



# Staff Report

Agenda Item No.

D-3

**To:** Imperial City Planning Commission

**From:** Othon Mora

**Date:** June 5, 2020

**Project:** LaBrucherie Widening Project

---

## Summary:

**Project Location:** LaBrucherie Road, From Treshill Road to Aten Boulevard

**Zoning:** Existing C-1 Neighborhood Commercial  
R-1 Residential Single Family

**General Plan:** **Existing:** Residential Single Family  
Commercial Neighborhood

**Environmental:** Initial Study/Negative Declaration

## Project Description:

The proposed project will involve the widening of an existing roadway making the southern part of LaBrucherie Road, within City limits of Imperial, a four lane street (two lanes heading northbound and two lanes heading southbound). The project site is located within City limits of the City of Imperial within existing right-of-way. The proposed segment of LaBrucherie Road is half (0.5) a mile long. The proposed portion of the street, between Treshill Road and Aten Boulevard, receives heavy traffic from residents who live in the subdivision (west of LaBrucherie Road) and traffic from local businesses and residents who live in the apartment complex (east of LaBrucherie Road). The proposed project will accommodate the traffic demand that the street currently receives. There is an existing sidewalk on the west side of LaBrucherie Road giving the residents safe pedestrian access to the local businesses and Aten Boulevard.

The proposed street widening project also involves of pipelining portion of the existing concrete Dahlia Canal, located along the East side of LaBrucherie Road from Treshill

Road to Aten Boulevard. The work includes importing suitable material from an approved borrow site to the jobsite (FOB site), demolishing and removing existing concrete lining and structures, trenching, pipelining, installation of concrete transitions, final grading, and cleanup. The proposed Dahlia Canal Pipeline distance is approximately, 2505 linear feet (0.47 miles). The new pipelining is proposed to be a 72"Ø RCP x 2505 lineal feet. All work will be done within existing IID right of way. The staging area will be located on the west side of the proposed pipeline and will include the closure of LaBrucherie Road from Treshill Road to Aten Boulevard throughout the completion of the project.

**California Environmental Quality Act (CEQA):** The City is the lead agency for the CEQA review of the project. The Development Review Committee and the Environmental Assessment Committee, reviewed an Initial Study/ Negative Declaration (IS/ND) for the subject project. The IS/ND determined that the proposed project would not result in any significant on effect on the environment.

A Draft IS/ND for the project was prepared and circulated for public review from November 19, 2019 to December 20, 2019, and it was recirculated from May 8<sup>th</sup>, 2020 to May 28<sup>th</sup>, 2020 to include the underground of Dahlia Canal. The Final Negative Declaration (ND), included as an Attachment; and comment letters from stakeholders are also included and made part of the IS/ND.

**Recommendation:**

Staff recommends the Planning Commission approve Resolution No. PC2020-08 Adopting and Certifying the Negative Declaration for the LaBrucherie Widening Project.

**RESOLUTION PC2020-08**

**A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF IMPERIAL ADOPTING AND CERTIFYING A NEGATIVE DECLARATION FOR THE LABRUCHERIE WIDENING PROJECT BETWEEN TRESHILL ROAD AND ATEN BOULEVARD.**

**WHEREAS,** The City is the lead agency for the CEQA review of projects; and

**WHEREAS,** a duly notified public hearing was held by the Planning Commission on June 10, 2020; and

**WHEREAS,** upon hearing and considering all testimony and arguments, analyzing the information submitted by staff and considering any written comment received, the Planning Commission considered all facts relating to the request for the Initial Study/Negative Declaration.

**NOW THEREFORE, BE IT RESOLVED** by the Planning Commission of the City of Imperial as follows:

- A) That the foregoing recitations are true and correct; and
- B) The project has been reviewed in accordance with the requirements set forth by the City of Imperial for implementation of the California Environmental Quality Act; and
- C) There are no sensitive resources located within the area of the project or adjacent to the area of the project so as to be significantly impacted by the project; and
- D) That based on the evidence presented at the public hearing, the Planning Commission hereby Adopts and Certifies the Negative Declaration under the California Environmental Quality Act;

**PASSED, ADOPTED AND APPROVED** by the Planning Commission of the City of Imperial, this June 10, 2020.

\_\_\_\_\_  
Planning Commission Chairman

ATTEST:

\_\_\_\_\_  
Planning Secretary

**DRAFT**

- NEGATIVE DECLARATION**  
 **MITIGATED NEGATIVE DECLARATION**

***Initial Study & Environmental  
Analysis For:***

**City of Imperial**



**LaBrucherie  
Widening Project**

Prepared By:

**CITY OF IMPERIAL**  
400 S. Imperial Avenue, Suite 101  
Imperial, CA 92251  
(760) 355-1152  
[www.cityofimperial.org](http://www.cityofimperial.org)

**May 2020**

---

---

**TABLE OF CONTENTS**

**PAGE**

**SECTION 1**

**I. INTRODUCTION 3**

**SECTION 2**

**II. ENVIRONMENTAL CHECKLIST 8**  
**PROJECT SUMMARY 12**  
**ENVIRONMENTAL ANALYSIS 19**

*I. AESTHETICS ..... 19*  
*II. AGRICULTURE AND FOREST RESOURCES ..... 20*  
*III. AIR QUALITY ..... 22*  
*IV. BIOLOGICAL RESOURCES ..... 23*  
*V. CULTURAL RESOURCES ..... 25*  
*VI. ENERGY ..... 26*  
*VII. GEOLOGY AND SOILS ..... 26*  
*VIII. GREENHOUSE GAS EMISSION ..... 29*  
*IX. HAZARDS AND HAZARDOUS MATERIALS ..... 30*  
*X. HYDROLOGY AND WATER QUALITY ..... 32*  
*XI. LAND USE AND PLANNING ..... 34*  
*XII. MINERAL RESOURCES ..... 35*  
*XIII. NOISE ..... 36*  
*XIV. POPULATION AND HOUSING ..... 37*  
*XV. PUBLIC SERVICES ..... 38*  
*XVI. RECREATION ..... 39*  
*XVII. TRANSPORTATION ..... 40*  
*XVIII. TRIBAL CULTURAL RESOURCES ..... 42*  
*XIX. UTILITIES AND SERVICE SYSTEMS ..... 423*  
*XX. WILDFIRE ..... 425*

**SECTION 3**

**III. MANDATORY FINDINGS OF SIGNIFICANCE 47**  
**IV. PERSONS AND ORGANIZATIONS CONSULTED 48**  
**V. REFERENCES 48**  
**VI. NEGATIVE DECLARATION – CITY OF IMPERIAL 49**  
**27 FINDINGS 49**

**SECTION 4**

**VIII. RESPONSE TO COMMENTS (IF ANY) 50**  
**IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY) 50**



---

---

## SECTION 1

### INTRODUCTION

#### A. PURPOSE

This document is a  policy-level,  project level Initial Study for evaluation of potential environmental impacts resulting with the proposed roadway widening project from two lanes to four lanes, curb and gutter, and sidewalks. The project will also include pipelining the existing Imperial Irrigation District (IID) Dahlia Canal. (Refer to Exhibit "A" & "B").

#### B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines, 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 will not result in any potentially significant environmental impacts and therefore, a Negative Declaration is deemed as the appropriate document to provide necessary environmental evaluations and clearance as identified hereinafter.

This Initial Study and Negative Declaration are prepared in conformance with the California Environmental



---

Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); Section 15070 of the State Guidelines for Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et. seq.); applicable requirements of the City jurisdiction by law.

Pursuant to the Guidelines for Implementing CEQA, depending on the project scope, the City of Imperial is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for any project in the City.

### **C. INTENDED USES OF INITIAL STUDY AND NEGATIVE DECLARATION**

This Initial Study and Negative Declaration are informational documents which are intended to inform 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 and Negative Declaration, prepared for the project will be circulated for a period of 20 days (*30-days if submitted to the State Clearinghouse for a project of area-wide significance*) for public and agency review and comments. At the conclusion, if comments are received, the City will prepare a document entitled "Responses to Comments" which will be forwarded to any commenting entity and be made part of the record within 10-days of any project consideration.

### **D. CONTENTS OF INITIAL STUDY & NEGATIVE DECLARATION**

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

#### **SECTION 1**

**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 2**

**II. ENVIRONMENTAL CHECKLIST FORM** contains the City's Environmental Checklist Form. 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.

**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.

**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 3**

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

**IV. PERSONS AND ORGANIZATIONS CONSULTED** identifies those persons consulted and involved in preparation of this Initial Study and Negative Declaration.

**V. REFERENCES** list bibliographical materials used in preparation of this document.

**VI. NEGATIVE DECLARATION**

**VII. FINDINGS**

### **SECTION 4**

**VIII. RESPONSE TO COMMENTS (IF ANY)**

**IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY)**

## **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**

This Initial Study and Negative Declaration 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 City’s jurisdiction, are also not considered mitigation measures and therefore, will not be identified in this document.

