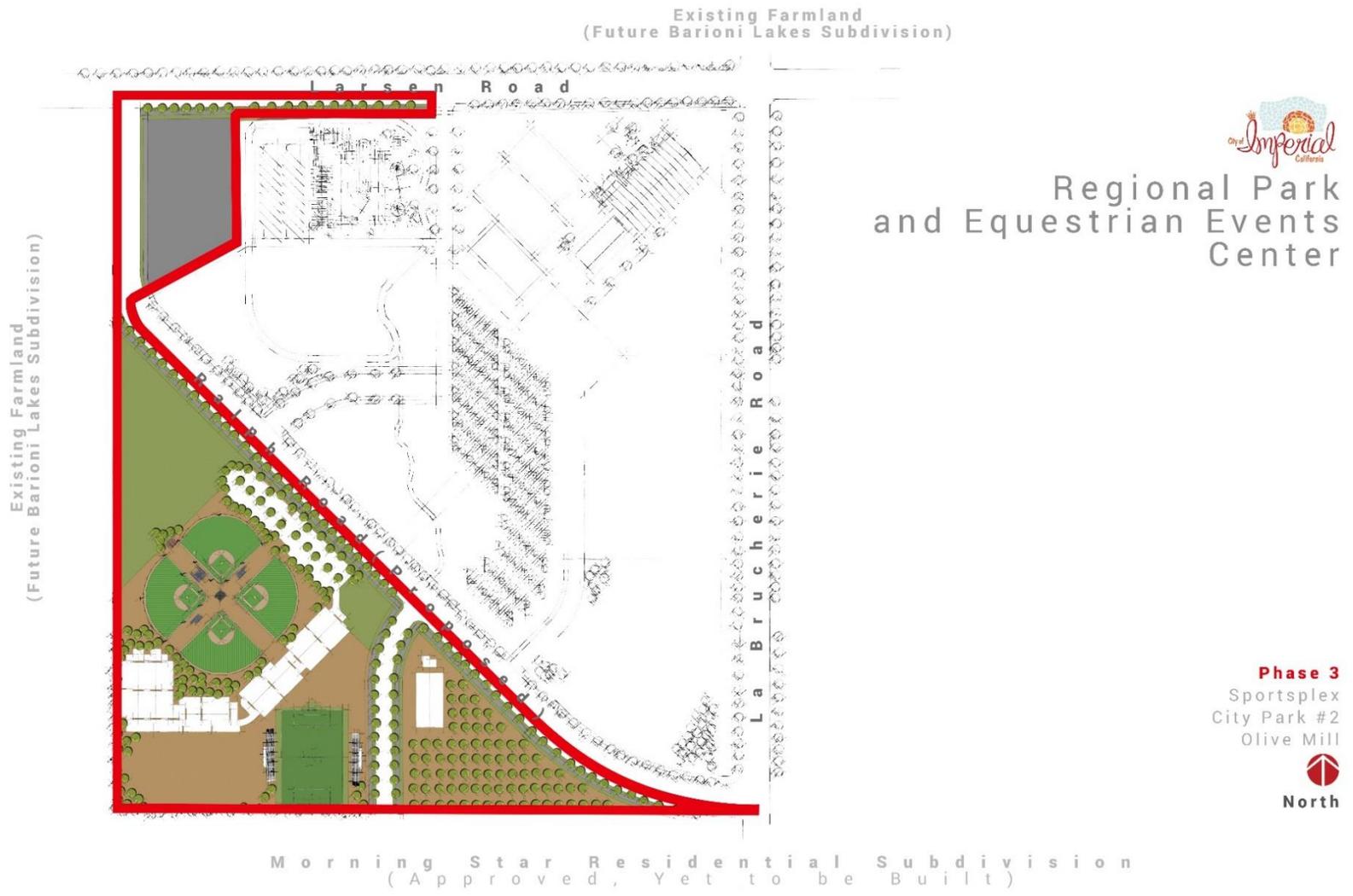


FIGURE 7D
CONCEPTUAL LAYOUT – PHASE III CITY OF IMPERIAL REGIONAL PARK & EQUESTRIAN CENTER



Regional Park and Equestrian Events Center

Turfed Areas

Sportsplex + Park #2:	6.35 ac
Baseball Diamonds x4:	2.89 ac
Soccer Fields x2:	4.18 ac
Park #1:	9.5 ac
Equestrian Events Center:	1.54 ac
Misc.:	3.18 ac
Total:	27.64 ac



North

FIGURE 8A
TURFED AREAS - CITY OF IMPERIAL REGIONAL PARK & EQUESTRIAN CENTER




Regional Park and Equestrian Events Center

Fenced Areas

Equestrian Events Center:	56.5 ac.
RV Park:	9.7 ac.
Sportsplex:	20.5 ac.
Total:	86.7 ac.



FIGURE 8B
FENCED AREAS - CITY OF IMPERIAL REGIONAL PARK & EQUESTRIAN CENTER

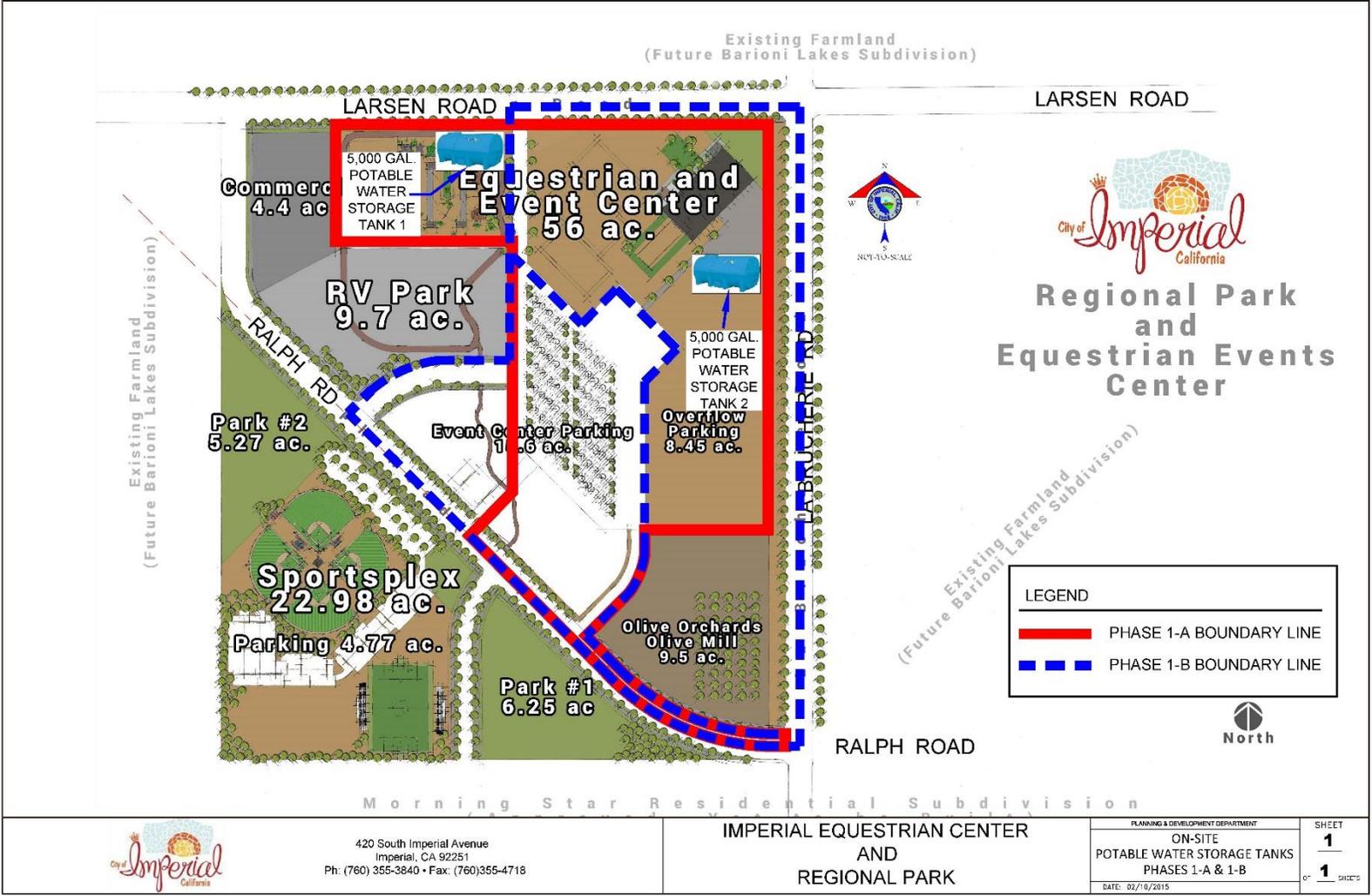
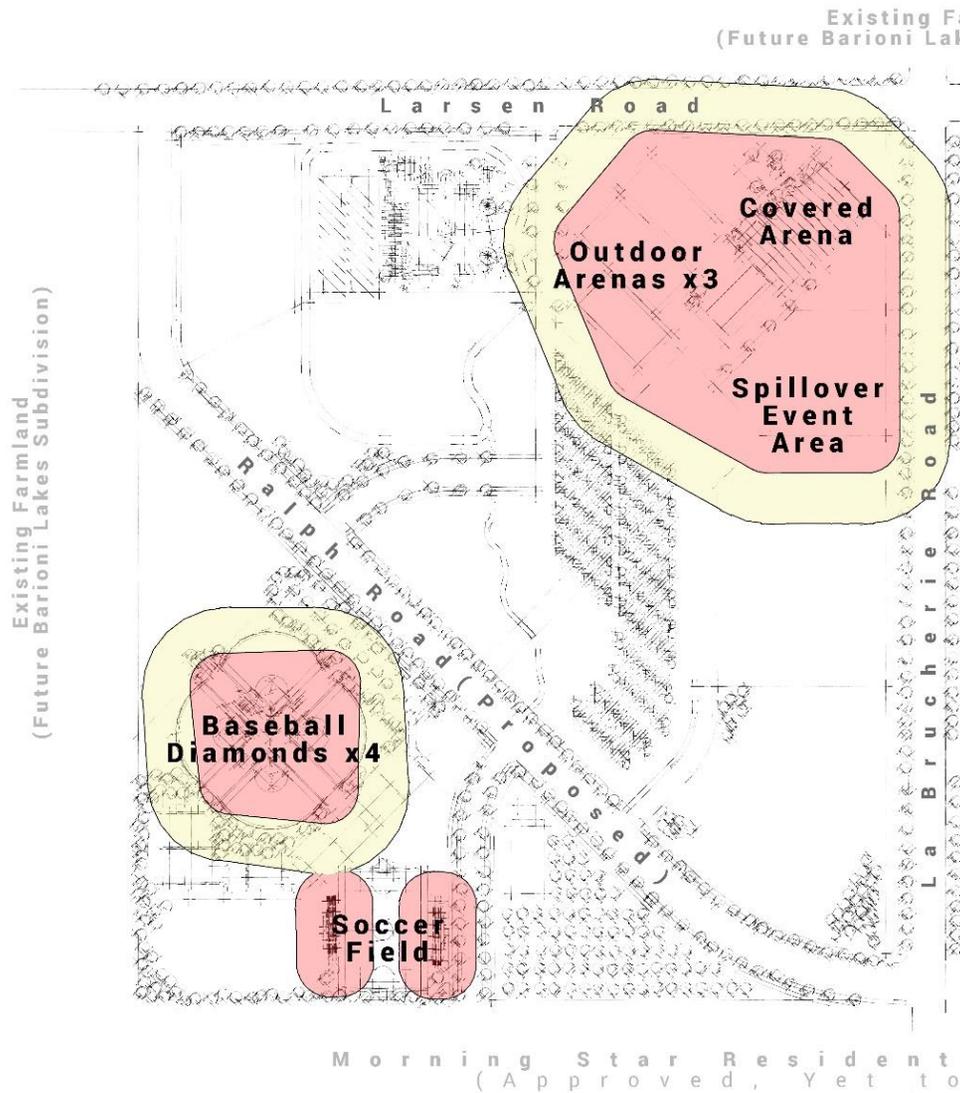


FIGURE 9A
WATER STORAGE TANK LOCATIONS - CITY OF IMPERIAL REGIONAL PARK & EQUESTRIAN CENTER



FIGURE 9B

LOCATION OF WATER PIPELINE EXTENSION TO SERVE CITY OF IMPERIAL REGIONAL PARK & EQUESTRIAN CENTER




**Regional Park
and Equestrian Events
Center**

Amplified Sound System Plan

- 100' Buffer
- 250' Buffer



FIGURE 10
SOUND SYSTEM AREAS - CITY OF IMPERIAL REGIONAL PARK & EQUESTRIAN CENTER

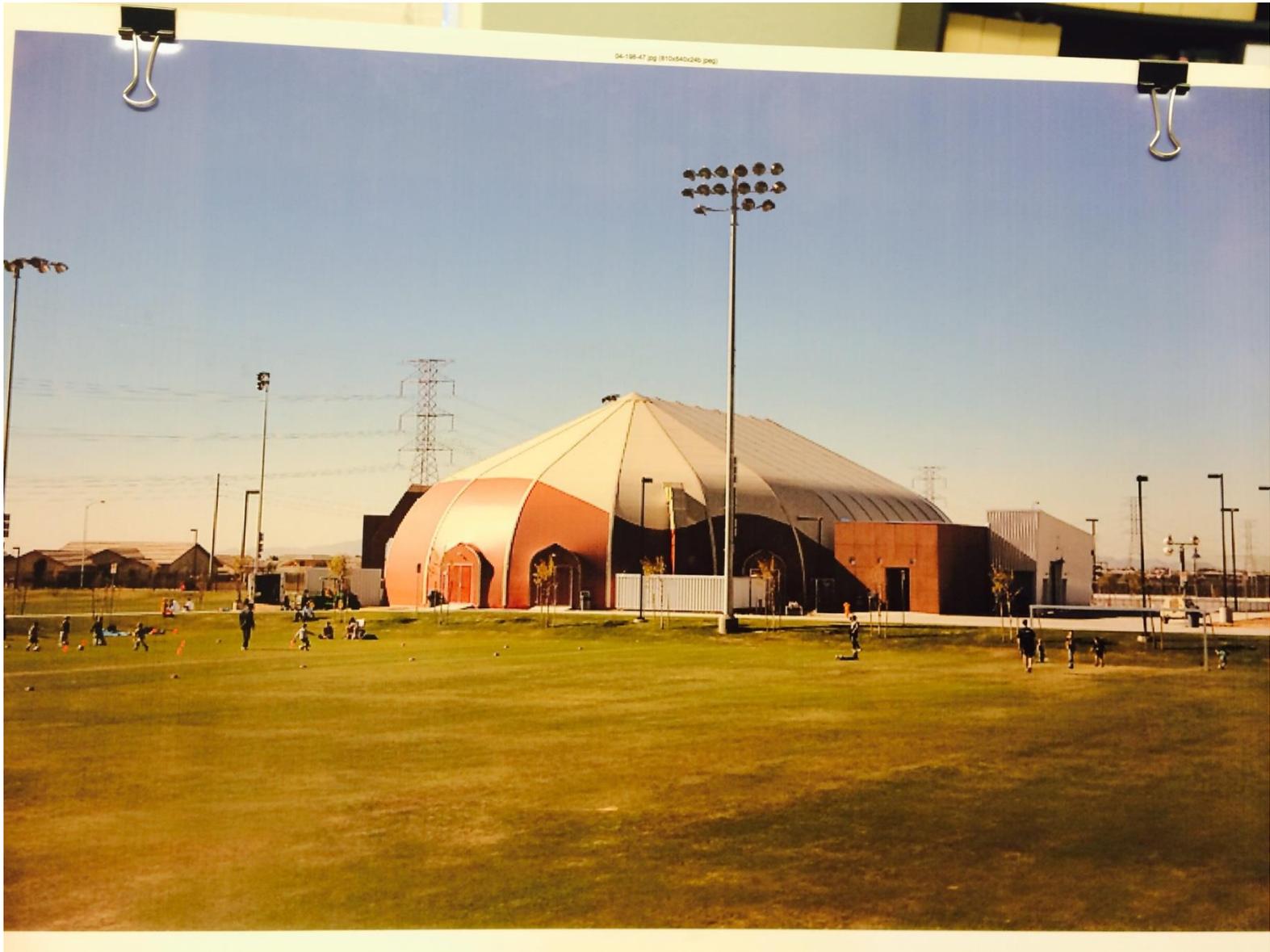


FIGURE 11
POTENTIAL COVERED ARENA DESIGN

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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I. AESTHETICS

Would the project:

- | | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Have a substantial adverse effect on a scenic vista or scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially damage scenic resources, including, but 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 which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Aesthetics Discussion:

The Project site is currently in agricultural use with no on-site sources of light or glare. Existing light sources in the area including a few residences and vehicle headlights on area roadways. The visual quality of the Project site will be affected as the existing character will change from agriculture to a regional park and equestrian center and include nighttime events and activities. In addition, two large scale residential developments, the Morningstar Subdivision to the south and Barioni Lakes Subdivision to the north, east and west, are proposed to be developed surrounding the Project site (refer to Figure 5).

- a) **Less Than Significant Impact.** The proposed Project would introduce a regional park and equestrian center into an area that is currently characterized by agricultural uses. State Route 86 (SR 86) is generally a north-south route and begins near the Townsite of Heber as a two lane conventional highway and ends at the Riverside County line as a four-lane expressway. It is not designated as a scenic highway in the Imperial County General Plan Circulation and Scenic Highways Element nor is it identified on the California Scenic Highway Mapping System (Caltrans 2015). No scenic vistas or areas with high visual quality would be adversely affected by development of a regional park and equestrian center on the Project site. Therefore, adverse effects on a scenic vista in association with implementation of the proposed Project are considered less than significant.
- b) **No Impact.** The Project site consists of a single 143-acre parcel of land currently in agricultural production. Aside from the concrete Newside Canal (on the western border of the site) and the dirt Newside Drain No. 1 (on the eastern border of the site), there are no scenic resources such as, trees, rock outcroppings, and historic buildings. As noted in item a), above, the Project site is not located adjacent to a scenic highway. SR 86 is approximately one-half mile east of the eastern boundary of the site. This highway is neither eligible nor officially designated as a Scenic Highway. Therefore, no impact to scenic resources within a state scenic highway would occur in association with development of the proposed regional park and equestrian center.
- c) **Less Than Significant Impact.** The proposed Project is the construction and operation of a regional park and equestrian center. The Project includes development of 143-acre site with tournament-level sports fields; an equestrian facility which includes a 160,000 square-foot covered arena, outdoor arena, stables, and an RV park; open space recreation; commercial for restaurants and equestrian-related retail stores; and an olive mill. The most dominant feature of the Project would be the covered arena which is estimated to be approximately 30 feet in height (refer to Figure 11). Given the existing agricultural character of the area, the introduction of regional park and equestrian center would alter

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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the existing views and character of the site, most notably with the introduction of the covered arena and overhead lights to illuminate the sports fields. However, the proposed regional park and equestrian center would be located adjacent to areas proposed for development (Figure 5) with subdivision uses to the north, east and south. In addition, the Project site is within the City’s SOI (refer to Figure 4) adjacent to the existing City boundary and would be annexed into the City limits. Development of urban uses, including subdivisions, retail, parks, etc., is consistent with the goals of the General Plan and represents a continuation and expansion of the City adjacent to its existing limits. Therefore, a less than significant impact is identified with regard to substantially degrading the existing visual character and quality of the Project site.

- d) Potentially Significant Impact Unless Mitigation Incorporated.** Building materials anticipated for the proposed Project structures would be typical of existing structures and in conformity with the City’s design guidelines in a manner that reduces glare and reflectivity. However, the Project is anticipated to include a lighting system that will provide illumination for night-time sporting and/or musical events, parking areas, the RV park and commercial/retail area. Because the Project site and adjacent lands are currently undeveloped and used for agricultural purposes, there are no on-site sources of light. The addition of lighting for nighttime events would likely adversely affect nighttime views of the area. Therefore, a potentially significant impact is identified for light and glare impacts.

Mitigation Measures

AEST-1: Prior to issuance of building permits, a lighting plan shall be developed. All lighting installed shall be shielded and directed so as to minimize significant off-site glare or adverse light intrusion into neighboring properties. The lighting plan shall be reviewed and approved by the City of Imperial Planning Department.

Timing/Implementation: Prior to issuance of building permit.

Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Level After Mitigation: Less than Significant.

AEST-2: Prior to issuance of building permits, a landscaping plan shall be submitted and approved by the City of Imperial Planning Department. The landscape plan must include perimeter landscaping around the Project site that would adequately provide shielding of the on-site lighting to the existing surrounding residences and the proposed future developments of the Morning Star and Barioni Lakes Specific Plan areas.

Timing/Implementation: Prior to issuance of building permit.

Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Level After Mitigation: Less than Significant.

II. AGRICULTURE AND FOREST RESOURCES

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.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
Would the project:				
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 non-agricultural 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, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land 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 non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Agriculture and Forest Resources Discussion:

The City is surrounded to north, east and west by agricultural land that is mostly in active production. According to the California Department of Conservation’s Farmland Mapping and Monitoring Program (FMMP 2012) the lands surrounding the City of Imperial consist of Prime Farmland and Farmland of Statewide Importance (Figure 12). However, the 2010 Williamson Act Map from the California Department of Conservation identified no contracts for farmland preservation within the City’s planning area (City of Imperial 2014a, p. 2) (Figure 13).

The Project site is currently zoned A-2-U, “General Agriculture Urban.” This particular zoning is reserved for certain agriculture parcels that are in close proximity to urban areas (including incorporated cities). The site has been, and currently is, used for agricultural operations (i.e. alfalfa). Surrounding parcels are currently used for hay production and/or hay storage. Irrigation to the site is available through the system maintained by the Imperial Irrigation District (IID) (DMG 2010, p. 4). The City of Imperial encourages agricultural production to continue on lands zoned for other uses but not yet developed. The Project site is currently located in the County but is proposed to be annexed into the City and will require a General Plan Amendment to change the existing land use designation from “Agriculture” to “Public Use.” The site has been pre-zoned to Open Space.

a) Less than Significant Impact. The Project site is currently in agricultural production designated as Farmland of Statewide Importance on the Imperial County Important Farmland 2010 Map prepared by the California Department of Conservation (DOC 2010). The General Plan Update notes that agricultural uses have historically been important to Imperial County’s economy. However, because the City of Imperial is almost entirely surrounded by agricultural land, annexation and conversion of

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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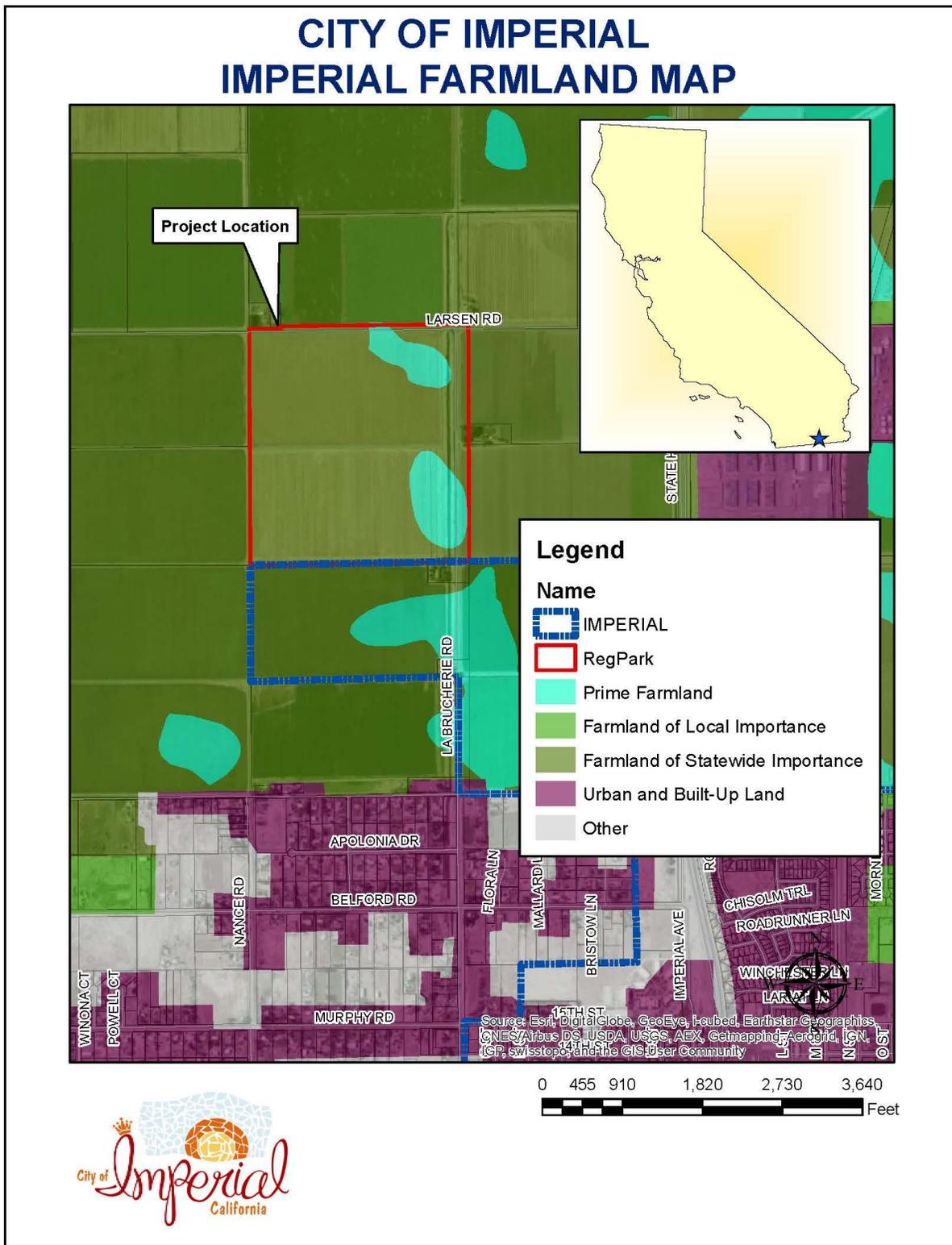