#### **G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE**

Information, findings, and conclusions contained in this document are based on incorporation by reference of tiered documentation, which are discussed in the following section.

##### **1. Tiered Documents**

As permitted in Section 15152(a) of the CEQA Guidelines, information and discussions from other documents can be included into this document. Tiering is defined as follows:

“Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.”

Tiering also allows this document to comply with Section 15152(b) of the CEQA Guidelines, which discourages redundant analyses, as follows:

“Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including the general plans, zoning changes, and development projects. This approach can eliminate repetitive discussion of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration.”

Further, Section 15152(d) of the CEQA Guidelines states:



---

“Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:

- (1) Were not examined as significant effects on the environment in the prior EIR; or
- (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means.”

## **2. Incorporation By Reference**

Incorporation by reference is a procedure for reducing the size of EIRs/MND and is most appropriate for including long, descriptive, or technical materials that provide general background information, but do not contribute directly to the specific analysis of the project itself. This procedure is particularly useful when an EIR or Negative Declaration relies on a broadly-drafted EIR for its evaluation of cumulative impacts of related projects (*Las Virgenes Homeowners Federation v. County of Los Angeles* [1986, 177 Ca.3d 300]). If an EIR or Negative Declaration relies on information from a supporting study that is available to the public, the EIR or Negative Declaration cannot be deemed unsupported by evidence or analysis (*San Francisco Ecology Center v. City and County of San Francisco* [1975, 48 Ca.3d 584, 595]). This document incorporates by reference appropriate information from the “Final Environmental Impact Report and Environmental Assessment for the “City of Imperial’s General Plan EIR” prepared by The Holt Group, INC in 1992.

When an EIR or Negative Declaration incorporates a document by reference, the incorporation must comply with Section 15150 of the CEQA Guidelines as follows:

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). The General Plan EIR and updates are available, along with this document, at the City of Imperial, 420 S. Imperial Avenue, Imperial, CA 92251 Ph. (760) 355-4371.
- This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the City of Imperial, 420 S. Imperial Avenue, Imperial, CA 92251 Ph. (760) 355-4371.
- These documents must summarize the portion of the document being incorporated by reference or briefly describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.
- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]).
- The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.



---

---

## II. Environmental Checklist

1. **Project Title:** La Brucherie Widening Project
2. **Lead Agency:** City of Imperial
3. **Contact person and phone number:** City of Imperial  
400 South Imperial Avenue, Suite 101  
Imperial, CA 92251  
  
Contact: Othon Mora, Community Development Director  
(760) 355-1152  
[omora@cityofimperial.org](mailto:omora@cityofimperial.org)
4. **Address** 400 South Imperial Avenue, Suite 101  
Imperial, CA 92251
5. **E-mail:** [omora@cityofimperial.org](mailto:omora@cityofimperial.org)
6. **Project location:** The project is proposed to be located on the northern portion of La Brucherie Road, from Treshill Road to Aten Boulevard, within the southern City Limits of the City of Imperial. For more information regarding project location refer to Exhibit A and B – Regional Location Map and Vicinity Map, respectively.
7. **Project sponsor's name and address:** City of Imperial  
400 South Imperial Avenue, Suite 101  
Imperial, CA 92251
8. **General Plan designation:** **Existing: Residential Single Family  
Commercial Neighborhood**  
**Proposed: No Change**
9. **Zoning:** **Existing: C- 1 Neighborhood Commercial  
R – 1 Residential Single Family**  
**Proposed: No Change**
10. **Description of project:** The City of Imperial is contemplating the widening of La Brucherie Road from the existing two-lane configuration. All proposed improvements will be completed within existing City right-of-way. The proposed improvements will result in two northbound lanes and two southbound lanes. The proposed



---

---

segment of the road extends about 0.5 miles. The proposed project will also include the undergrounding Dahlia Canal from Treshill Road to Aten Boulevard. The project is located in the Residential Single Family and Commercial Neighborhood. La Brucherie Road is adjacent to the Dahlia Canal, which is owned by the Imperial Irrigation District, therefore, an Encroachment Permit will be required.

**11. Surrounding land uses and setting:**

The proposed project is located in a residential and neighborhood commercial area. There is an existing single-family residential subdivision and a church to the west and an apartment complex to the east of La Brucherie Road. There is also a small multi-tenant office complex on the east side of La Brucherie at Wall Road. The project is consistent with the City of Imperial's adopted General Plan and Zoning Ordinance. The City of Imperial's General Plan identifies La Brucherie Road as one of the primary north-south roadways in the City connecting local roadways in the southwestern portion of the City and the northwestern portion of the City. It should be noted that La Brucherie Road is not a continuous roadway throughout the City as it is interrupted by the Imperial County Airport.

**12. Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement.):

a.) Imperial Irrigation District (IID)

**13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

The City of Imperial has not received request for consultation from Tribes.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code, Section 21080.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code, Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code, Section 21082.3 (c) contains provisions specific to confidentiality.



---

---

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



**ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION**

After Review of the Initial Study, the Environmental Evaluation Committee has:

- 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

<u>EEC VOTES</u>	<u>YES</u>	<u>NO</u>	<u>ABSENT</u>
<b>PUBLIC WORKS</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>PLANNING</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>FINANCE</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>POLICE DEPARTMENT</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>FIRE DEPARTMENT</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

\_\_\_\_\_  
Othon Mora, Community Development Department

\_\_\_\_\_  
Date:



---

---

## PROJECT SUMMARY

---

---

### A. Project Location:

The proposed project is located on the northern portion of La Brucherie Road between Treshill Road and Aten Boulevard. La Brucherie Road is west of Highway 86, a major arterial. Exhibit A on page 15 shows a Vicinity map which illustrates the location of the proposed project.

### B. Project Summary:

The proposed project will involve the widening of an existing roadway making the southern part of La Brucherie Road, within City limits of Imperial, a four lane street (two lanes heading northbound and two lanes heading southbound). The project site is located within City limits of the City of Imperial within existing right-of-way. The proposed segment of La Brucherie Road is half a mile long. The proposed portion of the street, between Treshill Road and Aten Boulevard, receives heavy traffic from residents who live in the subdivision (west of La Brucherie Road) and traffic from local businesses and residents who live in the apartment complex (east of La Brucherie Road). The proposed project will accommodate the traffic demand that the street currently receives. There is an existing sidewalk on the west side of La Brucherie Road giving the residents safe pedestrian access to the local businesses and Aten Boulevard.

The proposed street widening project also involves of pipelining portion of the existing concrete Dahlia Canal, located along the East side of La Brucherie Road from Treshill Road to Aten Boulevard. The work includes importing suitable material from an approved borrow site to the jobsite (FOB site), demolishing and removing existing concrete lining and structures, trenching, pipelining, installation of concrete transitions, final grading, and cleanup. The Contractor shall furnish all safety equipment, tools, and supplies to ensure compliance with design and all OSHA regulations, both State and Federal.

The proposed Dahlia Canal Pipeline distance is approximately, 2505 linear feet (0.47 miles). The existing concrete lined Dahlia Canal between Treshill Road and Aten Boulevard will require removal of existing lining, re-grade and import material to fill area of removed lined canal and additional material as backfill for new pipelining. The new pipelining is proposed to be a 72"Ø RCP x 2505 lineal feet. All work will be done within existing IID right of way. The staging area will be located on the west side of the proposed pipeline and will include the closure of La Brucherie Road from Treshill Road to Aten Boulevard throughout the completion of the project.

### C. Environmental Setting:

The area within the immediate vicinity of the project site is largely developed and urbanized. The west side of La Brucherie Road is predominantly developed with single-family residences and a church.



---

The east side of La Brucherie is intended for neighborhood commercial development with areas designated for multi-family residential development. There are pockets of underdeveloped parcels along the east side of the project site. The area to the north of the project site is also largely developed with light industrial and neighborhood commercial uses. La Brucherie Road terminates less than half a mile north of the project site but continues on to the south to the City of El Centro and beyond. La Brucherie Road in the City of El Centro is a four-lane undivided roadway with a center turn-lane. There are no pedestrian facilities south of the project site.