FIGURE 12
FARMLAND MAPPING AND MITIGATION PROGRAM MAP OF PROJECT SITE

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
-----------------------------------------------	-------------------------------------------------------------------------------	----------------------------------------------	----------------------

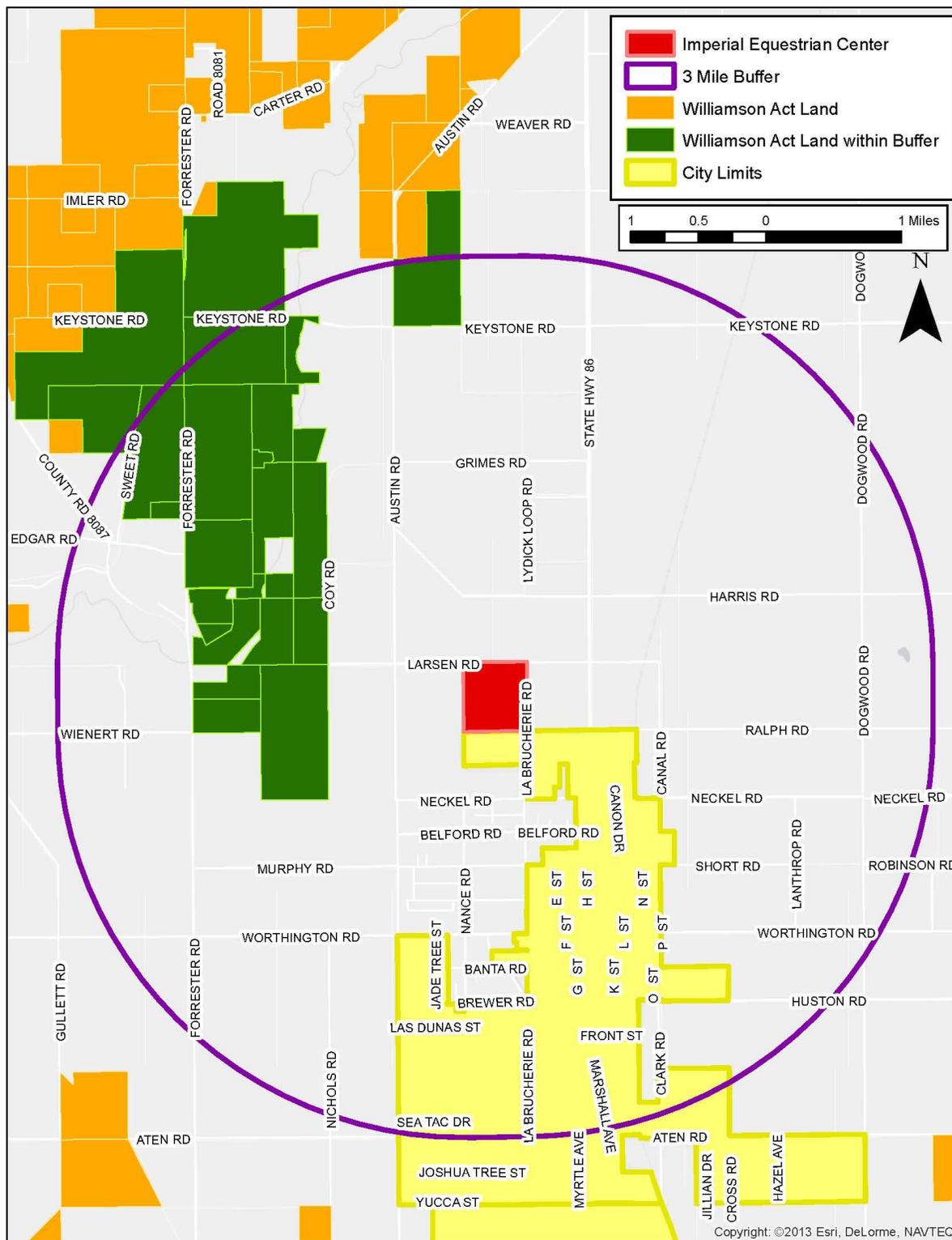


FIGURE 13
WILLIAMSON ACT CONTRACTS WITHIN 3 MILES OF THE PROJECT SITE

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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importance and local abundance of agricultural land, the City recognizes the importance and preservation of this resource within its SOI. The City intends to preserve agricultural resources and minimize the conversion of Prime Farmland to the extent feasible in light of the City’s growth and economic development goals (Conservation Element, p. 4). However, while conversion of agricultural land is not encouraged by the City’s General Plan, growth in the City of Imperial cannot occur without conversion of agricultural land due to the presence of agricultural land surrounding the City.

The 143-acre parcel proposed for development as the City of Imperial Regional Park and Equestrian Center is within the City’s SOI and is adjacent to the existing City limit. The parcel will be annexed such that the boundaries of the City will be contiguous and will not leave any “islands” of County farmland within an urban area as a result of premature development nor would the Project promote urban sprawl. In addition, based on the acreages identified in the California Farmland Conversion Report (2008 – 2010), the 143 acres converted in association with the proposed Project represents a minute portion of the overall agricultural acreage in the County ($[143 \div 1,028,508] \times 100 = 0.01$ percent) as well as a very small fraction ($[143 \div 307,221 \text{ acres}] \times 100 = 0.04$ percent) of Farmland of Statewide Importance (DOC 2014a). Therefore, the Project is considered to have a less than significant impact with regard to conversion of Farmland of Statewide Importance.

- b) **Less than Significant Impact.** The Project site is currently designated Agriculture and is zoned A-2-U “General Agriculture Urban.” The Project proposes a General Plan Amendment to designate the site as Public Use and a pre-zone to change the existing zoning to Open Space. Upon approval of the General Plan and pre-zone, the proposed Project would not conflict with existing agricultural zoning.

Additionally, neither the Project site nor the surrounding properties are encumbered with a Williamson Act Contract (Figure 13). Therefore, impacts associated with conflicts with existing agricultural zoning and Williamson Act Contracts are considered less than significant.

- c) **No Impact.** No forest or timberland is located within the City of Imperial. Mixed chaparral and pinyon-juniper habitats are located in the extreme southwestern corner of Imperial County; montane hardwood-conifer forest is in the extreme northwestern corner of Imperial County (Imperial County 2008a). Thus, there are no existing forest lands, timberlands, or timberland zoned Timberland Production either on or near the Project site that would conflict with existing zoning or cause rezoning. Therefore, no impact is identified for forest or timberland.

- d) **No Impact.** There are no existing forest lands on or in the immediate vicinity of the Project site. Development of the proposed City of Imperial Regional Park and Equestrian Center would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact is identified related to the loss or conversion of forest land.

- e) **Less than Significant Impact.** Implementation of the proposed Project would introduce a regional park and equestrian center on disturbed parcels historically and currently used for agricultural production. However, lands adjacent to the Project site to the north, south, east and west (i.e. Barioni Lakes to the north, east and west and Morningstar to the south) are also currently in agricultural production but are identified in the City’s SOI as areas of future residential development. Therefore although the proposed Project would result in the conversion of the Project site from agricultural uses to a regional park and equestrian center the Project site and surrounding areas are already identified for future development. Therefore, this impact is considered less than significant.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to 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 region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Expose sensitive receptors to substantial pollutants concentrations? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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"/> |

Air Quality Discussion:

An Air Quality and Greenhouse Gas (GHG) Impact Analysis was prepared for the City of Imperial Regional Park and Equestrian Center (Ambient 2015a) to identify potential air quality impacts associated with the construction and operation of the proposed Project. The analysis was conducted using the most current versions of applicable air quality software modeling. The results of the modeled emissions were compared with all applicable Federal, State, and local agency regulations to determine if any exceedances of these regulations would occur. A description of all regulations, modeling assumptions, and output files are provided in the report (Appendix A) and are used as the basis for the discussion and analysis below.

Methodology

Short-term Construction. Emissions modeling was conducted for each of the Project phases using the California Emissions Estimator Model (CalEEMod), version 2013.2.2. Emissions were quantified based largely on the default parameters contained in the model for Imperial County. Road improvements proposed for Phase IB of the proposed Project were modeled using the Sacramento Metropolitan Air Quality Management District's (SMAQMD's) Road Construction Emissions Model, (RCEM) version 7.1.5.1. Although developed by the SMAQMD, the RCEM is based on emission factors and usage rates that are considered to be generally representative of the state-wide fleet and, therefore, suitable for use in other areas of the state, including Imperial County.

Long-term Operations. Long-term operational emissions associated with the proposed Project were calculated using the CalEEMod, version 2013.2.2. Emissions modeling included mobile sources, area sources, energy use, landscape maintenance, and off-road equipment operations. Vehicle trip generation rates were derived from the traffic analysis prepared for this Project by LOS Engineering (Appendix F).

To assist local jurisdictions in the evaluation of air quality impacts, the Imperial County Air Pollution Control

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	----------------------------------------------------------------	-------------------------------------	----------------

District (ICAPCD) has published the *Air Quality Handbook* (ICAPCD 2007). This guidance document includes recommended thresholds of significance to be used for the evaluation of short-term construction, long-term operational, odor, toxic air contaminant, and cumulative air quality impacts. Accordingly, the ICAPCD-recommended thresholds of significance are used to determine whether implementation of the proposed Project would result in a significant air quality impact. Projects that exceed these recommended thresholds would be considered to have a potentially significant impact to human health and welfare. The thresholds of significance are summarized, as follows:

- **Short-term Construction.** Construction-generated emissions exceeding the levels identified in Table 1 would be considered to have a potentially significant air quality impact that could conflict with or obstruct the implementation of the applicable air quality plan.

**TABLE 1
ICAPCD THRESHOLDS OF SIGNIFICANCE FOR CONSTRUCTION ACTIVITIES**

Pollutant	Emissions (lbs/day)
PM ₁₀	150
ROG	75
NO _x	100
CO	550

Source: ICAPCD 2007.

- **Long-term Operation.** Operational emissions exceeding the levels identified in Table 2 would be considered to have a potentially significant air quality impact that could conflict with or obstruct the implementation of the applicable air quality plan.

**TABLE 2
ICAPCD THRESHOLDS OF SIGNIFICANCE FOR PROJECT OPERATIONS**

Pollutant	Tier I Threshold	Tier II Threshold
CO	<550	≥550
ROG	<55	≥55
NO _x	<55	≥55
SO _x	<150	≥150
PM ₁₀	<150	≥150

*Excludes emissions from stationary sources applicable to ICAPCD permitting requirements.
Tier I requires implementation of applicable ICAPCD standard mitigation measures, with the exception of "no impact" determinations.
Tier II requires implementation of applicable ICAPCD standard mitigation measures, as well as, applicable discretionary mitigation measures.*

Source: ICAPCD 2007.

- **Local Mobile-Source CO Concentrations.** Local mobile source impacts associated with the proposed Project would be considered significant if the Project contributes to CO concentrations at receptor locations in excess of the CAAQS (i.e., 9.0 ppm for 8 hours or 20 ppm for 1 hour).
- **Localized Pollutant Concentrations.** Exposure to localized pollutant concentrations would be considered potentially significant if the Project would result in exposure of sensitive receptors to concentrations that would exceed applicable thresholds. Exposure to toxic air contaminants (TAC) would be considered significant if the probability of contracting cancer for the

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Maximally Exposed Individual (i.e., maximum individual risk) would exceed 10 in 1 million or would result in a Hazard Index greater than 1.

- **Odor.** Odor impacts associated with the proposed Project would be considered significant if the Project has the potential to frequently expose members of the public to objectionable odors.

a) **Potentially Significant Unless Mitigation Incorporated.** Implementation of the proposed Project would result in increases in short-term construction emissions as well as long-term operational emissions that would exceed applicable ICAPCD-recommended thresholds of significance (as discussed further under item “b” below). Proposed projects that exceed recommended thresholds of significance would also be considered to conflict with or obstruct the implementation of applicable air quality plans. This impact would be considered potentially significant without the implementation of mitigation measures. However, implementation of Mitigation Measures AQ-1 through AQ-4 would reduce conflicts with, or obstruction of, implementation of the applicable air quality plan to a less than significant level.

Mitigation Measures

AQ-1: During construction, the proposed Project shall implement ICAPCD’s standard mitigation measures to reduce fugitive dust control, as noted below:

- All disturbed areas, including Bulk Material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall 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.
- All on site and off site unpaved roads will be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.
- All unpaved traffic areas one (1) acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emission shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering.
- The transport of Bulk Materials shall be completely covered unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of Bulk Material. In addition, the cargo compartment of all Haul Trucks is to be cleaned and/or washed at delivery site after removal of Bulk Material.
- All Track-Out or Carry-Out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.
- Movement of Bulk Material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers or by sheltering or enclosing the operation and transfer line.
- The construction of any new Unpaved Road is prohibited within any area with a population of 500 or more unless the road meets the definition of a Temporary

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Unpaved Road. Any temporary unpaved road shall be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emission by paving, chemical stabilizers, dust suppressants and/or watering

Timing/Implementation: During construction activities.

Enforcement/Monitoring: City of Imperial Planning and Development Department/ICAPCD.

Significance Level After Mitigation: Less than Significant.

AQ-2: During construction, the proposed Project shall implement the following ICAPCD Standard Mitigation Measures to reduce heavy-duty construction combustion equipment emissions:

- Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel powered equipment.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum.
- Limit, to the extent feasible, the hours of operation of heavy duty equipment and/or the amount of equipment in use
- Replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set)

Timing/Implementation: During construction activities.

Enforcement/Monitoring: City of Imperial Planning and Development Department/ICAPCD.

Significance Level After Mitigation: Less than Significant.

AQ-3: A minimum of fifty percent of heavy-duty off-road equipment used during Project Phase 1B shall meet Tier 3 emissions standards. Alternatively, this requirement can be amended if a supplemental air quality emissions assessment, to be based on the actual construction equipment fleet, demonstrates that construction-generated emissions would not exceed ICAPCD's applicable emission threshold of 100 lbs/day of NO_x.

Timing/Implementation: During construction activities.

Enforcement/Monitoring: City of Imperial Planning and Development Department/ICAPCD.

Significance Level After Mitigation: Less than Significant.

AQ-4: During Project operations, all onsite unpaved vehicle travel surfaces, including roadways and vehicle parking areas, shall be stabilized with an approved chemical dust stabilizer or shall be paved.

Timing/Implementation: During Project operation.

Enforcement/Monitoring: City of Imperial Planning and Development Department/ICAPCD.

Significance Level After Mitigation: Less than Significant.

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b&c) Potentially Significant Unless Mitigation Incorporated.

Short-term Construction. Construction-generated emissions are of temporary duration, lasting only as long as construction activities occur, but have the potential to result in significant air quality impacts. The construction of the proposed Project would result in the temporary generation of emissions associated with site grading and excavation; construction equipment exhaust; motor vehicle exhaust from worker trips; and the movement of construction equipment on unpaved surfaces. Table 3 provides a summary of the maximum unmitigated and mitigated daily emissions generated during construction.

**TABLE 3
SHORT-TERM CONSTRUCTION-GENERATED EMISSIONS OF CRITERIA AIR POLLUTANTS**

Project Phase	Maximum Daily Emissions (lbs/day) ⁽¹⁾				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Unmitigated ⁽¹⁾					
Phase IA	21.6	79.2	52.3	25.1	13.2
Phase IB	11.1	109.9	54.8	10.7	6.2
Phase II	9.8	97.2	64.0	13.5	8.1
Phase III	5.4	59.6	43.4	24.4	12.5
<i>ICAPCD Significance Thresholds:</i>	75	100	550	150	None
Exceeds Threshold? (Phase Exceeding Threshold)	No	Yes (Phase IB)	No	No	No
Mitigated ⁽²⁾					
Phase IA	21.6	79.2	52.3	10.9	6.8
Phase IB	9.0	89.0	54.8	5.4	3.1
Phase II	6.6	75.0	50.3	8.2	5.9
Phase III	5.4	59.6	43.4	6.2	4.0
<i>ICAPCD Significance Thresholds:</i>	75	100	550	150	None
Exceeds Threshold? (Phase Exceeding Threshold)	No	No	No	No	No

1. Emissions for Phases IA, II, and III were quantified using CalEEMod, version 2013.2.2. Emissions for Phase I-B were quantified using the SMAQMD's Road Construction Emissions Model. Represents highest daily emissions projected to occur for winter or summer conditions.

2. Mitigation includes implementation of ICAPCD standard mitigation measures and a minimum of 50% of heavy-duty off-road equipment used during Phase IB meeting Tier 3 emission standards.

Refer to **Appendix A Emissions Modeling of the Air Quality & GHG Impact Analysis (Appendix A of this document)** for modeling results and assumptions. Totals may not sum due to rounding.

Source: Ambient 2015a.

As noted in Table 3 the highest unmitigated daily emissions would total approximately 21.6 lbs/day of ROG, 109.9 lbs/day of NOX, 64.0 lbs/day of CO, 25.1 lbs/day of PM10, and 13.2 lbs/day of PM2.5. Uncontrolled emissions of NOX generated during Phase IB would exceed the ICAPCD's significance thresholds. In addition, although emissions of PM10 would not exceed the ICAPCD's significance thresholds, localized increases in nuisance-related impacts could potentially occur at nearby residential land uses. Therefore, construction-generated emissions of NOX and fugitive PM

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would be considered to have a potentially significant impact unless mitigated.

Long-term Operations. Long-term operation of the proposed Project would result in emissions generated by motor vehicle trips, energy use, routine landscape maintenance activities, and the occasional use of off-road equipment (e.g., small tractors and forklifts) at the equestrian center and olive mill. Estimated operational emissions are summarized in Table 4. As indicated, operation of the proposed Project would generate maximum uncontrolled daily emissions of approximately 9.2 lbs/day of ROG, 9.0 lbs/day of NO_x, 36.4 lbs/day of CO, 242.8 lbs/day of PM₁₀ and 24.8 lbs/day of PM_{2.5}. Emissions of SO_x would be negligible. As noted, operational emissions of PM₁₀ would exceed the ICAPCD’s significance thresholds of 150 lbs/day of PM₁₀. Emissions would be predominantly associated with on-site vehicle travel on unpaved surfaces. This impact is be considered potentially significant unless mitigation is incorporated.

**TABLE 4
LONG-TERM OPERATIONAL EMISSIONS OF CRITERIA POLLUTANTS**

Project Phase	Emissions (lbs/day) ⁽¹⁾					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Phase IA & IB	3.6	3.6	11.2	0.0	54.2	5.6
Phase II	0.1	0.2	0.9	0.0	6.6	0.7
Phase III	6.5	7.5	31.1	0.0	182.8	18.7
Total at Project Buildout ⁽²⁾	9.2	9.0	36.4	0.0	242.8	24.8
ICAPCD Significance Thresholds:	55	55	550	150	150	None
Exceed ICAPCD Thresholds?	No	No	No	No	Yes	N/A
With Mitigation ⁽³⁾ :	N/A	N/A	N/A	N/A	72.8	N/A

1. Emissions were quantified using CalEEMod, version 2013.2.2. Represents highest daily emissions projected to occur for either winter or summer conditions.
2. Emissions may not sum due to changes in emissions at phase buildout verses project buildout years.
3. Assumes a minimum reduction of 70% with application of chemical dust stabilizers to onsite unpaved vehicle travel surfaces.
Refer to **Appendix A Emissions Modeling of the Air Quality & GHG Impact Analysis (Appendix A of this document)** for modeling results and assumptions. Totals may not sum due to rounding.
Source: Ambient 2015a.

Currently, the SSAB is either in attainment or unclassified for all federal and state air pollutant standards with the exception of O₃ (8-hour) and total suspended particulate matter less than 10 microns in diameter (PM₁₀). Air pollutants transported into the SSAB from the adjacent South Coast Air Basin (Los Angeles, San Bernardino County, Orange County, and Riverside County) and from Mexicali (Mexico) substantially contribute to the non-attainment conditions in the SSAB. Thus, a potentially significant impact is identified for this issue area.

In addition, construction of the proposed Project may result in a cumulatively considerable net increase of one or more criteria pollutants as a result and non-point source emissions, for which the region is in nonattainment under applicable federal and state ambient air quality standards.

Thus, a potentially significant impact is identified with regard to contributing to an existing air quality violation. Both temporary construction air quality emissions and stationary source emissions

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during operation have the potential to result in an increase of criteria pollutants. This impact would be considered potentially significant without the implementation of mitigation measures. However, implementation of Mitigation Measures AQ-1, AQ-2 and AQ-3 (for construction emissions) and AQ-4 (for operational emissions) would reduce violations of any air quality standard/contributing substantially to an existing or projected air quality violation impacts to a less than significant level.

d) Potentially Significant Impact Unless Mitigation Incorporated.

Toxic Air Contaminants. Implementation of the proposed Project would not result in the long-term operation of any major on-site stationary sources of TACs. However, construction of the proposed Project may result in temporary increases in emissions of diesel-exhaust particulate matter (DPM) associated with the use of off-road diesel equipment. Health-related risks associated with diesel-exhaust emissions are primarily related to long-term exposure and the risk of contracting cancer. As such, the calculation of cancer risk associated with exposure of to TACs are typically calculated based on a long-term (e.g., 70-year) period of exposure. The use of diesel-powered construction equipment, however, would be temporary and episodic and would occur over a relatively large area. Construction activities would constitute less than approximately 3 percent of the typical 70-year exposure period. As a result, exposure to construction-generated DPM would not be anticipated to exceed applicable thresholds (i.e., incremental increase in cancer risk of 10 in one million).

Although construction emissions would not be anticipated to result in long-term health impacts that would exceed applicable thresholds, short-term exposure to DPM could still result in potential health effects. The type and severity of health effects depends upon several factors including the dose of the pollutant the individual is exposed to and the duration of exposure. Short-term exposure to DPM may cause irritation to the eyes, nose, throat and lungs, as well as, some neurological effects such as lightheadedness. Acute exposure may also elicit a cough or nausea as well as exacerbate asthma. These potential health effects are of particular concern among the more sensitive members of the population, such as children, the elderly, and individuals suffering from lung ailments (e.g., asthma). Given that some construction activities could potentially occur near existing rural residential dwellings, this impact would be considered potentially significant. However, implementation of Mitigation Measures AQ-1 through AQ-4 would require control of construction-generated emissions. These measures would result in a substantial reduction of construction-generated emissions from off-road equipment, including DPM. With mitigation, impacts resulting from exposure of sensitive receptors to TACs in the form of DPM would be considered less than significant.

Valley Fever. As noted earlier in this report, Valley Fever is an infection caused by the fungus *Coccidioides*. *Coccidioides* spores can become airborne after contaminated soil and dust are disturbed. Construction would include ground-disturbing activities which could result in an increased potential for exposure of nearby residents and on-site construction workers to airborne spores, if present. As a result, the potential for increased exposure of sensitive receptors to Valley Fever would be considered to have a potentially significant impact. However, implementation of Mitigation Measures AQ-1 through AQ-4 would require control of construction-generated emissions, as well as, fugitive dust emitted during long-term operation of the Project. These measures would result in a substantial reduction in fugitive dust emitted by ground-disturbing activities. The control of emissions from ground-disturbing activities would also reduce potential for exposure of sensitive receptors to Valley Fever spores. With mitigation, impacts resulting from exposure of sensitive receptors to Valley Fever spores would be considered less than significant.

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Fugitive Dust. Construction of the proposed Project would include ground-disturbing activities which would be anticipated to result in increased emissions of airborne particulate matter. In addition, the long-term operation of the Project may also result in emissions of fugitive dust associated with vehicle travel on unpaved surfaces. Increases of uncontrolled fugitive dust may result in increased localized concentrations of PM that could adversely impact occupants of nearby rural residential dwellings (i.e. sensitive receptors). As a result, localized emissions of airborne particulate matter emitted during construction would be considered potentially significant. However, implementation of Mitigation Measures AQ-1 through AQ-4 would require r the control of fugitive dust emitted during long-term operation of the Project. These measures would result in a substantial reduction in fugitive dust emitted by ground-disturbing activities. With mitigation, impacts resulting from exposure of sensitive receptors to fugitive dust would be considered less than significant.

- e) **Less Than Significant Impact.** Construction of the proposed Project would involve the use of a variety of gasoline or diesel-powered equipment that would emit exhaust fumes. Exhaust fumes, particularly diesel-exhaust, may be considered objectionable by some people. However, construction-generated emissions would occur intermittently throughout the workday and would dissipate rapidly within increasing distance from the source.

The long-term operation of the Project would not involve the use of any major sources of odorous emissions. However, the on-site storage of animal waste associated with the equestrian center could be a potential source of odors if not removed in a timely manner. According to City staff, animal waste would be removed shortly after completion of events, typically within approximately 72 hours (Galvan 2015). Additionally, portable toilets would be cleaned three times daily and wiped down and restocked with supplies such as toilet paper and paper towels twice daily. At the end of each day, each toilet would be pumped out and scrubbed down with a variety of products which include special toilet soap wash made specifically for portable toilets. For these reasons, exposure of a substantial number of people to frequent odorous emissions is considered less than significant.

IV. BIOLOGICAL RESOURCES

Would the project:

- | | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input checked="" type="checkbox"/> | <input 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, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input 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, etc.) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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through direct removal, filling, hydrological interruption, or other means?				
d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Biological Resources Discussion:

A Biological Resources Letter Report was prepared for the Project (Dudek 2015) to document biological conditions on the site. A records search of agency databases was conducted as a part of the Report to determine the presence or potential presence of special-status biological resources on the Project site. Additionally, a field survey of the Project site was conducted on September 16, 2014. The discussion and analysis that follows is based on the Biological Resources Letter Report which is included as Appendix B of this document.