**D. General Plan Consistency:**

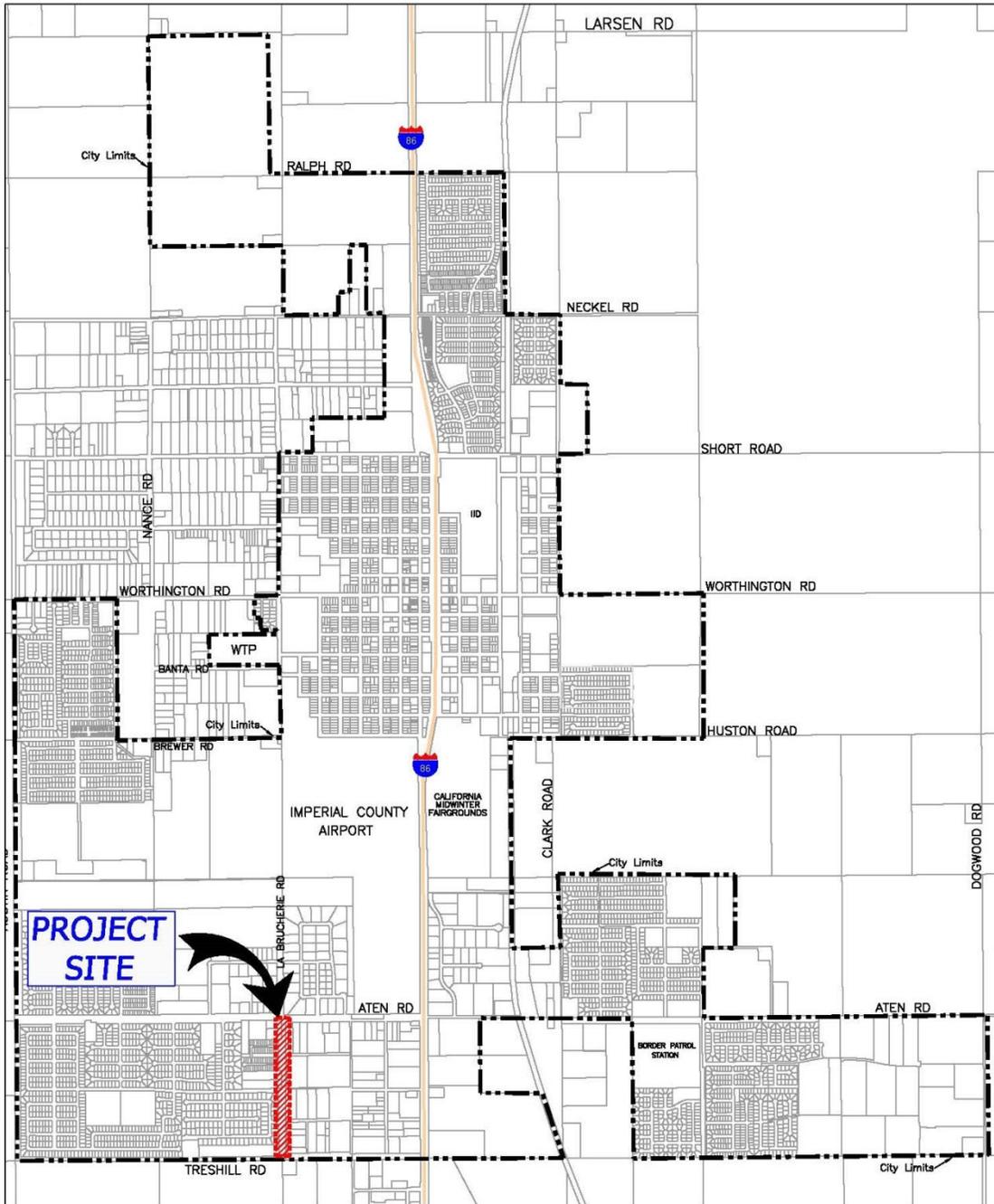
The City of Imperial General Plan Circulation Element identifies La Brucherie Road as a primary north-south roadway in the City. The Circulation Element identifies La Brucherie as a collector meant to serve as an intermediate facility connecting local areas to regional circulation corridors. La Brucherie Road connects to Aten Boulevard which ultimately connects to Highway 86 which serves as the primary north-south roadway in the County. La Brucherie Road is an auto-oriented roadway which prioritizes vehicle but also provides for pedestrian and bicycle linkages. The proposed project is the first phase in a long term, multi-phase project. South of the project site, the City of El Centro designates La Brucherie as a 4-lane arterial. The proposed improvements are intended to match the existing 4-lane configuration in El Centro. The proposed project is in furtherance of the goals, objectives, and policies of the City of Imperial General Plan in providing an efficient movement of people and goods.



---

Exhibit "A"  
Vicinity Map

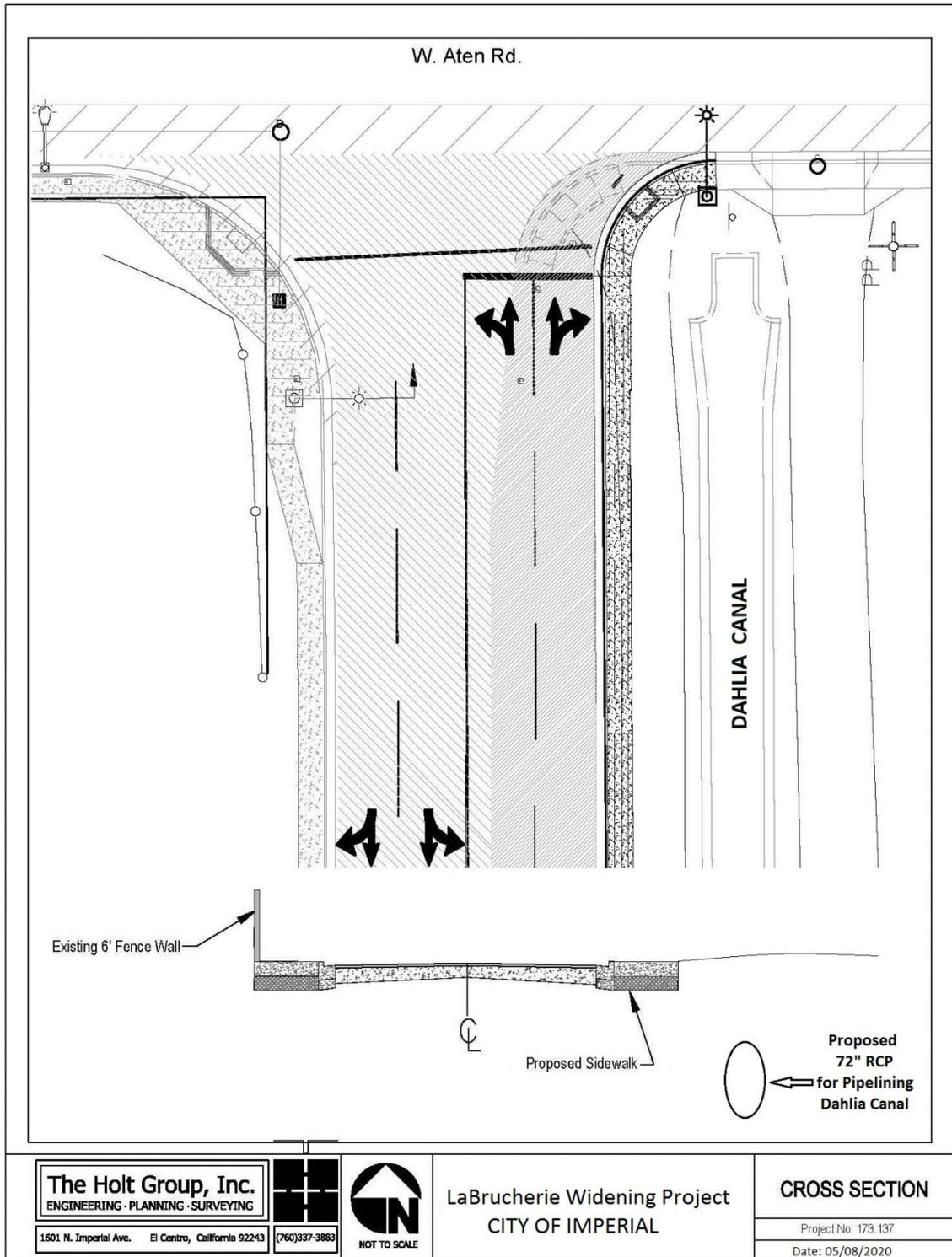




<p><b>The Holt Group, Inc.</b> ENGINEERING · PLANNING · SURVEYING</p> <p>1601 N. Imperial Ave. El Centro, California 92243</p>	 <p>(760)337-3883</p>	 <p>NOT TO SCALE</p>	<p><b>La Brucherie Widening Project</b> <b>CITY OF IMPERIAL</b></p>	<p>VICINITY MAP</p> <p>Project No. 173.137</p> <p>Date: 05/08/2020</p>
--	--	---	---	--







---

---

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)
--------------------------------------	--	-------------------------------------	----------------

I. **AESTHETICS**

**Background**

The proposed project will be located at a portion of La Brucherie Road, between Treshill Road and Aten Boulevard. The proposed segment of the street traverses through a subdivision with single family homes to the west and local business establishments to the east. There are no existing aesthetic resources along this portion of La Brucherie Road. La Brucherie Road is widely used by the community as it serves as a connector to Aten Boulevard, which gives access to the major arterial, Highway 86. La Brucherie serves as an alternate route connecting to and from Highway 86 and the City's commercial centers. Many residents use La Brucherie Road as an alternate route, while commuting to work, to avoid heavy traffic volume from Highway 86 during peak hours. As such, La Brucherie serves as a gateway into the City of Imperial.