To a large extent, the City of Imperial has been disturbed by human activity through urban development and agriculture uses and does not provide suitable habitat for many special-status plant and wildlife species located in other areas of the Imperial Valley. Non-urban areas and planning areas identified for annexation, including the proposed Project site, are either currently being farmed or have been farmed in the past. Areas not actively farmed are characterized by non-native, ruderal, weedy vegetation. Areas surrounding agricultural lands are known to provide habitat for the Burrowing Owl (BUOW) as well as foraging and roosting habitat for migratory birds that winter in the area. BUOW is a species covered under the Migratory Bird Treaty Act (MBTA) and identified as candidate, sensitive, or special status species by the California Department of Fish and Wildlife (CDFW) and U.S. Department of Fish and Wildlife Service (USFWS). The City recognizes the importance of protecting BUOW and thus works with both the Imperial Irrigation District (IID) and the County of Imperial to minimize impacts associated with urban growth and agriculture pollution in runoff that may affect wildlife species. Protection of the natural environment is important to the City, and it is the City’s intent to protect these resources as the City grows and develops (City of Imperial 2014a, p. 2).

a,b) Potentially Significant Impact Unless Mitigation Incorporated. The Biological Resources Letter Report identified two vegetation communities within the Project site: agriculture and disturbed habitat. The agriculture community supports little to no natural vegetation and is not considered sensitive. Agriculture is the dominant plant community on the Project site as well as the immediate surrounding areas. On site, agriculture consists of active alfalfa (*Medicago sativa*) production. Disturbed habitat typically describes areas that lack vegetation due to recent and/or repeated physical disturbance or areas where the overall vegetation cover is dominated by non-native species. Disturbed habitat includes unvegetated graded areas, such as the dirt roads surrounding the

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Project site. Because there are no special-status vegetation communities on the Project site, no impacts to special-status vegetation communities will occur as a result of Project implementation. Therefore there are no significant impacts to sensitive vegetation communities.

Additionally, no special-status plant species were observed during the survey of the Project site. Accordingly, the Biological Resources Letter Report determined there is low potential for special-status species on the Project site due to the lack of suitable vegetation and soils (Dudek 2015, p. 9). The Project's impact related to special-status plants was determined to be less than significant.

During the site survey one special-status wildlife species, the tricolored blackbird (*Agelaius tricolor*) was observed. This species was recently emergency-listed (under the California Endangered Species Act). The tricolored blackbird was observed foraging in a mixed flock (that included other blackbird and cowbird species) over the Project site. This species is not anticipated to nest on the Project site due to the active agriculture and lack of suitable breeding habitat (Dudek 2015, p. 9).

No suitable BUOW (*Athene cunicularia*) burrows were detected on the Project site. However, BUOW have the potential to invade the site if burrows become available (Dudek 2015, p. 9). Therefore, a potentially significant impact to BUOW could occur unless mitigation measure BIO-1 is implemented. No other species (listed or proposed for listing as rare, threatened, or endangered by either the CDFW or the USFWS) were detected in the Project site.

In addition, the Biological Resources Letter Report concluded the proposed Project site contains suitable habitat for nesting birds in a small number of non-native tree and shrub species such as palm (*Washingtonia filifera*), tamarisk (*Tamarix chinensis*), and mesquite trees (*Prosopis glandulosa* var. *torreyana*). Although impacts to the trees found on the Project site and other potential nesting habitat may not be considered significant, if clearing of vegetation were to occur during the nesting season (January 15 through August 31) impacts to nesting birds would be considered potentially significant, pursuant to the MBTA and Section 3503.5 of the California Fish and Game Code. Therefore a potentially significant impact associated with habitat modifications could occur unless mitigation measure BIO-2 is implemented.

Mitigation Measures

BIO-1: Prior to the start of construction, a pre-construction survey for the BUOW will be conducted in accordance with the CDFW 2012 Burrowing Owl Staff Report on Burrowing Owl Mitigation. The pre-construction surveys shall identify active BUOW burrows and provide estimates of the number of BUOWs, as well as include information to determine whether BUOW are considered breeding pairs or migrants. If it is discovered that there is an occupied BUOW burrow, then a Burrowing Owl Mitigation and Management Plan will be developed in accordance with the CDFW Staff Report, which outlines the methods of removal (if necessary) and the methods and placement of replacement burrows. At a minimum, occupied burrows will be replaced at a 2:1 ratio. The Management Plan shall include the following information:

- Descriptions of setbacks;
- A description of shelter in place and its purpose to minimize impacts to BUOW while allowing existing burrows to remain intact;
- A plan for excavation of inactive BUOW burrows, as appropriate;

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- A passive relocation plan;
- Additional measures to ensure protection of BUOW through construction and during operation and maintenance phases of the Project; and
- On-site and off-site mitigation plans for impacts to BUOW (if present).

Timing/Implementation: Management Plan prepared prior to issuance of building permit/Management plan implemented during construction

Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Level After Mitigation: Less than Significant.

BIO-2: If disturbances to suitable nesting habitat are proposed during the breeding season (January 15 through August 31), a pre-construction survey for nesting birds should be conducted by a qualified biologist not more than 72 hours prior to the disturbance. If any active nests are detected, the specific area would be flagged and mapped on the construction plans, an appropriate avoidance buffer may be necessary, and the nest would be avoided until the nesting cycle is complete or it is determined by the Project biologist that the nest has failed.

Timing/Implementation: 72 hours prior to ground disturbance (if conducted from January 15 through August 31).

Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Level After Mitigation: Less than Significant.

c) No Impact. Wetlands and other Waters of the United States (WUS) that are subject to Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act are under the jurisdiction of the U.S. Army Corps of Engineers (ACOE). Typically, these waters include naturally occurring traditional navigable waters (TNWs), relatively permanent waters (RPWs), and/or ephemeral waters with a significant nexus to a TNW. Agricultural water conveyance systems which are manmade and constructed wholly in uplands are typically only considered jurisdictional if they are RPWs. Man-made drainages constructed solely in uplands that are not RPWs are generally not federally jurisdictional. IID drains and canals are part of an agricultural system and, therefore, by definition of the ACOE Wetlands Delineation Manual, are not classified as wetlands.

The Biological Resources Letter Report concluded that the proposed Project will not impact any areas that potentially meet the criteria for jurisdictional wetlands or waters under the jurisdiction of the ACOE, Regional Water Quality Control Board (RWQCB), or CDFW (Dudek 2015, p. 6). Areas on or adjacent to the Project site that were considered to have potential to be jurisdictional include irrigation ditches along the western and eastern study area boundaries. There are no resources within the proposed development area that have similar potential wetland/water features such as a predominance of wetland (i.e., hydrophytic) vegetation or the presence of stream channel topography (i.e., bed/bank or basin). Because no potential wetlands or WUS under the jurisdiction of the ACOE, RWQCB, or CDFW are present within the boundaries of the proposed Project, no impacts to wetlands would occur.

d) Less than Significant Impact. Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. Habitat linkages are small patches that join larger blocks of habitat and help reduce the adverse effects of habitat

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fragmentation; these corridors may be continuous habitat or discrete habitat islands that function as stepping stones for wildlife dispersal. Because the Project site is an active agriculture operation, contains no suitable native habitat, and is surrounded by existing roads and agricultural fields, the site has limited value as a potential wildlife corridor or habitat linkage. Therefore, impacts related to the movement of fish or wildlife species or wildlife corridors are considered to be less than significant.

- e) **Potentially Significant Impact Unless Mitigation Incorporated.** The City of Imperial General Plan Update Conservation Element contains a policy addressing the protection of mature trees within the City. Goal 2, Policy 2.1, Action 2.1.2 states the City will “preserve existing mature trees, unless they are detrimental to public health and safety, and promote the planting of additional draught tolerant trees in developed locations by establishing developmental standards for planting and replacement of trees of at least a 2:1 ratio within the City” (City of Imperial 2014a, p. 9). Although mostly devoid of mature trees, the Biological Resources Letter Report indicated the Project site includes a small number of non-native tree and shrub species such as palm (*Washingtonia filifera*), tamarisk (*Tamarix chinensis*), and mesquite trees (*Prosopis glandulosa var. torreyana*), which may require removal. Therefore a potentially significant impact to the City of Imperial General Plan Goal 2, Policy 2.1, Action 2.1.2, regarding preservation of trees could result unless mitigation measure BIO-3 is implemented.

BIO-3: Prior to issuance of grading permits, the City shall conduct a survey to determine the presence of mature trees that would require protection or replacement in accordance with Goal 2, Policy 2.1, Action 2.1.2 of the Conservation Element. Any required replacement trees would be incorporated and recorded within the landscape plans and be indicated in the plan notes.

Timing/Implementation: Prior to issuance of grading permits.
Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Level After Mitigation: Less than Significant.

- f) **Less Than Significant Impact.** Several conservation planning efforts are currently in progress in Imperial County with the long-term goal of establishing a regional habitat reserve system that will protect native habitat lands and associated biota. The ultimate goal of these plans is the establishment of biological reserve areas in conformance with the California Natural Community Conservation Planning (NCCP) Act. Due to the number of endangered species in the region, the state enacted the NCCP Act, which promotes the development of regional conservation plans to ensure adequate protection of special-status species. This protection is to such a degree that lead agencies participating under approved plans would not need to seek project-specific approval for pre-authorized “take” of listed species and/or their supporting habitats. Within Imperial County, no NCCP/ Habitat Conservation Plan (HCP) areas have been officially adopted. The IID initiated the Imperial Valley NCCP/ HCP Planning Agreement in 2006. This document provides measures to conserve and manage natural biological diversity within the Planning Area. Although the City is located within the Plan Area, it is not currently a participant in the Plan and therefore not subject to coverage under the Plan. Additionally, none of the HCP’s Covered Activities pertain to the proposed Project. Furthermore, the proposed Project would not impact any of the HCP’s Covered Species or implementation of the HCP. In the event that the City becomes a signatory prior to obtaining a

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grading permit, compliance with the HCP guidelines on avoidance, mitigation, and species-specific coverage would be required. Thus, the Project would result in a less than significant impact related to the Imperial Valley NCCP/HCP Planning Agreement.

V. CULTURAL RESOURCES

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 type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Cultural Resources Discussion:

Cultural resources are a tangible or observable evidence of past human activity, regardless of significance, found in direct association with a geographic location. This may further include tangible properties possessing intangible traditional cultural values. Cultural resources include both archaeological (pre-historic) and historic resources (City of Imperial 2014a, p. 4).

A Cultural Resources Survey Report (Loveless & Linton, 2014) was prepared for the proposed Project to determine the presence, or potential presence, of cultural resources to occur on the Project site. A record search that encompassed a one-mile radius was performed at the South Coastal Information Center (SCIC) and San Diego State University on September 3, 2014. Also, the Native American Heritage Commission (NAHC) was contacted in compliance with Senate Bill 18 (SB18) and letters of notification and request for information were sent to Native American contacts provided by the NAHC on September 10, 2014. On September 15 and 16, 2014 a Class III cultural resources pedestrian inventory survey of the property was conducted by Loveless & Linton. The Cultural Resources Survey Report is attached as Appendix C of this document.

Although there are no structures on the Project site, five residential structures are located adjacent to the north, northeast, east, and south. The record search conducted through the SCIC located at San Diego State University did not identify any known historical resources eligible for the California or National Register for the City of Imperial or near the City’s proposed growth areas.

In accordance with SB18, letters of notification and request for information were sent to the Native American contacts provided by the NAHC. As of the date of this IS/MND, none of the contacts had responded to the request letters.

The Class III cultural resources pedestrian inventory survey of the property did not result in discovery of any new cultural/historical resources. However, non-cultural resources were located that may indicate that original surface material is still present within or below the disturbed soil. Non-cultural resources that were found include multiple lithic varieties that are known to be used as lithic sources for Native American tools

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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such as volcanics, quartz, and quartzites. The presence of multiple sources of lithic material may indicate that the area was once rich with lithic material that was frequently used by Native Americans or that the material was washed down from higher elevations which are known to facilitate human settlements. Also, these materials are not imported in farming material, top soil, or fertilization, it is more than likely these materials are an original deposit indicating that original material still exists within the disturbed soil. Additionally, lithic material covered in patina was located within the Project site and survey area, which according to the cultural resources report, indicates that surface deposits are present in the agricultural soil and could be an indication to what is buried or to what may be mixed in the soil (Loveless & Linton 2014, p. 6).

- a) **No Impact.** According to Section 15064.5(a) of the State CEQA Guidelines, a “historical resource” is defined as a resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR) (PRC21084.1); a resource included in a local register of historical resources (14 CCR15064.5[a][2]); or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (14 CCR §15064.5[a][3]). Currently, no permanent structures are located on the Project site and the record search conducted for the Cultural Resources Survey Report indicated that none of the five residences surrounding the Project site are listed or eligible as historical structures. Therefore, development of the proposed Project would have no impact on historical structures.
- b) **Potentially Significant Unless Mitigation Incorporated.** The Project site has been previously disturbed in association with agricultural operations and has been extensively tilled, furrowed, and otherwise disturbed. Based on the Cultural Resources Discussion above, the only potential for cultural resources to be present on the Project site is due to the presence of lithic materials (i.e. volcanics, quartz, and quartzites) that are known to be associated with Native American tools. Therefore a potentially significant impact could occur unless mitigation measures are implemented.

CULT-1: Cultural Resources Monitoring. During initial ground disturbance and vegetation removal, a qualified archaeological monitor and a Native American monitor shall be present.

- The Monitoring Archaeologist shall have the authority to temporarily halt construction operations within a reasonable distance from a find or resource exposure to determine if significant cultural resources are present and if they will be adversely affected by continuing construction operations.
- If a discovery proves to be significant, a preservation or data recovery excavation may be warranted, as deemed necessary by the Monitoring Archaeologist or Native American Monitor.
- If the initial disturbance does not yield any cultural resources then full-time monitoring shall subside and the monitors shall coordinate with the construction schedule to make site visits weekly or when significant disturbances will take place to ensure no soil changes or buried resources are unearthed. If resources are located during any phase of development, the frequency and intensity of monitoring activities shall occur at the discretion of the monitors. Monitoring methods shall be discussed with the project manager and the construction managers. If the monitors are confident that the area is unlikely to yield any resources, monitoring shall be terminated.

Timing/Implementation: During initial ground disturbance

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Level After Mitigation: Less than Significant.

CULT-2: Cultural Discovery Plan. Prior to issuance of grading permits, a detailed Discovery Plan for cultural/historical resources and human remains shall be developed in consultation with interested Native American groups and individuals in compliance with section 21083.2(i) of the CEQA Statutes, Section 15064.5(f) of the State CEQA Guidelines, *California Health and Safety Code 7050.5*, and *Public Resource Code 5097.98*. The Discovery Plan shall identify procedures to follow in the event that subsurface archaeological and Native American resources or human remains are discovered during construction. If subsurface archaeological or Native American resources are encountered during construction, the procedures identified in the Discovery Plan shall be followed.

Timing/Implementation: Prior to issuance of grading permits and during project construction.

Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Determination After Mitigation: Less than Significant.

b) Potentially Significant Unless Mitigation Incorporated. Paleontological resources are typically impacted when earthwork activities such as mass excavation cut into geological deposits (formations) with buried fossils. The entire Project site, as well as the entire Imperial Valley, is located within the former lakebed of Ancient Lake Cahuilla. The Ancient Lake Cahuilla lakebed sediments lie below the surface soils. Lakebed sediments have been proven to contain fossils or fossil remains such as invertebrates, small vertebrates, and extinct larger mammals (EGI 2014, p. 47-19). No paleontological resources are unlikely to contain intact paleontological remains due to the disturbed nature of the surface soils from farming practices on the Project site and its surroundings. However, the absence of fossils on the surface does not preclude the possibility of fossil presence within subsurface deposits (EGI 2014, p. 47-19). Therefore, although the potential of the proposed Project to impact paleontological resources is low in the disturbed surface sediments, there is a potential for resources to be impacted if grading or excavations were to occur in the subsurface of the undisturbed Ancient Lake Cahuilla sediments and underneath the older alluvium.

Because the proposed Project includes excavations that will be 5 to 6 feet in depth, earth-moving activities have the potential to disturb subsurface sediments and result in significant impacts to fossil remains unless mitigation measure CULT-3 is implemented.

Mitigation Measures

CULT-3: Paleontological Discovery Plan. Prior to issuance of grading permits, a detailed Discovery Plan for paleontological resources shall be prepared. The Paleontological Discovery Plan shall be consistent with the guidelines of the Society of Vertebrate Paleontologists (SVP) (SVP, 1995 and 2010). The plan shall include and implement procedures similar to the following:

Earth-moving operations impacting the soils five feet and deeper within the Project area shall be "spot-checked" up to two days per week by a Registered Professional Archaeologist (RPA) to determine whether undisturbed lakebed sediments have been encountered. During construction on the initial ten percent of total site grading, disturbance

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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below 5 feet shall be monitored through "spot-checking" two days per week. If within that period no paleontological findings meeting the San Bernardino County Museum significance criteria are found, the Principal Paleontologist may review the procedures and, if warranted, reduce the rate of "spot-checking" to one day per week. If paleontologically sensitive soils, as defined by the SVP (1995), are being impacted, or if paleontological resources meeting the San Bernardino County Museum significance criteria are encountered, they would be reported to the Principal Paleontologist and monitoring would be increased to full-time within a radius of 100 meters of the find. Full time monitoring may become necessary if the earth-moving operations continuously impact paleontological sensitive soils. A program to mitigate Project impacts on paleontological resources that are exposed shall be developed and implemented.

Paleontological monitors shall be equipped to salvage fossils as they are unearthed (to help avoid construction delays) and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. Monitors shall be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens. Recovered specimens shall be prepared to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates. Fossil specimens shall be curated by accessioning into an established, accredited museum repository with permanent retrievable paleontological storage. A report of findings with an appended itemized inventory of specimens shall be prepared. Submittal of the report and inventory to the Imperial County Planning and Development Services Department, along with confirmation of the curation of recovered specimens into an established, accredited museum repository, shall signify completion of the program to mitigate impacts to paleontological resources.

Timing/Implementation: Prior to issuance of grading permits and during Project construction.

Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Determination After Mitigation: Less than Significant.

- c) **Less Than Significant Impact with Mitigation.** Based on the results from the Cultural Resources Survey Report, no known human remains are present on the Project site and it is unlikely that human remains would be buried on site. However, ground-disturbing activities associated with the Project have the potential to disturb previously unknown human remains. This impact is considered potentially significant unless mitigation is incorporated.

CULT-3: Human Remains Discovery. In the event that human remains are encountered during Project construction, the Project Contractor shall immediately halt all construction activities. Upon discovery of osteological material (bone) that cannot be immediately and confidently identified as non-human, it is recommended that *California Health and Safety Code 7050.5C* and *California Public Resources Code 5097.98* be followed.

Timing/Implementation: During project grading and construction

Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Determination After Mitigation: Less than Significant.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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VI. GEOLOGY AND SOILS

Would the project:

a) Expose people or structures to potential substantial adverse effects, including 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 type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong Seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction and seiche/tsunami?	<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial risk to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Geology and Soils Discussion:

The City of Imperial is located in the Imperial Valley portion of the Salton Trough, a topographic and geologic depression resulting from large scale regional faulting from the San Andreas Fault System and the East Pacific Rise. Tectonic activity that formed the Trough continues at a high rate and therefore, the City is considered likely to be subjected to moderate to strong ground motion from faults in the region, including the Brawley, Superstition Hills, and Imperial Faults (City of Imperial 2014a, p. 5).

The land in the City of Imperial is relatively flat and is not susceptible to landslides or mudslides. However, due to the shallowness of the groundwater table in the Imperial Valley and the proximity to faults, there is a potential for liquefaction in the vicinity of the Project site (The Holt Group, 2005 16). According to the Conservation Element of the General Plan Update, soil within the City of Imperial planning area consists primarily of silty clay loam, with a slope of 0 to 2 percent (City of Imperial 2014a, p. 5). Due to the shallow groundwater depth and alluvial nature of the soils present in the Imperial Valley (silts, sands and sandy silts), the near surface soils in the City as in the rest of Imperial Valley are moderate to highly expansive (City of Imperial 2014a, p. 5).

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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The Project site contains four soil types (Figure 14): 106 Glenbar clay loam, wet; 110 Holtville silty clay, wet; 114 Imperial silty clay, wet; and 115 Imperial-Glenbar silty clay loams, wet, 0 to 2 percent slopes. The majority of the site is Imperial Glenbar silty clay loams. Each of the soil units within the Project site contain clay, have moderately slow to slow permeability, a seasonably high water table, and present limitations for septic systems (USDA 1981).

a-i) Less than Significant. The proposed Project site is not located within a State of California, Alquist-Priolo Earthquake Fault Zone. However, the site is located within an earthquake fault zone as depicted on Department of Conservation regulatory maps (CGS 2007). The closest mapped Alquist-Priolo Fault Zone is slightly over one mile to the southeast of the City limits (State of California 1990). Therefore, potential for surface fault rupture at the Project site is considered to be low. Thus, a less than significant impact is identified with regard to an Alquist-Priolo Earthquake Fault Zone or a potential for fault rupture relative to the City of Imperial Regional Park and Equestrian Center.

a-ii) Potentially Significant Impact Unless Mitigation Incorporated. The Project site is in the seismically active Imperial Valley in Southern California. According to the current General Plan EIR (City of Imperial 1994, p. 55), the major public safety concern in the City relates to earthquakes. The Imperial Fault, Superstition Hills Fault and San Andreas Fault are located east of the City (Figure 15). The City is considered likely to be subjected to moderate to strong ground motion from faults in the region (City of Imperial 2014a, p. 5). Based on Project’s location, it would likely be subjected to strong groundshaking during earthquakes along any of the faults in the vicinity. Imperial County is classified as Seismic Zone 4 by the Uniform Building Code (Sections 1626 through 1635), which requires developments to incorporate the most stringent earthquake resistant measures. A potentially significant impact could occur with regard to strong seismic ground shaking unless mitigation is incorporated.

Mitigation Measures

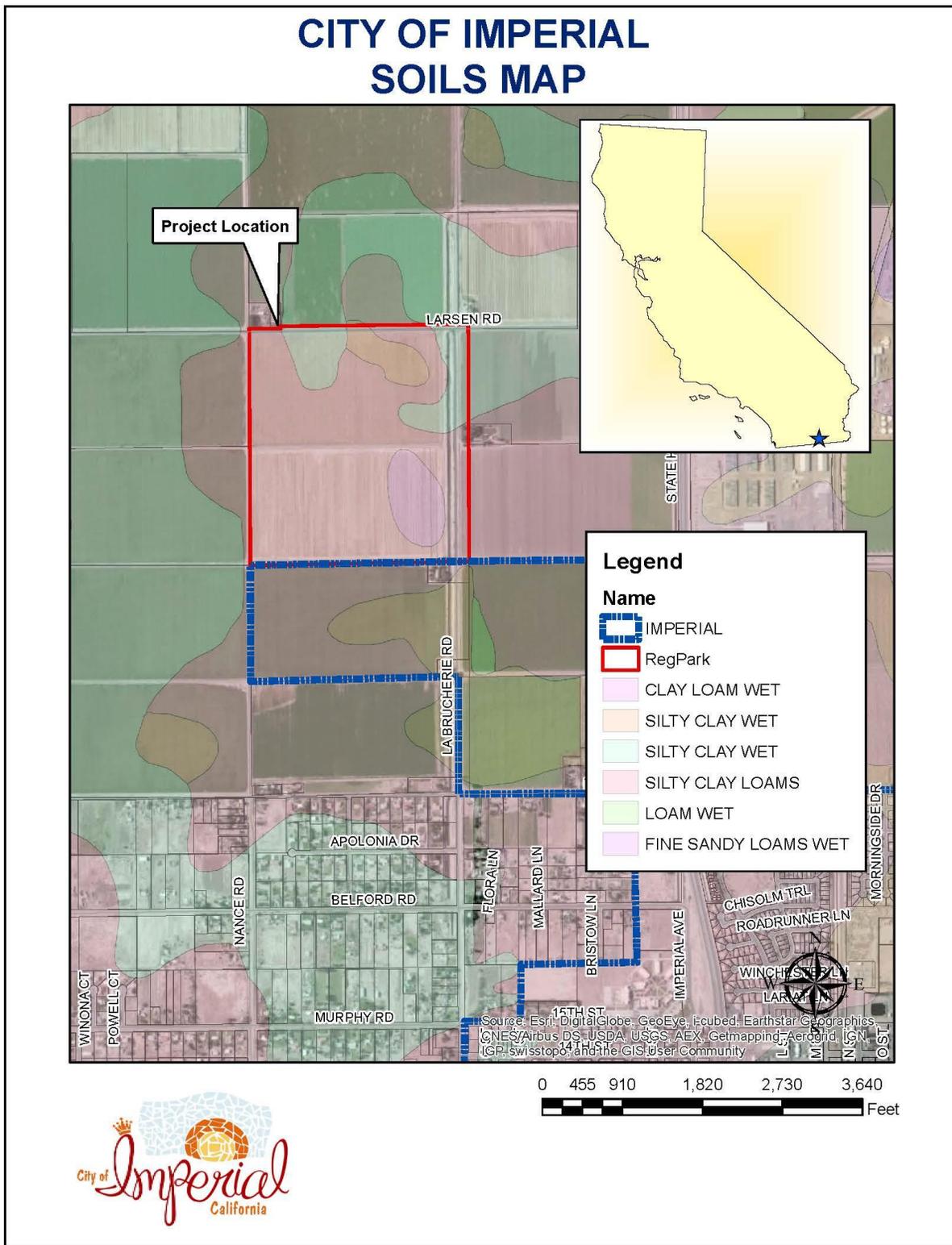
GEO-1: Prior to approval of final building plans, structures on the Project site shall be designed and constructed to resist the effects of seismic ground motions as provided in Section 1613 of the 2013 California Building Code. The Project shall be engineered using the 2013 California Building Code, Section 1613 Design Coefficients for the proposed structures.

Timing/Implementation: Prior to approval of final building plans/As part of Project design.

Enforcement/Monitoring: City of Imperial Planning and Development Department, and Public Services Department.