The construction phase of the project could result in visual impacts with the presence of construction vehicles and equipment. However, the visual impact would be temporary and would end when construction is complete. The proposed project will produce minor changes in the existing visual character along La Brucherie Road through widening the existing pavement from a two-lane roadway to a four-lane roadway. This change would only occur in the proposed segment of the street, Treshill and Aten Boulevard.

**Analysis**

Except as provided in Public Resources Code Section 21099, would the project:

- a) Have a substantial adverse effect on a scenic vista or scenic highway?

**No Impact.** The proposed project is not within a mapped/designated scenic vista or scenic resources area as identified by any adopted plans. The project will not cause any adverse effect on a scenic vista or scenic highway.

- b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

**No Impact.** The project area is not mapped as a scenic resource and will not affect trees, rock outcroppings or historic buildings within a state scenic highway. Therefore, no impact to scenic resources would occur upon project implementation.

- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surrounding? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations



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

governing scenic quality?

**No Impact.** The site is an existing road that has deteriorated over the years. The proposed project would improve the visual character and quality of the site and prove accessibility for the community. The project will not negatively impact the existing visual character of the site and its surroundings.

- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

**No Impact.** The proposed project site has existing shielded street lighting. The project will not result in any adverse impacts.

II. **AGRICULTURE AND FOREST RESOURCES**

**Background**

The proposed project is located in an urbanized area within the City of Imperial. The California Farmland Mapping and Monitoring Program has identified the project site as Urban and Built-up Land and Other Land. The project is not located near or within a forest resource area. Thus, the project will not negatively impact agricultural or forest resources. The staging of the area will not occur on agricultural land and agricultural parcels would not be otherwise significantly impacted during project construction.

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.

**Analysis**

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?



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

**No Impact.** The California Farmland Mapping and Monitoring Program has identified the project site as Urban and Built-up Land and other land; therefore, it will not convert farmland to a non-agricultural land use.

- b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

**No Impact.** The site is not party to any Williamson Act Contract nor will it conflict with existing zoning for agricultural use as the project site is zoned for commercial neighborhood.

- 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))?

**No Impact.** The proposed project would not conflict with existing forest zoning or cause the rezoning of forest land. There is no land within the City of Imperial zoned for forest land as the City is located in the Sonoran Desert.

- d) Result in the loss of forest land or conversion of forest land to non-forest use?

**No Impact.** The proposed project would not result in the loss of forest land. There is no forest land within the vicinity of the project.

- 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?

**No Impact.** The construction of the proposed project could not result in the conversion of farmland as it is proposed to be constructed in urban vacant site.



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

III. **AIR QUALITY**

**Background**

The project site is located in the southern-central portion of the Salton Sea Air Basin in the Imperial County. The County of Imperial is a non-attainment area for both Particulate Matter (PM10) and Ozone. Ozone is primarily generated by automobile traffic, trains, and the aircraft from the Naval Air Facility and Imperial County Airport. The Imperial County Airport is a negligible contributor.

The widening of the roadway would have the potential to generate particulate contaminants (dust) during grading and construction activities. The applicant would need to develop and implement a Dust Control Plan, consistent with Imperial County Air Pollution Control District Manual. The project would be located in an urban site as an infill development and will incorporate features to reduce gas greenhouse gas emissions.

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to the following determinations.

**Analysis**

Would the Project:

- a) Conflict with or obstruct implementation of the applicable air quality plan?

**No Impact.** The proposed project must adhere to the Imperial County Air Pollution Control District (ICAPCD) Rules and Regulations, revised 2017, the ICAPCD CEQA Handbook, and the standard best management’s practices for construction projects. The project must provide a Dust Control Plan. Therefore, the quality impacts of the project is less than significant.

- b) 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?

**Less Than Significant Impact.** Imperial County is a non-attainment area for both particulate matter (PM10) and ozone. Impacts to air quality from the construction activities and cumulative projects for the entire region may result in a net increase of these pollutants. The project however, incorporates Best Management Practices which would include the following: watering of the truck roadways as necessary to control fugitive dust, telescoping load discharge chutes, enclosed storage areas and flood loading of receiving conveyors. During operation any impacts would also be less than significant as this is not considered a growth-inducing project and will not result in additional vehicle trips.



	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
c) Expose sensitive receptors to substantial pollutants concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Less Than Significant Impact.** Sensitive receptors are typically land uses such as schools, hospitals, parks, or residential communities. The proposed project is adjacent to residential land uses which are considered sensitive receptors. The project, however, is small in scale as it will only be a portion of the street which is about half a mile long. The project is not growth-inducing and will not result in additional trip generation. Thus, the project will not impact sensitive receptors to substantial pollutant concentrations during long-term operation but is a low risk for PM 10 during construction activities. The Dust Mitigation Plan will bring any potential impacts to a level below significance.

d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	--------------------------	-------------------------------------	--------------------------

**Less Than Significant Impact.** Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be temporary, localized and generally confined to the project site. The proposed project would utilize typical construction techniques and the odors emitted would be typical of most construction sites. During operation, no objectionable odors will be emitted.

#### IV. **BIOLOGICAL RESOURCES**

##### Background

The project site is an urban, vacant site located within the light manufacturing zone. The subject site and surrounding sites consist of disturbed land used for residential land uses and other public uses. The project contains wind blown debris, weeds, other noxious plants and native material. Due to these conditions, the project site is not suitable for habitat or wildlife.

##### Analysis

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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

**No Impact.** The proposed project will not have an adverse effect on any species of special concern or their habitat as the site holds no habitat value. The project site is currently disturbed, vacant land that is not suitable for wildlife.



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

- 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?

**No Impact.** There are no sensitive habitats present at the site as it is an existing roadway, thus there will be no impact.

- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

**No Impact.** The proposed project site does not contain areas defined as protected wetlands (Section 404 of the Clean Water Act), therefore, there will be no impact to wetlands.

- d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

**No Impact.** Although there is an existing canal There are no waterways near the site, thus, the proposed project would not interfere with the movement of migratory fish. Additionally, there will not be removal of trees given that none exist at the site, thus, migratory wildlife such as birds will not be disturbed.

- e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance?

**No Impact.** There are no local ordinances or policies in effect protecting biological resources for the subject area and therefore, there will be no impact.

- 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?



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

**No Impact.** The proposed project site is not located within or in the vicinity of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan and therefore, there will be no impact.

V. **CULTURAL RESOURCES**

**Background**

The project site is located in an urban area on an existing roadway between a residential subdivision and local business establishments. Approximately 200 historic sites have been recorded in Imperial County; however, none have been identified on-site or within close proximity. Therefore, no additional archeological studies are warranted at this time however, despite the unlikelihood of cultural resources at the site, it is a practice to include on all construction specifications that if any cultural evidence of stone, bone or wood is discovered during site development, all work at the point of discovery would be ceased until a qualified archaeologist can examine the discovered material.

**Analysis**

Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

**No Impact.** The project site is within existing right-of-way which has been previously disturbed. As such, no historic or archaeological sites are identified on the property. No significant impacts are anticipated to occur to cultural resource sites as a result of the proposed project. However, if any historic resource is discovered during site development, all work at the point of discovery would be ceased until a qualified archaeologist can examine the discovered material.

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

**No Impact.** No archeological resources were identified on the proposed project site. As such, no impacts would occur relative to a change in the significance of an archeological resource. However, if any cultural evidence of stone, bone or wood is discovered during site development, all work at the point of discovery would be ceased until a qualified archaeologist can examine the discovered material.

- c) Disturb any human remains, including those interred outside of dedicated cemeteries?



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

**No Impact.** There is no evidence that the proposed project site has been used as a cemetery, either formal or informal; therefore, it is unlikely that the proposed project would disturb human remains. However, if any discoveries occur during construction, all work at the point of discovery would be ceased until a qualified archaeologist can examine the discovered material.

VI. **ENERGY**

**Energy Background**

The proposed project site is located in an area that receives sunlight year round, on average 309 days per year it is sunny in the Imperial County where the City of Imperial is located.

**Analysis**

Would the project:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

**No Impact.** The proposed project is not growth-inducing and would not result in additional trip generation or vehicle miles traveled. The proposed project would not have any significant potential to impact the environment due to wasteful, inefficient, or unnecessary consumptions of energy resources, during construction or operation.

- b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

**No Impact.** Energy demands are de minimis and therefore would not conflict or obstruct local plans.

VII. **GEOLOGY AND SOILS**

**Background**

The project site is located in the Imperial Valley portion of the Salton Sea Trough, a topographic and geologic depression resulting from large scale regional faulting. Although there is no known earthquake fault at the project site as delineated in the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the project site, tectonic activity that formed the Trough continues at a high rate. The City of Imperial as well as the entire Imperial Valley is considered to be a seismically active area. The project site has a potential for strong ground shaking because of the nearby Brawley, Superstition Hills, and Imperial Faults. Significant impacts are not expected to result from the proposed project. The proposed project involves the widening of an existing roadway and the construction of a 2 foot high masonry wall. The project would involve grading which will have minor



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

temporary impacts.

A geotechnical report for the subject site has not been prepared. The project proponent is required to prepare a Geotechnical Study in order to identify any impacts that could result from being within a seismically active area and to identify the soil conditions at the site.

**Analysis**

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving:

1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?

**Less Than Significant Impact.** The project is not within an earthquake fault, as delineated on the most recent Alquist-Priolo fault zone. Although there is no known earthquake fault at the project site as delineated in the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the project site, tectonic activity that formed the Trough continues at a high rate. The City of Imperial, as well as the entire Imperial Valley, is considered to be a seismically active area. The project site has a potential for strong ground shaking because of the nearby Brawley, Superstition Hills, and Imperial Faults. Impacts are less than significant as the project only involves at-grade roadway improvements which will not result in hazards to human lives.

2) Strong Seismic ground shaking?

**Less Than Significant Impact.** The City of Imperial, as well as the entire Imperial Valley, are considered to be a seismically active area. The project site is susceptible to potentially strong seismic ground shaking because of the nearby Brawley, Superstition Hills, and Imperial Faults. All recommendations set forth by the Geotechnical Study shall be strictly adhered to. Impacts are less than significant as the project only involves at-grade roadway improvements which will not result in hazards to human lives.

3) Seismic-related ground failure, including liquefaction and seiche/tsunami?



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

**Potentially Significant Unless Mitigation Incorporated.** The City of Imperial, as well as the entire Imperial Valley, are considered to be a seismically active area. A soils report/geotechnical report has not been prepared for the subject site. A geotechnical investigation will need to be prepared and all recommendations will be strictly adhered to. Impacts are less than significant as the project only involves at-grade roadway improvements which will not result in hazards to human lives.

- 4) Landslides?

**No Impact.** The proposed project site is located on level terrain in the Imperial Valley. There is no steep terrain on or near the site that could result in landslide concerns or risks, therefore, there will be no impact.

- b) Result in substantial soil erosion or the loss of topsoil?

**Less Than Significant Impact.** The construction of the proposed road widening project would involve grading of the land. Best Management Practices are required to be in place when improvement plans are being reviewed and the project is subject to an approved grading plan; therefore any potential impacts that would result in soil erosion or loss of topsoil would be less than significant.

- 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?

**Less Than Significant Impact.** Since a portion of the proposed site is an existing road, the project site is relatively flat, stable terrain and the project will not alter the existing flat slope. There will be less than significant impacts from seismic-related ground failure, including liquefaction.

- d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risk to life or property?

**Less Than Significant Impact.** Grading for the proposed project is minimal with up to three feet of excavation to accommodate the road base and surface pavement. As the project only involves roadway construction, the risk of exposing people or structures is less than significant.

- e) Have soils incapable of adequately supporting



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

the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

**No Impact.** The proposed project is a roadway widening project and does not require disposal of wastewater.

- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

**No Impact.** There are no paleontological resources or unique geologic features within the vicinity of the project site and therefore would not result in any adverse impacts.

VIII. **GREENHOUSE GAS EMISSION**

**Background**

The proposed project involves the widening of an existing roadway, La Brucherie Road, with two new lanes for both northbound and southbound traffic. Along with the installation of the new lanes, curb and gutter is also proposed. The project site is located within the City of Imperial. The project is considered infill development and would be located near residential areas and business establishments. The widening of La Brucherie Road will improve circulation and transportation for the community.

**Analysis**

Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

**Less Than Significant Impact.** The proposed project would generate Greenhouse Gas (GHG) emissions as a result from onsite construction equipment, emissions arising from traffic delays that may result from construction, and through vehicle trips generated from construction workers traveling to and from the project site. Long-term emission from the proposed project are not expected to be a significant source of emission since the proposed widening of La Brucherie Road will reduce the amount of Greenhouse Gas emissions by increasing traffic flow and reducing idling of vehicles.

These emissions are produced at different levels throughout the construction phase. The frequency and occurrence of the temporary impacts for the Project would be reduced through best practices to be incorporated into the plans and specifications, and by implementing better traffic management during construction. In addition, with innovations such as longer pavement lives and improved traffic



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

management plans, the GHG emissions produced during construction of the proposed Project would be mitigated to some degree by longer intervals between maintenance and rehabilitation events. Based on these considerations, the construction phase of the Project would result in less than significant impacts based on proposed avoidance, minimization, and mitigation measures.

- b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

**No Impact.** The project will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing emission of greenhouse gases.

**IX. HAZARDS AND HAZARDOUS MATERIALS**

**Background**

The proposed project involves the widening of an existing street, La Brucherie Road, between Treshill and Aten Boulevard. During construction, there is a potential for encountering hazardous materials or waste at the project site while doing routine transporting of materials. The materials, however, would not create significant hazard to the public or environment. All materials will be stored and disposed of according to Local, State and Federal regulations.

**Analysis**

Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

**No Impact.** Transport of hazardous materials and hazardous waste are governed by the US Department of Transportation and the California Department of Transportation. La Brucherie Road is not designated as a truck route as identified in the City of Imperial General Plan Circulation Element. The proposed improvements will not change this designation. The widening of La Brucherie Road will not result in the generation of hazardous materials or directly result in the routine use of hazardous materials.

- b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?



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

**No Impact.** Although there is always the potential for upset and accident conditions during construction of any development project, there will be no significant release of hazardous materials into the environment.

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

**No Impact.** The proposed project is located approximately 0.02 – miles from Knowledge Tree Preschool & Childcare Center, east of the project area. The other nearest school is TL Waggoner Elementary School located 0.5 miles west of the project site. The proposed project would not emit hazardous emissions or handle acutely hazardous material, or waste, thus there will be no impact.

- 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?

**No Impact.** The proposed project is not located on a site that is included in the State list of hazardous material sites per Government Code §65962.5. The California Department of Substance Control, EnviroStor database was consulted and did not reveal the project as a Federal Superfund site, State Response site, Voluntary Cleanup site, or School Cleanup site.

- 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 or excessive noise for people residing or working in the project area?

**Less Than Significant Impact.** The project site is located at a distance of 0.80 miles of the Imperial County Airport runway, however, the project site is within the D zone of Imperial County Airport Land Use Compatibility Plan (ALUCP), an area where there is negligible risk, with a potential for annoyance from overflights. The annoyance for overflights is negligible given that the airport is infrequently used. Furthermore, there are no direct safety hazards to the proposed project. There are no development restrictions identified in the ALUCP

- f) Impair implementation of or physically interfere with an adopted emergency response plan or



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

emergency evacuation plan?

**No Impact.** The proposed project would not adversely impact the movement of emergency response vehicles in the area. Additionally, the proposed project would not significantly interfere with emergency response or evacuation plans. During construction, however, minor delays may be experienced by emergency personnel. Delays will be minimal and other alternative routes exist

- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

**No Impact.** The proposed project site is located in a predominantly developed region of the Imperial Valley. Risk of wildfires in the area is minimal due to the location of the proposed project and its surrounding land uses.

**X. HYDROLOGY AND WATER QUALITY**

**Background**

The proposed project involves the road widening of a portion of an existing roadway, La Brucherie Road. The proposed project is located at an existing street where there will be no water quality impacts. The proposed project will have short-term water quality impacts associated with construction activities. Best Management Practices are required during construction and operation to minimize any hydrology and water quality impacts.

**Analysis**

Would the project:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

**No Impact.** There is no evidence that indicates that the proposed project would violate water quality standards, or waste water discharge requirements. The project would strictly adhere to Best Management Practice and the adopted standards and specifications established by the City, therefore, there would be no adverse impacts to hydrology and quality.

- b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?



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

**No Impact.** Groundwater supplies would not be depleted or interfered with because the project does not include the use of on-site wells or foundation work which may be at depths that interfere with groundwater.

- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(i) result in substantial erosion or siltation on or off-site;

**Less Than Significant Impact.** The proposed project would involve the roadway widening of one additional lane in each direction along the existing roadway. The project would not directly or indirectly alter the existing drainage pattern within the project site. Given the scope and location of the project, a stormwater Pollution Prevention Plan will be required and any siltation or erosion impacts would be less than significant.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

**Less Than Significant Impact.** There are no streams or rivers located nearby the project site. Surface runoff would not increase significantly where it could result in a flooding situation off-site. The proposed project location is not identified as a flood zone. On-site drainage and erosion would be addressed through Best Management Practices implemented during construction.

(iii) 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; or;

**Less Than Significant Impact.** The proposed project has the potential to contribute to an increase in stormwater runoff due to an increase in impervious surfaces from the additional two lanes proposed, however, the project will not create or contribute runoff water exceeding the capacity of existing drainage systems. The proposed project site has not been classified as a flood zone.



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

(iv) Impede or redirect flood flow?