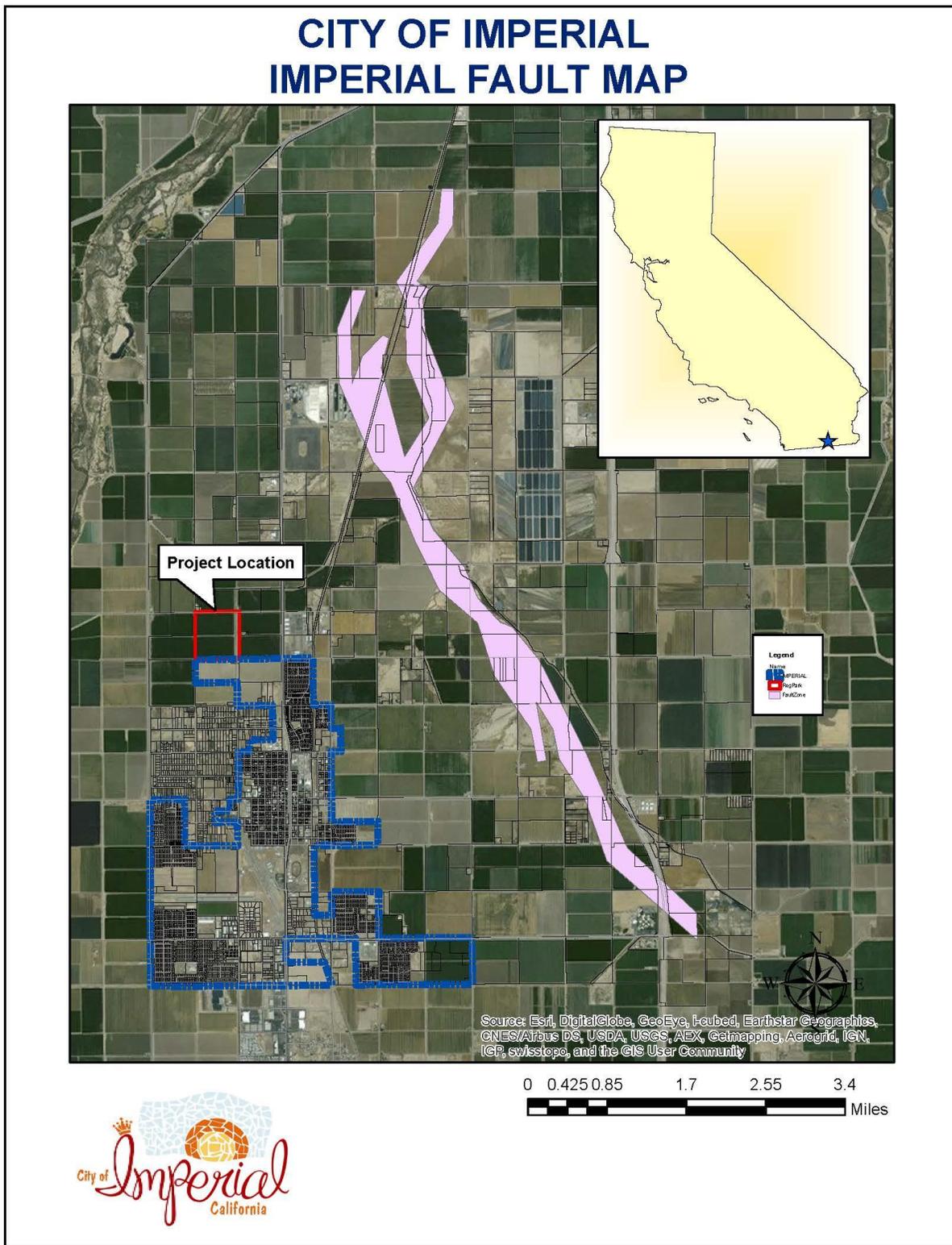
Significance Level After Mitigation: Less than Significant.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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**FIGURE 14
PROJECT SOILS MAP**

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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**FIGURE 15
FAULTS IN THE VICINITY OF THE PROJECT SITE**

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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- a-iii) **Potentially Significant Unless Mitigation Incorporated.** Due to the shallowness of the groundwater table in the Imperial Valley and the proximity to faults, there is a potential for liquefaction within the vicinity of the Project site. The Project site is potentially underlain by clays of moderate to high expansion potential and has a risk of considerable expansion heave (City of Imperial 2014a, p. 5). The City is having a Geotechnical Report prepared to examine site-specific levels of risk related to seismic groundshaking, liquefaction, and expansive soils. All requirements and recommendations of the Geotechnical Report to bring the construction of the project structures into compliance with applicable regulations will be incorporated into the building plans. With incorporation of the requirements and recommendations of the Geotechnical Report, impacts associated with liquefaction would be reduced to less than significant.
- a-iv) **No Impact.** The Project site is located on the floor of the Imperial Valley. The topography of the Project site and surrounding area is generally flat. The elevations on the Project site range from 61 feet below mean sea level (BMSL) along the southern boundary, to approximately 66 feet BMSL along the northern boundary (Dudek 2014, p 2). As a result, there would be no potential for impacts resulting from landslides on or near the City of Imperial Regional Park and Equestrian Center. Thus, no impact is identified for landslides.
- b) **Potentially Significant Unless Mitigation Incorporated.** Soil erosion could occur during Project construction in association with site preparation activities, installation of infrastructure and erection of structures. Grading and construction associated with development of the City of Imperial Regional Park and Equestrian Center can also remove topsoil causing erosion and creating large amounts of dust. During intense storms, significant amounts of rainfall can saturate upper layers of the soil. Once the soil is saturated, runoff can produce gullies and carry soil particles into drainage channels and ultimately to the Alamo River. Along with the New River, the Alamo River serves as the primary tributary source to the Salton Sea (City of Imperial 2014a, p. 5). A potentially significant impact unless mitigation is incorporated has been identified with regard to erosion and loss of top soil.

Mitigation Measures

GEO-2 The City shall implement water erosion control plans in accordance with National Pollutant Discharge Elimination System (NPDES) requirements and dust control plans in accordance with Imperial County Air Pollution Control District (ICAPCD) requirements (City of Imperial 2014a, p. 7).

Standard erosion control methods/best management practices such as straw wattles, check dams, fabric blankets, and silt fencing will be required in accordance with City standards including preparation, review and approval of a grading plan by the City Engineer.

Timing/Implementation: Prior to issuance of grading permits/During construction.
Enforcement/Monitoring: City of Imperial Planning and Development Department, and Public Services Department.

Significance Level After Mitigation: Less than Significant.

- c) **Potentially Significant Unless Mitigation Incorporated.** Soils in Imperial County primarily consist of silty clay loam, with a slope of 0 to 2 percent (City of Imperial 2014a, p. 5). Due to the shallowness of the groundwater table in the Imperial Valley and the proximity to faults, there is a potential for

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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liquefaction within the Project site (City of Imperial 2014a, p. 16). A potentially significant impact unless mitigation is incorporated has been identified with regard to landslides, lateral spreading, subsidence, liquefaction or collapse.

Mitigation Measures

Implement Mitigation Measure GEO-2.

Significance Level After Mitigation: Less than Significant.

- d) **Potentially Significant Unless Mitigation Incorporated.** Due to the shallow groundwater depth and alluvial nature of the soils present in the Imperial Valley (silts, sands and sandy silts), the near-surface soils in the City are moderate to highly expansive (City of Imperial 2014a, p. 5). A potentially significant impact unless mitigation is incorporated has been identified for this issue.

Mitigation Measures

Implement Mitigation Measure GEO-2.

Significance Level After Mitigation: Less than Significant.

- e) **No Impact.** The Project will not use any septic tanks or other alternative wastewater disposal system. Portable toilets will be used during Phase IA & IB with some permanent bathroom facilities constructed as part of Phase II supplemented with portable toilets during large events. Thus, no impact is identified with regard to the adequacy of soils to support use of septic tanks or alternative waste water disposal systems.

VII. GREENHOUSE GAS EMISSION

Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Greenhouse Gas Discussion:

An Air Quality and Greenhouse Gas (GHG) Impact Analysis was prepared (Ambient 2015a) to identify potential GHG impacts associated with the construction and operation of the proposed Project. The analysis was conducted utilizing the most recent modeling software and compared the results for compliance with all applicable Federal, State, and local agency regulations. A description of all regulations, modeling assumptions, and output files are provided in the report (included as Appendix A of this document) and is used as the basis for the discussion and analysis that follows. Emissions modeling assumptions and output files are also included in the report. For reference, the methodology utilized to assess potential impacts is described below.

- Short-term Construction. Emissions modeling was conducted for each of the Project phases using the California Emissions Estimator Model (CalEEMod), version 2013.2.2. Emissions were

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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quantified based largely on the default parameters contained in the model for Imperial County. Road improvements proposed for Phase IB of the proposed project were modeled using the Sacramento Metropolitan Air Quality Management District's (SMAQMD's) Road Construction Emissions Model, (RCEM) version 7.1.5.1. Although developed by the SMAQMD, the RCEM is based on emission factors and usage rates that are considered to be generally representative of the state-wide fleet and, therefore, is suitable for use in other areas of the state, including Imperial County.

- Long-term Operations. Long-term operational emissions associated with the proposed Project were calculated using the CalEEMod, version 2013.2.2. Emissions modeling included mobile sources, area sources, energy use, landscape maintenance, and off-road equipment operations. Vehicle trip generation rates were derived from the traffic analysis prepared for this Project.

Neither the City of Imperial nor the ICAPCD have adopted GHG reduction programs, plans, or regulations for the reduction of GHGs. However, other air districts in the state have developed guidance documents for assessing GHG impacts. One method is to evaluate the Project's estimated emissions under a Business-as-Usual (BAU) scenario, and compare the Project's GHG reductions to those required by AB 32 (the California Global Warming Solutions Act of 2006). Specifically, AB 32 requires California to reduce its GHG emission to 1990 levels by 2020. This reduction is also reflected in ARB's AB 32 Scoping Plan (2008), which estimated that GHG emissions in the state need to be reduced by approximately 29 percent, in comparison to business-as-usual (BAU) conditions. BAU is referenced in ARB's 2008 Scoping Plan as emissions occurring in 2020 if the average baseline emissions during the 2002-2004 period grew to 2020 levels, without control. Therefore, 2002-2004 emissions factors, on a unit of activity basis, multiplied by the activity expected to occur in 2020, is considered to be an appropriate representation of 2020 BAU. In accordance with this methodology, projects that reduce GHG emissions by a minimum of 29 percent, consistent with GHG emission reduction targets established in ARB's Scoping Plan, would not be considered to conflict with the goals identified in AB 32 and would be considered to have a less-than-significant individual and cumulative impact on climate change. It is important to note, however, that while ARB's 2008 Scoping Plan identified a necessary reduction in GHG emissions of 29% in order to meet AB 32 requirements, this estimate has since been revised. Based on current conditions, a reduction of 16% below BAU levels would now be required to achieve state's GHG-reduction goals (Ambient 2015a, p. 25).

In addition to the BAU methodology, some air districts have also identified a best-performance standard (BPS) methodology for determination of impact significance. In accordance with this methodology, projects implementing BPS would be considered to have a less than significant individual and cumulative impact for GHG emissions. No BPS have yet been identified by federal, state, or local agencies applicable to the proposed project. However, although no BPS have been identified, in January 2010, the California Attorney General issued a guidance document entitled *Addressing Climate Change at the Project Level*. This guidance is intended for use by local agencies in carrying out their duties under CEQA as related to global warming and climate change. Included were various GHG-reduction measures that were recommended for individual development projects, including measures to achieve reductions related to motor vehicle use, energy consumption, water use, and waste generation.

Because estimated GHG-reductions necessary to achieve the state's goals can fluctuate on a year-to-year basis, a project impact would be considered significant if, in comparison to BAU conditions, the project would not achieve the more conservative GHG-reduction target of 29%, as noted in ARB's 2008 Scoping

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Plan; or, if the project does not implement BPS applicable to the proposed project. As noted above, BAU conditions are based on emissions occurring in 2020 if the average baseline emissions during the 2002-2004 period grew to 2020 levels, without control. This scenario excludes implementation of GHG-reduction measures. Therefore, 2002-2004 emissions factors, on a unit of activity basis, multiplied by the project's operational activities expected to occur in 2020, would be considered an appropriate representation of 2020 BAU. However, because the CalEEMod computer program does not quantify emissions for year 2002-2004, and to ensure a conservative analysis, BAU modeling was conducted for year 2005 conditions, which are anticipated to be slightly lower than 2002-2004 emissions estimates (Ambient 2015a, p. 27).

a,b) Potentially Significant Unless Mitigation Incorporated.

Short-term Construction. Estimated construction-generated emissions are summarized in **Table 5**. As shown in the table, construction of the proposed Project would generate maximum annual emissions of approximately 700.7 metric tons of carbon dioxide equivalent (MTCO_{2e}) per year. In total, Project construction would generate approximately 1,759.9 MTCO_{2e}. When amortized over the approximate 30-year Project life, amortized annual emissions would be approximately 58.7 MTCO_{2e} (Ambient 2015a, p. 26).

**TABLE 5
SHORT-TERM CONSTRUCTION-GENERATED GHG EMISSIONS**

Project Phase	Emissions (MT CO _{2e}) ⁽¹⁾
Phase IA	682.4
Phase IB	246.8
Phase II	130.0
Phase III	700.7
Total at Project Buildout:	1,759.9
Amortized:	58.7

Source: Ambient 2015a, p. 26.

1. Emissions were quantified using CalEEMod, version 2013.2.2. Refer to Appendix A of the Air Quality & GHG Impact Analysis (Appendix A of this document) for modeling results and assumptions. Totals may not sum due to rounding.
2. Amortized emissions were quantified based on an approximate 30-year project life.

Long-term Operation. Long-term operation of the proposed Project would result in emissions predominantly associated with vehicle trips. To a lesser extent, emissions would also be generated in association with electricity consumption, water use, and solid waste generation. Estimated operational emissions are summarized in **Table 6**.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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**TABLE 6
LONG-TERM OPERATIONAL GHG EMISSIONS**

Project Phase	Annual Emissions (MT CO ₂ e) ⁽¹⁾	
	Unmitigated ⁽²⁾	Mitigated
Phase IA & IB	570.0	570.0
Phase II	87.9	83.5
Phase III	1,898.1	1,800.5
Total at Project Buildout:	2,556.0	2454.0
Amortized Construction Emissions:	58.8	
Total with Amortized Construction Emissions ⁽³⁾ :	2,614.8	2512.7
BAU Conditions ⁽⁴⁾ :	3,677.2	
GHG Reduction Compared to BAU ⁽⁵⁾ :	28.8%	31.7%

Source: Ambient 2015a, p. 27.

1. Emissions were quantified using CalEEMod, version 2013.2.2. Totals may not sum due to rounding.
2. Assumes compliance with current building standards and regulatory requirements. Does not include additional GHG-reduction measures.
3. Construction-generated emissions were amortized assuming a 30-year project life.
4. BAU is referenced in ARB's 2008 Scoping Plan as emissions occurring in 2020 if the average baseline emissions during the 2002-2004 period grew to 2020 levels, without control. Therefore, 2002-2004 emissions factors, on a unit of activity basis, multiplied by the activity expected to occur in 2020, is considered to be an appropriate representation of 2020 BAU. Because the CalEEMod computer program does not quantify emissions for year 2002-2004, and to ensure a conservative analysis, BAU modeling was conducted for year 2005 conditions, which are anticipated to be slightly lower than 2002-2004 emissions estimates.
5. Percent reductions are in comparison to BAU conditions. Unmitigated reductions assumes compliance with current building standards and regulatory requirements. Mitigated emissions include additional reductions with implementation of the proposed mitigation measures.

As indicated in **Table 6**, annual operational GHG emissions generated by the proposed Project would total approximately 2,556 MTCO₂e/year. With the inclusion of amortized construction emissions, GHG emissions would total approximately 2,614.7 MTCO₂e. With implementation of current building practices and compliance with applicable GHG-reduction regulatory requirements, the Project would achieve an approximate 28.8% reduction in GHG emissions, in comparison to BAU conditions. Additional GHG-reductions would be required to achieve the more conservative reduction of 29%, as initially identified in the ARB's Scoping Plan. As a result, increased GHG emissions attributable to the proposed Project could hinder implementation of AB32. In addition, the proposed Project does not include GHG-reduction measures, including those identified by the California Attorney General as identified in *Addressing Climate Change at the Project Level* (2010). Therefore, increases in GHG emissions would be considered to have a potentially significant impact unless mitigation is incorporated.

With implementation of mitigation measure GHG-1, the Project would achieve an approximate 31.7% reduction in GHG emissions, in comparison to BAU conditions (Ambient 2015a, p. 28). Mitigation Measure GHG-1 includes measures to reduce GHG emissions based on the Attorney General's 2010 guidance document, *Addressing Climate Change at the Project Level*. These measures are aimed at reducing vehicle use, energy consumption, water use, and waste generation. With mitigation, the project would be substantially consistent with recommended measures identified by the California Attorney General's guidance document. With mitigation, this impact would be considered less than significant.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Mitigation Measures

GHG-1 The following measures shall be implemented:

- a. Energy-efficient lighting (e.g., light emitting diodes (LEDs), metal halide, high-pressure sodium cutoff) shall be installed in exterior areas.
- b. Water-reducing features shall be incorporated into building and landscape design. Such measures shall include, at a minimum, the following:
 - Installation of drought-tolerant and water-efficient landscaping, where practical.
 - Installation of water-efficient irrigation systems and building fixtures.
- c. To the extent available and where possible, GHG-reducing building practices and site design elements shall be incorporated. Examples of such practices and elements include, but are not limited to, the following:
 - Design buildings to take advantage of sunlight. Use passive solar design (e.g., orient buildings and incorporate landscaping to maximize passive solar heating during cool seasons, minimize solar heat gain during hot seasons, and enhance natural ventilation).
 - Light colored “cool” roofs and cool pavements.
 - Design buildings to accommodate solar, wind, and/or geothermal power systems, where feasible.
 - Provide on-site connections to adjacent existing and/or planned off-site transit, bicycle, and pedestrian facilities.

Timing/Implementation: Prior to approval of final building design.

Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Level After Mitigation: Less than Significant.

VI. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

- | | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <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 reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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"/> |

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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 or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Hazards and Hazardous Materials Discussion:

Hazardous materials are defined as a substance or combination of substances which cause, or significantly contribute to, an increase in mortality or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported or disposed of or otherwise managed.

This Project will involve park areas, tournament-level sports fields, an equestrian facility, stables, an RV park, open space, commercial uses, and an olive mill. Construction and operation of the proposed Project will involve the transport, use, and disposal of limited quantities of hazardous materials.

The Project site is currently in agricultural use and has been farmed for approximately 50 years. Based on the current and historical use, the potential exists for residual pesticides, fertilizers and agricultural chemicals to be found in on-site soils. The Project site is also bordered by the concrete-lined IID Newside Canal on the west and the Dahlia Canal on the east side of LaBrucherie Road.

The Imperial County Airport is a county-owned public use airport. According to the Federal Aviation Administration Passenger Boarding (Enplanement) and All-Cargo Data for U.S. Airports, the Imperial County Airport is recovering from a decrease in airplane travel between 2008 and 2011, which was reflective of recent economic trends within the market. No expansion of the airport is planned (City of Imperial 2014d, p. 3). The Project site, at its southern border, is approximately 1.75 north of the Imperial County Airport. The site is located completely outside of any of the compatibility zones associated with the Imperial County Airport (Imperial County 1996. p. 3-12).

- a) **Less than Significant Impact.** The operation of City of Imperial Regional Park will involve the transport, use and storage of a limited amount of hazardous materials both during construction and

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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operation. Materials used during construction would include gasoline and diesel fuel, oil and solvents. Once operational, these same materials may be used in association with fueling portable equipment used in maintenance and up-keep of the facilities, including portable generators. In addition, pesticides, fertilizers and herbicides would be needed to maintain the sports fields as well as the olive trees. The transport and use of these materials would occur in limited quantities and would be used in an appropriate manner in accordance with application instructions. Further, transport and storage of any hazardous materials would occur in accordance with federal and state laws as applicable based on the amount of the material. In addition, the Project will be required to comply with State laws and County Ordinance restrictions which regulate and control the application of hazardous materials on-site. Any hazardous wastes that may be transported off-site for disposal would be done according to applicable State and County restrictions and laws governing the disposal of hazardous waste during construction and operation of the Project. Therefore, impacts associated with routine transport, use, or disposal of hazardous materials are considered less than significant.

- b) **Less than Significant Impact.** Based on the nature of the facility as a regional park and equestrian center, the Project is not anticipated to create a significant hazard to the public or the environment through an accidental release. The proposed uses (tournament-level sports fields, an equestrian facility, stables, an RV park, open space, commercial uses and an olive mill) are not considered hazardous nor would any of these uses require or generate substantial quantities of hazardous materials that have the potential to become a significant hazard to the public. Therefore, impacts associated with the creation of a significant hazard to the public or the environment through an accidental release are considered less than significant.
- c) **No Impact.** The Project site is currently surrounded by agricultural land with no existing emissions sources. In addition, the Project does not include uses that would emit hazardous emissions or handle hazardous materials. The closest school to the Project site is Frank Wright Middle School which is approximately one mile to the southeast. A future school is proposed in the northeast corner of the Morningstar Subdivision and would be less than one-half mile east of the Project site. Because no emissions would be emitted in association with the Project, and no schools exist or are proposed within one-quarter mile of the site, no impact would occur.
- d) **No Impact.** The Project site is not located on a site identified on a list of hazardous materials sites as defined in Government Code Section 65962.5 (DTSC, 2015). No impact would occur with regard to creating a significant hazard to the public or the environment from use of a site with documented hazardous waste contamination.
- e) **Less than Significant Impact.** The Project site is within two miles of the Imperial County Airport. However, this airport is not within any of the airport compatibility zones as identified in the Imperial County Airport Land Use Compatibility Plan (Imperial County, p. 3-12) (Figure 16). The City's Land Use Plan takes into consideration the airport approach zones, high noise zones, and runway protection zones to ensure adequate protection of the public health and safety, by minimizing the public's exposure to high noise levels and high risk aircraft crash areas (City of Imperial 2014d, p. 5). Therefore, the Project would result in a less than significant safety hazard for people at the Project site.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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- f) **Less than Significant Impact.** The Project site is over six miles south of the O’Connell Brothers Airport, a private airstrip. The highest structure on the Project site is anticipated to be the covered equestrian arena that would reach a height of approximately 30 feet. Based on the height of the proposed structures as well as the distance of the O’Connell Brothers Airport from the Project site, the Project is anticipated to result in a less than significant safety hazard for people at the project site.
- g) **Less than Significant Impact.** The City of Imperial does not have an emergency response plan or emergency evacuation plan. Instead, the City is covered in the Imperial County Emergency Plan (EOP 2007). As identified in the Seismic and Public Safety Element of the County of Imperial General Plan (Imperial County 1993), the "Imperial County Emergency Plan" addressed Imperial County's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and nuclear defense operations. As a part of the approval process, the Project will be required to provide a circulation plan and emergency access points for safe vehicular travel. In addition, federal, state and local building and safety codes would be followed to minimize flood, seismic, and fire hazard. Thus, because the City would comply with the County’s Emergency Plan, impacts with regard to impairing implementation of or physically interfering with an emergency response plan or emergency evacuation plan are considered less than significant.
- h) **No Impact.** The wildland interface is defined as the line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels (EOP 2007, p. 91). The proposed Project site is not characterized as being in an area of urban/wildland interface. According to the Fire Hazard Severity Zones in State Responsibility Area (SRA) adopted by the California Department of Forestry and Fire Protection (DOF 2007), the Project site is not within a fire hazard severity zone. Thus, the Project site would not expose people or structures to significant risk of loss injury or death involving wildland fire. No impact is identified with regard to wildland fire.

Potentially Significant Impact (PSI)

Potentially Significant Unless Mitigation Incorporated (PSUMI)

Less Than Significant Impact (LTSI)

No Impact (NI)

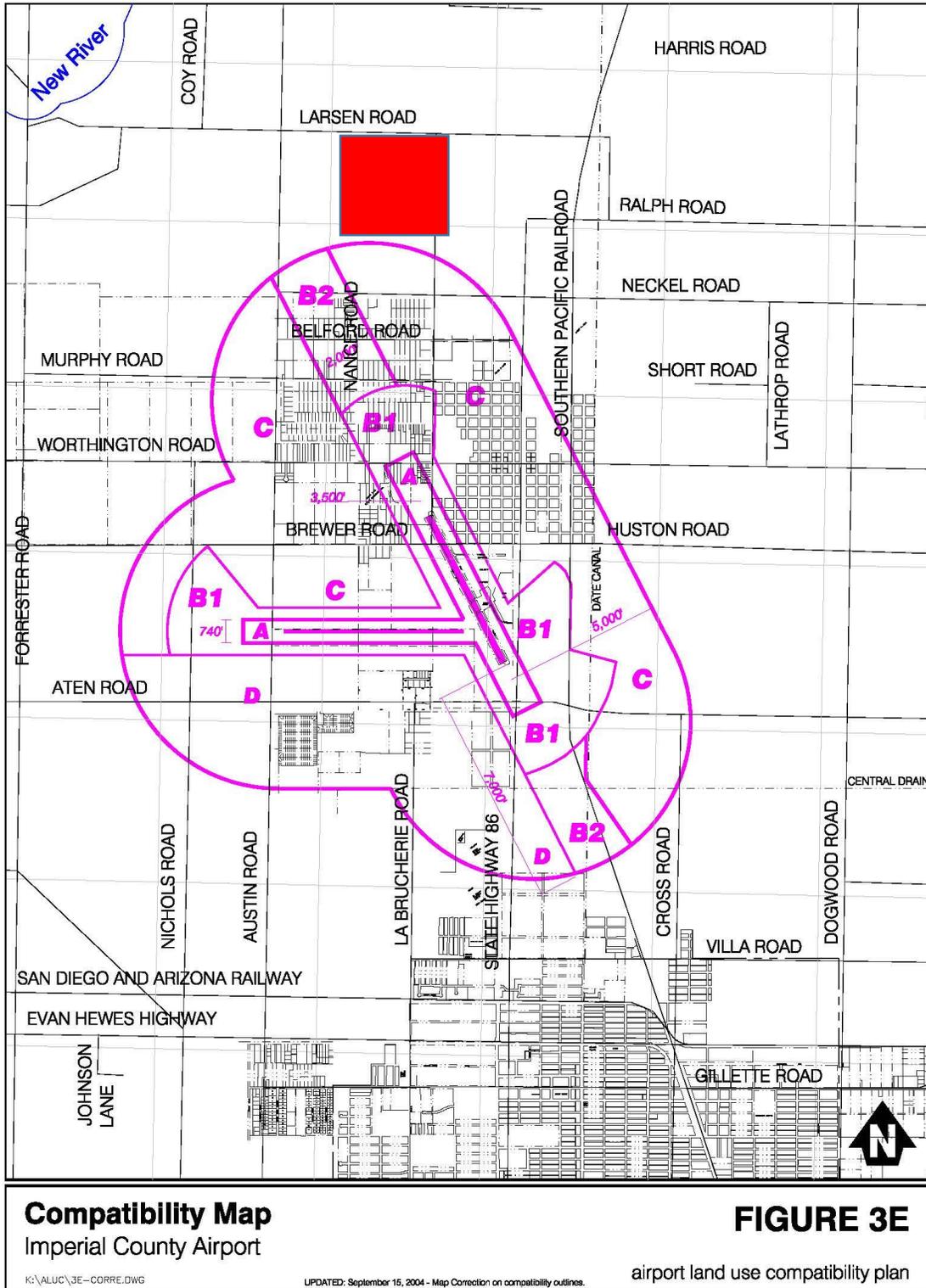


FIGURE 16
IMPERIAL COUNTY AIRPORT COMPATIBILITY PLAN

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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VIII. HYDROLOGY AND WATER QUALITY

Would the project:

a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" 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 patterns 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 which 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 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 which would impede or redirect the 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 the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunamis, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Hydrology and Water Quality Discussion:

The City of Imperial is located within the Imperial Valley Planning Area of the West Colorado River Basin, one of 16 hydrographic planning units established by the State Department of Water Resources and

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Regional Water Quality Control Boards. Most of the basin's interior drainage flows into the Salton Sea, a large artificial saline lake formed as a result of agricultural irrigation diversion from the Colorado River. The Salton Sea watershed includes all of the Imperial Valley, where natural drainage is confined largely to the New and Alamo Rivers. These streams carry storm runoff and irrigation drainage from the Imperial Valley and northern Mexico, with the New River draining the western portion of this area and the Alamo River draining the eastern Imperial Valley. During the process of irrigation, runoff water accumulates additional salts, nutrients, etc., associated with agricultural processes (e.g., the application of fertilizers and pesticides). The result is a reduction in water quality for agricultural runoff. The New and Alamo Rivers flow northward in the central portion of the Imperial Valley and eventually empty into the Salton Sea (City of Imperial 1992a, p. 31).