**No Impact.** Design of roadway and curb and gutter elevation slopes are intended to direct stormwater runoff away from the project site so as not to impede flood flows. There will be no adverse impacts to flood flows.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

**No Impact.** The project site is not located within a low-lying coastal region and therefore would not be subject to tsunami. The closest body of water to the project site is the Salton Sea which is not within the project vicinity, meaning no risk of pollutant release due to project inundation.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

**No Impact.** The project is subject to compliance with all local, state and federal laws. No component of the project conflicts with or obstructs the implementation of a water quality control plan or sustainable groundwater management plan.

**XI. LAND USE AND PLANNING**

**Background**

The proposed project site is zoned C – 1 (Commercial Neighborhood) and R – 1 Residential Single Family, by the City of Imperial’s Zoning Ordinance. The City of Imperial General Plan designates land to the north as I – 1 (General Industrial). The existing abutting land uses are the following: to the north, commercial businesses; to the south, vacant land and the City of El Centro’s Wastewater Treatment Plant; to the east are commercial businesses and apartment units; to the west, residential subdivision. The proposed project is consistent with the abutting land uses.

**Analysis**

Would the project:

a) Physically divide an established community?

**No Impact.** The proposed project would improve the existing roadway from two lanes to four lanes. The proposed project is within the incorporated City Limits and would not physically divide an established community. The road widening would not construct new streets or otherwise alter the existing surroundings of the residential subdivision and commercial businesses. The proposed project would only



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

widen the existing roadway, therefore, no impact would occur.

- b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

**No Impact.** The proposed project will not conflict with any land use plan, policy or regulation of an agency with jurisdiction over the project, therefore, there will be no impact.

XII. **MINERAL RESOURCES**

**Background**

Known mineral resources for the Imperial Valley are gold and gypsum as well as limestone, pumice and clay stone and sand and gravel. Mining operations are conducted in the Glamis Plateau area and the Cargo Muchacho and Picacho Mountains. The project site lies in the northern Imperial Valley on developed land that has been historically used for agricultural activities. According to the Imperial County General Plan’s survey of mineral and soil resources, no unique mineral resources are typically developed in this region of the Valley and there are no known mineral deposits or resource recovery sites shown on the City of Imperial General Plan for this project site.

**Analysis**

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?

**No Impact.** No mineral resources that would be of value to the region have been identified on or near the project site.

- 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?

**No Impact.** There are no locally important mineral resource recovery sites delineated on any local plans in the vicinity of the proposed project.



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

XIII. **NOISE**

**Noise Background**

The proposed project site is located at the southern City Limits portion of La Brucherie Road, between Treshill Road and Aten Boulevard. Land uses within the project’s vicinity include residential land uses to the west, local businesses to the east and vacant land to the south. The proposed project is east of Highway 86 and south of the Imperial County Airport. The Imperial County Airport is 0.80 miles away from the project site. Noise impacts to the existing residential land uses would be less than significant.

**Analysis**

Would the project result in:

- a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

**Less Than Significant Impact.** The project would be at an existing roadway which generates minimal levels of noise, thus, the widening of the street is negligible. The project will not increase ambient noise levels substantially. The widening will result in additional vehicles on this portion of La Brucherie Road which will result in minor increases to noise. Increased noise levels were contemplated as part of the development review process for the various residential projects in the area. Noise mitigation measures were incorporated as part of those projects, therefore long term noise impacts are less than significant. Construction activities for the proposed project are to include demolition of existing curb and gutter, roadway restriping and paving of new lanes. Noise impacts will be associated with the equipment used during construction activities. The residential subdivision to the west and the apartment units to the east are the nearest sensitive receptors to the proposed project. The construction activities will be restricted between the hours of 8:00 p.m. and 7:00 a.m. to protect nearby sensitive receptors, for a less than significant impact.

- b) Generation of excessive groundborne vibration or groundborne noise levels?

**Less Than Significant Impact.** Short-term construction activities associated with the proposed project will not generate significant groundborne vibration or groundborne noise levels that travel significant distances, any construction related noise vibrations would be less than significant.

- c) For a project located within the vicinity of a private airstrip or an airport land use plan or



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

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?

**Less Than Significant Impact.** The nearest airport from the project site is as near as 0.80 miles in the northerly part of the project site, an area where there is negligible risk for excessive noise levels. Given that the Imperial County Airport is infrequently used, there is minimal noise from overflights.

**XIV. POPULATION AND HOUSING**

**Population and Housing Background**

The proposed population involves the widening of an existing roadway from two lanes to four lanes. The project will not propose housing or induce population growth.

**Analysis**

Would the project:

- a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?

**No Impact.** The proposed project will not induce population growth, given that it does not propose housing. The proposed project does not involve the extensions of roads, however, it would involve the widening of an existing road to accommodate existing and future growth. Therefore, no impact would occur.

- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

**No Impact.** The proposed project occurs within existing right-of-way and would not displace any existing housing or people necessitating the construction of replacement of housing elsewhere. The proposed project does not involve the addition of new roads or other infrastructures, but would widen the existing roadway to accommodate existing traffic and future growth.



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

XV. **PUBLIC SERVICES**

**Background**

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:

a1) Fire Protection?

**Less Than Significant Impact.** There are no existing fire protection facilities within the project vicinity, thus the proposed widening of La Brucherie Road will not have a significant impact on fire protection facilities. The City of Imperial is under an agreement with the Imperial County for fire-protection services. The City’s engine company is located at 2514 La Brucherie Road, which is 0.25 miles away from the proposed project site. The department has an engine crew of three (3) on duty at all times. The City of Imperial’s response time is 5 minutes for medical emergencies and 7 minutes for structural fires. The nearest fire hydrant to the project site is located on Wall Road, about 370 feet west of La Brucherie Road. In addition, the proposed project would not result in the intensification of land use, therefore, no additional demand for fire protection is needed.

2) Police Protection?

**Less Than Significant Impact.** There are no police protection facilities within the project vicinity, thus the proposed widening of La Brucherie Road will not have a significant impact on police protection facilities. The City of Imperial’s police station is located at 424 South Imperial Avenue, about 1.80 miles from the proposed project site. The department is employed by 27 officers with a three (3) minute emergency response time. The proposed project will increase traffic flow which is susceptible to accidents increasing the demand for police protection and emergency services, however, the demand would not exceed the current department’s capabilities.

3) Schools?

**No Impact.** The proposed project would be located approximately 0.02 – miles from Knowledge Tree Preschool & Childcare Center, east of the project area and 0.5 – miles from TL Waggoner west of the project area, however, the proposed project is not anticipated to increase the service demand as it does not propose new housing.



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

4) Parks?

**No Impact.** The proposed project is not located within the vicinity of any parks. The proposed project is a non-residential use that would not involve the addition of any housing units that would increase population. Thus, no impact would occur.

5) Other Public Facilities?

**No Impact.** There are no other public facilities such as libraries or community centers within the project site. Thus, there will be no impact.

**XVI. RECREATION**

The proposed project involves the widening of an existing roadway. The proposed project would not create a recreational park or increase the demand for the recreational facilities. The proposed project does not involve the production of housing that would increase population.

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?

**No Impact.** The proposed project is a non-residential use that would not involve the addition of any housing units that would increase population. Thus, there would be no additional demand for park facilities.

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?

**Less Than Significant.** The proposed project will not require the construction of expansion of recreational facilities since it is a non-residential project and would not increase population or demand of recreational activities.



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

XVII. **TRANSPORTATION**

**Background**

The proposed project involves the widening of an existing roadway, La Brucherie Road to maximize traffic circulation. The proposed segment of La Brucherie Road is currently a two lane road classified as a Collector providing vehicle access to adjacent properties. Although the proposed portion of La Brucherie Road is designated as a residential collector, the proposed segment receives higher traffic volume from residents, within the subdivision and the region, commuting to work. The portion of La Brucherie Road, northern City Limits between Barioni Boulevard and Larsen Road, is classified as a Major Arterial, thus, often times traffic from the northern portion is often received from the southern portion. La Brucherie Road is often used as an alternative road to connect to Highway 86, a major four lane Expressway west of project site. The project proposes to widen the road to a four-lane road. The proposed roadway project is compliant with the City’s General Plan.

**Analysis**

Would the project:

- a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

**Less Than Significant Impact.** Long term operation of the proposed project is consistent with the City’s General Plan Circulation Element and will not conflict with any other applicable plan, ordinance or policy, establishing measures for circulation effectiveness. During the construction phase of the project, the traffic level of service may be temporarily impacted.

Average daily traffic (ADT) counts were using machine traffic counters were conducted during a two-week period between September 19, 2019 and October 20, 2019. Traffic counters were placed on La Brucherie Road approximately 200’ north of Joshua Tree Street and 250’ north of Treshill Road. The results of the traffic count are shown in the table below.