Surface waters in the vicinity of the City also include intermittent storm runoff. This type of flow normally occurs at relatively high velocities resulting in high total dissolved solid (TDS) levels and poor water quality. Storm runoff within the project area is generally infrequent and of relatively limited volume. When such runoff does occur, it is assimilated into irrigation waters moving through the IID system of drainage canals (City of Imperial 1992a, p. 32).

Water quality for all surface water and groundwater for the entire Imperial Valley is regulated under the jurisdiction of the Colorado River Basin Regional Water Quality Control Board Region 7. The source of all surface waters in Imperial County is the Colorado River. Water is diverted from the Colorado River at the Imperial Dam by the Imperial Irrigation District (IID). The City obtains raw water from the IID, which holds rights and entitlements to Colorado River water that it manages for the benefit of water users in its service area (City of Imperial 2014a, p. 4).

The *Drainage Report for Imperial Equestrian and Events Center Project* was prepared by Alfred Civil Engineering (Alfred 2015) and summarizes the hydrological analysis for the proposed. Hydrological and drainage information presented in this section is based on the Drainage Report. The drainage report in its entirety is included as Appendix D of this document.

Under existing conditions, rainfall is detained on the Project site by the berms and roadways along the perimeter prevent runoff except through two small PVC pipes discharging to Newside Drain. Similarly, because of the perimeter barriers, there are no direct offsite flows to the site. Existing condition hydrologic modeling was prepared to reflect the existing land use within the Project site (i.e. farmland). The site was assumed to be completely pervious and function as a detention basin with two pipes as outlet structures discharging into Newside Drain (Alfred 2015, p. 7).

Under existing conditions, there is no outlet for the Newside Drain adjacent to the project site between Ralph Road and Larsen Road. The drain therefore functions as a retention basin. The segment of Newside Drain adjacent to the project site is approximately 2,500 feet long, 50-foot average top width, 20-foot average bottom width and approximately 10 feet deep. The storage volume is approximately 20 acre-feet (Alfred 2015, p. 3).

- a) **Potentially Significant Impact Unless Mitigation Incorporated.** The grading and construction phases of the Project would require temporary disturbance of surface soils and removal of vegetative cover which could potentially result in erosion and sedimentation on the Project site. The total disturbed area associated with Project construction totals approximately 143 acres. Because the proposed Project disturbs greater than 1 acre of soil, it is subject to the requirements of the State Water resources Control Board's (SWRCB) National Pollution Discharge Elimination System (NPDES)

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ, as amended by Order No. 2010-0014-DWQ, NPDES No. CA000002) (Construction General Permit [CGP]). Permittees must verify compliance with permit requirements by monitoring effluent, maintaining records, and filing periodic reports. An NPDES permit would generally specify an acceptable level of a pollutant or pollutant parameter in a discharge (for example, a certain level of bacteria). Compliance with the NPDES permit requirement is specified in Mitigation Measure GEO-3. Short-term potentially significant stormwater pollutant discharges from the Project site would be mitigated through compliance with the applicable NPDES permitting process, resulting in a less than significant impact.

Under the CGP, the Project would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) and implement construction Best Management Practices (BMPs) detailed in the SWPPP during construction activities. A SWPPP is a written document that describes the construction operator's activities to comply with the requirements in the NPDES permit. The SWPPP is intended to facilitate a process whereby the operator evaluates potential pollutant sources at the site and selects and implements BMPs designed to prevent or control the discharge of pollutants in stormwater runoff.

Construction and operational BMPs would include, but not be limited to, Erosion Control and Sedimentation Control BMPs designed to minimize erosion and retain sediment on site (e.g., the use of gravel bags, silt fences, hay bales, check dams, hydroseed, and soil binders), and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

During operation, anticipated pollutants associated with recreational and commercial uses include suspended solids/sediments, nutrients, pathogens (bacteria/viruses), pesticides, oil and grease, and trash and debris.

During construction and operational activities, the proposed Project has the potential to discharge pollutants from the Project site and result in a potentially significant impact. However, with the incorporation of construction and post-construction BMPs that would target pollutants of concern, as specified in Mitigation Measures GEO-3 (as identified in the analysis of Geology and Soils impacts) and WQ-1 identified below, the proposed Project would not violate any water quality standards or waste discharge requirements and impacts would be less than significant.

Mitigation Measures

GEO-3 Refer to the Geology and Soils Section.

Significance Level After Mitigation: Less than Significant.

WQ-1 During Project operation, the City of Imperial shall verify BMP implementation and maintenance through inspection, self-certification, survey, or other equally effective measure. The City of Imperial shall retain operations, inspections, and maintenance records of the BMPs for at least 5 years after the recorded inspection date for the life of the Project. In addition, the City of Imperial shall ensure that long-term funding for BMP maintenance is available.

Timing/Implementation: During Project construction and operation.

Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Level After Mitigation: Less than Significant.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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b) **No Impact.** The Project does not propose the use of groundwater. Potable water will be provided from the City’s Water Treatment Plant and stored in two 5,000 storage tanks during Phases IA and IB (Figure 9A). At full build-out, the proposed Project would obtain water via a pipeline extending north from Neckel Road and east from La Brucherie Road to the Project site (Figure 9B) (Galvan 2014). Therefore, the proposed Project would not substantially deplete or interfere with groundwater supplies. No impact is identified with regard to depleting groundwater.

c-f) **Less than Significant Impact.** The proposed Project site will develop an agricultural parcel consisting of 100% pervious surfaces to a regional park and equestrian center that proposes to include turf sporting fields, parking areas, an olive orchard, open space, roadways, and buildings (refer to Figure 6).

Hydrologic modeling for the proposed Project calculates that the Event Center Area north of the proposed extension of Ralph Road would generate a 100-year peak flow of approximately 140 cubic feet per second (Alfred 2015, p. 7). The Sportsplex Area would generate a 100-year peak flow of 45 cubic feet per second. The total Project site would generate approximately 40.9 acre-feet. It is anticipated that the Project site would discharge excess runoff up to the storage capacity of Newside Drain (approximately 20 acre-feet) and the rest of the runoff (approximately 20.9 acre-feet) would be stored onsite in a single detention basin. The Basin is proposed on the east side of the Project site and would be approximately 4 feet deep and 2:1 side slopes (Figure 17) (Alfred 2015, p. 8). A concrete spillway and 18-inch low flow pipe would discharge runoff into Newside Drain (Figure 18).

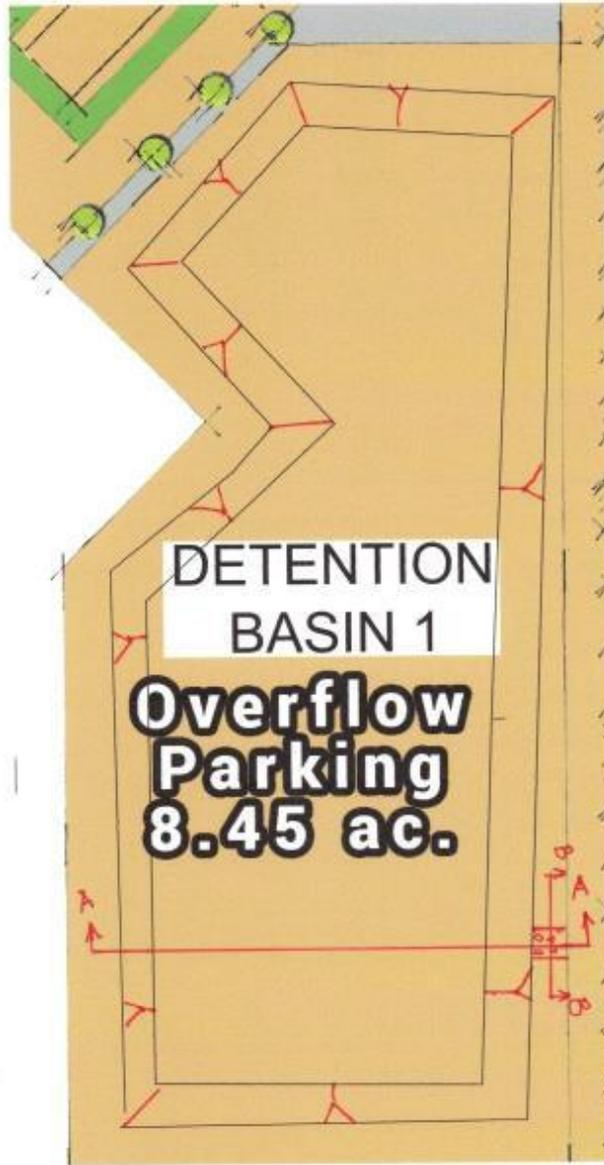
The increase in impervious surfaces would alter existing drainage patterns and runoff volumes from the site as it is currently agricultural land that does not contain any impervious surfaces. Increased amounts of surface runoff including pollutants from parking areas (grease, oil, etc.) and stables could affect receiving waters. In addition, the proposed Project would be required to comply with the requirements of a stormwater permit. However, the proposed Project would detain 100% of the surface runoff onsite through the installation of a detention basin and the use of the self-contained Newside Drain for overflow runoff. With the combination of the detention basin and Newside Drain accommodating Project runoff, impacts such as erosion, siltation, flooding, burdening storm drain capacity, adding additional sources of polluted runoff, or the degradation of water quality are considered less than significant.

g,h) **No Impact.** According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (Panel#: 06025C1725C, September 26, 2008), the entire Project site and surrounding area is located in Zone X, which is an area determined to be outside of the 0.2% annual chance of a flood (Figure 19). The Project does not include construction of any housing nor would it place any of the proposed structures within a 100-year flood hazard area. Thus, no impact is identified with regard to placement of structures in a 100-year flood hazard zone.

i) **No Impact.** No dams or levees are in the vicinity of the City of Imperial Regional Park and Equestrian Center site. However, the Imperial Dam is located approximately 65 miles east of the Project site on the border of California and Mexico. Thus, if it became breached, the Dam is too far from the site and the Imperial Valley to result in flood damage to the Project. No impact is anticipated.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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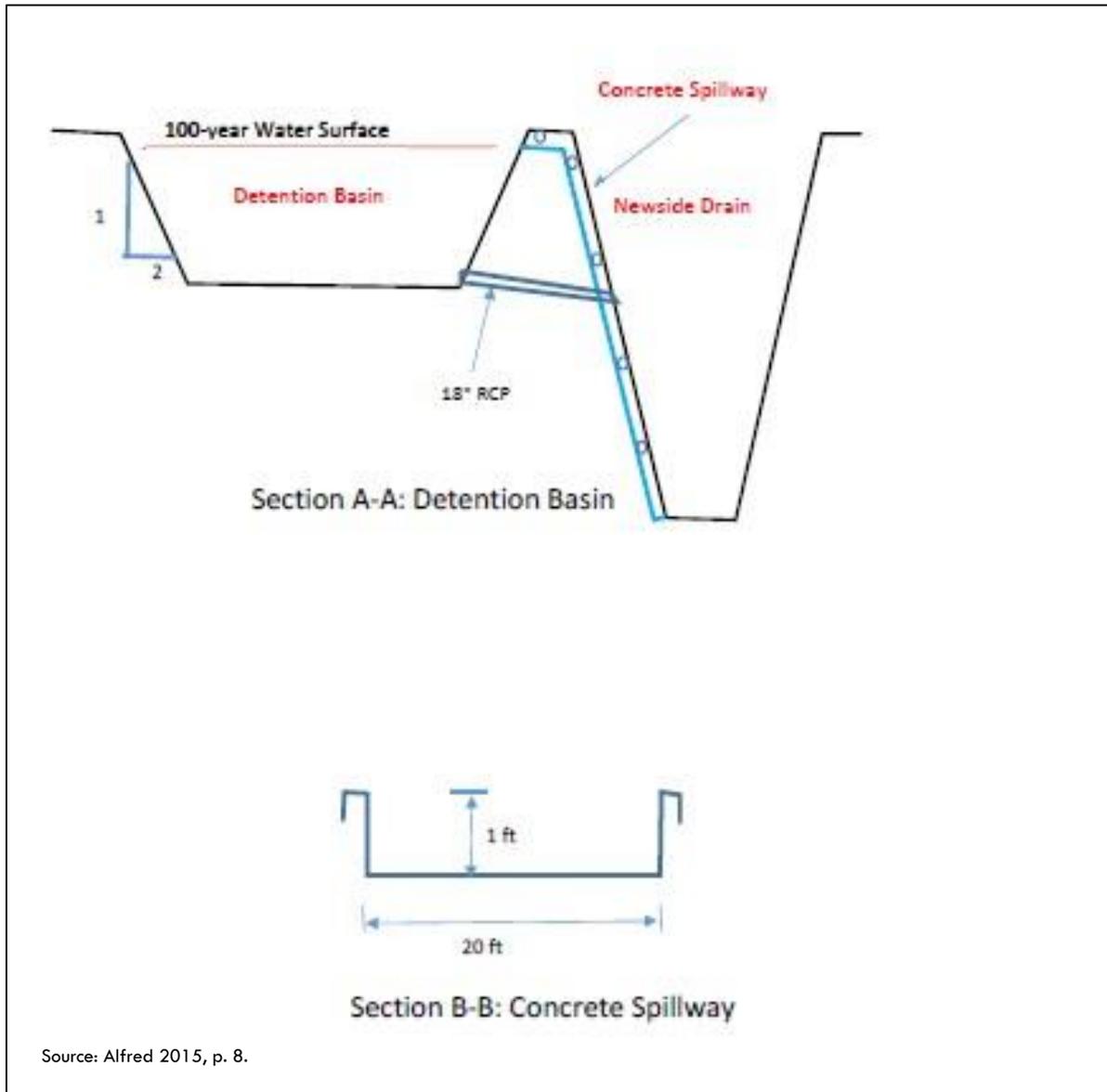
- j) **No Impact.** The Project site is located approximately 100 miles east and inland from the Pacific Ocean. The closest large body of water to the Project site is the Salton Sea. Due to the distance of the site from the ocean and the Salton Sea, there is no threat of tsunami, seiche, or other seismically-induced flooding. Thus, no impact is identified for these issues.



Source: Alfred 2015, p. 8.

FIGURE 17
DETENTION BASIN LAYOUT

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Source: Alfred 2015, p. 8.

FIGURE 18
CROSS SECTION THROUGH BASIN AND SPILLWAY

Potentially Significant Impact (PSI) Potentially Significant Unless Mitigation Incorporated (PSUMI) Less Than Significant Impact (LTSI) No Impact (NI)

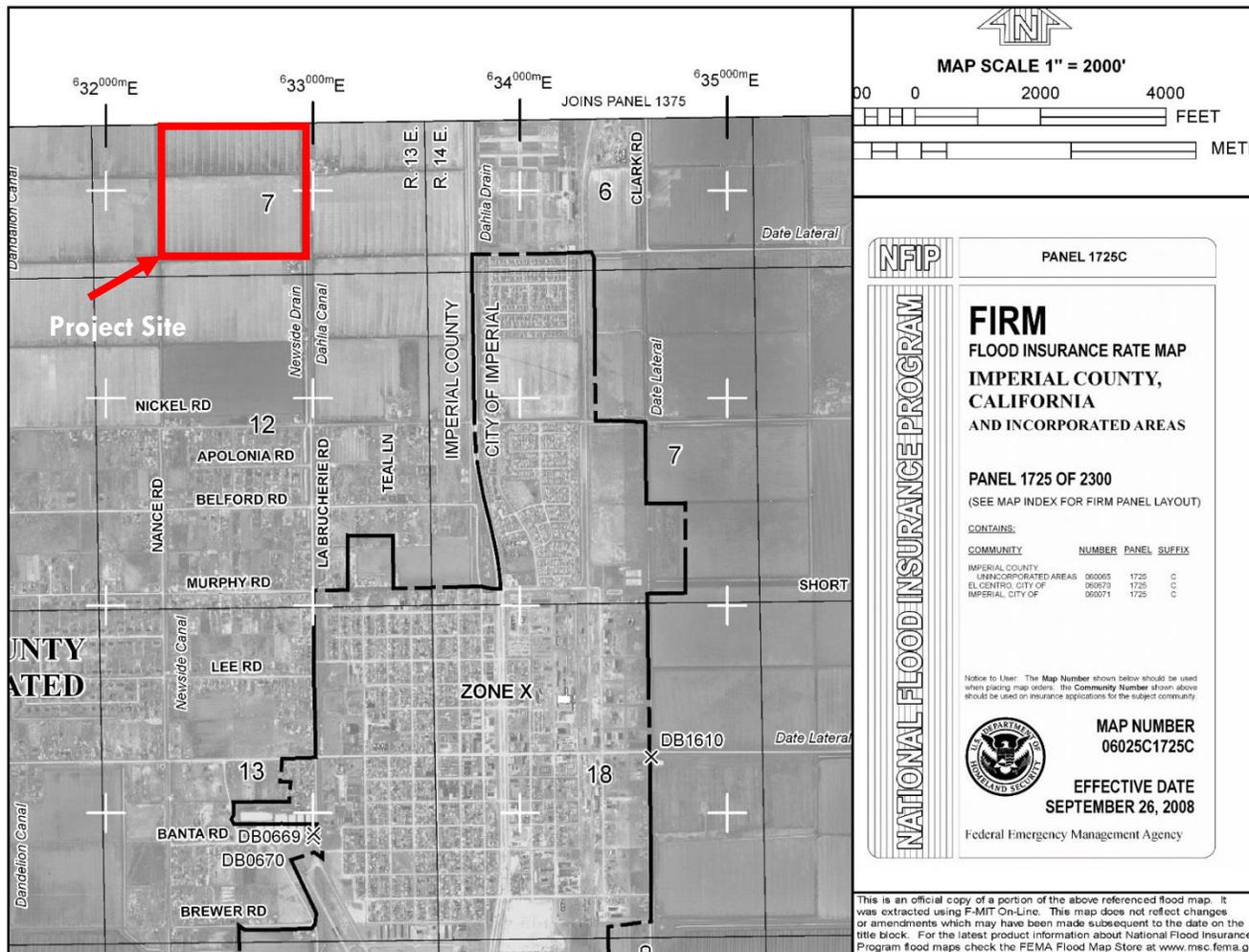


FIGURE 19
FEMA MAP OF PROJECT SITE

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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X. LAND USE AND PLANNING

Would the project:

- | | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Physically divide an established 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 (include, 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"/> |

Land Use and Planning Discussion:

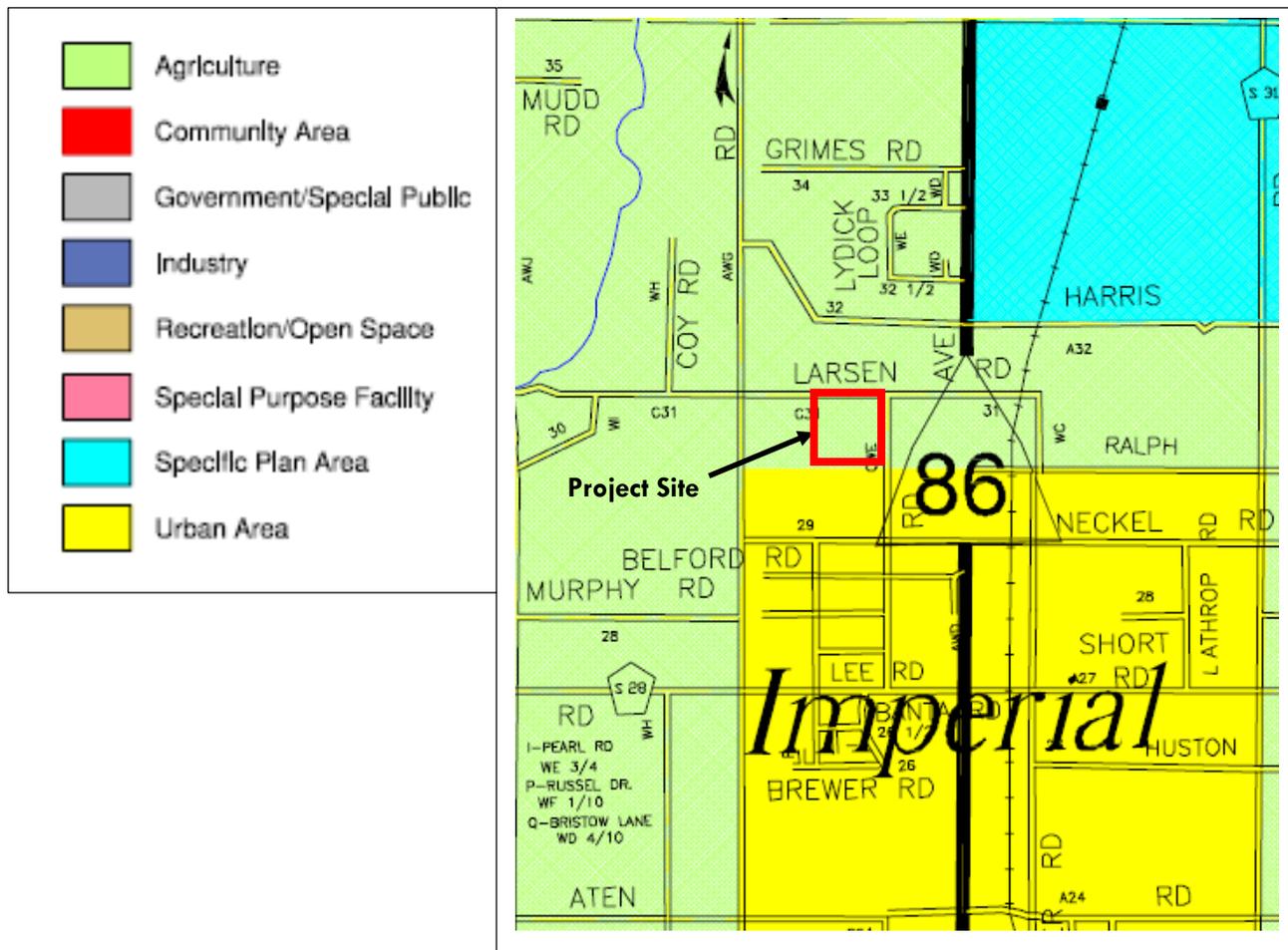
The current Sphere of Influence (SOI) includes County land outside of the City of Imperial’s boundaries that has been identified as having the potential to be annexed in the future. Most of the vacant or agricultural land within the SOI is east of the City. Many Specific Plans have been approved in these areas (City of Imperial 2014d, p. 4) (refer to Figure 5).

Since approximately 2007, the City has annexed large tracts of land with plans to annex additional areas. Specific Plans were adopted for these areas to ensure consistency with the General Plan and to ensure that the mixed-use projects are human-scaled and walkable. Generally, these Specific Plans ensure that open space and park areas are within one-quarter mile of all homes and that small commercial zones provide neighborhood-serving commercial uses (small market, dry cleaners, etc.) to all homes within a one-half mile radius (City of Imperial 2014d, p. 3).

The Project proposes to develop land that is currently designated as Agriculture on the County’s General Plan Land Use Map (Figure 20). Likewise, the Project site is currently in agricultural production and is surrounded by land uses that are mostly agricultural or rural residential and still under the County’s jurisdiction. The Project seeks to annex the 143-acre parcel into the City of Imperial and amend the General Plan to change the land use designation from Agriculture to Public Use (Figure 21) and a pre-zone to change the existing zoning to Open Space (Figure 22) to be consistent with City land use and zoning standards. The Project site is located within the City’s SOI area and, therefore, has been planned for the future growth by the City’s approved General Plan and would not be considered “leap frog” development.

- a) No Impact.** The proposed Project site is located in Imperial County on land designated as Agriculture and zoned A-2-U (General Agriculture, Urban Overlay) (Figure 20). The Project site and surrounding area on the north, south, east and west are currently under agricultural production, but are also identified for future annexation and development as residential subdivisions within the City limit. Thus, the proposed Project would not physically divide an established community. Instead, it would expand the existing City limits contiguous with proposed future development. Thus, no impact is identified with regard to dividing an established community.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Source: City of Imperial 2007.