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

Location	Direction	Average Daily Trips	
		Week 1	Week 2
La Brucherie Road			
North of Joshua Tree Street	NB	3,368	3,168
	SB	4,076	4,267
	Total	7,444	7,435
La Brucherie Road	NB	3,081	3,187
North of Treshill Road	SB	4,195	4,096
	Total	7,276	7,283

The traffic count shows that the peak morning traffic occurs at 7:00AM with an average of 334 vehicles traveling northbound and 468 vehicles traveling south bound. Afternoon peak hour occurs at 5:00PM with an average of 381 vehicles traveling northbound and 419 vehicles traveling southbound. The traffic count also shows that a majority of the vehicles traveling on La Brucherie occur between the hours of 6:00AM and 7:00 PM. Levels of service is generally free flowing and falls within LOS A and B which are acceptable levels of service as required by the City’s General Plan.

La Brucherie will remain open during construction but levels of service will be affected and will decrease to LOS C or D during peak hours. Delays will only occur during the construction period. It is estimated that approximately 50% of the traffic will choose to use other routes to avoid delays. This will impact Highway 86 and Austin Road which will see a minimal increase in traffic loads. Levels of service on both roads currently operate at LOS A. Increase in traffic will be minimal and will not result in a degradation of the level of service.

During its long-term operation, the project is intended to improve traffic flow in the area. The project is not a residential or commercial project that would generate traffic. Because of the travel time savings that could be facilitated by the project, the project would be expected to absorb some, but a less than significant amount, of traffic from paralleling and adjacent streets such as Austin Road, and Highway 86. Accordingly, the project, as a road improvement project with the objective of accommodating existing and future traffic conditions in the area, would not be expected to directly cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

- b) Would the project conflict or be inconsistent with the CEQA Guidelines section 15064.3, subdivision (b)?



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

**No Impact.** The project will not conflict or be inconsistent with the CEQA Guidelines. The project is not a land use development project which will not result in additional vehicle miles traveled.

- c) Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

**Less Than Significant Impact.** The proposed project will widen the existing two lane road to four lanes. Although the proposed project includes modifications of turning lanes, it will not substantially increase hazards due to design features such as sharp curves. All uses of the proposed project are compatible with the current design of the existing lanes. Thus, impacts would be less than significant.

- d) Result in inadequate emergency access?

**Less Than Significant Impact.** The proposed project would have temporary traffic disturbance during construction hours, however, the proposed widening of the road would improve traffic flow due to the lane expansion. Therefore, emergency access would improve along with vehicle response times.

XVIII. **TRIBAL CULTURAL RESOURCES**

**Background**

The proposed project is not on or near tribal cultural resources, the nearest one in the Imperial County is located within the City of El Centro. The area was extensively farmed during the early 1900's with the Dahlia canal and roadway existing at its current location since the early part of the 20<sup>th</sup> Century. During the phase of construction if anything is found that shows to have cultural significance, the proper evaluation would be conducted by a qualified archaeologist before construction continues.

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is:

- (i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as define in Public Resources Code Section 5020.1(k), or



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

**No Impact.** The proposed project does not cause any substantial adverse change in any cultural site, feature, place, cultural landscape or a place of cultural value to a California Native American tribe. There are eleven cultural resources listed in the National Register of Historic Places in Imperial County. The closest resources to the project site are located in Salton Sea and El Centro, approximately 25 miles west and 30 miles south of the site. Resource surveys and studies have been conducted within the area which resulted in no effects to any Historical Resources. Therefore, the project would not create impacts and no mitigation measures are required.

(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

**No Impact.** The proposed project applies the criteria set forth in subdivision 5024.1. The design/construction plans shall incorporate language that stipulates that if buried cultural materials are encountered during construction, work in the area must halt until a qualified archaeologist can evaluate the nature and significance of the finding.

**XIX. UTILITIES AND SERVICE SYSTEMS**

**Background**

The proposed project would involve the widening of the existing roadway, La Brucherie Road, south of City Limits. The project site is an existing street west of the Imperial Irrigation District canal. Expansion of the road would not result in the relocation of any existing facilities.

**Water Services** – The City of Imperial owns and operates its own water treatment and distribution system. The nearest fire hydrant to the project site is located on Wall Road, about 370 feet west of La Brucherie Road. The City of Imperial Water Treatment Plant is located on the southwest section of the City. The Imperial Irrigation District supplies surface water from the Colorado River via the All American Canal to the Imperial Valley. The City of Imperial operates a Conventional Treatment Plant and maintains approximately 63 miles of distribution piping.

**Wastewater Services** – The project is located within the Service Area of the City of Imperial Wastewater Treatment Plant which also falls under the jurisdiction of the Colorado Regional Water Quality Control Board. The Imperial Wastewater Treatment Plant is located at 701 East 14<sup>th</sup> Street, east of the railroad tracks. The Treatment Plant has



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

a total treatment design capacity of 2.4 million gallons per day (MGD). The existing wastewater treatment plant is located on a 4.68 acre site (net acreage) and services the entire City Limits. The Performance standards and requirements for the Imperial Wastewater Treatment Plant are further governed by the National Pollution Discharge Elimination System (NPDES) discharge permit number CA0104400 adopted by the California Regional Water Quality Control Board, Colorado River Basin Region on September 16, 2010, by Board Order Number R7-2010-0020.

**Stormwater Drainage Facilities** – The City of Imperial’s stormwater drainage facility is maintained within the incorporated City Limits via municipal collection systems that are ultimately conveyed into a regional irrigation drainage system maintained by the Imperial Irrigation District.

**Electrical Power** – Electrical Power is provided by the Imperial Irrigation District (IID).

**Communication Lines** – The proposed project would not require an extension or installation of new communication lines.

**Analysis**

**Would the project:**

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?

**No Impact.** The proposed project would not require new water treatment facilities nor new stormwater facilities.

- b) Have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years?

**No Impact.** The proposed project is a roadway project which will not require additional water.

- c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider’s existing commitments?



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

**No Impact.** The proposed project includes the widening of the existing roadway. Although the road would increase the width of the street, increasing the amount of impervious area, the impact would not be substantial. The proposed project would have sufficient water supply available to serve the proposed project.

- d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

**Less than Significant Impact.** The proposed project would not constitute a significant amount of solid waste. All waste will be transported off site to the Allied Imperial Landfill. The proposed project would be subject to existing policies which would help reduce any potential impacts related to solid waste.

- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

**No Impact.** The proposed project will comply with all state, federal, and local management regulations related to solid waste.

XX. **WILDFIRE**

**Wildfire Background**

During the construction phase the materials and machinery used does not expose the site to the risk of a fire.

The proposed project is located in the R-1 (Residential Single Family) and C-1 (Commercial Neighborhood) zone. Thus, wildfire risk is minimal.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

**No Impact.** The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, the project would not create impacts and no mitigation measures are required.

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose



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

project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

**No Impact.** The proposed project does not exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire. Therefore, the project would not create impacts and no mitigation measures are required.

- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

**No Impact.** The proposed project does not require the installation or maintenance of associated infrastructure that can exacerbate fire risks or result in temporary or on going impacts to the environment. Therefore, the project would not create impacts and no mitigation measures are required.

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

**No Impact.** The proposed project does not expose people or structure to significant risks as stated. There is no potential for landslides due to the relatively flat topography of the site and vicinity. Therefore, the project would not create impacts and no mitigation measures are required.

*Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.*

Revised 2009- CEQA  
 Revised 2011- ICPDS  
 Revised 2016 – ICPDS  
 Revised 2017 – ICPDS  
 Revised 2019 – ICPDS



## SECTION 3

### III. MANDATORY FINDINGS OF SIGNIFICANCE

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

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



#### **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. THE CITY OF IMPERIAL**

#### **V. REFERENCES**

1. Air Pollution Control District CEQA Air Quality Handbook
2. City of Imperial General Plan
3. City of Imperial Service Area Plan, 2015
4. Imperial County Airport Land Use Compatibility Plan
5. Imperial County General Plan and Updates
6. City of El Centro General Plan



1. **NEGATIVE DECLARATION – City of Imperial**

---

*The following Negative Declaration is being circulated for public review in accordance with the Imperial Environmental Quality Act Section 21091 and 21092 of the Public Resources Code.*

---

**Project Name:** City of Imperial

**Project Applicant:** City of Imperial

**Project Location:** The project is proposed to be located on La Brucherie Road, from Treshill Road to Aten Boulevard, within the southern City Limits of the City of Imperial.

**Description of Project:** La Brucherie Road, within City Limits of the City of Imperial, is widely used by the community as it serves as a connector to Aten Boulevard, which gives access to the major arterial, Highway 86. The proposed project adds an additional northbound and southbound lane and the undergrounding of the Dahlia Canal. La Brucherie Road connects the City of Imperial residents to local businesses and residential homes. The proposed segment of the road extends about 0.5 miles. Temporary construction easements would be required during construction of the retaining wall. The proposed project will also include the undergrounding Dahlia Canal from Treshill Road to Aten Boulevard

**V. FINDINGS**

This is to advise that the City of Imperial, acting as the lead agency, has conducted an Initial Study to determine if the project may have a significant effect on the environment and is proposing this Negative Declaration based upon the following findings:



The Initial Study shows that there is no substantial evidence that the project may have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.