FIGURE 20
IMPERIAL COUNTY LAND USE PLAN

Potentially Significant Impact (PSI) Potentially Significant Unless Mitigation Incorporated (PSUMI) Less Than Significant Impact (LTSI) No Impact (NI)

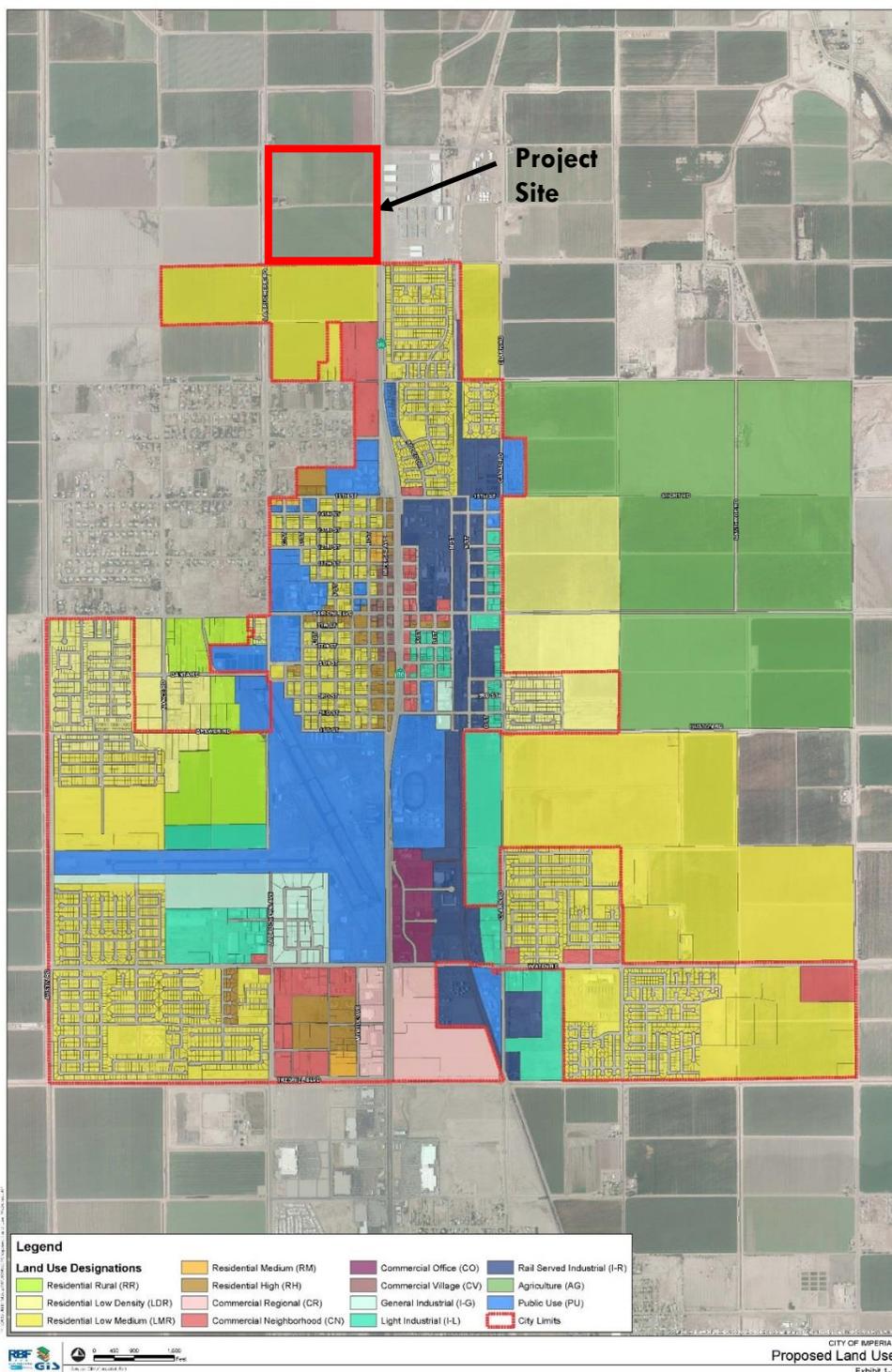
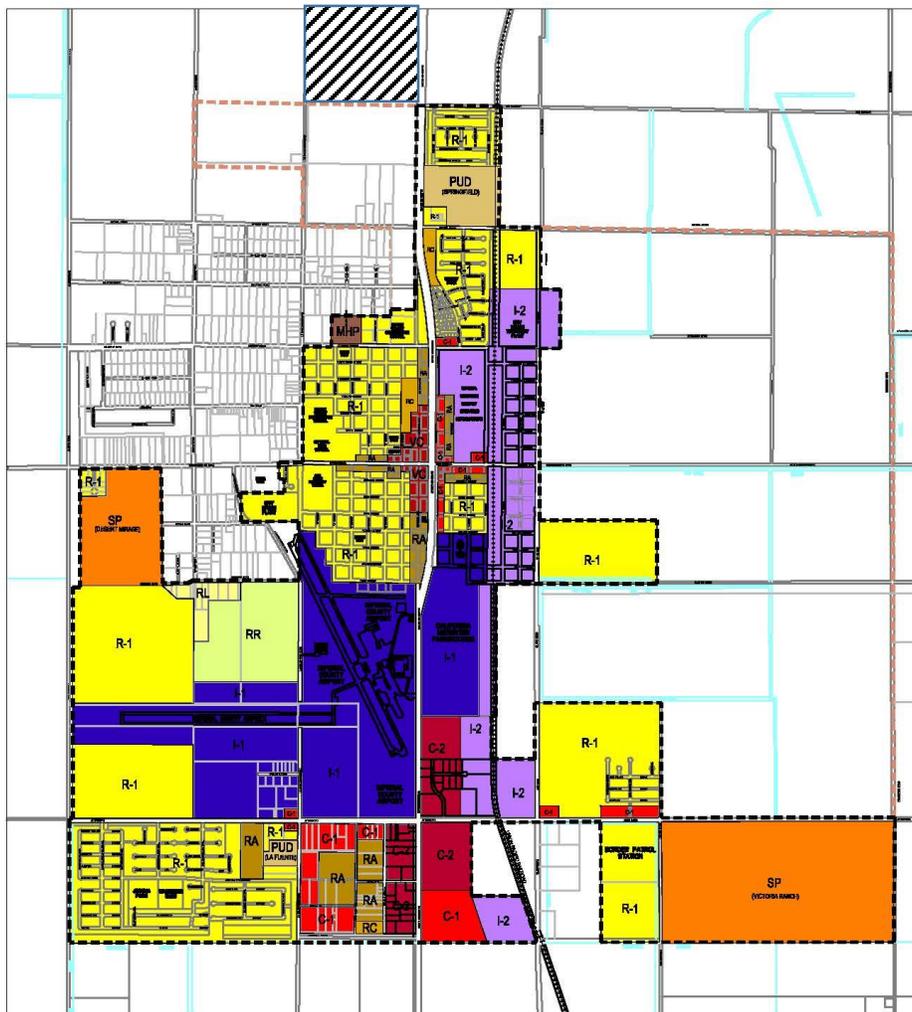


FIGURE 21
CITY OF IMPERIAL GENERAL PLAN LAND USE MAP

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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- | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| RR RESIDENTIAL RURAL | C-1 COMMERCIAL NEIGHBORHOOD |
| RL RESIDENTIAL LOW DENSITY | C-2 COMMERCIAL GENERAL |
| R-1 RESIDENTIAL SINGLE FAMILY | VC COMMERCIAL VILLAGE |
| RC RESIDENTIAL CONDOMINIUM | I-1 GENERAL INDUSTRIAL |
| RA RESIDENTIAL APARTMENT | I-2 RAIL SERVED INDUSTRIAL |
| PUD PLANNED UNIT DEVELOPMENT | SP SPECIFIC PLAN OVERLAY |
| MHP MOBILE HOME PARK | |
| IMPERIAL CITY LIMITS | Project Site |
| SPRINGVILLE INFLUENCE BOUNDARY | |

**CITY OF IMPERIAL
ZONING MAP**



**FIGURE 22
CITY OF IMPERIAL ZONING MAP**

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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- b) **Less than Significant.** The proposed 143-acre regional park and equestrian center consists of a single (APN): 063-010-049 that would be pre-zoned to Open Space to be consistent with the City’s Zoning Ordinance (Figure 22). The proposed Project involves a General Plan Amendment and annexation to allow for the construction and operation of a regional park and equestrian center within the City limits on land designated as Public Use (Figure 21). Approval of the annexation and planning actions would bring the proposed Project into compliance with applicable planning policies and impacts would be less than significant.
- c) **No Impact.** Within Imperial County, the Imperial Irrigation District (IID) initiated the Imperial Valley natural community conservation plan (NCCP)/habitat conservation plan (HCP) Planning Agreement in 2006. This document provides measures to conserve and manage natural biological diversity within the Planning Area. Although the City is located in the NCCP/HCP area, it is not currently a participant in the Plan and therefore not subject to coverage under the Plan. Additionally, none of the Plan’s Covered Activities pertain to the proposed project. Project implementation would not impact any of the Plan’s Covered Species or the implementation of the Plan. In the event that the City becomes a signatory prior to obtaining a grading permit, compliance with the Plan guidelines on avoidance, mitigation, and species-specific coverage would be required. Therefore, no impact to an HCP or NCCP would occur and this issue will not be examined in the EIR.

XI. MINERAL RESOURCES

Would the project:

- a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Mineral Resources Discussion:

The City of Imperial General Plan does not include discussion of mineral resources, nor does it put forward policies or action to protect or extract mineral resources that may be within the City. Therefore, a regional account of the County’s mineral resources can be referenced from the Imperial County General Plan Conservation and Open Space Element. The Conservation and Open Space Element identifies that a wide variety of minerals are found throughout Imperial County. However, mining operations are restricted to the relatively few locations where mineral deposits are suitable for extraction (Imperial County 2008, p. 24). Figure 5 of the Imperial County General Plan Conservation and Open Space Element depicts mining areas within the County (IC GP Conservation element, p. 26). None are located on or in the vicinity of the Project site. Further, there are no known mineral deposits or resource recovery sites within the vicinity of the Project site (the Holt Group 2005).

- a,b) **No Impact.** The proposed Project site is currently in agricultural production. According to the Conservation and Open Space Element of the County of Imperial General Plan, no known or mapped mineral resources occur within the Project site. As such, the proposed Project would not

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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adversely affect the availability of any known mineral resources. Thus, no impact is identified for these issue areas and mineral resources will not be discussed in the EIR.

XII. NOISE

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 applicable standards of other agencies? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <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 expose 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"/> |

Noise Discussion:

Noise is generally defined as sound that is loud, disagreeable, or unexpected. Sound is mechanical energy transmitted in the form of a wave because of a disturbance or vibration. Sound levels are described in terms of both amplitude and frequency. Amplitude is defined as the difference between ambient air pressure and the peak pressure of the sound wave. Amplitude is measured in decibels (dB) on a logarithmic scale. Laboratory measurements correlate a 10 dB increase in amplitude with a perceived doubling of loudness and establish a 3 dB change in amplitude as the minimum audible difference perceptible to the average person.

The frequency of a sound is defined as the number of fluctuations of the pressure wave per second. The unit of frequency is the Hertz (Hz). One Hz equals one cycle per second. The human ear is not equally sensitive to sound of different frequencies. To approximate the sensitivity of the human ear to changes in frequency, environmental sound is usually measured in what is referred to as "A-weighted decibels" (dBA). On this scale, the normal range of human hearing extends from about 10 dBA to about 140 dBA (U.S. EPA 1971).

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No Impact (NI)

The intensity of environmental noise fluctuates over time, and several descriptors of time-averaged noise levels are used. The three most commonly used descriptors are L_{eq} , L_{dn} , and CNEL. The Noise Impact Assessment prepared for the proposed Project (Ambient 2015b) provides full descriptions of all noise related terminology and methodology. Common noise level descriptors are summarized in **Table 7**.

**TABLE 7
COMMON ACOUSTICAL DESCRIPTORS**

Descriptor	Definition
Energy Equivalent Noise Level (L_{eq})	The energy mean (average) noise level. The instantaneous noise levels during a specific period of time in dBA are converted to relative energy values. From the sum of the relative energy values, an average energy value (in dBA) is calculated.
Minimum Noise Level (L_{min})	The minimum instantaneous noise level during a specific period of time.
Maximum Noise Level (L_{max})	The maximum instantaneous noise level during a specific period of time.
Day-Night Average Noise Level (DNL or L_{dn})	The 24-hour L_{eq} with a 10 dBA “penalty” for noise events that occur during the noise-sensitive hours between 10:00 p.m. and 7:00 a.m. In other words, 10 dBA is “added” to noise events that occur in the nighttime hours to account for increases sensitivity to noise during these hours.
Community Noise Equivalent Level (CNEL)	The CNEL is similar to the L_{dn} described above, but with an additional 5 dBA “penalty” added to noise events that occur between the hours of 7:00 p.m. to 10:00 p.m. The calculated CNEL is typically approximately 0.5 dBA higher than the calculated L_{dn} .
Single Event Level (SEL)	The level of sound accumulated over a given time interval or event. Technically, the sound exposure level is the level of the time-integrated mean square A-weighted sound for a stated time interval or event, with a reference time of one second.

Source: Ambient 2015b.

The Noise Impact Assessment was prepared identified potential noise impacts associated with the construction and operation of the proposed Project. The analysis was conducted utilizing the most recent modeling software and compared the results for compliance with all applicable Federal, State, and local agency regulations. A description of all regulations, modeling assumptions, and output files are provided in the report and is used as the basis for the discussion and analysis that follows. Noise terminology, modeling assumptions, and output files are also included in the report. For reference, the methodology utilized to assess potential impacts is described below. The Noise Impact Assessment in its entirety is provided as Appendix E of this document.

Methodology

A combination of existing literature, noise level measurements, and application of accepted noise prediction and sound propagation algorithms were used for the prediction of transportation and non-

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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transportation source noise levels. Traffic noise levels were calculated using the Federal Highway Administration (FHWA) roadway noise prediction model (FHWA-RD-77-108) based on California vehicle reference noise levels and traffic data obtained from the traffic analysis prepared for the proposed Project (LOS 2015). Additional input data included day/night percentages of autos, medium and heavy trucks, vehicle speeds, ground attenuation factors, and roadway widths. Increases in traffic noise levels attributable to the proposed Project were determined based on a comparison of predicted noise levels, with and without Project implementation.

City of Imperial General Plan Noise Element. The City’s General Plan includes policies intended to minimize the public’s exposure to adverse noise levels and to promote the compatibility of proposed land uses with the noise environment. The City of Imperial General Plan noise standards for noise-sensitive land uses are summarized in **Table 8**. In addition, Policy 5 of the City’s Noise Element requires that the City adopt an ordinance to prohibit construction activities between 8:00 p.m. and 7 a.m.

**TABLE 8
CITY OF IMPERIAL NOISE LEVEL STANDARDS**

Land Use Designation	Acceptable Noise Level (dBA CNEL)	
	Outdoor	Indoor
Rural Residential Single-Family Residential	60	45*
Multiple-Family Residential	65	45*
Schools, Libraries, Churches, Hospitals, Nursing Homes, Parks and Recreation	70	40

*This standard applies only if acceptable outdoor levels cannot be attained by noise mitigation measures.
Source: City of Imperial 1992.

The City’s noise standards as specified in **Table 8** were relied upon for determination of impact significance. The *CEQA Guidelines* do not define the levels at which ground-borne vibration levels would be considered excessive. For this reason, Caltrans’ recommended ground-borne vibration thresholds were used for the evaluation of impacts based on increased potential for structural damage and human annoyance. Caltrans considers a threshold of 0.2 in/sec peak particle velocity (ppv) to be the level at which architectural damage (i.e., minor cracking of plaster walls and ceilings) to normally-constructed buildings may occur. This same threshold is typically considered the level at which increased levels of annoyance may begin to occur to occupants in buildings.

For purposes of this analysis, a substantial increase is defined as an increase of 5 dBA in areas where ambient noise levels are less than 60 dBA CNEL/L_{dn}; an increase of 3 dBA where ambient noise levels range from 60 to 65 dBA L_{dn}/CNEL; and an increase of 1.5 dBA where ambient noise levels exceed 65 dBA L_{dn}/CNEL, which according to the Noise Impact Assessment is the level that people typically become increasingly annoyed and are the criteria typically used for the analysis of increases in ambient noise levels.

Noise-sensitive Land Uses. Noise-sensitive land uses generally include those uses where exposure to noise would result in adverse effects as well as uses where quiet is an essential element of the uses’ intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Other noise-sensitive land uses

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include hospitals, convalescent facilities, parks, hotels, churches, libraries, and other uses where low interior noise levels are essential. Noise-sensitive land uses located near the Project site consist primarily of rural residential dwellings which are located at varying distances from the boundaries of the Project site. The nearest residential land uses are located adjacent to Larsen Road and La Brucherie Road, near the Project site's northern and eastern boundaries.

Ambient Noise Levels. Ambient noise levels in the Project area are predominantly influenced by vehicle traffic on area roadways. Existing traffic noise levels along roadway segment primarily affected by the proposed Project as well as, distances to projected traffic noise contours, are summarized in **Table 9**. As shown, traffic noise levels at approximately 75 feet from the centerline of the near-travel lanes of area roadways generally range from a low of approximately 48 dBA CNEL along Larsen Road (between Forrester Road and Austin Road) to a high of approximately 69 dBA CNEL along State Route 86 (SR-86) (between Neckel Road and Worthington Road). Traffic noise levels along the adjacent segments of Larsen Road and La Brucherie Road range from approximately 52 to 51 dBA CNEL at 50 feet from the near-travel lane, respectively (Ambient 2015b, p. 6).

**TABLE 9
EXISTING TRAFFIC NOISE LEVELS**

Roadway	Predicted Noise Level at 75 feet from Near-Travel-Lane Centerline (dBA CNEL/L _{dn})	Distance to CNEL Contours		
		70	65	60
Forester Rd., Larsen Rd. to Ralph Rd.	64.3	WR	71	153
La Brucherie Rd./B St., Larsen Rd. to Ralph Rd.	51.3	WR	WR	WR
La Brucherie Rd./B St., Ralph Rd. to Neckel Rd.	53.7	WR	WR	WR
Larsen Rd., Forrester Rd. to Austin Rd.	48.4	WR	WR	WR
Larsen Rd., Austin Rd. to La Brucherie Rd.	52.1	WR	WR	WR
Larsen Rd., La Brucherie Rd. to SR-86	53.4	WR	WR	WR
Neckel Rd., La Brucherie Rd. to SR-86	58.3	WR	WR	61
SR-86, Larsen Rd. to Neckel Rd.	68.1	84	171	362
SR-86, Neckel Rd. to Worthington Rd.	69.4	100	208	444
Worthington Rd., SR-86 to SR-111	64.6	WR	74	159

Ambient 2015b.

WR=Within roadway right-of-way.

- a) Potentially Significant Unless Mitigation Incorporated.** As analyzed in *items c) and d)*, below, long-term operational and short-term construction activities associated with the proposed Project could result in increases in ambient noise levels that have the potential to exceed the City's Noise Ordinance and adversely impact nearby residential land uses. Activities occurring during the more noise-sensitive nighttime hours would be of particular concern given the potential for increased levels of sleep disruption to occupants of nearby residential dwellings. As a result, this impact would be considered potentially significant unless mitigation is incorporated. Implementation of Mitigation Measures NOI-1 and NOS-2 would reduce this impact to a less-than-significant level.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Mitigation Measures

NOI-1 During operation, the Project’s use of off-road equipment associated with the routine maintenance and operation of onsite land uses shall be limited to between the hours of 7:00 a.m. and 10:00 p.m.

Timing/Implementation: During Project operation.

Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Level After Mitigation: Less than Significant.

NOI-2 During operation, onsite recreational and equestrian events shall be limited to between the hours of 7:00 a.m. and 10:00 p.m.

Timing/Implementation: During Project operation.

Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Level After Mitigation: Less than Significant.

b) Less than Significant Impact. Increases in groundborne vibration levels attributable to the proposed Project would primarily be associated with short-term construction-related activities. Construction activities would likely require the use of various off-road equipment such as tractors, bull dozers, jackhammers, and haul trucks. The use of major groundborne vibration-generating construction equipment, such as pile drivers, are not anticipated to be required for this Project.

Groundborne vibration levels associated with representative construction equipment are summarized in **Table 10**. Based on the vibration levels analyzed in the Noise Impact Assessment, ground vibration generated by construction equipment would be approximately 0.09 in/sec ppv, or less, at 25 feet. Predicted vibration levels at the nearest onsite and offsite structures would not exceed the minimum recommended criteria for structural damage and human annoyance (0.2 in/sec ppv) at the nearest existing structures. As a result, this impact would be considered less than significant (Ambient 2015b, p. 8).

**TABLE 10
REPRESENTATIVE VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT**

Equipment	Peak Particle Velocity at 25 Feet (In/Sec)
Large Bulldozers	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozers and Tractors	0.003

Source: FTA 2006, Caltrans 2004 in Ambient 2015b, p. 8.

c) Potentially Significant Unless Mitigation Incorporated. Implementation of the proposed Project would result in increased noise levels from both non-transportation and transportation noise sources.

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Non-Transportation Noise Sources

Non-transportation sources of noise associated with the proposed Project would be predominantly associated with events held at the equestrian and event center, on-site recreational uses, vehicle parking areas, the operation of mechanical building equipment, and off-road equipment use associated with maintenance and material loading/unloading activities. Refer to Figure 10 for a depiction of areas that generate operational noise.

Onsite Equestrian & Event Center. Although the specific hours of operation for proposed equestrian and event center have not yet been identified, it is anticipated that the event center would be used primarily during the daytime hours, though some event activities could extend into the evening hours. Events would include horse shows held within the covered and uncovered arenas, which may include the use of public address (PA) systems. However, to minimize disturbance of the horses, PA systems used for equestrian events are typically set at low levels.

Noise levels produced by amplified sound systems are typically intermittent and can vary depending on numerous factors, including voice level, volume setting, amplifier power, and the directional aspects of the speaker. Based on measurements conducted at similar facilities, amplified sound systems typically generate noise levels ranging from approximately 65 to 75 dBA L_{eq} at 50 feet (Ambient 2015b, p. 9).

The nearest noise-sensitive land use is a rural residential dwelling located at the northeast corner of La Brucherie Road and Larsen Road, approximately 475 feet from the proposed arena. Based on the noise levels discussed above, predicted exterior noise levels at the nearest residence would be approximately 47 to 57 dBA L_{eq} (Ambient 2015b, p. 9). Using a conservative approach that assumed the use of a PA system continuously during the daytime hours, the predicted exterior average-daily noise levels at this nearest residence would be approximately 55 dBA CNEL. Therefore, as indicated in the Noise Impact Assessment, operational noise levels would not exceed the City's noise standard of 60 dBA CNEL and would be largely masked by traffic noise levels on adjacent roadways. However, instantaneous noise events from on-site PA systems may be detectable for brief periods of time, particularly during the quieter nighttime hours. Sources of instantaneous noise events occurring during the more noise-sensitive nighttime hours may result in increased levels of annoyance and potential sleep disruption for occupants of nearby residential dwellings. As a result, nighttime operations of onsite PA systems would be considered to have a potentially significant impact unless mitigation is incorporated.

Onsite Recreational Uses. The proposed Project includes the construction of a sportsplex, which is generally located within the southwestern portion of the Project site. Noise sources typically associated with the sportsplex would include play areas, hard courts, and ball fields. Noise levels generated by these uses would vary depending on various factors, including the type and number of outdoor events being conducted, whether a public address system is used, and the number of spectators in attendance. In general, noise from PA systems at recreational events tends to dominate the noise environment and occurs on a more frequent basis than noise generated by spectators. Noise associated with smaller recreational events that do not involve spectator crowds, such as the use of hard courts, disc golf, and children's play areas, typically generate noise levels of less than 55 dBA L_{eq} at 50 feet. Noise levels at ball fields that involve spectator crowds

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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(without the use of PA systems), such as competitive baseball, softball, and soccer events, generally range from approximately 60 to 65 dBA Leq at 50 feet from the spectator area. Events involving the use of a PA system, such as baseball and softball games, generate higher noise levels. Noise levels associated with spectator crowds and PA systems are highly directional and can reach levels of approximately 75 dBA Leq at 50 feet from the spectator stands (Ambient 2015b, p. 10).

The nearest offsite noise-sensitive receptors in relation to the proposed sportsplex is a rural residential dwelling located at the southwest corner of La Brucherie Road and Ralph Road (refer to Figure 23). According to the Noise Impact Assessment, the predicted noise levels at the nearest residence would range from approximately 28 to 38 dBA Leq, for events that do not involve the use of PA systems. Assuming large competitive events would be held at the Sportsplex area and would involve the use of PA systems, predicted operational noise levels at this nearest residence would be approximately 48 dBA Leq. With the conservative assumption that major events would occur continuously throughout the daytime hours, the highest average-daily noise levels at this nearest residence would be approximately 46 dBA CNEL. For most events, noise generated by the sportsplex, as perceived at the nearest residence, would be largely masked by vehicle traffic on area roadways. However, events occurring during the more noise-sensitive nighttime hours, particularly those involving the use of PA systems, may result in increased levels of annoyance and potential sleep disruption for occupants of nearby residential dwellings. As a result, activities occurring during the more noise-sensitive nighttime hours would be considered to have a potentially significant impact unless mitigation is incorporated.

Vehicle Parking Areas. Parking lots would be generally located along the eastern and western portions of the project site. Overflow parking, as well as, parking for recreational vehicles and trailers, would be provided along the southern boundary of the site. Parking-related noise associated with vehicle parking areas typically includes vehicle exhaust, brake and tire squeal, the opening and closing of doors and trunks, and occasional car alarms. Vehicle parking areas typically generate maximum single-event noise levels of approximately 92 dBA at 50 feet. Average noise levels are dependent on the number of vehicle accessing the parking lot over a given time period.