The Initial Study identifies potentially significant effects but:

- (1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.
- (2) There is no substantial evidence before the agency that the project may have a significant effect



on the environment.

- (3) Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance.

A NEGATIVE DECLARATION will be prepared.

If adopted, the Negative Declaration means that an Environmental Impact Report will not be required. Reasons to support this finding are included in the attached Initial Study. The project file and all related documents are available for review at the City of Imperial, City Hall, 400 S. Imperial Avenue, Imperial, CA 92251 (760) 355-1152.

#### NOTICE

---

The public is invited to comment on the proposed Negative Declaration during the review period.

---

Date of Determination

Othon Mora, Community Development Director

---

## SECTION 4

### VIII. RESPONSE TO COMMENTS

Comments from stakeholders are also included and made part of the IS/ND

### IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

(ATTACH DOCUMENTS, IF ANY, HERE)





# IID

*A century of service.*

www.iid.com

*Since 1911*

May 27, 2020

Mr. Othon Mora  
Director  
Community Development Department  
City of Imperial  
400 South Imperial Avenue, Suite 101  
Imperial, California 92251

**SUBJECT: NOI to Adopt a (Revised) Negative Declaration for the La Brucherie Avenue Widening Project from Treshill Road to Aten Road**

Dear Mr. Mora:

On May 13, 2020, the Imperial Irrigation District received from the City of Imperial, a request for agency comments on the Notice of Intent to adopt a revised Negative Declaration for the La Brucherie Avenue widening project. La Brucherie Avenue is a two-lane road that due to a high volume of traffic, the City proposes to improve its circulation by adding two additional lanes going northbound and southbound from from Treshill Road to Aten Road. The revised ND includes the pipelining of Dahlia Canal.

The IID has reviewed the revised ND and finds that the comments provided in the December 18, 2019 district letter on the original ND (see attached letter) continue to apply.

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

Respectfully,

Donald Vargas  
Compliance Administrator II

Enrique B. Martinez – General Manager  
Mike Pacheco – Manager, Water Dept.  
Marilyn Del Bosque Gilbert – Manager, Energy Dept.  
Sandra Blain – Deputy Manager, Energy Dept.,  
Jesus Martinez – Engineer Principal, Energy Dept., Transmission Planning  
Jamie Asbury – Asst. General Counsel  
Vance Taylor – Asst. General Counsel  
Robert Laurie – Outside Counsel  
Michael P. Kemp – Superintendent, Regulatory & Environmental Compliance  
Laura Cervantes. – Supervisor, Real Estate  
Jessica Humes – Environmental Project Mgr. Sr., Water Dept.



# IID

*A century of service.*

www.iid.com

*Since 1911*

December 18, 2019

Mr. Othon Mora  
Director  
Community Development Department  
City of Imperial  
400 South Imperial Avenue, Suite 101  
Imperial, California 92251

**SUBJECT: NOI to Adopt Negative Declaration La Brucherie Avenue Widening Project from Treshill Road to Aten Road**

Dear Mr. Mora:

On November 25, 2019, the Imperial Irrigation District received from the City of Imperial, a request for agency comments on the Notice of Intent to adopt a Negative Declaration for the La Brucherie Avenue widening project. The City is proposing to widen La Brucherie Ave. from Treshill Road to Aten Road by adding two additional lanes going northbound and southbound to improve traffic circulation.

The IID has reviewed the NDs and has the following comments:

1. IID water facilities that may be impacted include the Dahlia Canal, Dahlia Lateral, and the Dahlia Pipeline.
2. To insure there are no impacts to IID water facilities, the project's plans should be submitted to IID Water Department Engineering Services prior to finalization. IID Water Engineering can be contacted at (760) 339-9265 for further information. Currently City of Imperial staff is working with IID WDES on this project.
3. IID canal or drain banks may not be used to access the project site. Any abandonment of easements or facilities will be approved by IID based on systems (irrigation, drainage, power, etc.) needs.
4. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at <http://www.iid.com/departments/real->

estate. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements. No foundations or buildings will be allowed within IID's right of way.

5. In addition to IID's recorded easements, IID claims, at a minimum, a prescriptive right of way to the toe of slope of all existing canals and drains. Where space is limited and depending upon the specifics of adjacent modifications, the IID may claim additional secondary easements/prescriptive rights of ways to ensure operation and maintenance of IID's facilities can be maintained and are not impacted and if impacted mitigated. Thus, IID should be consulted prior to the installation of any facilities adjacent to IID's facilities. Certain conditions may be placed on adjacent facilities to mitigate or avoid impacts to IID's facilities.
6. Any new, relocated, modified or reconstructed IID facilities (including off-site improvements) required for and by the subdivision or any future project within the subdivision (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 analyzed. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**

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

Respectfully,



Donald Vargas  
Compliance Administrator II

Enrique B. Martinez – General Manager  
Mike Pacheco – Manager, Water Dept.  
Marilyn Del Bosque Gilbert – Manager, Energy Dept.  
Jamie Asbury – Deputy Manager, Energy Dept., Operations  
Matt MacDonald – Asst. Mgr., Energy Dept.  
Vance Taylor – Asst. General Counsel  
Robert Laurie – Outside Counsel  
Michael P. Kemp – Superintendent, Regulatory & Environmental Compliance  
Laura Cervantes – Supervisor, Real Estate  
Jessica Humes – Environmental Project Mgr. Sr., Water Dept.



December 18, 2019

Mr. Othon Mora  
Community Development Director  
400 South Imperial Avenue  
Suite 101  
Imperial, CA 92251

SUBJECT: Initial Study determination for a Negative Declaration for La Brucherie Avenue Road Widening Project

Dear Mr. Mora:

The Imperial County Air Pollution Control District ("Air District") would like to thank you for the opportunity to review the Initial Study for the proposed La Brucherie Avenue Road Widening Project ("Project") that would increase the present two-lane roadway to four lanes. The proposed segment of additional roadway will extend for approximately 0.5 miles between Treshill Road and Aten Boulevard. The Project also includes the installation of a 2-foot high retention wall on the east side of La Brucherie Avenue.

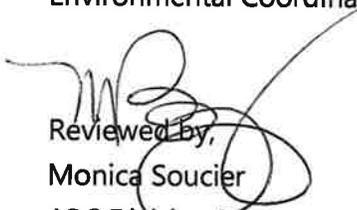
After review, the Air District offers the following administrative comments to clarify the distinction between Regulation VIII and the Air District's CEQA (California Environmental Quality Act) Handbook. The Air District's CEQA Handbook (revised 2017) functions to provide guidance for analysis of air quality impacts created by a project. Regulation VIII (revised 2012) is a collection of specific rules designed to mitigate emissions of fugitive (PM<sub>10</sub>) dust that must be adhered to during the life of a project. Failure to adhere to these rules can result in a violation. A Dust Control Plan is required under Rule 801 of Regulation VIII. Further, the Air District finds that, due to the amount of dust (PM<sub>10</sub>) created during the construction of a Paved or Unpaved Roadway (Rule 805), the "No Impact" finding in Section III (a) should most appropriately be termed a "Less Than Significant Impact." Finally, the Air District also requests the submittal of a Construction Notification 10 days prior to any construction activity.

The Air District's Rules & Regulations can be found on its website ([www.co.imperial.ca.us/AirPollution](http://www.co.imperial.ca.us/AirPollution)). Should the applicant have any questions, please contact our office at (442) 265-1800.

Sincerely,



Curtis Blondell  
Environmental Coordinator



Reviewed by,  
Monica Soucier  
APC Division Manager

**RESOLUTION PC2020-08**

**A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF IMPERIAL  
ADOPTING AND CERTIFYING A NEGATIVE DECLARATION FOR THE  
LABRUCHERIE WIDENING PROJECT BETWEEN TRESHILL ROAD AND ATEN  
BOULEVARD.**

**WHEREAS**, The City is the lead agency for the CEQA review of projects; and

**WHEREAS**, a duly notified public hearing was held by the Planning Commission on June 10, 2020; and

**WHEREAS**, upon hearing and considering all testimony and arguments, analyzing the information submitted by staff and considering any written comment received, the Planning Commission considered all facts relating to the request for the Initial Study/Negative Declaration.

**NOW THEREFORE, BE IT RESOLVED** by the Planning Commission of the City of Imperial as follows:

- A) That the foregoing recitations are true and correct; and
- B) The project has been reviewed in accordance with the requirements set forth by the City of Imperial for implementation of the California Environmental Quality Act; and
- C) There are no sensitive resources located within the area of the project or adjacent to the area of the project so as to be significantly impacted by the project; and
- D) That based on the evidence presented at the public hearing, the Planning Commission hereby Adopts and Certifies the Negative Declaration under the California Environmental Quality Act;

**PASSED, ADOPTED AND APPROVED** by the Planning Commission of the City of Imperial, this June 10, 2020.

---

Kristopher Haugh,  
Planning Commission Chairman

ATTEST:

---

Debra Jackson,  
City Clerk/Planning Secretary