Based on the Traffic Impact Analysis (TIA) prepared for the proposed Project, traffic demand projections could generate maximum combined in-bound and out-bound vehicle trips of approximately 32 vehicles/hour for Phase IA and IB conditions, and approximately 175 vehicles/hour at buildout. Assuming that all vehicle were to access the main event parking lot and a maximum of 175 vehicles/hour, predicted parking lot noise levels at the nearest residential land uses would be approximately 44 dBA Leq at 100 feet. With a conservative assumption that the maximum daily operational traffic trips would be 1,795, the Noise Impact Assessment predicted average-daily noise levels at the nearest residential land uses would be approximately 52 dBA CNEL. Therefore, predicted noise levels would not exceed the City's exterior noise standard of 60 dBA CNEL and would be largely masked by traffic noise levels on adjacent roadways. As a result, the contribution of parking lot noise to project-generated increases in ambient noise levels at off-site locations would be considered less than significant.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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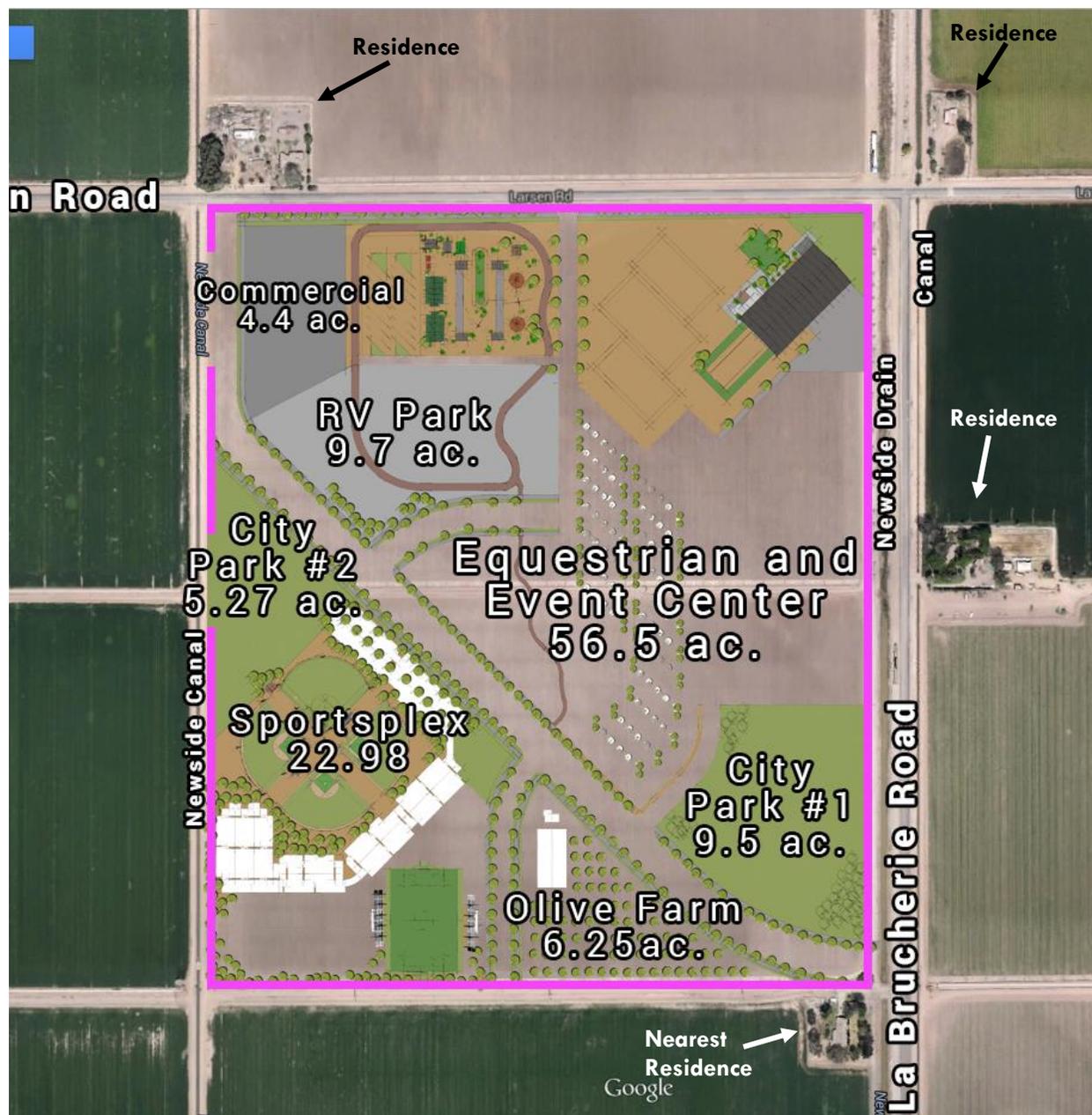


FIGURE 23
LOCATION OF NEAREST SENSITIVE RECEPTORS

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Mechanical Building Equipment. The proposed olive processing mill may include building mechanical equipment operations. Mechanical building equipment (e.g., heating, ventilation, and air conditioning systems, and boilers) typically generate noise levels of approximately 90 dBA at 3 feet from the source. However, mechanical equipment systems are typically shielded from direct public exposure and usually housed on rooftops, within equipment rooms, or within exterior enclosures. Conservatively assuming that building equipment would operate continuously over a 24-hour period with a noise level of 90 dBA (unenclosed), the Noise Impact Assessment predicted noise levels at the nearest residential land use would be approximately 48 dBA CNEL and would not exceed the City’s noise standard of 60 dBA CNEL (Ambient 2015b, p. 10). As a result, the contribution of building mechanical equipment to Project-generated increases in ambient noise levels at off-site locations would be considered less than significant.

Off-Road Equipment Operations. Landscape maintenance equipment, such as leaf blowers and gasoline-powered lawn mowers, generate noise levels of up to approximately 75-80 dBA L_{eq} at 50 feet. On occasion, the use of tractors and forklifts would also be anticipated at some locations, including in the vicinity of the equestrian stables and material loading and unloading areas within the proposed commercial use and olive mill areas. Operational noise levels associated with tractors and forklifts can reach levels of up to 85 dBA L_{eq} at 50 feet (Ambient 2015b, p. 11). Noise-sensitive land uses in the vicinity of the Project site consist of rural residential dwellings, the nearest of which are located near the northwestern, northeastern, and southeastern corners of the project site (Figure 23), adjacent to area roadways.

According to the Noise Impact Assessment, the predicted average-hourly noise levels from off-road equipment operations at the nearest residential land uses would range from less than 40 dBA L_{eq} to a high of approximately 79 dBA L_{eq} (Ambient 2015b, p. 11). The highest noise levels would occur at the residence located near the northwestern corner of the Project site (Figure 23), assuming that material loading and unloading activities could potentially occur near the northern boundary of the proposed commercial use area.

Because landscape maintenance activities are anticipated to occur predominantly during the daytime hours and over a relatively large area, average-daily noise levels at the nearest residential land use would not be projected to exceed the City’s exterior average-daily noise standard of 60 dBA CNEL. In addition, material handling activities within the equestrian stable, commercial, and olive mill areas would typically occur sporadically during the daytime hours. As a result, noise levels associated with these activities would, likewise, not be anticipated to exceed the City’s noise standard of 60 dBA CNEL at the nearest off-site land uses. However, off-road equipment operations are also considered a source of instantaneous noise events, such as back-up alarms, and pallet drops, which would be detectable at nearby residences. Sources of instantaneous noise events occurring during the more noise-sensitive nighttime hours may result in increased levels of annoyance and potential sleep disruption for occupants of nearby residential dwellings. As a result, nighttime operations of on-site equipment are considered to have a potentially significant impact (Ambient 2015b, p. 11).

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Transportation Noise

Ambient noise levels in the Project area are primarily influenced by vehicular traffic on area roadways. Project-generated increases in traffic volumes would predominantly occur along the adjacent segments of Larsen Road and La Brucherie Road. To a somewhat lesser extent, the Project would also contribute to increased traffic volumes on other nearby roadways, including Neckel Road, Worthington Road, Forester Road, and SR-86. The FHWA roadway noise prediction model was used to predict traffic noise levels along these primarily affected roadway segments. Predicted noise levels were calculated for near-term (Phase IA and IB buildout) and future Project buildout (Phases IA, IB, II, and III) conditions, with and without Project implementation. Predicted traffic noise levels for near-term and future Project buildout conditions, with and without implementation of the proposed Project, are summarized in **Table 11**.

**TABLE 11
PREDICTED INCREASES IN TRAFFIC NOISE LEVELS**

Roadway	Predicted Noise Level at 75 feet from Centerline of Near Travel Lane (dBA CNEL/Ldn)			
	Without Project	With Project	Difference ¹	Significant? ²
Phase IA & IB - Year 2015 Conditions				
Forester Rd., Larsen Rd. to Ralph Rd.	64.3	64.3	0	No
La Brucherie Rd./B St., Larsen Rd. to Ralph Rd.	51.3	51.6	0.3	No
La Brucherie Rd./B St., Ralph Rd. to Neckel Rd.	53.7	54.6	0.9	No
Larsen Rd., Forrester Rd. to Austin Rd.	48.4	48.9	0.5	No
Larsen Rd., Austin Rd. to La Brucherie Rd.	52.1	52.9	0.8	No
Larsen Rd., La Brucherie Rd. to SR-86	53.4	53.9	0.5	No
Neckel Rd., La Brucherie Rd. to SR-86	58.3	58.6	0.3	No
SR-86, Larsen Rd. to Neckel Rd.	68.1	68.1	0.0	No
SR-86, Neckel Rd. to Worthington Rd.	69.4	69.4	0.0	No
Worthington Rd., SR-86 to SR-111	64.6	64.6	0.0	No
Project Buildout (Phases IA, IB, II & III) - Year 2019 Conditions				
Forester Rd., Larsen Rd. to Ralph Rd.	64.8	64.8	0.0	No
La Brucherie Rd./B St., Larsen Rd. to Ralph Rd.	51.8	53.8	2.0	No
La Brucherie Rd./B St., Ralph Rd. to Neckel Rd.	54.2	59.1	4.9	No
Larsen Rd., Forrester Rd. to Austin Rd.	48.9	52.2	3.3	No
Larsen Rd., Austin Rd. to La Brucherie Rd.	52.6	57.0	4.4	No
Larsen Rd., La Brucherie Rd. to SR-86	53.9	56.8	2.9	No
Neckel Rd., La Brucherie Rd. to SR-86	58.8	61.0	2.2	No
SR-86, Larsen Rd. to Neckel Rd.	68.6	68.6	0.0	No

Potentially Significant Impact (PSI)
Potentially Significant Unless Mitigation Incorporated (PSUMI)
Less Than Significant Impact (LTSI)
No Impact (NI)

**TABLE 11
PREDICTED INCREASES IN TRAFFIC NOISE LEVELS**

Roadway	Predicted Noise Level at 75 feet from Centerline of Near Travel Lane (dBA CNEL/Ldn)			
	Without Project	With Project	Difference ¹	Significant? ²
SR-86, Neckel Rd. to Worthington Rd.	69.9	70.1	0.2	No
Worthington Rd., SR-86 to SR-111	65.1	65.3	0.2	No

Source: Ambient 2015b, pp. 11-12.

1. Difference in noise levels reflects the incremental increase attributable to the proposed project.

2 Significant increase is defined as:

- Project-generated increase in ambient noise levels of 5 dB, or more, in areas where the ambient no-project noise level at noise-sensitive land uses is less than 60 dBA CNEL/L_{dn};
- Project-generated increase in ambient noise levels of 3 dB, or more, in areas where the ambient no-project noise level at noise-sensitive land uses is 60-65 dBA CNEL/L_{dn};
- Project-generated increase in ambient noise levels of 1.5 dB, or more, in areas where the ambient no-project noise level at noise-sensitive land uses is greater than 65 dBA CNEL/L_{dn}.

As noted in **Table 11**, implementation of Phases IA and IB would result in increased traffic noise levels of approximately 0.9 dBA CNEL, or less. With Project buildout, in increased traffic noise levels of approximately 4.8 dBA, or less, would occur (Ambient 2015b, p. 11). The highest increases would occur along nearby segments of Larsen Road and La Brucherie Road. However, even with Project implementation, predicted noise levels along these primarily affected segments of Larsen Road and La Brucherie Road would not exceed the City's exterior noise level standard of 60 dBA CNEL. Therefore, implementation of the proposed Project would not result in a significant increase in traffic noise levels along primarily affected roadways (Ambient 2015b, p. 11). As a result, this impact would be considered less-than-significant.

- d) Less than Significant Impact.** Temporary short-term noise impacts would occur during Project construction. Construction noise typically occurs intermittently and varies depending upon the nature or phase of construction (e.g., land clearing, grading, excavation, and paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels.

Noise levels associated with individual construction equipment are summarized in **Table 12**. As shown, noise levels generated by individual pieces of construction equipment typically range from approximately 74 dBA to 89 dBA at 50 feet (Ambient 2015b, p. 13). Typical operating cycles may involve 2 minutes of full power, followed by 3 or 4 minutes at lower settings. Average-hourly noise levels associated with road improvement projects can vary, reaching combined levels of up to approximately 83 dBA L_{eq} at 50 feet, depending on the activities performed. Short-term increases in vehicle traffic, including worker commute trips and haul truck trips may also result in temporary increases in ambient noise levels at nearby receptors.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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**TABLE 12
TYPICAL CONSTRUCTION EQUIPMENT NOISE LEVELS**

Equipment	Typical Noise Level (dBA L _{max}) 50 feet from Source
Air Compressor	81
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Vibrator	76
Crane, Mobile	83
Dozer	85
Generator	81
Grader	85
Impact Wrench	85
Jack Hammer	88
Loader	85
Truck	88
Paver	89
Pneumatic Tool	85
Roller	74
Saw	76

Source: FTA 2006 in Ambient 2015b, p. 13.

As noted earlier in this report, noise-sensitive land uses in the Project area include residential dwellings, the nearest of which are generally located along the northern and eastern boundaries of the Project site, adjacent to Larsen Road and La Brucherie Road (Figure 23). However, construction activities (excluding activities that would result in a safety concern to the public or construction workers) will be limited to between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday with no construction occurring on Sundays and federally-recognized holidays. As a result, this impact would be considered to have a less than significant short-term noise impact to occupants of nearby residential land uses

e, f) No Impact. The nearest airport is the Imperial County Airport, which is located approximately 1.75 miles south of the Project site. The Naval Air Facility El Centro is located approximately five miles southwest of the Project site. Based on the Imperial County Airport Land Use Plan, the Project site is not located within the projected noise impact areas of these nearest airports (ALUC 1996). Therefore, the proposed Project would not expose people residing or working in the Project area to excessive levels of aircraft noise and no impact would occur.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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XIII. POPULATION AND HOUSING

Would the project:

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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"/> |

Population and Housing Discussion:

According to the Housing Element of the City’s General Plan Update (certified February 12, 2015), the City of Imperial has experienced an aggressive population growth over the last two decades taking into account growth trends since 1990 (City of Imperial 2014c, p. 7). From 1990 to 2010, the City had the highest growth in Imperial County, increasing at an average annual rate of 12.94 % percent compared to Imperial County as a whole which experienced an average growth rate of 2.99 % percent over the same time period.

According the population projections prepared by the Southern California Association of Governments (SCAG), the City of Imperial is anticipated to experience modest growth over the next two decades. SCAG projects a City of Imperial population of 22,900 residents by 2035, resulting in an average annual growth rate of 2.3% per year from 2010 to 2035, slightly below the County rate of 2.6 % for the same time period. These growth rates are consistent with Department of Finance projections for Imperial County at 2.3% for the same period (City of Imperial 2014c, p. 8).

The majority (57 percent) of the City’s housing stock is less than 15 years old (City of Imperial 2014c, p. 23). An increase in population usually requires a corresponding increase in housing development. In the City of Imperial, housing development has kept pace with population growth in both the City and in the County and has attracted residents that would have otherwise gone to neighboring communities with more attractive housing options (City of Imperial 2014c, p. 26).

The City’s growth projections may take into account not only the population growth from natural growth and net migration into City Limits, but also development of the annexation areas that took place during the prior planning period for the purpose of residential development. Assuming a modest development of recently annexation areas of only 20 percent, the City could potentially see an additional increase in population of 1,082 by 2021.

- a) **No Impact.** While the Project would generate a high level of economic activity in the City of Imperial, special events would occur on an intermittent basis and use existing available hotel/motel

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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capacity. For this reason, the proposed regional park and equestrian center would not be likely to induce the development of new visitor serving commercial facilities or generate new long-term employment opportunities that would indirectly result in population or housing growth. The intermittent nature of special events at the proposed regional park and equestrian center would not result in any direct population growth or indirectly induce substantial population growth because the Project does not involve the development of new homes or a substantial increase in new businesses (Meridian Consultants 2012, p. 6.0-22).

The Project would extend Ralph Road diagonally through the Project site specifically to serve the Project. By its nature as a regional park and equestrian center, the Project would not induce growth but would serve an existing recreational need by the current City residents. In addition, the proposed Project would increase economic activity by attracting more visitors to the area thereby benefitting the local economy. No impact would occur with regard to inducing growth.

b,c) No Impact. The Project site is disturbed agricultural land and does not currently contain any housing units. As a result, development of the proposed regional park and equestrian center would not displace substantial numbers of existing housing or people. Therefore, construction of replacement housing elsewhere will not be required. No impact would occur with regard to displacing substantial numbers of people and housing necessitating construction of replacement housing elsewhere.

XIV. PUBLIC SERVICES

a) Would the project result in substantial adverse

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

1) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Fire Protection Discussion:

The City of Imperial contracts with the Imperial County Fire Department for fire protection and prevention services. Services include fire suppression, advanced life support, basic life support, fire prevention/safety

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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education, consulting and fire investigative services; community disaster preparedness, hazardous materials response and mitigation, hazardous device response and rescue services.

The City Engine Company is located at 2514 La Brucherie Road, Imperial. The Department has one new front-line fire engine and one reserve fire engine. The Department has an engine crew of three firefighters on duty at all times. A Duty Fire Chief is assigned to supervise daily operational duties (City of Imperial Website 2014a). Three fire captains, six firefighters and one deputy fire chief are assigned to the City.

Police Protection Discussion:

The City of Imperial has its own Police Department with a total staff of 19 with 2.5 Records Clerks and two Reserves (not counted as a part of total personnel). The Department includes one Police Chief; one Administrative Sergeant, three Sergeants; one School Resource Officer; one Officer assigned to Narcotics Task Force with a Canine; ten Patrol Officers; one Corporal with a Canine; one Detective; one Police Service Technician (Colon 2015). Equipment includes eight patrol vehicles, one motorcycle and six support vehicles. A minimum of two police officers are on duty per shift.

Dispatching services are contracted through the City of El Centro Police Department. The City of Imperial Police Department also assists the County Sheriff’s Office if the County does not have an officer in the vicinity. The Police Station is co-located with the City Hall at 424 South Imperial Avenue (City of Imperial website 2014b).

Schools Discussion:

The Imperial Unified School District encompasses 554 square miles and serves approximately 3,711 students in grades Kindergarten through 12 (Imperial Unified School District 2014). The District operates five schools: Ben Hulse Elementary School, T.L. Waggoner Elementary School, Frank Wright Intermediate School, Imperial Avenue Holbrook Continuation School and Imperial High School. All schools in the District are located in the City of Imperial.

Park Discussion:

The City of Imperial Parks and Recreation Department is responsible for parks and recreation facilities in the City. The City owns and operates 15 parks totaling 38.5 acres with plans to develop the Monterey Park in the future for an additional 10 acres. The City parks provide a variety of amenities including playground equipment, softball fields, tennis courts, barbecue areas, restrooms and shaded areas with tables (City of Imperial website 2014c).

- a-1) Less Than Significant Impact.** The Project site is within the jurisdiction of the Imperial County Fire Department and would be serviced by the Fire Station at 2514 La Brucherie Road. Although the proposed Project, a regional park and equestrian facility, would not lead to an increase in population, the events and activities taking place at the facility may require services from the Fire Department in the rare case a fire or medical emergency were to occur. The Imperial County Fire Department was contacted to respond to a service request letter for the proposed Project. The Fire Department’s response, dated October 2, 2014, indicated that the Project would be required to meet all applicable access, water, and safety requirements in accordance with the applicable codes (Rouhotas 2014). The Project site is not currently served with a water system. Therefore, as a part of compliance with standard fire regulations, an adequate water system that would ensure adequate fire flows would be required to be proposed and approved by the Fire Department for

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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each Phase of development. The Fire Department also indicated that the proposed Project would not negatively impact the Department's existing ability to provide service (Rouhotas 2014). Therefore, no new fire facilities would be required to service the proposed Project and, as a result, less than significant impacts would occur from the implementation of the proposed Project.

a-2) Less Than Significant Impact. The Project site would be within the jurisdiction of the City of Imperial Police Department. Although the proposed Project, a regional park and equestrian facility, would not lead to an increase in population, the events and activities that could occur would require services from the Police Department in order to ensure public safety during events and operations. The City of Imperial Police Department was contacted to respond to a service request letter for the proposed Project. The response from Chief Miguel Colon Jr., dated March 18, 2015, indicated that the Department has indicated that it can handle the additional calls for service. However, from a public safety perspective, the Project may increase demand for police services, tax the Department's ability to provide general police services and increase work for support personnel and ancillary services. The Project will increase traffic and the service population as visitors come to visit and stay in this venue for a protracted amount of time (i.e. seasonal visitors and regional visitors). As an attractive nuisance, the Regional Park and Equestrian Center will also attract visitors with criminal intent requiring more directed patrols and investigations (Colon 2015).

The Department requests that equipment be installed to assist with public safety including surveillance cameras to cover the entire park; security lighting; and infrastructure to protect the buildings on the grounds. Several call boxes should also be installed for the public to use to call for police assistance. The presence of security cameras, security lighting and call boxes will minimize the demand for police services. The use of a traffic control plan and private security will further reduce the need for additional personnel and equipment (Colon 2015). Therefore, less than significant impacts to the environment from additional police facilities would result.

The Department also indicated that more personnel, equipment, and technology may be required in order to maintain future acceptable service ratios, response times or other performance objectives. Cumulative impacts resulting from the proposed Project in combination with other development requiring Police protection would be mitigated through impact fees, property taxes and sales tax generated by the Project (Colon 2015). These fees and taxes will offset salaries and capital improvements needed by the police department to meet the cumulative impacts and would reduce these impacts to less than cumulatively considerable.

a-3) No Impact. As a regional park and equestrian center, the proposed Project would not result in a substantial permanent increase in residents. As such, the Project would not generate students within the Imperial Unified School District that would require the construction of new school facilities. No impacts would occur.

a-4) No Impact. As a regional park, the proposed facility would provide further recreation options for the residents of the City and the region. Therefore, no impacts related to parks would occur as a result of the implementation of the Project.

a-5) No Impact. The proposed Project would not result in a substantial increase in population because it neither includes a residential component nor is it anticipated to generate the need for new

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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housing to accommodate workforce population. Based on the nature of the Project as a regional park and equestrian facility, no increase in demand for, and subsequent construction of, other public facilities are anticipated. No impacts would occur.

XV. RECREATION

- a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?

Recreation Discussion:

The proposed Project is a regional park and equestrian center which will provide for a variety of recreational activities. The proposed park would attract users from the City as well as visitors from the region. The proposed Project would expand and diversify the types of recreational options available within the City of Imperial and broader region.

- a) **No Impact.** The proposed Project is not anticipated to increase the use of existing neighborhood parks. Instead, it will provide a new regional park and equestrian center for the residents of the City and attract visitors from the region. Therefore, it is likely that usage of existing parks and other recreational facilities would decrease or remain unchanged. Therefore, no impact would occur with regard to a substantial deterioration of existing neighborhood parks.
- b) **Less Than Significant Impacts.** The proposed Project is a recreational facility. However, the environmental effects of the Project are examined in this Initial Study/Mitigated Negative Declaration and all impacts can be reduced to a level considered less than significant with the implementation of mitigation measures noted throughout this document and provided in the mitigation, monitoring, and reporting program (MMRP). Therefore, with implementation of the mitigation measures included in this IS/MND, the proposed Project would result in less than significant impacts related to recreational facilities.

XVI. TRANSPORTATION / TRAFFIC

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?

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
b) Conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion/management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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) Conflicts with adopted policies, plans, programs, regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Transportation/Traffic Discussion:

A Traffic Impact Analysis (TIA) was prepared by LOS Engineering, Inc. (LOS 2015) to determine and analyze potential traffic impacts for the proposed Project. The 2000 Highway Capacity Manual (HCM) operations analysis using Level of Service (LOS) evaluation criteria were used in the TIA. The operating conditions of the study intersections were measured using the HCM LOS designations ranging from A through F. LOS A represents the best operating condition and LOS F denotes the worst operating condition. Intersection LOS was calculated using the Synchro 8.0 (Trafficware Ltd., 2003-2007) computer software program. The HCM LOS for the range of delay by seconds for un-signalized and signalized intersections is described in Table 1 of the TIA which is included as Appendix F of this IS/MND. The roadway segments were analyzed based on the functional classification of the roadway using the Imperial County Standard Street Classification capacity lookup table. The roadway segment capacity and LOS standards used to analyze roadway segments are summarized in Table 1 of the TIA which is included as Appendix F of this IS/MND.

The significance criteria for traffic impacts are based on the Imperial County Planning and Development Services Department level of service standard as outlined on page 55 of the Circulation and Scenic Highways Element dated January 29, 2008, which states “The County’s goal for an acceptable traffic service standard on an Average Daily Traffic (ADT) basis and during AM and PM peak periods for all County-Maintained Roads shall be LOS C for all street segment links and intersections.” The current practice of determining direct or cumulative impacts is defined by the significance criteria outlined in the TIA prepared for the proposed Project.

The Project Study Area was determined in coordination with City and County of Imperial staff and includes the following intersections:

- 1) Forrester Road/Larsen Road (un-signalized)

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- 2) Austin Road/ Larsen Road (un-signalized)
- 3) La Brucherie Road/B Street/Larsen Road (un-signalized)
- 4) SR-86 Imperial Avenue/Larsen Road (un-signalized)
- 5) La Brucherie Road/B Street/Ralph Road (un-signalized)
- 6) La Brucherie Road/Neckel Road (un-signalized)
- 7) SR-86 Imperial Avenue/Neckel Road (un-signalized)
- 8) SR-86 Imperial Avenue/Worthington Road (signalized)
- 9) SR-111 / Worthington Road (signalized)
- 10) Forrester Road/I-8 Westbound Ramp (un-signalized)
- 11) Forrester Road/I-8 Eastbound Ramp (un-signalized)
- 12) Larsen Road/Ralph Realignment Access (un-signalized)
- 13) Larsen Road/Project Driveway (un-signalized)

The following roadway segments were also included:

- 1) Forrester Road from Larsen Road to I-8
- 2) La Brucherie Road/B Street from Larsen Road to Ralph Road
- 3) La Brucherie Road/B Street from Ralph Road to Neckel Road
- 4) Larsen Road from Forrester Road to Austin Road
- 5) Larsen Road from Austin Road to La Brucherie Road
- 6) Larsen Road from La Brucherie Road to SR-86
- 7) Neckel Road from La Brucherie Road to SR-86
- 8) SR-86 Imperial Avenue from Larsen Road to Neckel Road
- 9) SR-86 Imperial Avenue from Neckel Road to Worthington Road

The number of scenarios to be analyzed is based on the methodology outlined in the County of Imperial Department of Public Works Traffic Study and Report Policy dated March 12, 2007, revised June 29, 2007 and approved by the Board of Supervisors of the County of Imperial on August 7, 2007 (LOS 2015). Based on the aforementioned methodology source, the following scenarios were analyzed:

- 1) Existing (Year 2014) Conditions
- 2) Year 2015 Conditions (earliest anticipated opening day)
- 3) Year 2015 + Project Phase IA & IB Conditions
- 4) Year 2015 + Project Phase IA & IB + Cumulative Conditions
- 5) Year 2019 Conditions
- 6) Year 2019 + Total Project Conditions
- 7) Year 2019 + Total Project + Cumulative Conditions
- 8) Horizon Year 2050 + Total Project Conditions

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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The TIA in its entirety includes a description of the existing conditions, detailed numerical criteria used for intersections and roadway segments, trip distribution and assignment descriptions, the cumulative projects list, as well as figures depicting predicted intersection and segment volumes and LOS. The analysis below summarizes the results and conclusions from the TIA for analysis with the CEQA thresholds. Refer to Appendix F for the entire traffic analysis in all scenarios presented for the proposed Project.

Special Event Traffic Management Planning. Special events planned for the Project site may include an annual large event and several smaller events; however, sufficient information is not available to determine an accurate or reasonable trip generation or perform a quantitative analysis. Therefore, all future special events that exceed the typical activities used as the basis for determining the Project’s daily trips will be coordinated with City staff to determine if a Traffic Management Plan is required. A Traffic Management Plan will include coordination between the City, the County, and Caltrans and consider implementing; as-needed traffic control personnel; temporary signing; cones/barriers; manual operation of signals; and Caltrans encroachment permits if needed.

a) Potentially Significant Impact. Based on the results from the TIA prepared for the proposed Project, Phase IA & IB was calculated to generate 177 daily trips with 27 AM peak hour trips and 32 PM peak hour trips. Phase II & III of the Project are calculated to generate 1,618 daily trips with 148 AM peak hour trips and 137 PM peak hour trips. The total Project (Phases IA, IB, II, & III) was calculated to generate 1,795 daily trips with 175 AM peak hour trips and 169 PM peak hour trips. Eight scenarios (refer to Appendix F for a discussion of all eight scenarios) were analyzed to determine the potential for operational impacts to the surrounding roadway system. The following lists the scenarios in which potentially significant impacts were identified and summarizes the nature of the impact.

Year 2015 Conditions. Under Year 2015 Conditions, the study intersections and segment were calculated to operate at LOS C or better except for the intersection of SR-86 and Neckel Road which would operate at LOS D during both the AM and PM peak hours and result in an exceedance of the County’s LOS C threshold. However, this exceedance is not directly related to the proposed Project because the Year 2015 Condition is the baseline setting prior to the construction of the proposed Project.

Year 2015 + Phase IA & IB Conditions. Under Year 2015 + Phase IA & IB Conditions, all of the study intersections and segments were calculated to operate at LOS C or better except for the intersection of SR-86 and Neckel Road (LOS D in the AM and PM). The Project is calculated to have one cumulative impact at the intersection of SR-86 and Neckel Road due to the addition of between 2.0 and 9.9 seconds in delay to an existing LOS D condition. This decline in LOS is considered potentially significant unless mitigation measure TRAF-1 is incorporated.

Year 2015 + Phase IA & IB + Cumulative Conditions. Under Year 2015 + Phase IA & IB + Cumulative Conditions, all of the study intersections and segments were calculated to operate at LOS C or better except for the intersection of SR 86 and Neckel Road (LOS F in both the AM and PM peak hours). The Project is calculated to have one cumulative impact at the intersection of SR 86 and Neckel Road due to the addition of between 2.0 and 9.9 seconds of delay to an unacceptable LOS condition caused by cumulative traffic. This decline in LOS is considered potentially significant unless mitigation measure TRAF-1 is incorporated.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Year 2019 Conditions. Under Year 2019 Conditions, the study intersections and roadways were calculated to operate at LOS C or better except for the intersection of SR 86 and Neckel Road (LOS E in the AM peak hour and LOS D in the PM hour).

Year 2019 + Total Project (Phase IA & IB, II, & III) Conditions. Under Year 2019 + Total Project (Phase IA & IB, II, & III) Conditions, the study intersections and roadways were calculated to operate at LOS C or better except for the intersection of SR 86 and Neckel Road (LOS F AM and PM). The Project is calculated to have a direct impact to the intersection of SR 86 and Neckel Road due to degrading the LOS from E to F during the AM peak hour and from LOS D to F during the PM peak hour. This decline in LOS is considered potentially significant unless mitigation measure TRAF-2 is incorporated.

Year 2019 + Total Project (Phase IA, IB, II & III) + Cumulative conditions. Under Year 2019 + Total Project (Phase IA, IB, II & III) + Cumulative conditions, the study intersections and roadways were calculated to operate at LOS C or better except for the:

- 1) Intersection of SR 86 and Neckel Road (LOS F during both the AM and PM peak hours);
- 2) Intersection of SR 86 and Worthington Road (LOS D during both the AM and PM peak hours);
- 3) Segment of Forrester Road between Larsen Road and I-8 (LOS D); and
- 4) Segment of Worthington Road between SR 86 and SR 111 (LOS D).

The Project is calculated to have a direct impact at the intersection of SR 86 and Neckel Road due to adding more than 10 seconds of delay under LOS F conditions. This decline in LOS is considered potentially significant unless mitigation measure TRAF-2 is incorporated.

Mitigation Measures

TRAF-1 To reduce cumulative impacts related to the Year 2015 + Phase IA & IB Conditions and the Year 2015 + Phase IA & IB + Cumulative Conditions, prior to the approval of final building plans, the City shall develop and make financial provisions to contribute to a “Fair Share Program” for the signalization of the intersection of SR-86 and Neckel Road.

Timing/Implementation: Prior to approval of final building plans.
Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Level After Mitigation: Less than Significant.

TRAF-2 To reduce direct impacts related to Year 2019 + Total Project (Phase IA & IB, II, & III) Conditions and Year 2019 + Total Project (Phase IA, IB, II & III) + Cumulative conditions, prior to the approval of final building plans, the City shall develop and incorporate as a condition of approval the requirement that only Phase II and Phase III proceed until the intersection of SR 86 and Neckel Road is fully signalized.

Timing/Implementation: Prior to approval of final building plans.
Enforcement/Monitoring: City of Imperial Planning and Development Department.

Significance Level After Mitigation: Less than Significant.

Special Event Traffic Management Planning. As described in the traffic discussion section above,

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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a Traffic Management Plan will be prepared for all future special events that exceed the typical activities used as the basis for determining the Project's daily trips. The preparation of the special events Traffic Management Plan will include coordination between the City, the County, and Caltrans and consider implementing as needed traffic control personnel, temporary signing, cones/barriers, manual operation of signals, and Caltrans encroachment permits if needed. Therefore, traffic impacts related to special events are considered less than significant.

- b) **No Impact.** Imperial County does not have a Congestion Management Program. According to the Congestion Management Strategy prepared by the Southern California Association of Governments (SCAG), Imperial County does not yet have the legal population minimum for Congestion Management Area incorporation (SCAG 2012, p. 5). Therefore, no impact would occur with regard to a Congestion Management Program.
- c) **No Impact.** The Project site, at its southern border, is approximately 1.75 north of the Imperial County airport. The site is located completely outside of any of the compatibility zones associated with the Imperial County Airport (ALUC 1996, p. 3-12) (Refer to Figure 16) and would, therefore, not result in a change in air traffic patterns which would result in significant safety risks. No impact would occur.
- d, e) **Less than significant Impact.** All vehicular access points and street alignments would be designed to City standards and would be subject to the review by the Fire and Police Departments for potential safety hazards and compliance with fire and emergency access standards and requirements. Therefore, the proposed Project would not substantially increase hazards due to a design feature or result in an impact related to inadequate emergency access. Impacts are considered to be less than significant.
- f) **Less than significant Impact.** Development of the proposed Project would occur outside of the existing City limits in the SOI and would not interfere with existing public transit routes, bicycle access, or pedestrian facilities. Pedestrian access will be made available with the completion of road improvements along Larsen Road, Ralph Road, and La Brucherie Road with accommodations for bike lanes as well as bike racks at all proposed facilities. Therefore, the proposed Project would have less than significant impacts related to conflicts with public transit, bicycle, or pedestrian facilities.

XVII. UTILITIES AND SERVICE SYSTEMS

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 water treatment 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"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
could cause significant environmental effects?				
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 which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<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 checked="" type="checkbox"/>	<input 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"/>

Utilities and Service Systems Discussion:

Water

City of Imperial Distribution System

The City of Imperial takes its water primarily from the Dahlia Canal, Gate 52 on the east side of the water treatment plant or the Newside Canal. When the Dahlia Canal is out of service the City draws raw water from the Newside Canal Gate 9B on the west side of the water treatment plant (DCE 2011, p. 21).

Water treatment and distribution facilities have an existing capacity of 7 million gallons per day (mgd) and an estimated daily demand of 2.6 mgd, based on 2014 residential population and assuming a 150 mgd per day per capital usage. Water treatment and distribution facilities are estimated to be at 37% capacity (City of Imperial 2014c, p. 37).

There is no domestic water delivery infrastructure currently available at the Project site. Potable water will be provided from the City's Water Treatment Plant and stored in two 5,000 storage tanks for Phase IA and IB (Figure 9A). At full build-out the proposed Project would obtain water via a pipeline extending north from Neckel Road and east from La Brucherie Road to the Project site (Figure 9B) (Galvan 2014). The total annual water needed for this Project is estimated to be 39 million gallons for irrigation and 98,500 gallons of potable water. No water tanks will be necessary for fire water storage.

The City collects water impact fees which will help off-set the costs of improvements to the water treatment plant and other major water distribution facilities. The water treatment facility currently has sufficient capacity to serve the Project (City of Imperial, 2014e).

IID Water Supply

A Water Supply Assessment was prepared for the proposed project. It is included as Appendix G of this document

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Sanitary Sewer (Wastewater)

The City’s wastewater collection and treatment facilities have the capacity of processing 2.4 mgd and have an estimated demand of 1.7 mgd, based on the current 2014 residential population and 100 gallons per day (gpd) per capita usage. The City’s wastewater collection and treatment facilities are currently at 71 % (City of Imperial 2014c, p. 37).

Wastewater Collection System

The existing wastewater collection system consists of vitrified clay pipe (VCP) and polyvinyl chloride (PVC) pipelines, and includes approximately 25 miles of gravity sewers ranging in size from 6 to 24 inches in diameter, 15 lift stations, and 1.95 miles of force mains. The topography of the City is fairly flat, sloping gently to the northeast. Trunk sewers in the major roads transport wastewater to the treatment plant (City of Imperial 2007, p. 95).

The wastewater treatment facility has performed adequately because of its inherently conservative design and the fact that the existing flows (ranging between 0.948 mgd and 0.968 mgd) are less than the design flow of 2.4 mgd. The plant currently serves 2,700 dwelling units and is at approximately 39% of capacity. However, with current City developments in process, flow may increase to 1.45 mgd by the year 2028 (City of Imperial 2007, p. 95). The City is currently developing a plan to increase capacity of the WWTP by approximate 2.6 mgd. (Villegas 2015).

Solid Waste

At a local level, household and commercial solid waste collection services (trash and recycling) are provided by Republic Services (Galvan 2014). The City of Imperial is a member of the Imperial Valley Resource Management Agency (IVRMA) under a Joint Powers Agreement. Through various programs, the IVRMA and the City have collectively exceeded a 70% waste reduction goal, achieving the state mandate of 50% as required by AB 939. The IVRMA also provides recycling centers and household hazardous waste drop off centers in the region.

Electricity

The IID provides electricity in the City of Imperial. Electricity is produced by harnessing hydroelectric power generated on the All-American Canal and canals that branch off the All-American Canal (the East Highline, Central Main and Westside Main). Additional locally generated sources of IID electricity include natural gas and diesel plants located in the nearby cities of El Centro and Brawley (City of Imperial 2014a, p. 7). Electrical connection is accessible to the Project site from existing power lines located along Larsen Road, La Brucherie Road, and Ralph Road.

a,e) Less Than Significant Impact. Wastewater would be generated at the following rates for each phase:

- 2015 – No Solid Waste Generation.
- 2016 – Phase IA = 101,202 Gallons/Year
- 2017 – Phase IA = 101,202 Gallons/Year
- 2018 – Phases IA & IB = 101,202 Gallons/Year
- 2023 – Phases IA, IB & II = 140,998 Gallons/Year
- 2028 – Phases IA, IB, II & III = 350,844 Gallons/Year

Note that construction of the parking lot (Phase IB) will not generate wastewater (Villegas 2015).

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Wastewater volume generated by the proposed Project would be similar to wastewater produced by other recreational and commercial land uses in the City. Therefore, it is not anticipated that wastewater treatment requirements would be exceeded as a result of the implementation of the proposed Project. Additionally, the proposed Project is anticipated to generate approximately 961 gpd or 350,844 gpy. This represents approximately 0.04% of the treatment plant's daily capacity and 0.04% of the annual capacity (Villegas 2015). Because the wastewater treatment plant currently has sufficient capacity to accommodate this amount of wastewater, impacts would be considered less than significant.

- b,d) Less Than Significant Impact.** The City's water treatment plant is currently estimated to be at 37% capacity increasing to 49% during the summer months. As such, the plant would have adequate capacity to supply the proposed Project's estimated 961 gpd water usage requirements (Villegas 2015). Pipelines to serve the Project development would extend from Neckel Road and La Bruchiere, within the existing roadway right-of-way and, therefore, would not result in significant environmental impacts.
- c) Less Than Significant Impact.** The proposed Project would detain all storm water on-site through the use of a detention basin with overflow runoff draining into the self-contained Newside Canal. Therefore, no impact related to the new construction or expansion of the City stormwater drainage facilities would occur.
- f,g) Less Than Significant Impact.** Solid waste services are currently provided by Republic Services which operates out of a facility at 3354 Dogwood Road. The proposed Project will generate solid waste on an intermittent basis in association with the various special events and sports tournaments held at the facility as well as through day-to-day waste generated by the parks and commercial uses. Construction recycling would be implemented as a part of the projects' standard construction practices and on-site recycling would be implemented in accordance with the City's existing recycling programs. Additionally, recycling receptacles would be provided at all special events in order to reduce solid waste from the landfill. Solid waste is hauled and disposed of at the Allied Imperial Landfill located at 104 East Robinson Road. Waste diversion is handled at the Valley Environmental Recycling Facility at 702 East Heil Avenue in El Centro (Republic Services 2014). The proposed Project is anticipated to produce 9,605 tons of waste in association with Phase IA (2016) and IB (2017). In year 2018, the Project is anticipated to generate 19,402 tons of waste in association with Phases IA, IB and II. At buildout of Phases IA, IB, II and III, the Project is estimated to generate 37,980 tons of waste annually. [Note that construction of the parking lot (Phase IB) will not generate wastewater] (Villegas 2015). CalRecycle shows that the Allied Imperial Landfill has a remaining capacity of 15,485,200 cubic yards as of December 31, 2010 (CalRecycle 2015a). The Ceased Operational Date (i.e. the date the landfill is estimated to reach its permitted capacity) is projected to be December 31, 2040 (CalRecycle 2015a and b). Therefore, a less than significant impact would result from compliance with solid waste regulations and landfill capacity.

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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SECTION 3 - III. MANDATORY FINDINGS OF SIGNIFICANCE

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- a) **Potentially Significant Impact.** Implementation of the proposed project has the potential to impact biological resources and cultural resources. However, implementation of mitigation measures BIO-1 through BIO-3 as well as CULT-1 and CULT-2 were determined to reduce those impacts to levels considered to be less than significant.
- b) **Potentially Significant Impact.** The proposed project has the potential to result in environmental impacts that cumulatively could be considerable. However, through the implementation of mitigation measures provided in the mitigation, monitoring, and reporting program (MMRP) the cumulative contribution of the projects impacts are considered to be less than significant.
- c) **Potentially Significant Impact.** The proposed project has the potential to result in significant environmental effects, which could directly or indirectly cause adverse effects on human beings. As demonstrated in this Initial Study, the proposed project has the potential to result in significant environmental impacts to air quality, greenhouse gases, geology/soils, noise and water quality. However, through the implementation of mitigation measures provided in the MMRP, the cumulative contribution of the projects impacts are considered to be less than significant with implementation of AQ-1 thru AQ-4; GHG-1; GEO-1 and GEO-2; NOI-1 and NOI-2; and TRAF-1 and TRAF-2.

IV. PERSONS AND ORGANIZATIONS CONSULTED

This section identifies those persons who prepared or contributed to preparation of this document. This section is prepared in accordance with Section 15129 of the CEQA Guidelines.

A. CITY OF IMPERIAL

- Marlene D. Best, City Manager
- Jorge Galvan, Director of Planning & Development
- Jesus Villegas, Project Manager
- Gracie Hauvermale, Project Coordination

B. OTHER AGENCIES/ORGANIZATIONS

- Imperial Irrigation District
- Local Area Formation Commission

V. REFERENCES

- Alfred Civil Engineering. 2014. *Drainage Report for Imperial Equestrian and Events Center Project*. February 2015. Referenced in text as (Alfred, 2015).
- Ambient Air Quality and Noise Consulting. 2015a. Air Quality & Greenhouse Gas Assessment for the City of Imperial Regional Park & Equestrian Center. January 2015. Referenced in text as (Ambient 2015a.)
- 2015b. Noise Impact Assessment for the City of Imperial Regional Park & Equestrian Center. January 2015. Referenced in text as (Ambient 2015b.)
- California Department of Conservation. 2012. Imperial County Important Farmland 2010. Referenced in text as (FMMP 2012).
- California Department of Transportation Website, Accessed January 18, 2015. Referenced in text as (Caltrans 2015).
- California Geological Survey (CGS). 2007. Regulatory Map of City of Imperial. Referenced in text as (CGS 2007).
- Rouhotas, Jr., Tony. City of Imperial Fire Department, 2014. Service request letter response from Tony Rouhotas Jr. Dated October 2, 2014. Referenced in text as (Rouhotas 2014).
- Colon, Miguel. City of Imperial Police Department, 2014. Service request letter response from Chief Miguel Colon. Dated October 16, 2014. Referenced in text as (Colon 2014).
- California Integrated Waste Management Board website. <http://www.calrecycle.ca.gov/SWFacilities/Directory/13-AA-0019/Detail/> Accessed September 25, 2014. Referenced in text as (CalRecycle 2014).
- 2015a. <http://www.calrecycle.ca.gov/SWFacilities/Directory/13-AA-0019/Detail/> Referenced in text as (CalRecycle 2015a).
- 2015b. <http://www.calrecycle.ca.gov/SWFacilities/Directory/Definitions/Default.aspx?VW=SITE> Referenced in text as (CalRecycle 2015b).
- City of Imperial. 2014a. City of Imperial General Plan Update, Conservation Element. August 2014. Referenced in text as (City of Imperial 2014a).
- 2014b. City of Imperial General Plan Update, Draft Circulation Element. August 2014. Referenced in text as (City of Imperial 2014b).
- 2014c. City of Imperial Draft Housing Element. August 2014. Referenced in text as (City of Imperial 2014c).
- 2014d. City of Imperial General Plan Update, Land Use Element. August 2014. Referenced in text as (City of Imperial 2014d).
- 2014e. City of Imperial. Storm Drainage Response letter to LSA Associates. Written by Jesus Villegas. December 2014. Referenced in text as (City of Imperial 2014e).
2007. Service Area Plan Draft Update. December 2007. Referenced in text as (City of Imperial 2007).
1994. Final City of Imperial Environmental Impact Report General Plan Revision Project 1992. Referenced in text as (City of Imperial 1994).
- 1992a. City of Imperial General Plan. Revised, December 1992. Referenced in text as (City of Imperial 1992a).
- 1992b. Final City of Imperial Environmental Impact Report General Plan Revision Project. Referenced in text as (City of Imperial 1992b).

City of Imperial website. 2014a. "Fire Department" webpage. <http://www.cityofimperial.org/dept.php?id=36> Accessed November 14, 2014.

City of Imperial website 2014b. "Imperial Police Department" webpage. <http://www.cityofimperial.org/dept.php?id=28> Accessed November 14, 2014.

City of Imperial website 2014c. "Parks and Recreation" webpage. <http://www.cityofimperial.org/dept.php?id=33> Accessed November 14, 2014.

Colon, Jr., Miguel. Police Chief. Imperial Police Department. Response to Will Serve Letter sent via e-mail, March 18, 2015. Referenced in text as (Colon 2015).

County of Imperial. 2008. "Open Space and Conservation Element of the Imperial County General Plan." January 29, 2008. Referenced in text as (Imperial County 2008).

2007. Imperial County Operational Area Emergency Operations Plan (EOP). July, 2007. Referenced in text as (Imperial County 2007).

1996. Airport Land Use Compatibility Plan. Imperial County Airports. June, 1996. Referenced in text as (Imperial County 1996).

1993. Imperial County General Plan, Seismic and Public Safety Element. Referenced in text as (Imperial County 1993).

Department of Conservation. 2014. California Farmland Conversion Report 2008-2010. April 2014.

Department of Finance. 2014. Table E-1 City/County Population Estimates with Annual Percent Change, January 1, 2013 and 2014. Referenced in text as (DOF 2014).

Department of Toxic Substances Control. Envirostor website. Accessed February 12, 2015. http://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST.

Development Management Group, Inc. 2010. Fiscal Impact Analysis Proposed Annexation 063-010-049 (Regional Park site). August 18, 2010. Referenced in text as (DMG 2010).

Dynamic Consulting Engineers. (DCE) 2011. City of Imperial 2010 Urban Water Management Plan, June 2011. Referenced in text as (DCE 2011).

Ericsson-Grant, Inc. EGI. 2015. SB 610 - Water Supply Assessment for City of Imperial Regional Park and Equestrian Center. February 2015. Referenced in text as (EGI 2015).

2014. Wistaria Ranch, Solar Energy Center Draft EIR. August 2014. Referenced in text as (EGI 2014).

Federal Emergency Management Agency. 2008 Flood Insurance Rate Map, Imperial County, California. Map Number 06025C1725C. Effective Date September 26, 2008.

Galvan, Jorge. Response to questions RE: City of Imperial Regional Park and Equestrian Center. 2014. August 28 and September 15, 2014. Referenced in text as (Galvan 2014).

Galvan 2015. Personal communication (telephone). February and March 2015.

Imperial Office of Emergency Services. 2007. Imperial County Operational Area. Emergency Operations Plan (EOP). July 2007. Referenced in text as (EOP 2007).

Imperial Unified School District website, 2014. School District website on the "About Us" webpage. Accessed November 14, 2014. <https://sites.google.com/a/imperialusd.org/imperialusd-home/about-us>. Referenced in text as (IUSD 2014).

-
- Loveless & Linton Consulting, 2014. Cultural Resources Survey Report. Prepared by Loveless & Linton Consulting, Inc. October 2014. Referenced in text as (Loveless & Linton 2014).
- LOS Engineering 2015. *City of Imperial Regional Park and Equestrian Center County of Imperial (SW corner of Larsen Rd/La Brucherie Rd) Draft Traffic Impact Analysis*. January 6, 2015. Referenced in text as (LOS 2015).
- Meridian Consultants. 2012. City of Indio. Draft Environmental Impact Report for Music Festival Plan. December 2012.
- Republic Services website. <http://www.republicservices.com/corporate/localservices/local-waste-services-refuse-services.aspx> accessed September 25, 2014. Referenced in text as (Republic Services 2014).
- Society Vertebrate Paleontology, 2015. Website of Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. <http://vertpaleo.org/PDFS/8f/8fe02e8f-11A9-43b7-9953-cdcfaf4d69e3.pdf>. Accessed February 10, 2015. Referenced in text as (SVP, 2015).
- Southern California Association of Governments (SCAG) 2012. Congestion Management Strategy. April 2012. Referenced in text as (SCAG 2012).
- State of California. 1990. Special Studies Zones. Revised Official Map, Effective January 1, 1990. Referenced in text as (State of California 1990).
2007. Department of Forestry and Fire Protection. State Hazard Severity Zones in SRA. November 7, 2007. Referenced in text as (DOF 2007).
- The Holt Group. 2005. Mitigated Negative Declaration For The Morningstar Subdivision. August 2005. Referenced in text as (The Holt Group 2005).
- United States Department of Agriculture Soil Conservation Service. 1981. *Soil Survey of Imperial County California, Imperial Valley Area*. October 1981.
- Villegas, Jesus. 2015. Water, wastewater and solid waste generation information. Personal communication (e-mail). February and March 2015. Referenced in text as (Villegas 2015).